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# Human Rights in an Ecological Era

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ABSTRACT: After presenting a brief history of the idea of a human right to an adequate environment as it has evolved in the United Nations documents, I assess this approach to our moral responsibility with regard to the environment. I argue that although this rights approach has some substantial weaknesses, these are outweighed by such clear advantages as its action-guiding nature and its political potency.

KEYWORDS: Ecological era, environmental rights, human rights, politics and the environment

## INTRODUCTION

In his 1989 anthology, *The Philosophy of Human Rights*, Morton Winston says,

In the late twentieth century new threats loom on the historical horizon – pollution and degradation of the environment, over-population, the depletion of natural resources ... In turning to face these new threats we must ask whether the theory of human rights can be adapted and revised to meet these new dangers without sacrificing the protection to individuals provided by traditional rights.<sup>1</sup>

Among the more 'ecologically' inspired value theories like bio-centricism, ecoholism, bio-egalitarianism, and some versions of eco-feminism, the notion of human rights, though not entirely abandoned, is seen as somewhat bothersome. Arne Naess is dismayed at the "mass of ecologically irresponsible proclamations of human rights". John Rodman sees rights as tied up with the "project of modernity – the total conquest of nature". Jim Cheney calls it "a market economy notion". Irvine and Ponton say, "We live in a limited world, and this means limited rights." And Garrett Hardin says, "Claiming rights is a major oratorical sport of our time: it is a marvellous substitute for reasoned argument." Many 'green' and ecologically informed political and ethical theorists do not even mention the notion of human rights in their analyses. The very concept is seen to be tied to the ethical theories of the age of Modernity – the age of

individualism, rationalism, domination, homocentricism, and androcentrism. But this worldview, and its moral theories, is precisely what is being challenged by environmental philosophers. Although I think it a bit foolish to simply prescribe, as some have, a 'paradigm shift' (as if this were merely a matter of willing it to be so), and I think it is irresponsible to spin out elegant utopian visions of humans' return to 'harmony' with Nature (like earlier aboriginal peoples) which are naive to the facts of current demographic and economic realities and thereby offer nothing remotely connected to a viable praxis; nonetheless, I do think it is important to examine popular value assumptions critically from an ecological perspective, because our deontology can only be as good as our axiology. And so it is important to examine the tradition of human rights, to determine the extent to which it is compatible with ecological ideology and to explore the role, if any, that human rights can and/or should play in our current era of increasing environmental awareness. I begin this exploration by examining the United Nations' articulation of human rights as they have evolved to include an 'environmental' aspect.

## **HUMAN RIGHTS DOCUMENTS**

At its inception in the 1948 United Nations Universal Declaration of Human Rights, the discourse on human rights avoided dealing with the relationship of humans to the environment. The focus was on the liberty and welfare rights fundamental to human dignity and well-being. However, among the rights asserted were several which, if fully exercised by all peoples, could have harmful environmental repercussions. Among these were the rights of everyone "to marry and to found a family", "to own property", "to work", "to rest and leisure including ... holidays", "to a standard of living adequate for the health and wellbeing of himself and of his family", and "to share in scientific advancement and its benefits". Article 19 specified that the sole conditions under which these rights could be limited was "for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society". 8 This seems to suggest that only the enhancement of human rights could limit human rights. It is certainly understandable, considering the gross maltreatment of people in the 1930s and 1940s, that the drafters of this document would insist that individual freedoms never again be sacrificed to any 'greater' good; that the worth and dignity of each individual human would be recognized and protected. Aldous Huxley was one of the few environmentally oriented critics; he worried about how 'liberty' could survive with a population which he estimated would reach 3.3 billions by the year 2000.9 (Wouldn't he be shocked by our 5.2 billions today?) Other than a few neo-spencerian or neo-malthusian concerns, the implications for the environment went largely unheeded.

