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# FINNISH FUR SALES

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May 16, 2011

**BY ELECTRONIC FILING**

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex J)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

**Re: Comment of Finnish Fur Sales in Response to the FTC Request for Comments on Fur Rules Review Matter No. P074201**

Dear Sir or Madam:

This letter is in response to the Federal Trade Commission's ("FTC" or "Commission") request for comment on the Fur Products Name Guide.<sup>1</sup> Finnish Fur Sales (Turkistuottajat Oyj), one of the world's leading international fur auction houses and the only publicly listed company in its sector requests that the FTC consider amending the Fur Products Name Guide to provide for the use of the term "Finnraccoon" for products of the *Nyctereutes procyonoides* species originating in Finland.

Under the current Fur Products Name Guide, products of the *Nyctereutes procyonoides* species are required to use the common name, "Asiatic Raccoon," regardless of country of origin. We believe this term is misleading when used to describe products of the *Nyctereutes procyonoides* species originating in Finland, because of the vastly different animal welfare standards that are in place in Finland versus Asian countries like China. Indeed, animals of this species originating in Finland are raised in accordance with the strictest national and European Union regulations and standards for animal welfare. In addition, Finnish Fur Sales auction house only sells skins that have been traced back to the farm of origin and have been produced in countries enforcing fur animal welfare legislation. In contrast, the animal welfare standards that are in place in Asian countries, in some cases, do not exist and in other cases, are not nearly as rigorous as the standards in place in Finland.

Since Asian countries do not maintain the high animal welfare standards, there is a negative connotation associated with the fur that originates there. Finnish Fur Sales is responsible for the marketing and sales of this product and has promoted its products on the basis of their superior animal husbandry standards. Meanwhile, animal rights groups highlight the conditions in Asian countries without disclosing the vastly different conditions in Finland, in an effort to curb the use of all fur products. Consumers are, therefore, justifiably confused about the quality of fur products identified as "Asiatic Raccoon."

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<sup>1</sup> See 76 Fed. Reg. 13550 (Mar. 13, 2011).

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Further, the term, "Asiatic Raccoon" has caused confusion because the name implies that the fur originates from Asia when, in fact, much of the fur from the *Nyctereutes procyonoides* species originates from Finland. Indeed, Finland is the largest producer of products of the *Nyctereutes procyonoides* species in the world. This animal is produced in over 100 farms in Finland, 80 percent of which have been certified as having met the strict animal welfare standards. In the coming season, 2011-2012, Finnish Fur Sales is selling Finn raccoon skins originating solely from the certified farms. The certification criteria go further than the existing legislation, and the comparison between these two is enclosed in a separate attachment.

The current FTC standards do not provide a manner in which to distinguish Asian fur of this species from Finnish fur of this species. Certainly, advertisers are free to use the term, "Finnish Asiatic Raccoon"; however, this term may be equally confusing because consumers may view it as referring to a raccoon with two geographic descriptors. Therefore, Finnish Fur Sales believes that by adding the common name, "Finn raccoon" in the Fur Products Name Guide to describe products of the *Nyctereutes procyonoides* species originating in Finland may help decrease the consumer confusion by ensuring that consumers have the maximum information necessary to make informed purchasing decisions.

Finnish Fur Sales appreciates this opportunity to share its views and stands ready to participate in continued work of the FTC staff.

Sincerely,

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