

February 14, 2023

Via email

Matthew Scanlan
 Cofounder, CEO, and General Partner
 Naadam Inc.
 [REDACTED]

Dear Mr. Scanlan:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) to demand that Naadam Inc. immediately cease its false and misleading marketing claims that its cashmere products are “cruelty-free” or “without cruelty,” including the following claims:

- “Responsible and cruelty-free. From hand combing to providing veterinary care, we promote ethical conditions for the animals behind our raw materials.”¹
- “We treat our goats the way we want to be treated: responsibly, with love, and without cruelty.”²

Despite Naadam’s representations, cashmere is not made “without cruelty” or “cruelty-free.”

To produce cashmere, workers typically pin goats to the ground, bind their legs, and tear out their hair with sharp metal combs. Experts in animal welfare have rejected or advised against combing goats. The Australian Royal Society for the Prevention of Cruelty to Animals (RSPCA) “does not support the combing of goats with a sharp-toothed comb. It is a prolonged procedure that can lead to bruising and skin injuries, and cause unnecessary and extended pain, suffering and distress in goats.”³ Even the “Good Cashmere Standard”—which Naadam cites in its Social and Environmental Impact Report in an attempt to “humane wash” and greenwash its cashmere products⁴—suggests that combing goats causes them to endure “stress and injury.”⁵

Goats are prey animals: Their “fight or flight” instinct is deeply ingrained. Published studies have confirmed that goats “are fearful towards ... threatening situations” and endure stress when handled or when they perceive a risk of predation.⁶ Yet during combing, goats are forced into highly stressful and often painful situations from which they cannot escape because workers forcibly restrain them and often tie their limbs with ropes. Even if the goats are not physically harmed, they are psychologically harmed. Finally, when goats are no longer profitable, they are sent to slaughterhouses. There, workers commonly hit them on the head with hammers or may even fail to stun them at all, before slitting their throats. Many goats continue to move for minutes after their throats are cut. This terrifying and violent ordeal is not considered “cruelty-free” or “without cruelty” by any reasonable consumer.

PEOPLE FOR
 THE ETHICAL
 TREATMENT
 OF ANIMALS
 FOUNDATION

Washington
 1536 16th St. N.W.
 Washington, DC 20036
 202-483-PETA

Los Angeles
 2154 W. Sunset Blvd.
 Los Angeles, CA 90026
 323-644-PETA

Norfolk
 501 Front St.
 Norfolk, VA 23510
 757-622-PETA

PETA FOUNDATION IS AN OPERATING
 NAME OF THE FOUNDATION TO
 SUPPORT ANIMAL PROTECTION.

ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

The Federal Trade Commission Act (FTC Act) prohibits unfair methods of competition, which includes false and misleading advertising. 15 U.S.C. § 45. Naadam’s claims that its cashmere products are “cruelty-free” and “without cruelty” assert without qualification that the goats did not experience anything that a reasonable consumer would consider to be “cruel.” However, cruelty is inherent in cashmere production, including painful and distressing combing, castration without pain relief, and violent slaughter. By specifically including these representations in its marketing, Naadam clearly recognizes that consumers value animal welfare and believe that at a minimum, goats should not be subjected to cruelty. Therefore, claims that cashmere is “cruelty-free” or “without cruelty” are false and likely to mislead ordinary consumers.

Accordingly, PETA looks forward to your prompt confirmation that you have removed these false and misleading claims from your website and any other marketing materials. Please confirm by February 28 that these claims have been removed. PETA hopes to resolve this issue with you before pursuing any additional legal action, including but not limited to a complaint to the Federal Trade Commission for apparent violations of the FTC Act.

Respectfully,



Jared Goodman
General Counsel, Animal Law



¹NAADAM, *Soft Stuff for Hard People*, <https://naadam.co/pages/soft-stuff> (last visited Feb. 1, 2023).

²NAADAM, *Introducing Naadam*, <https://naadam.co/pages/introducing-naadam> (last visited Feb. 1, 2023).

³RSPCA Knowledgebase, *What Are the Animal Welfare Issues Associated With Cashmere Production?* (Oct. 9, 2019), <https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-associated-with-cashmere-production/#what-is-the-rspcas-view>.

⁴ NAADAM, SOCIAL AND ENVIRONMENTAL IMPACT REPORT 11 (2020). Note further that Farm Animal Welfare Committee and A Greener World do not appear to have opined on combing and that the American Veterinary Care Association does not appear to be a recognized organization. The American Veterinary Medical Association, however, has not opined on combing.

⁵GOOD CASHMERE STANDARD 6.0.3. (“Goats should have their fibre removed with hand shears or electric clippers in preference to combing.”).

⁶Pamela Pophiwa et al., *A Review of Factors Affecting Goat Meat Quality and Mitigating Strategies*, 183 SMALL RUMINANT RES. 106035, 106045 (2020); EFSA Panel on Animal Health and Welfare, *Welfare of Small Ruminants During Transport*, 20 EFSA J. 07404, 07430 (2022) (“[P]ushing, pulling the wool or holding the animals by the skin [or] ... hold[ing] one or more animals by the fleece or leg to load (or unload) them ... induce stress and fear in the animals.”).