



USA on Display: How “Made in America” Claims Are Regulated

Intro (0:00 – 01:49 min)

Trade Press (01:49 min – 7:49 min)

Main Content (7:49 min – 38:15 min)

- What “Made in USA” Really Means: Customs Country-of-Origin Rules vs. Advertising Claims (7:49 min)
- Key Laws and Regulatory Players (11:30 min)
 - An overview of the major federal and state rules shaping this space:
 - Buy America Act
 - Federal Made in USA Labeling Rule
 - California’s version of Made in USA standard
- New Executive Order: What’s Changed? (19:25 min)
 - Four key directives:
 - FTC enforcement priority: increased focus on false or misleading “Made in USA” claims
 - Potential online marketplace regulations: FTC to consider rules addressing responsibility for misleading claims on e-commerce platforms
 - Expanded country-of-origin labeling efforts: Agencies encouraged to promote voluntary labeling for U.S.-made products
 - DOJ enforcement via False Claims Act: Government contractors making false domestic-origin claims may face legal action
 - [New EO Raises Uncertainty for MUSA Claims | Keller and Heckman](#)
 - [FTC “Made in the USA” Enforcement Sweep | Keller and Heckman](#)
- Impact on Food & Drug Industries (24:46 min)
- Enforcement Trends (27:06 min)
 - April 14, 2026: FTC announced a “Made in USA” enforcement sweep
 - 3 enforcement actions
 - 2 closing letters
 - Year-by-year activity:
 - 2025: no enforcement actions, but several warning letters sent to companies and online marketplaces; FTC Chairman declared July 2025 “Made in the USA’ Month”
 - 2024: 4 resolved enforcement actions and almost a dozen closing letters
 - 2023: couple of enforcement actions and several closing letters
 - [FTC Issues Warning Letters to Businesses and Platforms After Designating July “Made in the USA” Month | Keller and Heckman](#)
- Recent Class Action Lawsuits (30:57 min)

- ~20 “Made in USA” class actions filed by end of 2025
- Best Practices for Companies (34:08 min)
 - Minimize exposure by supply chain monitoring
 - Maintain detailed sourcing and manufacturing records
 - Conduct periodic audits
 - Marketing alignment:
 - Ensure unqualified claims meet FTC’s “all or virtually all” standard
 - Qualify claims so as not to overstate the nature or amount of American content/processing
 - Track FTC enforcement, closing letters, and settlement trends
- Key takeaways: What companies need to understand about the executive order and the broader legal landscape (35:52 min)

Upcoming Keller and Heckman Events (38:15 min – 39:14 min)

- Seminar on September 22 – 23, 2026 - [2026 Practical Primer on Pesticides | Keller and Heckman](#)
- Seminar on October 6 – 7, 2026 - [Navigating TSCA: Basics and Beyond 2026 | Keller and Heckman](#)
- Seminar on October 27 – 28, 2026 - [2026 Annual Food Packaging Law Seminar | Keller and Heckman](#)