

29 May 2014

Philip Malmberg, CEO
Ecover
Industrieweg 3
Malle, 2390 Belgium

Adam Lowry, Co-Founder
Method Home
637 Commercial Street, Suite 300
San Francisco, CA 9411
USA

Dear Philip Malmberg and Adam Lowry,

RE: Ecover and Method's decision to use ingredients derived from Synthetically Modified Organisms (SMOs) in its products

We are writing as representatives of several international environmental, consumer and social justice organisations to formally ask Ecover and Method to reconsider its decision to use ingredients derived from synthetic biology in its products.

On April 2nd 2014, Ecover announced that it would replace some of the palm oil used in its laundry detergent with algal oil produced by Solazyme Inc. of California (USA), which is derived from the fermentation of Brazilian sugarcane. As you are aware, Solazyme's proprietary product is 'genetically tailored oil' fermented in vats of bioengineered algae that were created using the tools of synthetic biology – often referred to as 'extreme genetic engineering.' Subsequent discussions with your employees, including the leadership at Method, have confirmed to us that Method also is exploring using these ingredients.

Synthetic biology is still a new and poorly defined industry; however, since it uses techniques that go beyond recombinant DNA and may pose new risks as well as cause significant disruptions in production and supply chains, there is growing international recognition of the need to bring it under proper oversight on a precautionary basis. The United Nations Convention on Biological Diversity, which will discuss synthetic biology in depth at its June scientific subcommittee meeting, currently urges governments to take a precautionary approach, and 117 civil society organisations from around the world have called for a moratorium on the commercial use and environmental release of synthetically modified organisms (SMOs). It is our view that, given the significant gaps in knowledge, it is premature to bring synthetic biology and its products into commercial use. There are no developed or agreed protocols for adequate biosafety assessment of SMO's. Existing risk assessment, traceability and containment measures for genetically modified organisms (GMOs) may be inadequate for novel organisms produced through synthetic biology. There are also significant concerns about the impact of such highly novel organisms on ecosystems should they escape and on the livelihoods of tropical farmers and on biodiversity.

We are alarmed that a new generation of synthetic biology-derived ingredients is now being developed for foods, cosmetics and other consumer products in the absence of any oversight framework. Although a number of such ingredients (e.g. nootkatone, resveratrol) are known to be entering the consumer market, unlabelled and unassessed, it has been difficult to identify specific brands incorporating these products. Ecover will be the first international consumer brand to identify itself as using a synthetic biology-derived ingredient. In doing so, your company will be on the forefront of the public debate over synthetic biology's risks to the environment, biodiversity, human health and livelihoods.

We are surprised that Ecover and Method's decision-makers believe that the company's green-minded consumers will welcome a synthetic biology-derived product, and we would question any 'natural,' 'green,' 'ecological' and/or 'sustainable' claims if they are applied to a product containing bioengineered algal oil. (Opinion surveys carried out over the last several years in North America by Hart Research Associates have found that the public tends to associate synthetic biology with something 'manmade or artificial,' and while current knowledge of synthetic biology is low among the public, concerns about associated risks increase as more information about the technology is relayed. Eurobarometer polls have revealed that the need for information about the possible risks associated with synthetic biology is the main priority of the European public.)

We do not believe that engineered algae fed on sugarcane are a 'green,' 'ecological' or 'sustainable' solution to the problems of palm oil use. While we share your concerns about the forest destruction associated with palm oil (in this case palm kernel oil), we do not regard a switch to Brazilian sugarcane feedstock to be the solution. As you are no doubt aware, sugarcane production on Brazil's fragile Cerrado eco-region is associated with significant biodiversity loss and CO₂ emissions from both land use change and burning of the bagasse, as well as poor working conditions that can resemble slave-labour practices. The rapid expansion of land devoted to growing sugarcane in Brazil is moving back the agricultural frontier, driving forest destruction into the Amazon. It is our understanding that Ecover and Method could have chosen to source the relevant oleochemical ingredients from coconut oil, thereby supporting small and sustainable coconut farmers and not requiring the use of synthetically modified organisms.

We also understand that Ecover intends its North American products to be derived from synthetic biology-derived algal oil fermented from North American corn sugar. Will this be genetically modified corn? We remind Ecover of its existing commitment to not use genetically modified crops in its products.

We further understand that Ecover has not undertaken any independent safety tests of the new algal oil ingredient (e.g., with regards to allergenicity), does not intend to label the products to inform consumers of the synthetic biology-derived ingredient and does not intend to seek regulatory approval for this ingredient. This is disappointing to learn.

We support Ecover's determination to move away from using unsustainable palm oil, but would ask your company to reconsider the false solution of using ingredients derived from the new genetic engineering – synthetically modified organisms (SMOs). Specifically, we are asking Ecover to:

- Pledge not to use SMO-derived ingredients in its products;

- Acknowledge that descriptors such as ‘natural,’ ‘green,’ ‘ecological’ and ‘sustainable’ cannot apply to the products of synthetic biology; and
- Join us in calling on the Convention on Biological Diversity and national governments to establish a moratorium on the commercial use and environmental release of synthetically modified organisms.

Please contact Jim Thomas, Programme Director, ETC Group at jim@etcgroup.org or by telephone 1 514 2739994 by COB Eastern Standard Time on Tuesday 3rd June so that we may discuss this matter further.

Yours sincerely,

Jim Thomas, Programme Director - **ETC Group** (International)

Dana Perls, Food and Biotechnology Campaigner - **Friends of the Earth** (USA)

Jaydee Hanson, Senior Policy Analyst - **Center for Food Safety** (USA)

Maria José Guazzelli, Executive Director - **Centro Ecológico** (Brazil)

Beverley Thorpe, Executive Director - **Clean Production Action** (International)

Michael Hansen, Senior Staff Scientist - **Consumers Union** (USA)

Nina Holland, Campaigner - **Corporate Europe Observatory** (Europe)

Ricarda Steinbrecher, Co-Director - **Econexus** (UK)

Kerstin Lindgren, Campaign Director - **Fair World Project** (USA)

Jonathan Matthews - **GM Watch** (UK)

Devlin Kuyek, Senior Researcher - **GRAIN** (International)

Gopal Dayenini - **Movement Generation** (USA)

Marciano Silva - **Movimento dos Pequenos Agricultores** (Brazil)

Alexis Baden-Mayer, Political Director - **Organic Consumers Association** (USA)

Lim Li Ching - **Third World Network** (International)

Erin Switalski, Executive Director - **Women’s Voices for the Earth** (USA)

Winnie Overbeek, International Co-ordinator - **World Rainforest Movement** (International)