By 1966, when the Declaration was updated in the International Covenants (one on Civil and Political Rights and the other on Economic, Social and Cultural Rights), the focus shifted to protecting the sovereignty and development of the new, previously colonial, nation states. Both covenants begin with an identical article on a people's right of self-determination, the second part of which begins, "All peoples may, for their own ends, freely dispose of their natural wealth and resources ..." And near the conclusion of both covenants there appears an identical article (47 and 25 respectively) which reads,

Nothing in the present covenant shall be interpreted as impairing the inherent right of all peoples to enjoy and utilize fully their natural wealth and resources.<sup>11</sup>

This 'inherent right' of a people to utilize resources 'fully' may make sense as a claim to protect against foreign exploitation. But this strong assertion of right leaves little room to argue for conservation, much less preservation. The Covenant on Economic, Social and Cultural Rights asserts a right to health (Article 12) which calls for steps "necessary for the improvement of all aspects of environmental and industrial hygiene" which could be used to regulate levels of sewage or chemical pollution in air and water. But by and large, this document is environmentally impotent. It ignores the claims of future generations, the interests of bordering 'neighbour' nations, and the global significance of some natural systems like rain forests. Part of the problem may have been the implicit economic assumptions which were driving the development ideology of that day, which tended to reduce all environmental factors, entities and systems to a type of capital, which, if not used to benefit current people, was somehow being wasted.

But things changed significantly in 1972 when the United Nations Conference on the Human Environment issued the Stockholm Declaration, the first principle of which is,

Man has the fundamental right to freedom, equality, and adequate conditions of life, in an environment of a quality that permits a life of dignity and well-being. 13

Suddenly humans were seen as having a 'fundamental' right to an environmental 'good' – a certain environmental quality – the insurance of which was placed upon governments who were responsible "to protect and improve the environment for both present and future generations". <sup>14</sup> Conserving Nature was no longer in opposition to human welfare; it was a claim future generations had against us. This 'responsibility' or 'stewardship' approach was given extra impetus by the somewhat frightening 1972 Club of Rome's report, *The Limits of Growth*, <sup>15</sup> and it was given moral justification by John Passmore's important 1974 book, *Man's Responsibility for Nature*. <sup>16</sup>

By 1982 when the United Nations Environmental Programme released its *World Charter for Nature*, the language of responsibility had completely replaced the language of rights. There is no mention whatsoever of rights in that

document; albeit the justification given for "respecting nature" is "for the benefit of present and future generations" <sup>17</sup>

However, by 1987 the language of rights returned in the Report of the World Commission on Environment and Development, *Our Common Future*, known as the Brundtland report. This much discussed report proposes some principles for international law, the first and most important of which is,

All human beings have the fundamental right to an environment adequate for their health and well-being.  $^{18}$ 

Although this may appear to establish some special status for 'the environment', it does not. The Commission clearly sees it as a 'good' exclusively for human use (albeit not necessarily their immediate use). The well-being of people "is the ultimate goal of all environmental and development policies" and the Commission calls for "decisive political action now to begin managing environmental resources to ensure both sustainable human progress and human survival". <sup>20</sup> The second principle makes this very clear:

States shall conserve and use the environment and natural resources for the benefit of present and future generations.<sup>21</sup>

And the third principle, which on the surface sounds very 'green', is still humancentred:

States shall maintain ecosystems and ecological processes essential for the functioning of the biosphere, shall preserve biological diversity and shall observe the principle of optimum sustainable yield in the use of living natural resources and ecosystems.<sup>22</sup>

Note this does not mean, for example, that this particular rainforest necessarily shall be maintained; as long as there are sufficient other forests to support the carbon dioxide-oxygen exchange and so maintain the functioning of the biosphere, then this one could be burned. Or if it is determined to be an 'essential' forest, then it could be logged to derive "optimal sustainable yield" – meaning, I suppose, the maximal amount of board footage harvested in, say, a 100 year period. And preserving biological diversity could presumably be satisfied by sending plant seeds to seed storage centres or the last remaining members of an animal species to a zoo where, through careful breeding, the germ line could be retained. Although this action would go against the recommendations of the 1982 World Charter, they are certainly compatible with Brundtland's prescriptions.

The Brundtland report is far superior to previous statements of rights regarding the environment, in that it is sensitive to the needs of future generations, to transboundary obligations, to global effects of local action, to the need for assessing environmental impact and monitoring, and to the necessity of international incentives, sanctions, and assistance in preserving local environments. Nonetheless, it does not really go beyond the view that the environment

is merely a resource which humans have a right to use for their benefit. Any human can claim, as a right of entitlement, the availability of a certain level of quality of that resource. So, in effect, an environmental aspect has simply been inserted into the familiar and time tested tradition of human rights.

