

Ref: Fur Products Labeling Act / Federal Trade Commission's advance notice of proposed rulemaking; Request for comment

Subject: Proposal to add the term *Finnraccoon* in the Fur Products Name Guide to describe the products of the *Nyctereutes procyonoides*.

Comments to be delivered in electronic form at <https://ftcpublic.commentworks.com/ftc/furrulesreview>

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 to the comments made by the Finnish Fur Sales on this matter), we would 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:

NAME	ORDER	FAMILY	GENIUS-SPECIES
Raccoon, Asiatic / Finnraccoon	do	Canidae	Nyctereutes procyonoides

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