
Response: Feminist Positions on Vegetarianism: Arguments For and Against and Otherwise¹

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I

Nicholas Dixon has organized his paper, "A Utilitarian Argument for Vegetarianism," around the positions for and against vegetarianism that are derived from the two main currents of traditional ethical theories—utilitarianism and some variant of a rights-based approach. These currents are reflected in the work of Peter Singer and Tom Regan, respectively and are taken up by many others who write in the area. It is easy to understand why, in the context of his project of providing a utilitarian argument for vegetarianism, he chooses to limit the discussion to the two groups he addresses—utilitarianism and "human supremacism." Yet, it leaves out an entire area of recent deliberation and debate concerning the moral imperative of vegetarianism, that which is presented in contemporary ecofeminist thought. This is an area which deserves consideration, and not only for reasons of comprehensiveness, representation and inclusivity. It deserves consideration, also, and perhaps more importantly, because the issues addressed and points made by feminist writers on the topic speak directly to the need to combine "private decision with political action."²

I wish to focus instead on a third set of arguments that can provide—on some variants—the basis for

support for vegetarianism as well as a critical perspective on the positions taken by adherents of traditional ethical theories. Feminist approaches to the issue enable one to explore the relationship between theory and practice in our moral lives; indeed, they require one to address the question of connections between theory and practice. Ultimately as with all complex and sophisticated ethical theories, it has to be said that the introduction of feminist theorizing into the topic of vegetarianism does not lead to easy answers or simple remedies. It is both intellectually interesting and practically significant that just as one can find utilitarian arguments both for and against vegetarianism and rights-based arguments both for and against vegetarianism, there are a range of possible feminist positions on vegetarianism.

There are many reasons for addressing the topic of vegetarianism from a feminist, or rather from feminist perspectives.³ For one thing, a remarkable proportion of the increasing number of vegetarians are women.⁴ The emphasis in much feminist literature in ethics on the connection between life experience and values makes it worth examining the gender dimension of the so-called "vegetarian option."⁵ Further, a significant amount of recent writing on vegetarianism, in particular, has been produced by feminists, and there have been several very prominent and influential ecofeminist treatments of the issue which make the case for the necessity of the connection.⁶ Popular literature on animal rights and vegetarianism often seems to assume that there is a simple and easy case to be made for allying feminism with vegetarianism. Carol Adams puts it succinctly and forcefully when she implies that the "values and beliefs imbedded in the choice to eat animals are antithetical to feminism."⁷

Recent articles, nevertheless, have touched on the tensions within feminist circles about the issue of endorsing vegan, or even vegetarian conferences and events.⁸ Ecofeminists, specifically, contend that "in the case of meat eating, the personal *is* political"; yet, not all feminists accept this.⁹ Some feminists have even suggested that efforts to endorse vegetarianism are tantamount to cultural imperialism, and have the effect of undermining cultural traditions, in particular those of women of color.¹⁰ Thus, some feminists are likely to feel a reluctance to advocate vegetarianism for several reasons: in order to avoid the accusation of cultural imperialism, out of deference to cultural traditions, and not wanting to be perceived as



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infringing on women's rights to choose. Some feminist theorists reject the claims of animal rights theory on other theoretical grounds.

It might be helpful at this point to distinguish two disparate approaches to feminist ethics: one based on a "care ethic" and one based on an "anti-domination ethic."¹¹ The former is derived from, and developed out of the work of psychologist Carol Gilligan, whose book *In A Different Voice* is widely read and whose ideas have become extremely influential. The latter can be found in the work of feminist theorists such as Carol Adams, Karen Warren, Lori Gruen and Kathryn Paxton George, among others. Simply put, the care ethic emphasizes the importance of relationships and emotional connections between beings, and the anti-domination ethic advocates the "elimination of any and all factors that contribute to the continued and systematic domination or subordination of women."¹²

What I hope to show in this paper is that there is no neat and tidy relation between a particular approach to ethics and a stance on the moral imperative of vegetarianism. Some people think that a care ethic will support, or even require vegetarianism, others do not. And similarly, some people think that an anti-domination ethic will support, or even require vegetarianism, but others do not. The importance of an exploration of feminist perspectives on vegetarianism, I argue, does not reside in whether or not the approach will produce the "right answer." The importance lies instead in the approach taken to moral reasoning.

