

FDA COMMUNICATIONS PLAN

1. Immediate communication to CFSAN within FDA
 - Office of Premarket Approval, Division of Petition Control
 - * Phone call to alert them to issue and explain TSCA 8(e) submission
 - * Possible follow-up letters, if requested
 - * Schedule meeting for full disclosure ASAP
 - * Multiple meetings likely

2. Plan to Address Issue

- migrate to product with no migration*
- Start here*
- ~~Intent to have orderly exit from the market~~
 - Define size and extent of business
 - Disclose metabolism study and general finding of PFOS in sera
 - Provide summary of existing tox testing and planned tox testing
 - Provide summary of 3M plant worker studies
 - Provide plan to **immediately** reduce levels of "contaminants" in product X% and set absolute release specifications
 - Address pending microwave popcorn petition
 - Shift product mix to minimize exposure
 - No new business (product or regions)
 - *Timing - give definition*
- eliminate*

Exhibit
1488

State of Minnesota v. 3M Co.,
Court File No. 27-CV-10-28862

3MA10063015

1488.0001

FDA COMMUNICATIONS PLAN



- * Immediate communication to CFSA within 24 hours
- * Office of Premarket Approval, Division of Pesticide Control
- * Phone call to alert them to issue and expected timeline
- * TSCA (e) submission
- * Possible follow-up letters, if requested
- * Schedule meeting for full disclosure
- * Multiple meetings likely

Center for Food Safety and Nutrition Applied
 safe, reliable, economical food supply

- Plan to Address Issue
- Intent to have orderly exit from the market
- Define size and extent of business
- Disclose metabolism study and general findings of PFO2 in sera
- Provide summary of existing tox testing planned tox testing
- Provide summary of 3M plant worker studies
- Provide plan to immediately reduce levels of "contaminants" in product X% and set release specifications
- Address pending microwave popcorn petition
- Shift product mix to minimize exposure
- No new business (product or regions)

X
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- Timing - give definition

Mention Canada Europe Japan

3M Flip-Frame™
 Transparency Protects

EPA COMMUNICATION PLAN

1. Corporate TSCA 8(e) committee met 2/13/98
 - Consensus to file 8(e) to EPA
 - Based on:
 - (1) metabolism study identifying additional routes of exposure through metabolism of other chemistries
 - (2) finding PFOS in sera from the general population not exposed occupationally
2. TSCA 8(e) submission completed
 - Describes only metabolism study and finding of FC in sera
 - References communication to FDA
3. Plan
 - File 8(e) on or before 3/6/98
 - Call EPA in advance of submission
 - Arrange meeting for full disclosure ~ late March, early April
 - Maintain consistent communication with EPA as additional information is developed
4. Issues associated with 8(e) filing
 - **Public disclosure** (environmental activist, regulatory newsletters)
 - **Must** coordinate with FDA communications
5. 8(e) submissions also include environmental hazards
 - We are making analytical measurements at Decatur facility and mass balance evaluations to assess environmental aspects of this issue. Could trigger

only facts



PA COMMUNICATION PLAN

Constate TSCA 8(e) committee met 2/13/98
Consensus to file 8(e) to EPA



Based on:
(1) metabolism study identifying additional
of exposure through metabolism of other che
(2) finding PFOS in sera from the general po
not exposed occupationally

TSCA -
chemical
risk mgmt.
law.

A 8(e) submission completed
Describes only metabolism study and finding
in sera
References communication to FDA

File 8(e) on or before 3/6/98
Call EPA in advance of submission
Arrange meeting for full disclosure - late M
April
Maintain consistent communication with EF
Additional information is developed

We do have
a history
of 8(e) filing
on PFOS

es associated with 8(e) filing
Public disclosure (environmental activist re
newsletters)
Must coordinate with FDA communication

submissions also include environmental has
We are making analytical measurements at
facility and mass balance evaluations to ass
environmental aspects of this issue. Could

preliminary
waste water
measurements
in Decatur

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