#### PROBLEMS WITH THIS APPROACH

There are some major problems with this approach. First, there are some rather troublesome conceptual problems involved in this notion of a right to an 'adequate' environment. There is an immense vagueness in the notion of "an environment adequate for ... health and well being". Is New York City's environment adequate? I'm not sure that it is. And if not, does that entitle residents to initiate a grievance? If so, against whom? Must malicious intent be proved or can inadvertent acts of environmental degradation be considered instances of rights violations? Is such a right a welfare right (for example, an entitlement to safe water which may require treatment of naturally contaminated water) or a liberty (for example, your right is violated only if other responsible agents knowingly pollute your drinking water)? And then there are numerous problems establishing causation and liability as well as problems with enforcement and appropriate redress.

In determining what an adequate environment is, do we focus on the minimum to sustain human life or do we include environmental 'amenities' as well? How long must the resource be maintained at 'adequate' levels? Do we discount the future? Do future generations who do not currently exist have rights claims against us such that we can violate 'their' rights? Can communities have rights, for instance to continue a certain traditional lifestyle even though this may endanger others' right to an adequate environment?

And what about the many unresolved problems of casuistry, especially when there are inter-generational conflicts, conflicts between property and welfare rights, and conflicts between people to the use of common goods? Simply declaring a right to a certain environmental quality will not automatically protect the environment from abuse. Conflicts of rights and interests must be accounted for and some clear criteria for weighting the stringency of rights claims must be developed if this right is to be anything more than rhetoric. Claiming a right to an environmental quality may well suffer the fate that claiming a right to basic subsistence has suffered; inspirational language but little concrete policy.

These problems may not be insurmountable but they are formidable. And although I enjoy these philosophical debates over abstract rights, I think it might be helpful in clarifying some of these problems if we narrow our view of 'human rights' and see them not so much as moral rights or ideals of what a good society should honour, but rather as more mundane items of law. Or as Rex Martin says, a human right is a "claim as recognized in law and maintained by governmental

action".<sup>23</sup> At least then there would be some chance of working out international covenants which would establish the necessary guide-lines and procedures to recognize and enforce these rights. However, past experience should make us wary of relying exclusively upon international covenants and law as a means of protecting the environment from abuse; their environmental track record is not that good.

The second major problem with this approach to establishing humans' relationship to the environment is more substantial; does it go far enough in its valuing the environment, is it 'green' enough? Does it really do anything more than just protect 'natural resources' from immediate use? William Blackstone was worried about this humanistic approach a dozen years ago when he said,

... humans, if everything is reduced in some way or another to human interests, will find multiple rationalizations to ruin the very environment on which their lives and those of future generations depend.<sup>24</sup>

What has occurred in the last decade to answer this challenge is that ecologically minded humanists have substantially expanded the notion of human interests to include aesthetic, scientific, spiritual, recreational, communal, tribal, and familial interests. So now their interests in, and consequent 'right' to, an environment adequate for their well-being, requires significant environmental preservation. For example, from a human-centred view, Bryan Norton has argued for the preservation of non-human species and natural systems, <sup>25</sup> Janna Thompson for the preservation of wilderness, <sup>26</sup> and Eugene Hargrove for the preservation of natural beauty. <sup>27</sup> Andrew Brennan suggests that self-realization may "require a life involving certain relations with other natural things", <sup>28</sup> and Robin Attfield thinks there is a "symbolic significance of wild nature to our sanity and sense of perspective". <sup>29</sup> One can do a lot with this expanded human interest type of strategy.

But this does not necessarily mean that one needs to adopt a 'rights' perspective in order to argue for an environmentally sensitive humanism. In fact, rights language among environmental philosophers is rather out of vogue; there is not even an index entry under 'human rights' in most of the books published in this area in the past few years. But it is not merely that this type of moral theory is out of vogue. One could make the case that the rights perspective is so burdened with a history of the ever increasing demand for satisfaction of individual humans' desires and preferences, that it is not flexible enough to incorporate the type of systemic thinking over the long term which an ecologically informed era requires. If all decisions involving environmental treatment must be translated into the language of adjudication of rights claims between humans, then relatedness and compatibility could not be preserved. Senator Albert Gore wondered if the cause of Americans' failure to even recognize that there is a "crisis facing the global environment" might not be "because we have reduced our ability to recognize wrongs to those categories which are reserved to describe

transgressions against individuals rights". <sup>30</sup> Maybe, he suggests, we need a more relational or communitarian, albeit humanistic, moral theory which recognizes responsibilities without requiring a reduction to rights claims.