I will first discuss the claims made by Nell Noddings on behalf of a variant of care ethic and the positions she takes on human obligations towards animals derived from that ethic. She finds that the development of her ethical perspective does not dovetail with the approach taken by ecofeminists and others. Next, I will examine the positions advocated by adherents of variants of an anti-domination ethic. I will first address those theorists who argue for an integral connection between feminism and vegetarianism. I will then look at the analysis presented by Kathryn Paxton George, who takes an anti-domination approach but explicitly critiques the arguments of traditional ethical theory in favour of the "vegan ideal." It is clearly worth exploring why some feminists think vegetarianism is morally obligatory and others don't. It is also worth speculating on the implications of their approaches to moral reasoning, on their views about how moral thinking and feeling should proceed.

II

The care ethic is premised a "mode of thinking that is contextual and narrative rather than formal and abstract."¹³ Gilligan proposes that there is a different moral voice, one which tends to be articulated by women and tends to be empirically associated with women. This different moral voice is concerned with care and responsibility rather than with the focus of the dominant moral voice—rights and justice. The dominant moral voice, Gilligan claims, tends to be articulated by men and tends to be empirically associated with men. The ethic of care is thus contrasted with the ethic of rights and justice. In passing, I would like to point out that Gilligan sometimes writes as if one could simply combine utilitarianism and a deontological or rights-based approach to ethics in one position. Other authors, such as Josephine Donovan, who write about "animal rights theory" tend to use this term to cover both utilitarian and rights-based approaches. Needless to say, moral philosophers would resist this lumping and find it unhelpful at best.

Nell Noddings' book *Caring: A Feminine Approach to Ethics and Moral Education* contains a chapter titled "Caring for Animals, Plants, Things and Ideas." In a passage in that chapter, Noddings makes clear that her "caring" ethic extends only to humans and that her approach to ethics would not result in a judgmental stance against raising animals for food, eating meat or other human uses of animals (sealing, hunting, fishing etc.). She says positive things about keeping pets, in part because of the benefits to humans in so doing. Similarly, spiders, toads and snakes are welcome in the garden due to their usefulness. As for rats, she says she would not torture a rat, and she would hesitate to use poisons on one, but she "would shoot it cleanly if the opportunity arose."¹⁴ Thus, her approach is really quite anthropocentric, a fact which she does not try to deny. Noddings, ultimately, does not accept the interpretation of speciesism found in animal rights theory. She says instead that "[i]t is not "speciesism" to respond differently to different species if the very form of response is species specific."¹⁵

It is necessary to set her remarks in context in order to understand why she takes the position she does. For Noddings, primary moral obligation is located in the domain of human life. The ethical impulse or attitude, she says, is grounded in the caring relation. Caring, in turn, depends upon past experience and conscious

choice.¹⁶ Caring is anchored in recognition of relations. Furthermore, our obligation to summon the caring attitude is limited by the possibility of reciprocity.¹⁷ Obligation, then, can only arise on encounter.¹⁸ As responsiveness or perceived responsiveness increases in the potential to be cared-for being, then so does caring.

