

Ethics

Discussion

Reply to David Graham and Nathan Nobis, "Putting Humans First?" (Fall 2006)

Putting Humans First? YES!

John Altick

The world is constantly being altered by the conglomeration of living entities interacting with each other and with their environments. This complicated matrix of interactions produces shifts in the arrangement of matter spread about the planet in a myriad of ways. Trees fall, mountains shift, the ground shakes; these changes in the arrangement of the world's various material expressions extend to its living, active participants in the animal kingdom. Lions kill gazelles, bears kill fish, sharks kill seals; none of these alterations in the relationships of beings to one another and their environments invokes conceptions of moral assessment. The storm is not immoral for knocking down the tree, nor is the earth's interior for shaking the surface. Similarly blameless are the lion, the bear, and the shark. Likewise, we don't speak of the trees' rights being violated, nor the mountains', nor the gazelles', fish's or seals'.

While animal rights activists undoubtedly shake their heads in frustration at the frequency with which 'anti'-animal rights scholars like Tibor Machan continue to present stories like these, he continues to do so, as do I, because their relevance is in fact significant, and not mere rhetorical sport. Several elements of the above assessment of the earth's dynamic nature are relevant.

First, the most basic point is precisely the earth's dynamic nature. Various identifiable 'things' constantly come into and out of being. Particular types of things are said to 'die' when they cease to be in

their particular natures. The gazelle dies when the lion ‘kills’ it while the rock simply ceases to be when it is disintegrated or blown up. This leads to another observation: That in this myriad of interactions that alter the identifiable nature of particular things, some things alter, or even kill, other things in the occurrences of their interactions. The lion kills the gazelle to feed; he might even kill the older male lion that becomes too weak to dominate his pride. On a more basic level, smaller animals might be killed incidentally as when ants are crushed under the feet of larger species without even the recognition of the occurrence by the latter.

The idea of assessing these occurrences and interactions presents several possibilities. The idea of assessing these interactions by how they *ought* to occur is, in these circumstances, only relevant insofar as the actors act in the best ways to achieve their objectives, as opposed to morally assessing their objectives, which implies the potential for moral culpability. In other words, it might make sense to say that the lion *should* have chosen a different gazelle that was slower if he didn’t catch his intended target, or that the younger lion should have waited to attack the old male if he failed to oust him from leadership. There are two relevant aspects to this consideration. First, the very assessing of the lion’s behavior against any standard at all invokes consciousness, more specifically, abstraction. It takes the abstraction of recognizing the lion’s intended objective, and the assessment of how he might have gone about this best. In other words, it takes conscious (human) intervention to even make *this* form of judgment. Put simply, a human couldn’t stroll up to the young male lion after his failed attack and reason with him. Also, this type of assessing is very different from moral assessing, of which the lion is incapable. The above assessing is *not* of the type offering condemnation or praise by some moral standard. This ability stems from what Ayn Rand termed “volitional consciousness.”

Human beings’ interactions are fundamentally different from the nature of those beings already discussed. Human beings *do* abstract from immediacy to judge their interactions with the world in regards to both moral and other standards. Human beings interact through a variety of means, all the while implicitly acknowledging and utilizing their common tool of volitional consciousness. While human beings might oftentimes behave as the young lion did above, it is our distinct

nature as human beings that allows us to change the type of assessment of the conduct.

A brief reproduction of the above situation, substituting human beings for lions, can demonstrate this: a young man sneaks up and tries to kill the older leader of his group but fails and runs away. My assessment of the situation in this regard can become twofold. I can say, as I said about the lion, “from my point of view, you ought not to have performed that action, you had no chance at succeeding!” However, I can also say, “you *ought* not to have performed that action because it was *wrong*.” I can offer moral condemnation of the action because the actor is a morally culpable one who is capable of acting *wrongly*. He can violate another person’s rights, and similarly, have his own rights violated. He gets these ‘rights’ by his moral faculty, his consciousness, and hence, by his free will.

This last sentence is a loaded one and has much intellectual baggage associated with it. I will not try to clear away all of this baggage and will try to show that for our present purposes, not much agreement is needed on what morality precisely is, what consciousness precisely is, or what free will precisely is. The primary point is that all of these concepts presuppose our human participation in either finding their definitions or shaping their definitions. It is the very fact that humans can argue about morality’s nature, about the definition of consciousness and what it entails, or what precisely is meant by free will, agency, etc. that separates our interactions fundamentally from those of the lions, tigers, and bears.