The rights approach is even more deficient when examined from the perspective of 'green politics' which calls for a radical change in political and economic structures; for decentralization, a substantial reduction in human population numbers, and a radical rejection of 'industrialism' and 'consumerism'; in a word, devolution.31 The rights oriented view, by emphasizing the enhancement of all human beings' personal, political and economic security in what is an increasingly populated, urban, and economically interconnected world, does seem to be linked to some notion of continued development. Although I think that the human rights approach is compatible with a 'limits of growth' model which contains a strong emphasis upon redistribution of wealth and thus is not necessarily wedded to any particular economic mode or ideology, it is true that it has frequently been bundled up with the ideology of capitalism (with its economic growth, free trade, and consumerism), and then sold as one solitary item by the international funding agencies. And so in practice, the human rights approach does seem to be tied to the ideology of 'growth and progress' and thus would impede the implementation of the Green policy of devolution.<sup>32</sup>

And furthermore, the rights approach becomes even less desirable when seen from the 'deeper' perspectives. Most of the advocates for human rights do (although it is not necessary that they do) affirm the single most important assumption which separates them from the 'deeper' theories; what Richard Sylvan aptly calls the Greater Value Assumption, which is,

... other things being equal, the value of humans is greater than other things.<sup>33</sup>

So even if this human rights approach were modified and made to serve the environmental cause in the way that Christopher Stone<sup>34</sup> and others have suggested, by extending rights and granting the status of right holder to nonhuman fauna, flora, or natural systems and objects (which is certainly not problematic from a legal perspective), presumably the casuistry would still favour humans in cases of genuine conflict between human and non-human claimants. But this would make the security of the environment contingent upon countervailing human claims and thus highly vulnerable.

And even more significantly, very deep theories, like Aldo Leopold's, which not only do not treat individuals as foci of value independent of their relationships, but actually derive the very the worth of individuals exclusively from their functional role within a larger biotic system, are incompatible with the rights perspective, which is inherently individualistic both in its designations and its value ascriptions. So the human rights approach could not endorse a completely holistic 'land ethic' in the most literal sense.<sup>35</sup>

So there are some very substantial drawbacks to this human rights approach to environmental protection.

### ADVANTAGES OF THE APPROACH

Although I think the project as ideally set out in the documents proclaiming human rights (that is, of recognizing the dignity and worth of each human being and of providing for the fulfilment of the basic needs of all humans) has moral merit on its own, independent of its relationship to environmentalism, it is also the case that this rights approach has some decided advantages to the cause of furthering environmental protection. There are two types of advantages. The first is that by stressing the frequent link between abuse of the environment and neglect or violation of the fundamental economic, social, or cultural rights of people, this approach can direct attention to the types of measures which are needed to remedy the environmental problems. It is, then, action guiding. If, as Richard Watson says, "environmental problems of today have social causes in the infrastructure of human economic and power relations", 36then solving the environmental problems will require solving these political and economic problems. This is to recognize that there is as much a social problem here as there is an environmental problem and that they can not be treated as if completely independent. It is interesting to note that *Time* magazine says in reporting on the harassment of ecological activists,

Persecution of activists appears to be worst in developing countries, where environmentalism has become entwined with the struggle to ensure basic rights for the underprivileged and disenfranchised.<sup>37</sup>

This linkage is further illustrated by pointing out that severe environmental damage frequently serves as an indicator of economic injustice, so the recognition of this 'right' to an adequate environment may reveal other rights abuses which call for remediation. This link was straightforwardly made by the Group of 100 in their Latin American Ecological Alliance Statement which said in part,

All too often the destruction of their (i.e.indigenous peoples) environment entails the violation of their human rights as they lose their habitat and their means of sustenance, their social systems and their religious practices.<sup>38</sup>

One could draw the conclusion from this that the appropriate action then is not to destroy their environment.

A second action guiding advantage which comes from this approach is that it can prevent solving environmental problems in ways that merely shift the resultant environment damage to other peoples (e.g., exporting toxic waste), or to future peoples (e.g., inadequate storage of nuclear waste), since such action will violate their rights to an adequate environment. And under the rights approach, distant people, 'downstream' as it were, who are currently suffering from the effects of others' actions may legitimately make claim to redress and compensation. This too is a valuable component of the rights approach since it provides the rationale for the type of redistribution from the industrialized

nations to the developing nations which has become necessary in order to combat the environmental problems which are caused be extreme poverty.

