

March 28, 2024

*Via email*

Tim Kunin, CEO  
 Greater Good  
 tim@greatergood.com

David Onsager, General Counsel  
 Greater Good  
 donsager@baileyonsager.com

Dear Messrs. Kunin and Onsager:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) to demand that Greater Good immediately cease its false and misleading marketing claims that its wool, alpaca, and silk products offered in its online shop are "cruelty-free" or "humane," including the following:

- Products claiming to include "verified humane and cruelty-free" wool,<sup>1</sup> or "100% verified humane and cruelty free wool"<sup>2</sup>
- Products claiming to include "[h]umanely gathered alpaca wool" wherein "no animals are harmed in the yearly shearing process."<sup>3</sup>
- Products claiming to include "cruelty-free" silk.<sup>4</sup>

Despite Greater Good's repeated representations, and the company's assertion to PETA that you "sell some products derived from animals ... [only] when the animal is not hurt during the process of creating the product," wool, alpaca, and silk are neither "humane" nor made "cruelty free."

<sup>1</sup> See, e.g., Pawsitively Warm Wool Headband, <https://store.greatergood.com/collections/all/products/91713-pawsitively-warm-wool-headband>; Cute Critter Felt Ornament, <https://store.greatergood.com/collections/all/products/91700-cute-critter-felt-ornament>; Handmade Felt Paw Print Oven Mitt, <https://store.greatergood.com/collections/all/products/91599-handmade-felt-paw-print-oven-mitt>; Handmade Felt Red Ribbon Ornament, <https://store.greatergood.com/collections/all/products/34687-handmade-felt-red-ribbon-ornament>.

<sup>2</sup> See, e.g., Handmade Felt Paw Print Oven Mitt, <https://store.greatergood.com/collections/all/products/91599-handmade-felt-paw-print-oven-mitt> (last visited Feb. 5, 2024); Handmade Felt Red Ribbon Ornament, <https://store.greatergood.com/collections/all/products/34687-handmade-felt-red-ribbon-ornament>.

<sup>3</sup> See, e.g., Braided Two-Toned Baby Alpaca Fingerless Mittens, <https://store.greatergood.com/collections/all/products/96568-braided-two-toned-baby-alpaca-fingerless-mittens>; Colorful Alpaca Fingerless Mittens, <https://store.greatergood.com/collections/all/products/97532-colorful-alpaca-fingerless-mittens>; Alpaca Fingerless Mittens, <https://store.greatergood.com/collections/all/products/78839-alpaca-fingerless-mittens>; Small Squares Baby Alpaca Fingerless Mittens, <https://store.greatergood.com/collections/all/products/96570-small-squares-baby-alpaca-fingerless-mittens>; Baby Alpaca Knitted Fingerless Gloves, <https://store.greatergood.com/collections/all/products/96569-baby-alpaca-knitted-fingerless-mittens>.

<sup>4</sup> See, e.g., Color Connection Scarf, <https://store.greatergood.com/collections/all/products/80277-color-connection-scarf>; Simplicity Scarf, <https://store.greatergood.com/collections/all/products/85648-simplicity-scarf>; Sustainable Silk Breezy Scarf, <https://store.greatergood.com/products/66931-promo-sustainable-silk-breezy-scarf>; Sustainable Silk Breezy Scarf, <https://store.greatergood.com/products/66931-promo-sustainable-silk-breezy-scarf>.

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.)

These statements mislead consumers, as wool production entails enormous psychological and physical harm. Because shearers are usually paid by volume rather than hourly, they are incentivized to work as fast as possible without any regard for the sheep’s welfare. This in turn leads to hasty and careless shearing, frequently causing injuries—the worst of which workers sew shut without any pain relief. Strips of skin, including teats, tails, and ears, are often cut or ripped off during shearing.<sup>5</sup>

While Greater Good makes its “verified” claims without providing any purported support for the assertion, such as third-party accreditation, note that even the “humane” certifications that exist allow for painful practices such as tail-docking without pain relief.<sup>6</sup> They do not ensure that the animals were raised and their hair obtained humanely or without cruelty. Furthermore, an investigation of the world’s top alpaca producer 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—signs of severe distress.<sup>7</sup>

Alpacas and sheep are prey animals with deeply ingrained “fight or flight” instincts. Published studies confirm that sheep and alpacas “are fearful towards ... threatening situations” and endure stress when handled, such as during combing or shearing,<sup>8</sup> including as evidenced by “behavioral, autonomic, endocrine and immune responses.” Yet they are still forced into highly stressful and often painful situations they cannot escape because workers forcibly restrain them, often tying their limbs with ropes. Even in instances where sheep or alpaca are not physically harmed by shearing, they are harmed psychologically.