We have rights because we recognize and experience our abilities to assess our actions, thoughts, and being through volitional consciousness. As Machan (2004, 5) puts it, “when a right is considered natural, the freedom involved in having this right is justified by reference to the kind of being one is, one’s nature as a certain kind of entity.” People have rights because of their nature as the kind of entity who has volitional consciousness and the consequences thereof. “Basic rights spell out the ‘moral space’ we require in our communities so as to live according to our nature as choosing, thinking, social animals” (10). Here Machan points to the nature of rights stemming from the manner in which man acts as man. Just as animals interact in certain ways, so do humans; the difference is that animals do not act freely through free will and volitional consciousness as humans do.

Rights are the recognition that man has the ability to live his life through his own power and that in order for men to live together they ought to do so through ideals consistent with this ability. Basically, man's style of interaction ought to match his nature of *interacting*.

While there is certainly more to be said in this regard, and I feel almost remiss in so briefly presenting such a vast subject, I move on in the interest of addressing David Graham's and Nathan Nobis' critique of Machan's book, *Putting Humans First: Why We are Nature's Favorite*. I say that I move on because Graham and Nobis do not direct their attacks against Machan's conception of rights per se; rather, they seem more interested in critiquing his application of his own conception, and of criticizing Machan more on the grounds of consistency rather than on his philosophical interpretation of natural rights as such.

The authors begin, however, by pointing out that perhaps 'rights' are not of vital significance in assessing the treatment of animals in the real world. "Talk of moral rights, then, can be a huge red herring, a distraction from whether an action or policy is morally permissible or not" (Graham and Nobis 2006, 87). They point out that there might be a myriad of other moral considerations that may dictate particular treatment of animals; "even if animals don't have moral rights, there might be other, non-rights-based reasons that would make it obligatory that we not eat, wear or experiment on them" (87). They point to Machan (2004, 21) himself who says clearly that "the issue of rights does not exhaust the field of morality." While they mean this merely as an introduction to attacking Machan's denial of animal rights, this discussion is *hugely* significant. By Machan's reasoning on rights theory, if animals do not have rights then how we treat them becomes a mere matter of moral behavior identifiable by customs, norms, rules, etc. in particular situations or in more or less universalizable application. This is because, by Machan's conception of rights, it is the very ability to apply *other moral considerations* that dictates natural rights in the first place. If animals do not have these natural rights, then their treatment is subject to moral consideration in more or less the same way that any number of other contingent moral subject matters are treated. This is not to say that animals might not bring certain particular considerations with them in analyzing their moral treatment, such as the fact that they can feel pain, or can become

companions, etc., but this makes them not inherently different from *anything* else to which human beings apply moral consideration. For instance, perhaps it is morally advisable that people be polite and cordial to strangers, but they do not violate people's natural rights when they are not. Perhaps gentlemen ought to open the door for ladies, but they do not violate the ladies' natural rights when they do not. Perhaps people ought to be kind and loving towards their cats, but they do not violate their cats' 'rights' when they are not. Natural rights are the basis upon which other contingent rights and moral considerations become relevant.

It is clear that animal rights in this way *do* matter immensely in analyzing their actual treatment in the real world. While there might be other moral reasons than rights to treat animals in particular ways, if they do not have moral rights, then there is not *absolute* reason; it becomes merely contingent and circumstantial, advisable, rather than compulsory. It is for this reason that the attacks leveled at Machan such as "Machan's focus on 'theory' might explain why much of his discussion is irrelevant to the concrete question of whether such treatment [actions that result in harms] of animals is right or wrong" is misguided (Graham and Nobis 2006, 87). This is similar to attacking Machan for not writing a book on "Why Not to Kill the Endangered Swamp Rats of Indonesia." This wasn't his purpose! And if they are more broadly criticizing the nature of theory as a valuable tool for assessing animal rights issues then this seems entirely contradictory to much of their own critique where they bring up rights themselves, and discuss several considerations of theoretical justifications for animal rights. Machan's discussion of animals not having rights is *incredibly* significant for the treatment of animals because it places animals in an entirely different category, one in which their appropriate treatment becomes one of degree, consideration, and contingency, not one of the natural rights that presuppose the very ability to make these moral considerations of treatment towards animals in the first place, not one of the natural rights that only humans possess. While in any number of circumstances particular treatments of animals might be deemed *morally* wrong, these particular treatments do not amount to natural rights violations.

