



BC International Group, Inc.

John Raptis  
Senior Vice President

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Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex O)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

**Re: Regulations Under the Fur Products Labeling Act: Comments of BC International Group, Inc. in Response to the FTC Notice of Proposed Rulemaking 77 Fed Reg. 57,043 (Sept. 17, 2012)**

Dear Sir/Madam:

BC International Group, Inc. (BCI) submits these comments in connection with the above-referenced Proposed Rulemaking. BCI was established in February of 1993. Since its inception, BCI has become the world's largest fur retailer with over 120 full service fur salons nationwide. BCI operates as a leased space retailer within major department stores including Saks Fifth Avenue, Macy's, Bloomingdale's. BCI's mission is to continue to be the world's leading furrier by providing a premier product and superior service to its customers. The company employs over 1000 people. In a changing commercial and regulatory environment, BCI is committed to a compliance policy that recognizes the importance of providing correct information to the consumer through its implementation of the Fur Product Labeling Act regulatory requirements.

BCI agrees with the FTC's decision to decline replacing "Asiatic Raccoon" with the colloquial term, "raccoon dog," as proposed by animal rights groups such as the Humane Society of the United States. BCI has sold products of the *nyctereutes procyonoides* species for more than a decade. The product has gained increased acceptance in the marketplace, especially as a trim used in garments consisting largely of other textile materials. For decades, the product has been recognized by the common name, which appears in the Fur Products Name Guide, "Asiatic Raccoon." The retail and consumer market continues to recognize that name.

The Asiatic Raccoon product, however, has suffered a setback in the marketplace in recent years, as a result of the attempt to link the product in the media with the term "raccoon dog." That term is deceptive and has created immense consumer confusion since it implies that the Asiatic Raccoon is related to the domestic dog. The misleading media campaign aimed at spotlighting the Asiatic Raccoon as a dog is for political reasons only and not based on any actual evidence showing that consumers are unfamiliar with the term "Asiatic Raccoon." If the common name were to be changed to "raccoon



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dog,” there would no longer be a market for Asiatic Raccoon fur, and garments with this type of fur would be eliminated.

BCI agrees with the FTC. The name “Asiatic Raccoon” must remain unchanged because (a) it describes the animal in a way that consumers can properly identify it; and (b) consumers have become familiar with the name through the current labeling requirements, which have required use of that term for over fifty years.

BCI, however, asks the FTC to take note of the extraordinary marketing campaign that has been conducted by Saga Furs, which has led to the recognition and acceptance in the marketplace of the term Finn raccoon for products of the *nyctereutes procyonoides* species originating in Europe, especially Finland.

One of the reasons that the fur retail sector has been able to resist the deceptive campaign to link the *nyctereutes procyonoides* product with domestic dog is the aggressive steps taken by Finnish fur breeders to raise these animals in accordance with the highest welfare standards in the world, and on farms that are certified compliant with those standards. Finn raccoon, as the product is marketed globally, has achieved name recognition comparable to that of the Asiatic Raccoon product originating in China. This is especially true in the United States where most of the *nyctereutes procyonoides* species garments are manufactured from skins originating from Finland. The FTC regulations permit use of the term Finnish “Asiatic Raccoon” based on its regulation permitting the use of a geographic descriptor before an accepted common name. It is not a giant step to permit the more recognized term “Finn raccoon” for this same product.

BCI urges the Commission to accept the name “Finn raccoon” as an alternative for Asiatic Raccoon for product originating in Europe. The name Finn raccoon has achieved a level of recognition in the fur market and among the consuming public such that use of the term would better inform the consumer of its origin and the superior standards applicable to its production.

BCI appreciates the opportunity to comment on these important issues.

Sincerely,

/s/

John Raptis