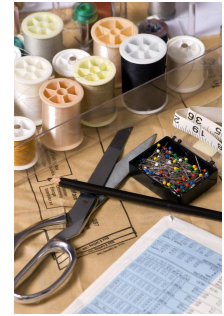

❖ SPC&B Textile Report ❖

A Newsletter for Clients of Sharretts, Paley, Carter & Blauvelt, P.C.

March 18, 2011

FTC Publishes Enforcement Policy on Truth in Fur Labeling Act



The “Truth in Fur Labeling Act,” which removes the \$150 exemption from the fur labeling requirements of the Fur Products Labeling Act, went into effect today. Recognizing the difficulties of accurately labeling products already in the stream of commerce that were not required to be labeled under the *de minimis* exemption, the Federal Trade Commission (FTC) announced that it will not take steps to enforce the Fur Act labeling requirements against any retailer covered by the expired exemption, subject to the following requirements:

1. The product containing a *de minimis* amount of fur was delivered to the retailer on or before March 18, 2011 and sold by March 18, 2012; and
2. The product is not mislabeled under the old requirements.

The FTC believes that the delay in enforcement for the above-referenced products will permit retailers to exhaust their existing inventories. Nevertheless, the Commission ‘encourages’ retailers to add hang tags or otherwise clearly and conspicuously disclose that items contain fur and provide the fur name if known.

We will continue to keep you apprised of further developments with respect to implementation of the Truth in Fur Labeling Act. In the meantime, if you have any questions or concerns about the proper labeling of your fur products, whether real or faux, please contact Gail Cumins at gcumins@spcblaw.com or Donna Shira at dshira@spcblaw.com, or call us at 212-425-0055.

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