What this means for animals is that affection for animals varies greatly across persons. Some people will have had past experiences—encounters with certain animals and they will choose to undertake a commitment to that being. Such is the reason that Noddings herself perceives an obligation to her family pet, a cat who appears expectantly, stretches its neck, and vocalizes its need.¹⁹ In response, Noddings feels obligated to that particular animal, and perhaps to others of its kind she encounters. But the obligation does not extend any further, and certainly not to animals in general. For Noddings, one cannot be obligated to the entire class of animals.²⁰

Of course, other people will not have had past experiences or encounters with animals, nor will they choose to undertake any commitments to animals. In that case, they can hardly be said to have an obligation to any particular beings, on Noddings' account. They can be expected to avoid inflicting pain, since the one thing that Noddings' approach does require is that we must not inflict pain without justification. One must act to "prevent pain to consciousness, even the nonreflective consciousness of animals."²¹ According to Noddings, when the form of response of the being in question permits detection of pain, then we as caregivers are obligated to relieve it. Noddings' version of a care ethic, then, seems to provide a rationale for a minimal obligation to refrain from inflicting pain upon animals, although even that may be qualified.²² It does not give rise to further obligations to promote the welfare of animals, except insofar as particular caregivers choose to undertake a commitment to care for particular animals. It would not lead to judgmental stances prohibiting meat eating or the raising of animals for food or other reasons.

I do not want to dwell on a discussion of the "care ethic," since I think that most arguments for vegetarianism that rest upon a feminist ethic depend upon the anti-domination version of feminist ethics. In addition, as I have already mentioned, at least one proponent of the care ethic version of feminist ethics—namely Nell Noddings—explicitly rejects the idea that the care ethic entails support for vegetarianism.

Donovan actually tries to combine elements of both the care ethic and the anti-domination ethic approaches to feminist ethics. I will now go on to discuss the anti-domination versions of feminist ethics.

III

In an article entitled "Animal Rights and Feminist Theory," Josephine Donovan sets out the case for a feminist or feminine ethic to address the issue of the ethical treatment of animals. She claims that it is necessary to ground an ethic of concern for animals in what she calls "an emotional and spiritual conversation with nonhuman life-forms." She finds both utilitarianism and rights theories to be inadequate for this purpose, primarily due to the insistence of male moral philosophers that their positions are rooted in reason and not emotion.

Donovan quotes Peter Singer's preface to *Animal Liberation* in which he recounts an anecdote about a visit to the home of a woman who claimed to love animals but who ate meat. He writes: "...certainly she was keen to talk about animals. 'I do love animals', she began... and she was off. She paused while refreshments were served, took a ham sandwich, and then asked us what pets we had."²³ Donovan says that Singer's point "is not only to condemn the woman's hypocrisy in claiming to love animals while she was eating meat but also to dissociate himself from a sentimentalist approach to animal welfare."²⁴ Singer then goes on to profess that he and his wife were not particularly interested in, nor fond of animals, that they did not 'love' animals. He says that the "portrayal of those who protest against cruelty to animals as sentimental, emotional 'animal lovers' [has meant] excluding the entire issue... from serious political and moral discussion."²⁵ Donovan takes Singer to be assuming that associating the cause of animal rights "with 'womanish' sentiment is to trivialize it."²⁶

Donovan goes on to propose that women animal rights theorists—here she includes people like Mary Midgley (author of *Animals and Why They Matter*) and Constantia Salamone (an activist)—have been able to develop theories which acknowledge and emphasize the importance of emotional bonding with animals. Midgley, for example, talks about the social and emotional complexity of animals and says: "[w]hat makes our fellow beings entitled to basic consideration is surely not intellectual capacity but emotional

fellowship."²⁷ Salamone and other activists adopt a more explicitly feminist stance and condemn the "rationalist, masculinist bias of current animal rights theory," according to Donovan.²⁸

There are at least two ways in which emotion and emotional fellowship between humans and nonhuman animals could be relevant to the discussion of the ethical treatment of animals. One way in which it could be relevant is in providing reasons to treat animals with kinship. Thus, the biological affinity between humans and other animals could be seen to be at least partial justification for treating animals with equal concern and respect. If this is the intended interpretation, then the feminist position would simply echo the utilitarian position first formulated by Jeremy Bentham, who said "[t]he question is not, Can they *reason*? nor, Can they *talk*? but, Can they *suffer*?"²⁹