Graham and Nobis direct the majority of their critique to the issues of animal rights, and point out that "Defenders of animal

rights, like defenders of human rights, believe in the rights to self-defense and rights to bodily protection . . . whether the aggressor is an animal or human” (88). They are referring in these remarks to Machan’s story about a boy whose arm was bitten off by a shark, which was then killed to retrieve the boy’s arm. So presumably they do not believe that animals have ‘rights’ to ‘bodily protection’ against other animals, and although it is unclear from this exact sentence, they later point more broadly to the idea that they are arguing for *negative* rights for animals, which they clarify in the following manner: “most philosophers arguing for animal rights are merely calling for the recognition of a negative right: the right to be left alone and not harmed” (88). Even this, however, is significant as it demonstrates a vastly different conception of rights from what Machan has in mind, which is consistent with the questioning of the significance of Machan’s discussion of animal rights in the first place. In this way, animal rights defenders are *not* arguing for rights in the same way that human rights defenders are, nor are their arguments in regards to the same rights! Regardless of Machan’s specification of a ‘right to life’ rather than the specification of a ‘right to self-defense or bodily protection,’ the significant point is that *if* the authors are specifying that an animal’s “rights” are contingent, and that they do not extend to the right to ‘bodily protection’ from other animals, then they are *fundamentally* different from humans’ natural rights. The authors would be implicitly agreeing that animals have rights *only* stemming from humans’ obligation to treat them in a particular way because of the nature of *humans*, *not* because of the nature of animals, which would mean that animals don’t have natural rights at all. By Machan’s standards, natural rights stem from the nature of the being in question, not from the nature of some other being who might or might not interact with the being in question. Therefore, if humans ought to treat animals in particular ways, these particular ways are not because of the ‘natural rights’ of animals. To call these ‘particular ways’ “rights” is a misnomer by Machan’s arguing, because he is focusing on natural rights, not contingent rights that become possible only after humans’ natural rights are acknowledged. If they are not suggesting this, and are indeed suggesting that animals have rights because of their nature, then they would somehow have to demonstrate how the dynamic world previously discussed would operate.

They would have to specify how the lions, and tigers, and bears are to get along in the world without violating one another's rights. I do not see them demonstrating this, however, which leaves them in apparent agreement with Machan that rights are linked to human beings. While we might seem to have this implicit understanding here, the authors poke at other, I shall argue, less significant strands of Machan's presentation of the case for '*putting humans first*.'

The explication of the nature of the dynamic world and how humans are different in their interactions from other existent things becomes relevant in regards to the remainder of Graham and Nobis' critique of Machan's position. They interpret Machan to be saying "that nobody is justified in preventing someone from intruding on any animal's 'sphere of jurisdiction.' This is rather cryptic," so they say, "and not what people typically seem to be saying when they claim that animals have no moral rights, and we will later see that Machan, surprisingly, affirms that animals have rights in this sense" (89). Again this demonstrates a gross caricature of Machan's description of natural rights. We will recall the discussion above, and our tale of the dynamic earth, in which it becomes clear that natural rights are tied to volitional consciousness, which enables people's moral nature. So, yes, Machan (2004, 19, 21, 118) has absolutely no problem admitting that there are *several* potential areas of moral consideration in regards to the treatment of animals, but this is *entirely* different from ascribing *natural* rights to animals because, as has been discussed, rights can only be tied in this way to *human beings*. It is recalled from the above discussion that Graham and Nobis seem to accept this implicitly, and at this point they simply want to change around Machan's idea of natural rights without *attacking* his position. Saying that Machan means one thing by rights is not the same as arguing that his conception of rights is invalid. Machan says that natural rights imply a distinct sphere of protection for human beings in which to conduct their lives; it is this sphere that *allows* them to make the moral considerations that animals *cannot* make, which is why animals are divorced from conceptions of moral assessment.