This brings up the third action guiding advantage of this approach. It has become widely accepted that extreme poverty has a devastating effect upon the environment. Economist David Pearce says,

For the group of thirty-six (the poorest countries on earth) their very poverty is a major cause and effect of environmental problems. Poverty, which denies poor people the means to act in their own long-term interest, creates environmental stress ... leading to resource degradation and growing population pressure.<sup>39</sup>

People struggling to survive understandably use whatever they need to stay alive. Ecological responsibility is a luxury which they can scarcely afford. Meeting their basic human needs, satisfying their welfare rights, creates the real possibility of respecting and protecting the environment. The human rights approach directs attention to the need for action now to eliminate this extreme poverty and thus to create the conditions under which a right to an adequate quality of the environment can be protected.

And fourthly, if women were granted equal rights to develop their potential, to acquire adequate education and real employment opportunities, then population growth rates would most likely go down and this would greatly enhance the effort to guarantee a right to an adequate quality of environment for all persons, especially in densely populated areas.

The second major type of advantage of this human rights approach is pragmatic in that politically it is familiar, potent, and efficacious. That it is familiar means that we know how to proceed with this model of conflict resolution: establish priority rules, specify defeasibility and mitigatory conditions, create arbitration procedures and mechanisms, and then provide for appeal, redress, and compensation. Even though there are immense complications in actual practice and in developing a casuistry, as I indicated earlier, nonetheless we know how to go about doing these tasks; we know the procedures and methodology. This is a familiar, even if at times frustrating, maze.

This is also a potent strategy in that 'rights' carry Dworkin's 'trump' value which serves to override utility maximization. Finding a way to establish environmental quality as a right strengthens the claim and puts it into the serious arena of adjudication. For instance Costa Rica, in order to preserve its rain forest, has created a political mechanism to override its tradition of 'squatting' rights by which private title could be established by the act of forest clearance. And, within the rights framework, even when a right is overridden by another more stringent right, it retains some residual power thus tending to place limits on the extent of environmental damage justifiable in the exercise of the overriding right.

This approach is also politically efficacious for several reasons. It evokes the conventions of international law and cooperation which will be necessary to solve such global environmental problems as ozone destruction, atmospheric

warming, and acid rain. It also only asks that sacrifices be made for the sake of other humans ,which though perhaps grounded in human prejudice, is nonetheless a bias which politically must be taken into account. Finally, this approach is grafted firmly on to the political ideology which currently dominates the international discussion; that of an open democratic society which respects human rights. As H.J. McCloskey says,

the only realistic, feasible avenue to ecological political reform is through the political institutions of an open society that respects human rights.  $^{41}$ 

Whether this ideology will survive through the next century is debatable, but at least it cannot be doubted that it is currently quite popular and that it has grown in prominence in the past few years not only in the official world of international affairs, but also in the public consciousness as is illustrated by the power which voluntary groups like Amnesty International can bring to bear in pressuring governments to take human rights seriously.

So there are a number of advantages in adapting this ideology of human rights so as to include the goal of protecting the environment.

#### ASSESSMENT

But the question still remains, can the human rights model endure in an ecological era? Expanding the set of rights to include the notion of a right to an environment adequate for the health and well-being of each human is one thing. But it is quite another thing to make it a stringent enough right with a broad enough meaning of well-being so as to actually carry some weight in the forum of conflicting claims. Could it be made strong enough to override rights to procreate, rights to own and use property in certain ways, economic 'freedom' rights, rights to higher levels of 'development', those beyond minimally adequate standards of living? Could public support for this right reach the intensity required to pressure governments into adopting policies which enforce this right? Perhaps the results of the Earth Summit will inspire people around the world to recognize this right to an adequate environment for all people now and in the future and thus to begin to change their lives and their governmental policies accordingly.

Even though it is questionable whether there is sufficient moral or political will to accomplish much through this approach prior to the occurrence of substantial and perhaps irreparable environmental damage, species loss, and wilderness destruction, I do not think people sincerely concerned with preserving the environment ought to abandon it or vehemently denigrate it (at least in public) in their efforts to put forward deeper theories. This is because it carries substantial political weight. Because it uses the familiar international language of human rights, it has a great advantage over other 'deeper' theories which use

a bio-centric, bio-egalitarian, or 'bio-self-realization' type of discourse. These new forms of describing and prescribing are not yet appreciated world-wide, and exclusive reliance upon them may lead to exclusion from the real political debate. Worse yet, exclusive use of 'deeper' discourse may cause hostility to the environmental cause because some from the Third World find these forms of discourse offensive, if not actually insulting. <sup>42</sup> In addition, the rights approach to the environment can create an alliance between the political activists who are primarily interested in promoting international and inter-generational justice and those primarily interested in promoting ecological consciousness and actions; this could defuse potential conflicts between these groups and give each more power.

