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[www.ethicalmarkets.com](http://www.ethicalmarkets.com)

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Edith Ramirez, Chairwoman  
 Terrell McSweeney, Commissioner  
 Federal Trade Commission, Office of the Secretary  
 600 Pennsylvania Avenue NW., Suite CC-5610 (Annex O)  
 Washington, DC 20580

Maureen K. Ohlhausen, Commissioner  
 Reenah L. Kim, Attorney

Dear Chairwoman Ramirez, Commissioners Ohlhausen and McSweeney and Attorney Kim:

Ethical Markets Media, based on the EthicMark GEMS Standard, is writing to comment on Jewelry Guides, 16 CFR part 23, Project No. G7110 in reference to nomenclature for diamonds.

We support the use of the term “created” in reference to lab-created diamonds with properties identical to those of mined diamonds.

The term “created” helps consumers distinguish mined from non-mined diamonds. Lab-created diamonds have the potential to transition the diamond industry away from the environmental and humanitarian damage imposed by mined diamonds. One of the processes of making a lab-created diamond is similar to how pearls are formed: it begins with a seed around which the diamond crystal forms. As proponents of Biomimicry, we applaud this process more aligned with Nature and Life’s Principles than that of mining.

There is a social disconnect in mining gemstones linked to wars and human rights abuses, child labor and environmental degradation unnecessary now that human science creates gems indistinguishable from those mined. The EthicMark® GEMS Standard highlights how jewelry can be sourced ethically, without harming humans or the environment, certifying only gems created by Earth-friendly materials science, conflict and cruelty free, more humane and sustainable. The standard was envisioned by sustainability pioneer Hazel Henderson, member of the US Congress Office of Technology Assessment Advisory Council (1976-1980), and is backed by Ethical Markets’ reputation as a leader in setting progressive standards in finance, marketing and advertising.



The Standard encourages consumers to seek all available alternatives. The EthicMark GEMS website continues to gather pledges NOT to purchase mined gems -- indicating a consumer base and a need for consumers to be able to distinguish non-mined from mined diamonds.

Just as the fur industry transitioned to manufactured furs, the diamond industry is evolving. The FTC has an obligation to aid that transition on behalf of consumers, allowing language to facilitate decision-making based on environmental and other humanitarian concerns without implying a lesser quality.

Best regards,

  
 Dr. Hazel Henderson, D.Sc.Hon., FRSA  
 President and CEO

  
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 Executive Director and COO