I would argue that this is not the import of feminist approaches presented by Donovan and others. Recognition of sentience or the capacity for suffering or enjoyment does not distinguish feminist approaches from utilitarian approaches. The issue that arises from the application of feminism to the question of the ethical treatment of animals is the role of emotion in the process of ethical reasoning. I take Donovan's critical point to be that a feminist ethic for the treatment of animals is one that emerges out of "women's relational culture of caring and attentive love."³⁰ She implies, then, that moral reasoning should attend to this culture and should incorporate a sensitivity to the affective dimension of our (meaning us humans) relations with animals as well as with each other.³¹

Carol Adams uses the phrase "traffic in animals" as a parallel to the term "traffic in women" to suggest the parallels. Lori Gruen emphasizes the social construction of the connection between women and animals, a connection created by patriarchy as a means of oppression. She says that "ecofeminists are committed to a reexamination and rejection of all forms of domination."³² She refers to the work of Karen Warren during the elaboration of her anti-domination ethical perspective. Karen Warren, in "The Power and Promise of Ecological Feminism," presents a critique of the role of conceptual frameworks in the logic of domination, a logic which has justified both the domination of nature and women by men.

Warren argues that there are several significant features of oppressive conceptual frameworks including value dualisms and logic of domination.³³ Value

dualisms are disjunctive pairs which are seen as oppositional and exclusive and which place higher status, prestige and value on one disjunct rather than another. Examples include: mind/body, reason/emotion, male/female. A logic of domination is a structure of argumentation which leads to a justification of subordination. The justification rests on the grounds of characteristics—for example, rationality—which allegedly the dominant (e.g., men) have and the subordinate (e.g., women and nonhuman animals) supposedly lack.³⁴

Warren argues that ecofeminism "involves an ethical shift *from* granting moral consideration to nonhumans *exclusively* on the grounds of some similarity they share with humans (e.g., rationality, interests, moral agency, sentience, right-holder status)."³⁵ Warren implies that the shift is toward an approach which provides a contextual account, one which has several significant features: it "makes a central place for values of care, love, friendship, trust and appropriate reciprocity" and it "involves a reconception of what it means to be human, and in what human ethical behavior consists."³⁶ As with Donovan, it seems as if elements from the care ethic and the anti-domination ethic are being merged and combined.

IV

There is yet another feminist perspective on vegetarianism and in particular, on the vegan ideal, which needs to be brought into the discussion, and that perspective can be found in the work of Kathryn Paxton George. George has taken a critical stance on the assumption that there is a simple connection between a feminist approach rooted in concern for social justice and the universalist prescription in favor of ethical veganism based on traditional moral theory. George has asked the question "Should feminists be vegetarians?" and her answer seems to be "Not necessarily." She argues that the vegan ideal is actually discriminatory because the arguments for it "presuppose a 'male physiological norm' that gives a privileged position to adult, middle-class males living in industrialized countries."³⁷

George's concern is that people who are not adult, middle-class males living in industrialized countries cannot be expected to adopt vegetarian and vegan diets for a whole series of reasons—having to do with ecology, economy and nutrition. These people would thus have to be excused from the duty to attain the virtue

associated with ethical lifestyles. As George puts it: “[i]f women, and infants, and children, and the elderly, and those who live almost everywhere else besides western societies are *routinely* excused for doing what would normally be considered wrong, in practice this relegates them to a *moral underclass* of beings who, because of their natures or cultures, are not capable of being fully moral.”³⁸ This leads her to suggest that the moral tradition which has this implication is one which is designed to serve only the most privileged class of humans.

The point that vegetarianism can be more easily realized by persons in industrialized countries has been made elsewhere. As Beardsworth and Keil put it: “[t]he conditions in which contemporary voluntary vegetarianism can flourish are located not only in a cultural climate of nutritional pluralism. They also rest on the economic foundations of an affluent, consumer-oriented economy which can draw upon a vast array of food items, freed by the channels of international trade from the narrow limits of locality, climate and season.”³⁹ George adds to this point a concern with the gender dimensions of the vegan ideal.