So, because of the current ascendency in the international forum of the ideology of human rights, it seems to offer the best chance, on prudential grounds, of creating a viable praxis with regard to the environment. By grounding environmental responsibilities on human rights (including those of future humans) one can engage in the debate in the language used by decision makers in the international forum and thus have a chance to influence concrete policy. Principled rejection of this approach because it is not green enough or deep enough may well result in environmentalists being marginalized and categorized as beyond the pale and thus not to be taken seriously. When the post-industrial, decentralized, spiritually green, communitarian era arrives and does away with the need for international political and economic cooperation and treaties and enforcement procedures, the human rights approach may not be needed. However, until then, the prudent, potent, and practical approach is the human rights approach and even though this may be the tourist track up the mountain, at least it is heading toward the right destination and it has the decided advantage of enabling others to come along too; which, after all, is what creating a viable praxis is all about.

#### **NOTES**

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<sup>&</sup>lt;sup>1</sup> Winston, 1989, p. 39.

<sup>&</sup>lt;sup>2</sup> Naess, 1989, p. 30.

- <sup>3</sup> Rodman, 1977.
- <sup>4</sup> Cheney, 1987, p. 141.
- <sup>5</sup> Irvine and Ponton, 1988, p. 80.
- <sup>6</sup> Hardin, 1982, "Limited World, Limited Rights", p. 254.
- <sup>7</sup> These are Articles 16, 17, 23, 24, 25 and 27 respectively.
- <sup>8</sup> "Universal Declaration of Human Rights", in Winston, 1989, p. 262.
- <sup>9</sup> Aldous Huxley, "The Rights of Man and the Facts of the Human Situation", in UNESCO, 1973, p. 199..
- <sup>10</sup> "International Covenant on Economic, Social, and Cultural Rights", 1966, in Winston, 1989, pp. 280-1.
- <sup>11</sup> Ibid, p. 288.
- <sup>12</sup> Ibid, p. 284.
- <sup>13</sup> World Commission on Environment and Development, 1987, p. 330.
- <sup>14</sup> Ibid, p. 330.
- 15 Meadows et al., 1972.
- <sup>16</sup> Passmore, 1974.
- <sup>17</sup> United Nations Environment Programme, 1982, p. 4.
- <sup>18</sup> World Commission on Environment and Development, 1987, p. 348.
- 19 Ibid, p. xiv.
- <sup>20</sup> Ibid, p. 1.
- <sup>21</sup> Ibid, p. 348.
- <sup>22</sup> Ibid, p. 348.
- <sup>23</sup> Rex Martin, "Human Rights and Civil Rights", in Winston, 1989, p. 79.
- <sup>24</sup> Blackstone, 1980.
- <sup>25</sup> Norton, 1987.
- <sup>26</sup> Thompson, 1983.
- <sup>27</sup> See Hargrove, 1989, especially chapter 6.
- <sup>28</sup> Brennan, 1988, p. 164.
- <sup>29</sup> Attfield, 1983, p. 192.
- <sup>30</sup> Senator Gore's comments are recorded in *The Responsive Community*, Winter 1991-2, pp. 25-6.
- <sup>31</sup> For an overview, see Dobson, 1990, especially chapter 3.
- <sup>32</sup> See Irvine and Ponton, 1988, pp. 79-86.
- <sup>33</sup> Sylvan, 1985, p. 9.
- 34 Stone, 1975.
- 35 Leopold, 1949, "The Land Ethic".
- <sup>36</sup> Watson, 1990.
- <sup>37</sup> "Endangered Species", Time, April 27 1992, p. 49.
- <sup>38</sup> Group of 100, 1991, p. A5.
- <sup>39</sup> Pearce and Turner, 1990, p. 3.
- 40 Dryzek, 1987, p. 133.
- <sup>41</sup> McCloskey, 1983, p. 159.
- 42 Guha, 1989.

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