Case Study

Subject: “Made/Assembled in USA” Product Markings
Re: FTC product labeling; country of origin

Issue: April 2, 2013

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Provided By: Angie Farmer
GLOBAL DIRECT a division of A Brand Company
913.563.4538
angie.farmer@gbldirect.com

Challenge:
Made in the USA, Assembled in the USA Claims
A domestic headwear vendor was claiming “Made in the USA” and “Assembled in the USA” on their caps. Their original label stated “Assembled in the USA”, however, the plastic tab at the back of the hat said “Made in the USA” 5x’s larger than the “assembled in the USA” on the label (the plastic tab is the only component made in the USA)

Issue:
Having both “Assembled in the USA” and “Made in the USA” would be considered deceptive and deceiving according to FTC regulations.

Solution:
We worked with the vendor to change the wording on the label to “Cut, Sewn & Assembled in the USA of Imported and Domestic Materials”. We also asked them to remove “Made in the USA” from the back tab.

Research Links:
Complying with the Made in USA Standard