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Pluhar's Perfectionism: A Critique of Her (Un)Egalitarian Ethic

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I intend to criticize Evelyn Pluhar's allegedly egalitarian ethic, presented in her recent work *Beyond Prejudice*, partly by way of contrasting it with what she calls "perfectionism" and partly by demonstrating that, in fact, her ethic schizophrenically embraces a defective form of perfectionism. My analysis suggests that knotty animal-rights dilemmas are best approached not from a stance of viewing animals and humans as morally equal but rather from a framework more flexible and adaptive to the complexity of real-life scenarios. Such adaptability in a theory need not condone cruelty, and it avoids the unintuitive and absurdly demanding features of a rigid egalitarian perspective.

I. A Day in the Lifeboat with Pluhar, Regan, or Edwards

Pluhar's egalitarian ethic claims that all "conscious purposive agents" are maximally morally significant. She includes as conscious purposive agents humans, most marginal humans, mammals, and birds (granting them the benefit of the doubt) but, conversely, excludes reptiles, amphibians, and fish.¹ The upshot is that an ordinary adult human is as morally significant as a horse, a dog, or at the extreme, a mouse or songbird. Contrasting with the egalitarian picture is perfectionism, which Pluhar defines as the view that "the moral significance of beings increases in proportion to the degree to which they possess certain capacities or virtues."²

To illustrate the praxis of these views, let's briefly return to Regan's oft-referenced lifeboat scenario. Four humans and a dog are candidates for occupancy in a lifeboat; there is not enough room for all, so one must perish. Regan sees the humans and the dog as equally morally significant in that all possess sufficient attributes to qualify as a "subject-of-a-life," a moral status intended to grant equal rights to those who qualify. Despite this egalitarian move, Regan finds it morally appropriate to let the dog die due to the worse-off principle: when rights must be overridden due to conflict, those who would be worse-off by violation of their rights have the conflict resolved in their favor. Since "no reasonable person would deny that the death of any of the four humans would be a greater...harm, than would be true in the case of the dog," the dog is left out of the lifeboat.³

Rem Edwards gives a commonsensical perfectionist solution to the dog-in-a-lifeboat dilemma. Contra Regan, Edwards claims there are different degrees of being a subject-of-a-life, degrees that confer different levels of moral status:

Despite Regan's insistence to the contrary, it seems to me that there are *degrees of being the subject-of-a-life*. By degrees I mean that subjects-of-a-life differ immensely with respect to

1. the complexity of their organization,
2. the extent to which they exemplify the defining characteristics of the notion,

and

3. the richness with which they may manifest additional traits of subjectivity conspicuously absent from Regan's list like rationality, self-consciousness, moral agency, etc. [emphasis in original].⁴

Noting that Regan's solution to the lifeboat problem leads to inconsistencies in his theory (e.g., it seems to justify fatal experiments on millions of animals to save one human, yet Regan explicitly bans animal experimentation), Edwards supplies a more plausible solution:

If I am right...that all subjects-of-a-life do not have equal inherent worth, and if, as they typically are, the human subjects-of-a-life are indeed much more complex, intense, and richer in properties than that of the dog, then casting the dog overboard is justified both in terms of inherent and intrinsic value...it is unreasonable to suppose that the dog has a right to life that is equal to that of the humans.⁵

Hence Edwards sees the dog as less morally significant than the humans based on the complex correlation of relevant moral factors in the above citation. Pluhar's egalitarian ethic, however, leads her to find this route unacceptable. She cannot condone flinging the dog to the cold waters because its right to life is inferior due to an inferior mental life.

Instead, she adopts a different strategy. Yes, the dog should go, but not because it lacks maximal moral significance; rather, "If there is not enough to go around for everyone to make it, *those involved have the right to influence the odds in their favor* [emphasis in original]."⁶ This rather thrasymachian solution morally allows the humans to get together and say, "Well, gee, here we are in a lifeboat, there's not enough to go around, okay, let's kill the dog," whereupon poor Fido's right to influence the odds is quickly subdued by a simple shot from a 9mm handgun (or a blow from a paddle or knife). Instead of providing a morally appropriate, egalitarian resolution (like drawing straws), Pluhar returns to a Hobbesian state of nature where each is at war with all.