The remainder of Graham and Nobis' critique focuses largely on the problems that 'marginal' cases present to Machan's rights theory. The essence of their claim is straightforward; if Machan rests his claims to natural rights on humans having a 'moral sphere' stemming

from their volitional consciousness, then what about humans whose volitional consciousness is not working properly or adequately? They say that they “might agree that *only* humans have this capacity for discerning right and wrong, but only *some* humans, not *all*” (Graham and Nobis 2006, 90; italics in original). So what about infants, vegetables, and mentally retarded *individual* human beings? This is a slippery issue and one that very easily falls treacherously away from the point of Machan’s argument.

Before this issue is delved into, a basic point must be made. Human beings as a recognizable type of entity use volitional consciousness to interact with the world, while animals as a separate identifiable collection of types of entities do not use volitional consciousness to interact with the world. The primary point is not that individual humans might have varying degrees of functioning consciousness, but that animals *do not* use volitional consciousness to interact with the world. Because Machan argues for natural rights flowing from volitional consciousness, and because human beings as a species naturally use volitional consciousness to interact with the world, they have natural rights. Because animals as a collection of beings that are not human do not use volitional consciousness to interact with the world, they do not have natural rights.

Natural rights are not based upon each *individual* human’s consciousness or moral activity. Because the human being as a type of identifiable entity is distinguished at least in part by his consciousness, he has rights that stem directly from this. As Machan (2004, 16) puts it: “The argument for human rights rests primarily not on the particular level of intelligence or mental capacity of individual human agents but rather on their particular type of consciousness.” It is the identification that Graham and Nobis seem to accept, that ‘only humans have this ability,’ which makes them the type of entity that has rights. The very concept of natural rights entails their inviolability and universality, as has been discussed; we don’t earn them by being more able to utilize our consciousness. This relates to the arguments presented that natural rights are the only noncontingent rights; they are inviolable, which allows for all other moral considerations to take place. They are the stem from which other moral considerations grow. So it is completely irrelevant what individual human beings’ capacities for moral consideration might be. We categorize them as

'human rights' to signify that beings of this species naturally have volitional consciousness, which then means that they have rights. One doesn't walk up to a human being and give him a quiz to assess his 'consciousness ability' to determine if it is sufficient for him to indeed be considered a moral agent 'worthy' of natural rights. If he is recognized in whatever manner as a human being, as belonging to that category, then he has natural rights that flow from this.

I believe these arguments are what Machan wishes to stress when pointing out that "one cannot make general claims based on special cases; one cannot even know what constitutes a special case until one first knows what constitutes a normal and typical one" (16). Natural rights flow from the manner in which human beings interact with the world, through volitional consciousness. This is what Machan emphasizes in assessing the natural rights of human beings as a species. All other cases that seem far enough way from this natural manner in which human beings as a species interact with the world are deviations *from* the norm, but are recognized as such, namely, deviations from the way in which it is normal for human beings to interact with the world.

In order to supplement this argument, another important observation becomes clear by stepping back from the situation. Human beings do not have natural rights because we 'must' in some necessary way; we have natural rights because of the way in which we actually do interact with reality. In other words, the process of conceptualizing the idea of natural rights is not one of finding the concept through mathematical formulation or logical discovery; it is one of noting the nature of humans' acting in the world and, from this, assigning natural rights to protect and allow for this means of interacting to be used by individual human beings. We don't 'create' natural rights in the same way that we 'create' mathematical formulations; rather, we recognize natural rights as principles underlying human beings' manners of acting in the world. Machan addresses this point by reference to animals not having rights in the following manner: "That animals do not qualify as rational beings and, therefore, basic rights holders, is not something we know from a syllogistic proof but from reflecting on the evidence and putting forth an explanation that makes better sense than any other" (Machan 2007).

Graham and Nobis' problem in these regards is primarily an

extension of their misinterpretation of natural rights already discussed. They say, in reference to judging Ted Bundy by his particular abnormal traits rather than by the normal traits of human beings, that “[i]t seems we have to judge people’s moral status by their individual traits, not by what is normal for their species.” (Graham and Nobis 2006, 92). I could not agree more; we certainly must judge *moral activity* by individual acts, and individual traits, and individual circumstances, *but*, in order to do this in the first place, the being that is judged must *be a moral being*. He must be one who has the ability to utilize the moral space to act morally that stems from having natural rights. Namely, he must be the type of being who consciously interacts with the world, specifically, a human type of being. Graham and Nobis continue their misdirected critiques along similar lines: “It would seem, then, that whether we’re talking about medicine or morality, to learn how to deal with normal cases, we have to look at individual normal cases, and to learn how to deal with marginal cases, we have to look at individual marginal cases. In other words, we have to look at individuals” (93). Again, I agree with them as I’m sure would Machan. In reference to *rights*, however, this argument is irrelevant. In order to analyze how to treat individual cases, it is individual cases that must be examined. Machan’s point is not to analyze *what is moral or immoral*; his point is to distinguish human beings as a species *capable of moral action*, and it is from this that they derive their rights. It is this that distinguishes them from animals. No description of an individually marginal case, be it infant, or brain dead vegetable, negates the fact that human beings as a species interact with the world distinctly through conscious volition.

