July 13, 2023

Via email

Sid Gupta CEO and Co-Founder Quince Sid@OneQuince.com

Dear Mr. Gupta:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) to demand that Quince immediately cease its false and misleading marketing claims that its cashmere and alpaca wool products are "non-harmful" or "pos[e] no harm" to animals, including the following claims:

- "The cashmere is detached from the goats in a non-harmful way"—by combing—"to secure their safety and a raw product."<sup>1</sup>
- "No alpacas are harmed during shearing."<sup>2</sup>
- "The shearing process poses no harm to the alpacas."<sup>3</sup>

Despite Quince's representations, cashmere is not "non-harmful," and the shearing process always harms alpacas.

To produce cashmere, goats are typically forced to suffer from extreme abuse and are ultimately killed once they are no longer profitable. A newly released PETA <u>exposé</u> of twelve cashmere industry operations revealed consistent with the findings of its <u>prior exposé</u>—that goats screamed in terror as workers pinned them down, twisted their sensitive legs, and ripped their hair out with sharp metal combs, leaving some with bleeding wounds from shearing and tearing off pieces of their skin. In addition, kid goats were crudely castrated without painkillers, and young goats were found dead, likely from extreme cold or hunger.<sup>4</sup>

Quince's website states, "[C]ombing the goats is the most optimal method to collect the cashmere."<sup>5</sup> 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



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.)

<sup>&</sup>lt;sup>1</sup> Quince, All About Cashmere 101, https://www.quince.com/cashmere-101.

<sup>&</sup>lt;sup>2</sup> Ex. 1, Quince Instagram Post.

<sup>&</sup>lt;sup>3</sup> See, e.g., Quince, Baby Alpaca-Wool Quarter Zip, https://www.quince.com/women/alpaca-quarter-zip-sweater.

<sup>&</sup>lt;sup>4</sup> PETA, *PETA Asia Investigation Exposes Extreme Abuse of Goats for Cashmere*, https://investigations.peta.org/peta-asia-exposes-cashmere-industry/.

<sup>&</sup>lt;sup>5</sup> Quince, *supra* note 1.

skin injuries, and cause unnecessary and extended pain, suffering and distress in goats."<sup>6</sup> Even the "Good Cashmere Standard"—which some companies use in an attempt to further humane wash cashmere products—indicates that combing goats causes them to endure "stress and injury."<sup>7</sup>

Additionally, alpaca hair is the product of extreme cruelty. An investigation of the world's largest privately owned alpaca farm revealed workers hitting alpacas, slamming them onto tables, and shearing them so violently that many were left with deep wounds, which workers sewed up with a needle and thread. The terrified animals struggled, screamed, and vomited—a sign of severe distress.<sup>8</sup>

Goats and alpacas are prey animals: Their "fight or flight" instinct is deeply ingrained. Published studies have confirmed that goats and alpacas "are fearful towards ... threatening situations" and endure stress when handled and during combing or shearing.<sup>9</sup> Yet goats and alpacas 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 these animals are not physically harmed, they are psychologically harmed.

Finally, when these animals are no longer profitable, they are slaughtered. Workers commonly hit goats on the head with hammers or may even fail to stun them at all, before slitting their throats. Many animals continue to move for minutes after their throats are cut. Alpacas are also violently killed. This terrifying and cruel ordeal is not considered "non-harmful" by any reasonable consumer.

The Federal Trade Commission Act (FTC Act) prohibits unfair methods of competition, which includes false and misleading advertising. 15 U.S.C. § 45. Quince's claims that its cashmere products are made in a "non-harmful" way, and its claims that "[n]o alpacas are harmed during shearing," and "[t]he shearing process poses no harm to the alpacas," assert without qualification that the animals did not experience anything that a reasonable consumer would consider to be "harmful." However, harm is inherent in cashmere and alpaca wool production, including painful and distressing combing or shearing and violent slaughter. By specifically including these representations in its marketing, Quince clearly recognizes that consumers value animal welfare and believe that at a minimum, goats and alpacas should not be subjected to harm. Therefore, claims that "cashmere is detached from the goats in a non-harmful way to secure their safety,"

<sup>&</sup>lt;sup>6</sup> RSPCA Knowledgebase, *What Are the Animal Welfare Issues Associated With Cashmere Production?* (Oct. 8, 2019), https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-associated-with-cashmere-production/#what-is-the-rspcas-view.

<sup>&</sup>lt;sup>7</sup> See ABTF, THE GOOD CASHMERE STANDARD 6.0.3 ("Goats should have their fibre removed with hand shears or electric clippers in preference to combing."), https://thegoodcashmerestandard.org/wp-content/uploads/2022/03/The-Good-Cashmere-Standard-by-AbTF\_v1.2\_EN.pdf.

<sup>&</sup>lt;sup>8</sup> PETA, Groundbreaking Undercover Investigation: Crying, Vomiting Alpacas Tied Down, Cut Up for Sweaters and Scarves, https://investigations.peta.org/alpaca-wool-abuse/#video (last visited July 11, 2023).

<sup>&</sup>lt;sup>9</sup> Pamela 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."); Thomas Wittek et al., *Clinical Parameters and Adrenocortical Activity to Assess Stress Responses of Alpacas Using Different Methods of Restraint Either Alone or With Shearing*, 180 Veterinary Record 23 (2017).

"[n]o alpacas are harmed during shearing," and "[t]he shearing process poses no harm to the alpacas," appear plainly 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 July 24, 2023, 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,



Mary Maerz Counsel PETA Foundation marym@petaf.org |

## Exhibit 1

