



Finnish Fur Breeders' Association
P.O. Box 5, FI-01601 VANTAA, Finland

To the Federal Trade Commission of the US

Response to FTC Proposed Rule (September 17, 2012)

The Finnish Fur Breeders' Association (FFBA) agrees 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.

FFBA also requests that the FTC 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 as a result of the extensive marketing efforts of Saga Furs Oyj and the European and Finnish Breeders Association. Those marketing efforts highlight the 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.

The FTC, by not permitting use of the name *Finnraccoon* and only permitting use of the term *Asiatic Raccoon*, has caused consumers mistakenly to believe that the product originates in Asia, where animal welfare standards are not as high as those in Europe, including Finland. This undermines the significant investments made by Finnish fur farmers to meet these high standards and to have third parties certify that their farms are in compliance. Thus the Finnish product has been hurt in the U.S. marketplace, not only as a result of the "raccoon dog" campaign, but also with the media effort to link the *Finnraccoon* with the product of the same species raised in China.

The U.S. and European Union recently established a High Level Working Group on Jobs and Growth and tasked it to identify policies and measures to increase trade and investment. One of the areas currently under review is the area of regulatory harmonization. Permitting acceptance of the well-recognized term *Finnraccoon*, as an alternative to the long standing term, *Asiatic Raccoon*, would be an important move in the area of regulatory harmonization and would stimulate export of the Finnish product to the U.S.

In rejecting use of the term *Finnraccoon*, the Commission noted that there was insufficient evidence to indicate that consumers were familiar with the term. The Government of Finland request that the Commission review the significant amount of marketing materials that have been developed by Saga Furs Oyj for the U.S. marketplace, and the fact that the term *Finnraccoon* is the name that predominates in all of these marketing materials.

In Vantaa November 8th 2012, on behalf of The Finnish Fur Breeders' Association

Max Arhippainen
Director, Community Relations och Communication
e-mail