The claim that George makes, based on these points, is that the traditional arguments for animal rights and animal welfare or liberation are tainted by bias. I do not want to enter into the debate concerning the accuracy of the nutritional literature on which George bases her critique—some of that debate can be found in Gary Varner’s article “In Defence of the Vegan Ideal.”⁴⁰ Suffice it to say that George thinks her analysis is well grounded in contemporary scientific studies and analysis, but her critics disagree.

I do want to suggest that George’s critique has interesting implications for a utilitarian defense of vegetarianism. The critique would have some relevance for a reassessment of rights-based theories, but it is less clear what the implications would be. Certainly, consequentialist utilitarianism has to take seriously the potential consequences of advocacy of universal vegetarianism and veganism. If there is sufficient substance to the claim that the vegan ideal is discriminatory due to the ecological, economic and nutritional factors outlined by George, then that has to be taken into account. Utilitarians need to consider the potential effects of their prescriptions on everyone concerned. It does seem somewhat arbitrary to limit the evaluation to only Western, industrialized societies. There has been an ongoing critique of environmental ethics generally, for its shortsightedness and

ethnocentrism. It seems that George’s work, if nothing else, has raised the concern that animal rights theory might have to address a similar critique.

V

Karen Warren’s and Lori Gruen’s ecofeminist perspectives on ethics would seem to lead to a position on the treatment of animals that converges with Carol Adam’s position derived from feminist critical theory and feminist theology. They would all recommend vegetarianism as a feminist statement against patriarchal dominance. Josephine Donovan details the kinds of actions and policies concerning the treatment of animals that she thinks are entailed by the feminist rejection of either/or thinking, or epistemological dualism. She says feminists should reject the following: carnivorism, the killing of animals for clothing, hunting, the trapping of wildlife for fur, factory farming, use of lab animals for testing of beauty and cleaning products, rodeos, and circuses. Feminists must work to abolish the “animal-industrial complex,” in other words.⁴¹ Additionally, feminists must support efforts to replace medical experiments by computer models and tissue culture and support the drastic redesigning of zoos. As she puts it, “[a]ll of these changes must be part of a feminist reconstruction of the world.”⁴²

From the perspective of moral philosophy and the question of the choice of ethical theory, it is significant that the list of recommended actions and policies provided by Peter Singer or Tom Regan or other adherents of either utilitarian or rights-based theories would not differ significantly from that presented by Donovan. Thus, for many proponents of the anti-domination ethic the prescriptive import of a feminist approach resembles that of traditional ethical theories, but the crucial difference lies in how one argues for those recommended actions or policies.

Notes

¹ This paper was initially titled “Feminist Arguments for and against Vegetarianism: Response to Nicholas Dixon’s ‘A Utilitarian Argument for Vegetarianism’.” It was prepared for the Society for the Study of Ethics and Animals sessions held in Chicago, Illinois, on April 27, 1995. I have revised and expanded that original paper.

² Nicholas Dixon, in his conclusion, acknowledges that Frey’s admonitions to combine private decision with political

action are well taken. In a sense, I see my paper as beginning where his left off. I wanted to explore the implications of feminism for the specific issue and also for moral reasoning in general. I do wish to state, nonetheless, that his paper provides an exemplary illustration of the merits of traditional ethical theorizing. When it is very well done, as his paper certainly is, it is certainly still worth doing.

³ It has become increasingly clear that it is not really possible to speak of a feminist perspective, or *the* feminist approach. There are myriad potential variants, or versions, of feminism. Some of these can be grouped in broad clusters, such as "cultural" feminism or "socialist" feminism or "liberal" feminism, but these labels have limited usefulness. Even within these broad clusters, there is as much diversity as there is between and among them.