This brings up a serious criticism of Pluhar's stance. Although her egalitarian ethic supposedly allots equal moral significance to humans and nonhumans, the lifeboat dog's right to influence the odds, at least de facto, is much less than the humans'. Pluhar is selling a harsh version of concealed perfectionism that morally rewards creatures able to kill most effectively. Intelligence, which Pluhar abhors as a standard for setting moral worth, becomes relevant with a vengeance. Barring some bizarre fluke of fate, the major odds-influencing will be done by those who can construct and use various massively lethal weapons (read: humans). It seems quite an unfair setup for the poor dog (or mouse!), given that it is allegedly equal in moral stature to a human being.

Lest one think that Pluhar's thrasymachian qualifier will rarely if ever apply in real life, consider Edwards' assertion that "There is a sense, of course, in which planet [E]arth is a giant lifeboat situation in which some individuals must die to save others," which leads him to find such a situation applicable in the case of life-saving animal experimentation.⁷ Garret Hardin infuses the metaphor with a malthusian twist in "Lifeboat Ethics." Hardin sees the burgeoning human population as seriously outstripping the food supply and heading toward disaster in terms of purely human existence, let alone animal. He voices his concern metaphorically:

Each rich nation amounts to a lifeboat full of comparatively rich people. The poor of the world are in other, much more crowded lifeboats.⁸

According to Hardin, we let no one into our sanctuary. We watch the poor starve in their overcrowded sinking rafts. But getting back to Pluhar, if the world is a big lifeboat or a collection of lifeboats, and supplies are severely strained and threatening to prove inadequate (as Pluhar seems to accept⁹ then animals are out of luck in a big way, at least given her might-makes-right solution. Even a charging elephant isn't going to get very far when it is head to head with a hunting rifle.

II. Pluhar's Defense

Pluhar barely touches on the problems raised by Hardin and fails to address them.¹⁰ However, she defends against the claim that animal organ-harvesting and experimentation are lifeboat situations by pointing out an apparent disanalogy:

[Regarding a lifeboat situation] the parties involved must both be innocently caught in a situation where there are not enough resources to sustain both their lives, although there are enough supplies to support one. Each is at risk; either could die if nothing is done. These individuals truly are competing for life.

These conditions are not present when we are considering killing [an animal] for her organs or for other medical purposes...The human and non-human animal are not *each* at risk of dying if nothing is done [emphasis in original].¹¹

But by going this route, I think Pluhar must accept some rather unpalatable consequences. Imagine a husband, wife, and dog on a lifeboat and furthermore imagine that the husband is terribly weak with little chance to survive *if* he does not get a share of the scanty provisions, provisions sufficient only to keep two of the three alive. Now, if "nothing is done," the husband will die, and the wife and dog survive (the woman and the dog are both in good shape). On the other hand, if the husband gets a share of the food, he'll probably pull through, though the dog, then, is sacrificed.¹² On Pluhar's reasoning, the wife cannot kill the dog to save her husband because this case does not constitute a 'lifeboat situation.' The criterion that "the human and nonhuman animal are not *each* at risk of dying if nothing is done" is not met.

If a Pluharian accepts this as a case where the might-makes-right qualifier applies, we have a strange situation where it is no less wrong for the dog to kill the woman (and hence bring about the death of the man, too), than for her to kill the dog. In the latter case, the husband and wife both live, while in the former only the dog survives, but the Pluharian is forced to consider both scenarios as equally acceptable outcomes.¹³

It does seem that the wife-husband-dog scenario is a lifeboat scenario, and it furthermore seems morally best if the wife kills the dog. The implication is that Pluhar has not shown animal-experimentation and organ-harvesting disanalogous in a morally relevant way to lifeboat cases. At least along the lines of the criteria so far considered, it seems that the case of the wife-husband-dog in a lifeboat is not so different from that of organ donation where the needed organ is only available from a nonhuman. A desperate wife looks justified in authorizing the killing of a nonhuman donor to save her sick husband, just as the wife in the lifeboat assumes a proper though unsettling moral course when she kills the dog so her spouse can live.

Nonetheless, a disanalogy unavailable to Pluhar is available to a perfectionist if the organ donor is a baboon or other ape. Many apes have salient attributes that most other animals lack, such as self-awareness, use of complex tools, rudimentary language capabilities, and moral behavior.¹⁴ Furthermore, DNA similarities between humans and apes are startling, especially in the case of chimpanzees, who are 98.4% genetically

similar to us. So, a perfectionist might argue, it is perhaps acceptable to kill a dog in situations where it is unacceptable to kill an ape, and most certainly organ-harvesting in a 'lifeboat' case might be such a situation.

