

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
 - 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

migrate to
product with
no migration

Start here

X

eliminate

Exhibit
1488

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

FDA COMMUNICATIONS PL

3M

- * Multiple meetings likely
 - * Schedule meeting for full disclosure A2
 - * Possible follow-up letters, if requested
 - * TSCA 8(e) submission
 - * Phone call to alert them to issue and exp
 - * Petition Control
 - Office of Premarket Approval, Division
 - Immediate communication to CFSA within
- Center for Food Safety and Nutrition Applied
- safe, reliable, economical food supply

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

- 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

only facts

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

PA COMMUNICATION PLAN

corate 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

3M

TSCA -
chemical
risk mgmt.
law.

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in sera

References communication to FDA

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Call EPA in advance of submission

Arrange meeting for full disclosure - late M

April

Maintain consistent communication with EF

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Public disclosure (environmental activist re

newletters)

Must coordinate with FDA communications

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environmental aspects of this issue. Could

preliminary
waste water
measurements
in Decatur

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