⁴ A Gallup Poll in Britain in 1995 found that the percentage of Britons who are self-defined vegetarians had doubled since 1984 to 4.5 per cent and that "[w]omen were almost twice as likely as men to be vegetarian." *The Economist*, August 19, 1995, 20. Beardsworth and Keil report that in the 1990 Gallup study, "the combined group of vegetarians plus red meat avoiders was 10.0 per cent, compared with... 4.0 per cent in 1984" (at 255-256). In that same study, 12.8 per cent of female respondents "claimed to eat meat rarely or not at all," whereas the figure for men was 7.1 per cent. Thus, the gender difference has been continuous. See "The Vegetarian Option: Varieties, Conversions, Motives and Careers," by Alan Beardsworth and Teresa Keil, *The Sociological Review*, 1992, 253-293 at 256. Age plays an important role, since young women are the most likely of all to be vegetarian. One in eight young women in Britain "professes vegetarianism." *The Economist*, August 19, 1995, 20.

⁵ This is the title of an article by Alan Beardsworth and Teresa Keil, *supra*. It does give the impression that vegetarianism is, in effect, a lifestyle choice. What I want to suggest in this paper is that for many ecofeminists, it is much more than a question of lifestyle choice.

⁶ Some recent examples include the following: Carol J. Adams, *The Sexual Politics of Meat: A Feminist-Vegetarian Critical Theory*, Continuum, 1990. Carol J. Adams and Josephine Donovan, editors, *Women and Animals: Feminist Theoretical Explorations*, Duke University Press, 1995. Greta Gaard, editor, *Ecofeminism: Women, Animals, Nature*, Temple University Press, 1993 (the papers by Lori Gruen and Carol J. Adams specifically). See also Carol J. Adams and Marjorie Procter-Smith, "Taking Life or 'Taking on Life'?", in Carol J. Adams, editor, *Ecofeminism and the Sacred*, Continuum, 1993. Michael Allen Fox has written about the influence of feminist thought on his defense of vegetarianism and critique of environmental ethics. See his "Environmental Ethics and the Ideology of Meat Eating," *Between the Species: A Journal of Ethics*, Volume 9, 1993.

⁷ Carol J. Adams, "The Feminist Traffic in Animals," at 196. In Gaard, ed., *Ecofeminism, Animals, Nature*.

⁸ Both Lori Gruen and Carol J. Adams discuss their frustrations when "proposals to make feminist events cruelty-free have been rejected. Both mention an incident involving the June 1990 convention of the National Women's Studies Association, in which "the Coordinating Council rejected the Ecofeminist Task Force recommendation that it "make a strong statement of feminist non-violence, and make NWSA a model of environmental and human behavior by adopting a policy that no animal products... be served at the 1991 conference, or at any further conferences." Lori Gruen, "Dismantling Oppression: An Analysis of the Connection Between Women and Animals," at 89-90. Carol J. Adams sets out to provide a philosophical exploration of the claim that "animal rights should be practically enacted through all-vegetarian conferences." Carol J. Adams, "The Feminist Traffic in Animals," at 196. Both papers are found in *Ecofeminism: Women, Animals, Nature*, edited by Greta Gaard, Temple University Press, 1993.

⁹ Carol J. Adams, *supra*, at 196.

¹⁰ Lori Gruen discusses this accusation and responses to it in "Dismantling Oppression: An Analysis of the Connection Between Women and Animals," *supra*, at 82.

¹¹ I mention these two, not because I wish to imply that they are the only ones possible, nor that they are even the most significant, but only that they are the approaches that one commonly finds in the literature on vegetarianism. There are, of course, many, many different versions of feminist ethics, including the increasing prominence of lesbian ethics. Thus far, most of the treatments of vegetarianism that I have come across have tended to affiliate with either an anti-domination ethic or a care ethic approach.

¹² Donovan, *supra*, at 356.

¹³ Donovan, *supra*, at 360.

¹⁴ Noddings, *supra*, at 157.

¹⁵ Noddings, *supra*, at 152.