III. Other Attempts

Pluhar attempts to disanalogize organ-harvesting/animal-experimentation from lifeboat cases in other ways. She notes that the parties involved must be "innocently caught" in the situation; otherwise, the might-makes-right corollary does not apply:

The continuing practice of killing nonhuman animals for medical purposes...cannot be painted as a party of innocents trapped in a lifeboat. The only lifeboat situation that would be parallel to this one would be one in which a healthy young individual, minding her own business, is forced onto a lifeboat at gunpoint and made to serve as one's lunch, organ supplier, or vaccine tester.¹⁵

The problem here is that those in need of organ donations (and concerned relatives) certainly seem innocently caught in their unfortunate predicament; few people intentionally put themselves in the position of needing an organ transplant! A scheme is not plotted in advance for the sake of doing away with poor animals.

No doubt, imprisoning animals minding their own business and killing/torturing them is distasteful, but Pluhar's self-defense might-makes-right corollary seems to allow just such activities, despite her insistence to the contrary. She seems to think that the organ-donor nonhuman is forced unfairly into the lifeboat, but she draws the boundary of the lifeboat too narrowly. It is inaccurate to speak of forcing an animal into a (moral) domain it is already in! And such is the case if the 'lifeboat' is, as Edwards claims, the planet Earth.

The boundary of the lifeboat seems best delineated by the realm in which the relevant resources are scarce, and given this delineation, it seems most proper to speak of the lifeboat being the entire globe in the case of organs available for transplant and subjects available for dangerous medical experimentation. Perhaps sensing this, Pluhar comes up with another strategy for protecting nonhumans from the use of their bodies to save human lives:

We could only claim there to be a scarcity of resources if we include the nonhuman's healthy, independently functioning body among those resources; by no stretch of the imagination is this compatible with the attribution of *full moral rights* to that animal [my emphasis].¹⁶

This assertion, nevertheless, simply begs the question. Whether the animal has full moral rights is just what is at issue. The same problem plagues the story Pluhar tells about "Sanchez," kidnapped by a dying woman who says:

Sanchez, you and I are competitors for a scarce resource: your liver. My liver is riddled with disease, and I will soon die without a transplant. No suitable cadaver organs are available, but tests show that your liver would be excellent for me. Either I will die or you will die: our lives are in conflict. I have the right to protect my own life, so I am justified in having you killed so that I may harvest your lovely liver.¹⁷

Why does Pluhar tell a story about imprisoning and harvesting an organ from a human when she wants to demonstrate the wrongness of such treatment for nonhumans? By focusing on the mistreatment of a human, she wishes to emphasize how horribly one acts in harvesting from animals. But the problem, of course, is that it has not yet been

established that nonhumans are as morally significant as humans. Pluhar says that the dying woman is not justified in taking Sanchez's liver, "given that her victim has the same basic moral rights that she does." But, again, to make such a claim about animals, without strong argumentation to back it up, simply begs the question. Pluhar, however, believes that she has such an argument.

IV. The Gewirthian Argument

No doubt Pluhar is relying on her crucial argument, one based on the philosophy of Gewirth, that purportedly demonstrates the maximal moral significance of all conscious purposive agents. Although not mentioned in her discussion of why organ-harvesting and animal experimentation do not count as lifeboat situations, the Gewirthian argument is Pluhar's main bulwark in defense of her egalitarian ethic. It is important, then, to examine this argument and determine its efficacy.

In a nutshell, the Gewirthian argument proceeds from the stance of "reflecting" agents; the agents realize that to achieve their goals they must have the rights to freedom and well-being (to have well being one must "be alive, have a certain minimal quality of life, and have certain basic mental and physical capabilities").¹⁸ Then the agents are driven by logical consequence to conclude that "all prospective purposive agents have rights to freedom and well-being." The follows from the fact that being a prospective purposive agent is sufficient for the conclusion. As Pluhar says:

The warrant for an agent's claim to basic ("generic") rights is very straightforward: She has purposes she wants to fulfill; that is, she is a "prospective purposive agent."¹⁹

Pluhar spends a good deal of energy grappling with the Humean problem that the argument seems to go from an observation of fact (that agents must be unimpeded in certain basic ways if they are to achieve their goals) to a statement of morality. I do not want to focus on this issue but rather on some others that arise, assuming that the Gewirthian argument does succeed in according equal basic rights to all conscious purposive agents.

