

May 22, 2023

Gregory S. Lovins
Chief Financial Officer
Avery Dennison Corporation
8080 Norton Parkway
Mentor, OH 44060

Corporation

Fiscal Year Ended December 31, 2022
2023

Re: Avery Dennison

Form 10-K for the
Filed February 22,
File No. 001-07685

Dear Gregory S. Lovins:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Manufacturing