

Ref: Regulations Under the Fur Products Labeling Act /Fur Products Name Guide /Request for comments by November 16, 2012

**Subject: Request to the FTC to revisit its decision not to accept, as an alternative to *Asiatic Raccoon*, the term *Finnraccoon* for products of the *Nyctereutes procyonoides* species.**

Comments to be delivered in electronic form at

[http://openregs.com/regulations/view/118248/regulations\\_under\\_the\\_fur\\_products\\_labeling\\_act](http://openregs.com/regulations/view/118248/regulations_under_the_fur_products_labeling_act)

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In Europe the species of *Nyctereutes procyonoides* is known as *Finnraccoon* and in Asia as *Asiatic raccoon*. The term *Finnraccoon* is used for furs produced in Europe also in international fur trade. Despite these established trade name practices, under the current US Fur Products Name Guide, all products of species *Nyctereutes procyonoides* are however required to use the common name “Raccoon, Asiatic”.

*Nyctereutes procyonoides* furs are produced in Europe and in China. Finland is the world’s largest *Finnraccoon* fur producer with approximately 160 000 skins produced per year. Close to 100 percent of the *Nyctereutes procyonoides* fur skins sold in the Finnish auction house are sold to international customers and the majority of the furs are used as fur trimming in ready-made garments in the US, European and Russian markets.

In Europe *Finnraccoon* farming is regulated both by national and EU-level legislation, which are one of the strictest in the world. The EU is party to the European Convention for the protection of animals kept for farming purposes. The Convention aims to protect animals against any unnecessary suffering or injury. Countries that have signed the Convention must comply with specified rules concerning farming premises, feed, animal health and the organization of inspections of installations. European Convention’s Standing Committee Recommendation sets down specific welfare guidelines for farmed fur animals. These recommendations are part of animal legislation in the EU, based on Council Directive 98/58/EC on the protection of animals kept for farming purposes.

Finland has transposed and implemented the requirements of the Recommendations in the Animal Welfare Act (1999) and in the species specific Ordinance concerning welfare requirements laid down for rearing of fur animals. The Ministry of Agriculture and Forestry is the supreme authority in steering and controlling the enforcement and compliance with the Act and provisions issued under it. At local level animal welfare authorities and in particular municipal veterinarians and state provincial veterinarians control compliance with the act and animal welfare provisions and regulations within the territory of the municipality. Inspections are carried out on fur farms as so called EU animal welfare inspections and the results of these inspections are notified to the EU Commission. Animal welfare authorities have also powers to inspect farms in case of a suspicion of noncompliance on a fur farm. In addition, the Finnish Fur Breeders Association has since 2005 had its own certification programme for fur farms. With the help of the traceability system, all *Finnraccoon* skins sold at the Finnish Fur Sales auction house can be traced back to the farms which they originate.

The current FTC standards do not provide a manner to distinguish *Asiatic raccoon* from the *Finnraccoon*. As the animal welfare standards in place in Asian countries producing *Nyctereutes procyonoides* are, unfortunately, not as high level as those in place in Finland/Europe, the situation is confusing also to the consumers; the term “Asiatic raccoon” implies misleadingly that the *Nyctereutes procyonoides* fur originates from Asia, when in fact, main part of the world trade originates from Finland.

**With reference to the above mentioned viewpoints and our respective comments sent to you already in May, we would encourage the FTC to revisit its decision not to accept, as an alternative to *Asiatic Raccoon*, the term *Finnraccoon* for products of the *Nyctereutes procyonoides* species.**

The term *Finnraccoon* has achieved global recognition in the international fur marketplace by the merits of strict national and EU-level animal welfare standards that regulate the farming of the *Finnraccoon*, including the fact that 100 percent of the farms that raise *Finnraccoon* are certified to European standards. We would thus like to give our support to the *addition of the common name Finnraccoon in the Fur Products Name Guide* to describe the products of the *Nyctereutes procyonoides*, as follows:

<b>NAME</b>	<b>ORDER</b>	<b>FAMILY</b>	<b>GENIUS-SPECIES</b>
Raccoon, Asiatic / Finnraccoon	do	Canidae	<i>Nyctereutes procyonoides</i>

We also want to express our agreement with the decision by the FTC not to accept the name “raccoon dog” for the *Nyctereutes procyonoides* species in the proposed rule. The name is not used in the market place; it is highly deceptive because it implies the animal is related to domestic dog; and it would confuse consumers. Use of the term would likely end all trade in the product, with devastating consequences for Finnish fur farmers.

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