A central question is, Does the possession of basic or generic rights necessarily qualify the rights holder for maximal moral significance? The answer, it seems, is no. First, in light of Pluhar's handling of the lifeboat dilemma, it appears humans have, *de facto*, more moral significance than nonhumans even though both have "basic rights." Clearly the poor dog or mouse is not on the same moral level when humans can use their intelligence and weapons to bump them out of 'lifeboats' (harvest their organs, use them for dangerous medical experimentation) or eat them in times of scarcity.

Secondly, even granted that basic rights afford the rights-holder a strong claim, it is a further step to conclude that all rights to what Pluhar calls "necessary goods" (e.g., freedom and well-being) are equal in magnitude. Pluhar needs the Gewirthian argument to demonstrate that all prospective purposive agents have *full* rights to freedom and well-being, if she wants to show maximal moral significance holds for all such agents.²⁰ Not only does the Gewirthian argument fail to do this, but Pluhar herself, following Gewirth, notes that some conscious purposive agents do not have full rights to some necessary goods.²¹ So, Pluhar is in an awkward position, one brought out in her final subsection where she claims of conscious purposive agents:

Any such being, human or nonhuman, is fully morally significant, despite the fact that not all rights held by such beings are the same.²²

It seems fair, not a composition fallacy, to argue that if one's basic rights are significantly lesser than another's, then one is not maximally morally significant. Pluhar's account is further complicated by her withholding of positive rights to certain animals, while keeping them for humans. She's mighty concerned about the wolf's right to freedom and well-being but becomes a consequentialist when it comes to protecting the sheep!²³ This consequentialist strain does not sit well with the deontology of the Gewirthian argument. It is extremely hard to see sheep as maximally morally significant if we can and should just let the wolf eat them, especially when one wolf requires many sheep or other prey animals over the course of its lifetime. Pluhar is in the same tangled web as Regan here, and as Sartre says, there's no exit.

Third, the Gewirthian argument appears to apply to any creature that cares about what happens to it. Pluhar asserts that:

The morally relevant similarity between the reflective agent and others to whom [basic] rights are attributed is *having purposes one wants to fulfill* [emphasis in original].

Stipulating that "all consciously conative beings are goal directed," she goes on:

So long as [such beings] have desires, even on a very basic level, the reflective agent will see that they are due the same moral consideration that she claims for herself.²⁴

But what has not been adequately addressed is the plausible possibility that creatures vary considerably in the quality and/or quantity of caring/desire with which they pursue their goals, projects, and commitments. If creatures of type A do not care nearly so much in intensity, complexity, or richness as B's about achieving their goals, then—drawing from the Gewirthian emphasis on desire to fulfill purpose—why should A's have the same rights as B's? In the extreme case, perhaps some persons have no purposes they want to fulfill (e.g., extreme apathy). It seems to follow that the Gewirthian argument does not attribute to such individuals any basic rights at all.

The argument becomes stronger when one considers animals that Pluhar excludes from the domain of full moral worth. Although she denies it, I think reptiles, amphibians, and fish deserve to be treated as conscious purposive agents. They meet Rollin's five criteria of conscious awareness:

Neurophysiological evidence—the presence of a nervous system in an animal—certainly suggest that these structures perform a function similar to that in humans. Second, biochemical evidence...The presence in an animal of a biochemical mechanism that is similar to a mechanism in man [sic] that regulates some conscious state is evidence for something like that state in the animal. Third, behavioral evidence—when an animal yelps or thrashes or shows avoidance behavior in the presence of a stimulus known to be harmful to the animal or unpleasant to men—that is evidence for awareness in the animal. Fourth, the presence of sense organs...suggests that the animal enjoys some kind of consciousness. Finally, we may cite all of the above in the context of evolutionary theory.²⁵

And a recent article on fish explains that:

The interests of fish...are basic survival interests, shared by many other animals. This ultimate survival interest is complemented by many others, such as acquiring food, frequenting habitats to which they are adapted, communicating with other

fish, and avoiding danger or harm to themselves through behavioral and physiological processes...fish are sensitive to pain, have memory and are capable of learning, and are conscious, or aware of, their existence. These interests are no different from those of other creatures, such as...amphibians, reptiles, birds, mammals, and humans.²⁶

In light of the empirical and philosophical evidence, Pluhar's statement that "Fish, amphibians, and reptiles lack limbic systems, after all, and their behavior is not obviously emotional" looks pretty weak in support of her exclusion of such critters from the list of conscious purposive agents (while including chickens!).