Graham and Nobis insist on dealing with contingent rights rather than natural rights. This confusion sidesteps the primary purpose of Machan’s argument. It seems that Graham and Nobis would have liked Machan to focus on contingent rights in specific contexts, as has been discussed, but this is simply not the aim of Machan’s current endeavor. Machan is not dealing with the ‘rights to drive a car’ that Graham and Nobis present as an example of ‘individual circumstances’ that influence the granting of ‘rights’ to individuals. Again, Machan is interested in the source of the possibility of these contingent rights; he is interested in what makes it possible to understand, comprehend, and abide by these contingent, specific rights; he is

interested in the underlying faculty of volitional consciousness that dictates natural rights for human beings. These natural rights ensure the individuals' responsibility for utilizing all other contingent rights like the 'right' to drive a car, and they ensure the individual's ability to be responsible for his moral activity.

This confusion in the discussion of the source of rights is most profound in the following summation of Machan's argument by Graham and Nobis: "In general, his principle seems to be this: to determine whether an individual has rights, we look not at the individual's capacities, but at what capacities are normal for members of the being's species" (96). Graham and Nobis are referencing contingent rights like the 'right' to drive a car, rights that certainly are referenced to individual circumstances like eyesight, loss of certain bodily abilities, etc. Machan is interested in the underlying source that makes these sorts of arguments for contingent rights possible in the first place; our natural rights allow for the consideration of contingent rights. Human beings can debate, modify, destroy, and construct the particular array of contingent rights that individuals have in society. While human beings do this, lions will continue to hunt gazelles with no consideration of the gazelles' potential 'rights,' and bears will continue to swipe fish from their watery homes with no thought to the life they are destroying.

The same contingent rights that Graham and Nobis so insistently present are only possible for volitionally conscious beings, which as far as we know right now are only human beings. The treatment of animals becomes just another contingent moral circumstance with specific nuances for rational human beings to discuss. It might very well be morally blameworthy to viciously torment a cat, but not because that cat has natural rights. It might also be morally blameworthy not to give up one's seat to an elderly patron on a bus, but again, not because one is violating the elderly person's natural rights. There are numerous moral influences that can affect standards and ideals, but it is the underlying natural rights that allow for the potential for moral conduct in the first place. As Machan (2007) says: "It is our dignity as basically choosing agents, who must take the initiative to act and whose actions can turn out to be right or wrong, that leads to our having rights." It would not be morally blameworthy for a cat to viciously torment another cat, nor would it be morally blameworthy

for a dog not to give up its seat on the bus to an elderly patron; but in both circumstances it very well might be blameworthy for a morally culpable human being with natural rights, which protect and ensure his ability to act with moral culpability in the first place.

In regards to Graham and Nobis' insistence on focusing on the individual rather than the species in regards to rights, it is useful to turn the table on them. What exactly is the source of 'rights' for Graham and Nobis? Do all 'animals' have rights? Do we have to look at the individual capabilities of each individual animal? At least on the surface it might seem that they run into the exact same problem that they accuse Machan of having, only they aren't even differentiating by species, they are including all animals. Now, leaving the discussion at this would of course be misleading, because the authors would presumably respond that they are certainly *not* arguing for rights based upon species. They are arguing for rights for *all* animals, including human beings. Presumably, as it is the only place they mention what their idea of animal rights might be, all animals ought to have the negative right to be "left-alone and not harmed" (Graham and Nobis 2006, 88). Against whom do 'all animals' have a right to be "left-alone and not harmed"? Is it in general? Or is it only from human beings that animals have the right to be left alone and not harmed? It seems clear that they do not mean it in regards to all animals as has been discussed at several points so it is presumably against only human beings. At this point a curious situation arises.