When sheep and alpacas no longer turn a profit, 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 animals continue to move for minutes after their throats are cut. No reasonable consumer would consider this terrifying and violent ordeal that is a fixture of the wool industry “humane,” nor would they agree that “no animals are harmed” as a result. Consequently, such assertions are materially false and misleading.

Further, Greater Good’s online shop claims to offer “cruelty free” silk products, but no such thing exists. The silk industry standard is to kill silkworms in their cocoons prior to emerging to harvest

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<sup>5</sup> PETA, *The Wool Industry*, <https://www.peta.org/issues/animals-used-for-clothing/wool-industry/>.

<sup>6</sup> See *Responsible Wool Standard 2.2*, TEXTILE EXCH. (Oct. 2021), <https://textileexchange.org/knowledge-center/documents/responsible-wool-standard/>.

<sup>7</sup> PETA, *Groundbreaking Undercover Investigation: Crying, Vomiting Alpacas Tied Down, Cut Up for Sweaters and Scarves*, <https://investigations.peta.org/alpaca-wool-abuse/#video>.

<sup>8</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).

<sup>9</sup> Francesca Arfuso et al., *Acute Stress Response of Sheep to Shearing Procedures: Dynamic Change of Cortisol Concentration and Protein Electrophoretic Pattern*, 12(7) *Animals* 862 (2022).


the silk.<sup>10</sup> To avoid damaging the cocoons from which the silk threads are taken, the pupae are killed in a process called “stifling”—typically being boiled alive.<sup>11</sup>

Ahimsa silk, often labelled as “Peace Silk,” is produced similarly to conventional silk prior to when pupae are killed, at which point Ahimsa silk manufacturers allow cocoons to hatch and breed.<sup>12</sup> Most silkworms raised for Ahimsa silk breed several times per season, causing exponential growth in the silkworm population.<sup>13</sup> The result: completely unsustainable populations of silkworms that producers cannot feed, leading many to die from starvation and dehydration.<sup>14</sup> Consequently, rather than kill one pupa per cocoon—as is the case with regular silk production—so-called “Peace” silk results in the death of hundreds of caterpillars.<sup>15</sup> As a result, consumers are being misled by Greater Good’s assertions that its silk products are “cruelty free.”


Greater Good must cease misleading consumers by removing these false and misleading product claims from its website and other marketing. The Federal Trade Commission Act (FTC Act) prohibits unfair methods of competition, which includes false and misleading advertising. 15 U.S.C. § 45. Greater Good’s claims that its wool, alpaca, and silk products are “cruelty-free” and “humane” assert without qualification that the sheep, alpaca, and silkworms did not experience anything that a reasonable consumer would consider to be cruel or inhumane. By specifically including these representations in its marketing, Greater Good clearly recognizes that consumers value animal welfare and believe that at a minimum, sheep, alpaca, and silkworms should not be subjected to cruelty. However, as described above, cruelty is inherent in sheep wool, alpaca wool, and silk production. Therefore, claims that the production of sheep wool, alpaca wool, and silk products is “humane” and “cruelty-free” 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 **April 11, 2024**, 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  
Managing General Counsel

 | JaredG@petaf.org

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<sup>10</sup> PETA, *What’s Wrong with Silk?*, <https://www.peta.org/about-peta/faq/whats-wrong-with-silk/>.

<sup>11</sup> *Id.*

<sup>12</sup> Wormspit.com, *Ahimsa (Peace) Silk, Why I Think It Doesn’t Add Up*, <http://www.wormspit.com/peacesilk.htm>.

<sup>13</sup> Polly, *What’s Wrong With (Peace) Silk?*, <https://www.shoplikeyougiveadamn.com/blogs/whats-wrong-with-peace-silk/bl-356>.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*