Not only are humans as morally significant as mice and chickens, frogs and catfish must be added to the egalitarian moral community, too. Something has gone wrong, and that something has to do with the vast differences in the functional capacities and virtues of various species. Let's face it, humans have attributes that most nonhumans lack, things like self-awareness, language use, a sophisticated array of reasoning procedures—narrative, scientific, and logical—with an extremely wide field of application and influence. Humans can have goals and commitments like bringing about world peace, ending hunger, writing a muckraking novel, saving an ecosystem from suburbanization; in short, our moral, religious, aesthetic, and reasoning capabilities suggest an inner life qualitatively different from that of many, if not most, nonhumans. And I submit that our unique power and breadth of evaluative and cognitive skills fundamentally affects our state of consciousness such that the way in which we 'care'—in the Gewirthian sense—is radically different from the ways in which a toad cares or a dog cares about fulfilling its purposes. On the other hand, a chimpanzee would be much closer to humans in its mental life and so would belong somewhere between dogs and *Homo sapiens*.

I do not deny the dog a deep and intense caring, and certainly a perfectionist can grant strong rights to the dog based on that intensity. But when it comes to saving the dog or a human, *ceteris paribus*, like Regan and Pluhar, the perfectionist chooses the latter. This is not a callous denial of the dog's ability to suffer and feel; it is an emotionally painful decision forced by exigencies and guided by a recognition of relevant differences between a dog's inner life and a human's.

V. Pluhar's Concealed Perfectionism

Given (a) the failure of the Gewirthian argument to take into account types of caring about purposes and the variations of moral significance suggested by these types (variations rendered more obvious by the inclusion of reptiles, amphibians, and fish in the moral community of goal-seeking beings), (b) the strong differences in human/nonhuman moral worth implied by Pluhar's self-defense might-makes-right solution to 'lifeboat' dilemmas, and the relative frequency of occurrence of such 'lifeboat' dilemmas, (c) the further moral divisions apparent from Pluhar's attribution of certain crucial positive rights to humans while denying them to nondomesticated prey species, and (d) her awkward admission that full moral status does not grant full moral rights and might in fact give to some creatures significantly fewer rights than others—granted these points, it appears Pluhar's theory itself is best described as perfectionistic rather than egalitarian.

Indeed, she even supplies the rudiments of a perfectionist framework when she says that, offered a choice, one should eat a clam instead of a fish, a fish instead of a chicken.²⁷ Of course her egalitarian ethic denies that killing and eating a human is worse than the same treatment for a chicken, for both are maximally morally significant. Pluhar

might try to claim eating the human is worse due to the pain caused to friends and relatives, but then she comes dangerously close to sanctioning a sort of speciesism based on emotional bonds, although she invests a great deal of energy challenging the validity of speciesism of any sort.²⁸

In the face of the extreme counter-intuitiveness of Pluhar's egalitarian project, and the collapse of that project into a concealed form of perfectionism, one is led to ponder her motives: Why does she cling so adamantly to egalitarianism? The purpose, it seems, is to protect marginal cases and animals from big bad perfectionists (and others) who, she claims, offer no moral injunction against exploiting such beings. Pluhar insists that perfectionism entails some abhorrent consequences:

There are...deeply ingrained "intuitions" that clash with perfectionism and cohere with the rights view. Do we not...have the "gut reaction" that young children...are fully morally significant, and should not be sacrificed for our benefit? Granted, the folks I have termed "normalists," along with their neo-Nazi cousins, do not share this conviction...Are we not revolted by the notion of imprisoning and experimenting upon such humans, no matter how many moral agents may benefit from such machinations? We are still less inclined to accept the exploitation of less intelligent humans for purposes of food, sport, or raiment.²⁹

The practices Pluhar describes are indeed monstrous, but I am at a loss as to why it is inconsistent for a perfectionist to morally condemn the exploitation/killing of marginal cases or animals. Positing a continuum of levels of moral standing spanning the animal kingdom does not rule out the possibility that strong rights to life and freedom, for example, emerge early in the progression, rights that cannot be overridden by human desires for "food, sport, or raiment" (though they might be overridden in 'lifeboat' cases).

Such a perfectionist account perhaps differs little in many normative ways from Pluhar's account, and yet, crucially, it is not so rigid as a proclamation of across-the-board equality handed down from the pulpit of (Gewirthian) abstract rationality. The world is a complex place, multifaceted and protean in its generation of moral problems, conflicts, and tangled scenarios. A moral theory must be flexible and adaptive to meet this challenge. One that is too rigid will often stifle rather than enrich the moral decision-making process and in a draconian fashion frustrate intuition, common sense, and good reasoning. I applaud Pluhar's effort to protect animals and marginal cases from pain and suffering, but the best of efforts can be ill-represented in the attempt to express them philosophically; such is the case when a facade of egalitarianism jars our better sentiments, while down below hides the basis for gross mistreatment of animals via appeal to a Hobbesian free-for-all.

