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Close Scrutiny of "Made in USA" Claims by the FTC

The **Federal Trade Commission** (FTC) continues to take all "Made in USA" claims very seriously and accord them a high level of enforcement priority. This enforcement trend will continue, particularly under the new Administration, which has clearly and repeatedly identified *US manufacturing and the use and sale of American-made products as a top priority*.

Case in point: The Federal Trade Commission (FTC) has just closed its "Made in USA" investigation of certain **Target** pillow products. According to the FTC, the outer packaging of the pillow products bore an unqualified "Made in USA" claim while the packages' contents – the pillows themselves – bore a "Made in China" label claim. FTC's investigation began in response to numerous consumer complaints regarding this conflicting origin labeling.

In response to the FTC's investigation, Target agreed to remedy the problem, including removing all affected items from sale, and, most significantly, agreeing to undertake several longer term "process enhancements" designed to prevent future deceptive "Made in USA" claims. These processes include the assembly of a team of experts to evaluate and analyze a product's origin, using a new flag when an unqualified "Made in USA" claim is proposed, validating "Made in USA" vendor claims, and reviewing private-label domestic vendors with spot checks for all unqualified "Made in USA" claims.

With these significant actions, the FTC opted to close out the matter.

It is suggested that your company REVIEW ALL MERCHANDISE LABELING!

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