The particular nature of human beings seems to necessitate particularly relevant circumstances even under the view that all animals have the negative right to be left alone. In regards to human beings interacting with other human beings these rights are relevant; a human being is violating another human being's rights if he attacks him, whereas a lion is not violating his fellow lion's rights when he attacks him. So again, how exactly do we determine these rights? Do we do as Graham and Nobis suggest, and just consider the individual's capabilities in 'assigning' rights to them, or do we take into account the species in these regards? Even under their own presuppositions, it seems necessary to consider species in regards to the treatment of negative rights. If we do not, then we simply must assess each individual entity for . . . what exactly? Appropriate levels of intelligence? Abilities to feel pleasure and pain to whatever relevant

degrees? Graham and Nobis do not supply a relevant criterion to determine the rights on the individual level even if we desired to. They reference Peter Singer's utilitarian considerations and 'most' animal rights philosophers' interpretation of 'negative rights' without clarifying their own. How do we sort out why it is not morally blameworthy for a lion to attack another lion but it is for a human to attack another human? If the story of the dynamic earth is accepted and the identities of particular living entities cease to be constantly and naturally, how do we determine when 'rights' of certain of these entities dictate that their particular identities deserve some sort of particular treatment?

Just as Graham and Nobis suggest that Machan might be a "friend of animals in disguise" (101), I suggest that they are 'implicit acceptors of distinctly human natural rights.' They certainly argue for contingent 'rights' of animals to particular treatment by human beings, but these 'rights' are a very different breed than the natural rights that Machan ascribes to human beings. The rights that they ascribe to animals are not possessed by the animals in the same way that natural rights are possessed by human beings; rather, they are contingent rights to particular types of treatment by rights-possessing human beings. The confusion of Graham and Nobis' position in these regards is neatly summarized by their surprise at Machan's argument that he would suggest that it is morally wrong to be cruel to cats: "For if humans have a duty not to treat cats in a 'cruel' way (whatever behavior that includes), and if a moral agent is not only permitted, but obligated, to override the property rights of a human who treats a cat in this way to forcibly prevent the abuse, what does this cat have if not a right not to be treated cruelly?" (101). The answer: nothing! The cat has no right; it is the human agent who has natural rights that are not contingent or circumstantial, rights that protect his ability to make further contingent moral considerations like saving an abused cat regardless of the fact that it violates another human being's property rights. No matter how desperately Graham and Nobis want to twist Machan's description of natural rights to also contain solely contingent ones, such as specific standards of treatment, this is not Machan's mission. Machan admirably defends the idea that it is only human beings who have natural rights that protect their moral sphere of activity, and from this discourse and argumentation can flow

particular suggestions as to the specific treatments of animals.

Animals are not the possessors of rights as the very concept of rights is intricately tied to humans' volitional consciousness, which animals do not possess. Unlike human beings, any considerations of their appropriate moral treatment are contingent and only relevant to how rights-bearing human beings should treat them. This is significant because the door for animals to be used by human beings as pets, experimental subjects, food, or anything else, is firmly opened. Unlike human beings, no treatment of animals is morally wrong on account of natural rights violations. This is important because it is from these natural rights that all other contingent moral considerations flow. Therefore, it is only human beings that have this inherent protection of a particular sphere for action, a moral space, which allows them to interact with the world as human beings.

References

- Graham, David. 2004. A libertarian replies to Tibor Machan's "why animal rights don't exist." Online at: <<http://www.strike-the-root.com/4/graham/graham1.html>>.
- Graham, David and Nathan Nobis. 2006. Putting humans first? *The Journal of Ayn Rand Studies* 8 no. 1 (Fall): 85–104.
- Hadley, John. 2004. Using and abusing others: A reply to Machan. *Journal of Value Inquiry* 38, no. 3 (September): 411–14.
- Machan, Tibor R. 2002. Why human beings may use animals. *Journal of Value Inquiry* 36, no. 1 (March): 9–14.
- _____. 2004. *Putting Humans First: Why We Are Nature's Favorite*. Lanham, Maryland: Rowman and Littlefield.
- _____. 2007. Rights, liberation and interests: Is there a sound case for animal rights or liberation? In *New Essays in Applied Ethics: Animal Rights, Personhood, and the Ethics of Killing*, edited by Hon-Lam Li and Anthony Yeung. New York: Palgrave & Macmillan, 42–61.