¹⁶ Nell Noddings, *Caring: A Feminine Approach to Ethics and Moral Education*, at 157. University of California Press, 1984.

¹⁷ Noddings, *supra*, at 149.

¹⁸ Noddings, *supra*, at 152.

¹⁹ Noddings, *supra*, at 157.

²⁰ Noddings, *supra*, at 157. On page 154, she explains that part of her criticism of utilitarianism results from its treating animals as a vast group of interchangeable entities,

of sources of pleasure and pain. The individuals are not the focus, but rather the amounts of pleasure and pain. She is discussing the debates about the "replaceability argument."

²¹ Noddings, *supra*, at 154.

²² One might see echoes of utilitarianism in her discussion of pain, which borders on setting out something like a universalizing generalization, which she labors greatly to avoid elsewhere. She claims that her ethic of caring "strives consistently to capture our human intuitions and feelings," and that makes it preferable to utilitarian views of the sort provided by Singer. Needless to say, her claims about capturing intuitions would be disputed by many who may have different intuitions on these issues, utilitarians and ecofeminists and others. In other passages, she even suggests some kind of balancing or trading off when she talks about the need to seriously consider the impact on humans of abolishing farming and hunting and so on and implies that human needs could quite easily outweigh the interests of animals, such as they are. This too resembles some aspects of a utilitarian approach, particularly one that rests upon a presumption of human supremacism.

²³ Peter Singer, *Animal Liberation*, at ii. Second Edition. New York Review of Books/ Random House, 1990.

²⁴ Josephine Donovan, "Animal Rights and Feminist Theory." *Signs: A Journal of Women in Culture and Society*, Volume 15 (2), 1990, 350-375 at 350. Also reprinted in Adams and Donovan, eds., *Women and Animals*.

²⁵ Singer, *supra*, at ii.

²⁶ Donovan, *supra*, at 351.

²⁷ Quoted in Donovan, *supra*, at 351. See Mary Midgley, *Animals and Why They Matter: A Journey Around the Species Barrier*. Penguin Books, 1983.

²⁸ Donovan, *supra*, at 352.

²⁹ Quoted in Donovan, at 356. From Jeremy Bentham, *Introduction to the Principles of Morals and Legislation*, 1789.

³⁰ Donovan, *supra*, at 374.

³¹ Of course, as I have already elaborated on in the discussion on Noddings above, simply taking an approach based on "caring" does not mean that one will automatically be driven to argue for vegetarianism. It is an interesting question, then, how to account for the differences between approaches which are based on care at some level. It is beyond the scope of this paper, however, to address the larger questions of choice of moral theory, levels of moral thinking, processes of moral reasoning and the complex dynamics of moral psychology and epistemology.

³² Lori Gruen, "Dismantling Oppression: An Analysis of the Connection Between Women and Animals," at 80.

³³ Karen J. Warren, "The Power and Promise of Ecological Feminism," at 435. In Armstrong and Botzler, editors, *Environmental Ethics: Divergence and Convergence*. McGraw-Hill, 1993.

³⁴ Warren, *supra*, at 436.

³⁵ Warren, *supra*, at 442.

³⁶ Warren, *supra*, at 443.

³⁷ Kathryn Paxton George, "Discrimination and Bias in the Vegan Ideal," at 19. *Journal of Agricultural and Environmental Ethics*, Volume 7(1), 1994.

³⁸ George, *supra*, at 23.

³⁹ Beardsworth and Keil, *supra*, at 289-290.

⁴⁰ Gary E. Varner. "In Defence of the Vegan Ideal: Rhetoric and Bias in the Nutrition Literature." *Journal of Agricultural and Environmental Ethics*, Volume 7(1), 1994. See also Johanna Dwyer and Franklin M. Loew. "Nutritional Risks of Vegan Diets to Women and Children: Are They Preventable?" in the same issue.

⁴¹ Barbara Noske uses this term in *Humans and Other Animals*, Pluto Press, 1989, at 24.

⁴² Donovan, *supra*, at 375.