Notes

¹ I say "most marginal humans" because Pluhar indicates that anencephalic children ("flesh and blood automata") and preborns before the stage of sentience have little or no moral significance. Presumably, other marginal cases might suffer a similar classification, such as those individuals in a persistent vegetative state. *Beyond Prejudice: The Moral Significance of Human and Nonhuman Animals*, Duke, 1995, p.252-4.

² *Beyond Prejudice*, p.232.

³ Tom Regan, *The Case for Animal Rights*, Berkeley, 1983, p.324.

⁴ Rem Edwards, "Tom Regan's Seafaring Dog and (Un)Equal Inherent Worth," *Between the Species*, vol. 9, no. 4, 1993, p.232.

⁵ *Ibid.*, p.234-5. Edwards notes that Regan's solution to the lifeboat problem leads to inconsistencies because: if the world is a lifeboat, and the worse-off principle favors a human's right to life over an animal's, then animals can be killed (their right to life overridden) to save a human, allowing animal experimentation, organ-harvesting and so forth, which Regan specifically rejects as morally acceptable.

⁶ *Beyond Prejudice*, p.282.

⁷ "Tom Regan's Seafaring Dog and (Un)Equal Inherent Worth," p.235.

⁸ Garret Hardin, "Lifeboat Ethics," *Environmental Ethics*, Louis Pojman (ed.), Jones & Bartlett, Boston, 1994, p.283.

⁹ *Beyond Prejudice*, p.273, Ch. 4.

¹⁰ *Beyond Prejudice*, p.295.

¹¹ *Beyond Prejudice*, p.295.

¹² The analogy to organ harvesting is even stronger if the husband must eat the dog to gain enough nutrition to live.

¹³ The full force of the argument is brought out in the scenario where the wife's husband and several children, on the lifeboat with the dog, are all weak and starving, and will die "if nothing is done." But if the dog is killed and its share given to the family members (perhaps, too, the dog must be eaten) all family members will live. Clearly, it is best here if the dog dies. If the might-makes-right qualifier comes into play, then it is equally morally acceptable that the dog kill the woman (and hence the whole family).

¹⁴ See index in *Beyond Prejudice* under "apes." Pluhar does an extraordinary job providing many references.

¹⁵ *Beyond Prejudice*, p.297.

¹⁶ *Beyond Prejudice*, p.295.

¹⁷ *Beyond Prejudice*, p.295.

¹⁸ *Beyond Prejudice*, p.241.

¹⁹ *Beyond Prejudice*, p.243. Pluhar's use of the term "prospective purposive agent" is restrictive. As Pluhar defines it, it means simply someone with "purposes she wants to fulfill." So, the statement "All prospective purposive agents have rights to freedom and well-being" does not mean potential or soon-to-be agents have such rights.

²⁰ Pluhar prefers the term "being" to Gewirth's "agent." She speaks of "sentient conative beings," yet she often uses Gewirth's phrase "prospective purposive agents" (keeping it within quotation marks). Since the terms are used synonymously to refer to all creatures within the category of maximal moral significance, I stick close to the Gewirthian usage for simplicity.

²¹ For example, on p.251.

²² *Beyond Prejudice*, p.300.

²³ Pluhar thinks protecting the prey would result in an “ecological nightmare,” due to disruption of complex patterns of ecological interdependence. However, though providing references, she does not spell out how protecting prey would bring about this disaster (p.277). She then goes on to say that ungulate contraception “has been developed to a field-tested, noninvasive, effective, reversible form, with no observable adverse side effects.” So, one might ask, Why not relocate predators and control the deer population, for example, with contraceptives?

²⁴ *Beyond Prejudice*, p.248, 251.

²⁵ Bernard Rollin, *Animal Rights & Human Morality*, Prometheus, New York, 1992 (revised edition), p.77.

²⁶ A. Dionys de Leeuw, “Contemplating the Interests of Fish,” *Environmental Ethics*, vol. 18 (4), 1996, p.325.

²⁷ *Beyond Prejudice*, p.259.

²⁸ *Beyond Prejudice*, Ch. 3.

²⁹ *Beyond Prejudice*, p.268.