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ARTICLES

Virtues and Animals: A Minimally Decent Ethic for Practical Living in a Non-ideal World

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Abstract Traditional approaches to animal ethics commonly emerge from one of two influential ethical theories: Regan's deontology (The case for animal rights. University of California, Berkeley, 1983) and Singer's preference utilitarianism (Animal liberation. Avon Books, New York, 1975). I argue that both of the theories are unsuccessful at providing adequate protection for *animals* because they are unable to satisfy the three conditions of a minimally decent theory of animal protection. While Singer's theory is overly permissive, Regan's theory is too restrictive. I argue that a minimally decent animal ethic requires a framework that allows for context-dependent considerations of our complex human–animal relationship in a non-ideal world. A plausible theory which exemplifies this new ethic is virtue ethics.

Keywords Philosophy · Animal ethics · Virtue ethics

Traditional approaches to animal ethics commonly emerge from one of two influential ethical theories: Tom Regan's deontology (1983) or Peter Singer's preference utilitarianism (1975).[1] While both theories are often rejected because they are committed to consequences that are undesirable for humans (Cohen 1986, 2001; Schmahmann and Polacheck 1995), I argue that both theories should be rejected because they are unsuccessful at providing adequate protection for

[1] See Singer's (1975) *Animal Liberation* and Regan's (1983) *The Case for Animal Rights*, which are considered to be the two most influential works on animal liberation.

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animals.[2] This is because both fail to satisfy at least one of the following three conditions which I argue a minimally decent theory of animal protection must embrace[3]:

1. It must condemn practices and industries which cause *unnecessary* animal suffering and death,
2. It must provide normative guidance for individual moral agents that forbids them from being a party to practices and industries that cause unnecessary suffering and death to animals, and
3. It must provide normative guidance that instructs moral agents to prevent moral catastrophes by at least minimizing or reducing the pain, suffering, and death of nonhuman animals if elimination of pain, suffering, and death is not feasible.

The permissive nature of Singer's preference utilitarianism prevents his theory from satisfying the first two conditions because: (1) his theory is unable to condemn certain industries and practices that cause unnecessary suffering to animals, and (2) his account is unable to demand that individuals refuse to be a party to certain industries or practices that generate a significant amount of unnecessary animal suffering. On the other hand, the restrictiveness of Regan's theory is at odds with the third condition: his account permits moral catastrophes which would generate unfathomable animal suffering and death.

The deficiencies of both utilitarianism and deontology stem from their assumption that there is one universal moral principle or rule that should govern all conceivable situations involving animals, regardless of the imperfect conditions of our world that impact our encounters with animals. Since rule moralities, like utilitarianism and deontology, cannot account for the complexity of human–animal interactions, I argue that a minimally decent animal liberation ethics requires a framework that allows for context-dependent considerations of our complex human–animal relationships in a non-ideal world. A plausible theory which exemplifies such a framework is virtue ethics.

A Minimal Decent Ethic for Animal Ethicists

Before proceeding, it is important to note that my target audience, individuals who desire to liberate and protect animals from human supremacy, are already committed to a concern for animals. The goal of this project, then, is not to convince utilitarians or deontologists to accept a theory of virtue ethics nor is the aim of this paper to convince moral agents to foster an interest in animal ethics if they are presently unconcerned. Rather, the intent of my project is to address those who *already* foster a concern for the welfare and lives of animals and to provide them with reasons to ground these concerns in a theory of virtue ethics, which I argue, can best account for their basic intuitions.

[2] For the sake of simplicity, I will often use the term "animal" to refer to nonhuman animals in this paper

[3] This idea of building an animal ethics around "common sense" principles is also found in Engel (2001), Sapontzis (1987), DeGrazia (1996) and Clark (1977)

Keeping in mind the goal of this project, there are four implicit assumptions which, I argue, give rise to and make sense of the three previously mentioned conditions of a minimally decent theory of animal protection. These assumptions are generally agreed upon by animal advocates and thus they will motivate the discussion which follows:

1. Causing unnecessary pain to animals is wrong.
2. Killing animals without good reason is wrong.
3. It is wrong to participate in activities that cause, or are made possible by, unnecessary animal suffering and death.
4. There will be times when it is necessary to kill an animal, or to cause it some amount of suffering, such as in order to prevent a greater amount of animal suffering and death.

I furthermore acknowledge that there is not widespread agreement about some of these claims in the ethical theory community at large. For instance, a utilitarian might question whether it is wrong to kill an animal if it is done painlessly. A utilitarian might also be skeptical of the claim that it is wrong to be a party to a practice that causes, or is made possible by, unnecessary animal suffering if one's presence itself does not cause suffering. I set aside these theoretical considerations and proceed with the assumption that these four claims should not be disregarded when evaluating possible ethical frameworks for an animal ethic because there is widespread agreement about these claims in the animal liberation community.

Claim #1: It is Wrong to Cause Animals to Suffer Unnecessarily

The first condition of a minimally decent theory of animal protection is derived from a basic principle of nonmaleficence that, at the very least, every minimally decent theory of animal ethics should accept: nonhuman animal suffering and pain is bad and *unnecessary* suffering ought not to be imposed on them (DeGrazia 2005; Clark 1977). At first glance, this principle of nonmaleficence may appear utilitarian in nature, yet as most animal ethicists would agree, a disdain for unnecessary suffering is not unique to utilitarianism: all minimally decent moral theories agree that beings who can suffer, including nonhuman animals, should not be subjected to unnecessary pain or suffering (see Clark 1977; DeGrazia 2005; Francione 1995; Engel 2000). As DeGrazia points out, this is one moral principle that is beyond serious doubt and one need not appeal to a specific moral theory in order to accept this principle. According to DeGrazia (1996, 259), "a system of thought that did not embrace nonmaleficence would hardly be recognizable as a *moral* system." Thus, at the very least, a decent animal ethic should endorse the claim that the *unnecessary* pain and suffering of animals ought to be prevented and an ethic that does not succeed in preventing unnecessary harms to nonhuman animals is a deficient foundation for an animal protection ethic.

A fundamental consideration within this discussion concerns what constitutes unnecessary or needless suffering. To say that X is necessary is to say that one must X in order to get Y, and there are no other ways to get Y without Xing. Yet to say that something is necessary does not settle the moral question: it might be

"necessary" to do A in order to achieve a certain outcome B, while at the same time, it might be morally impermissible to do A because it causes suffering in order to achieve B, when B itself is not itself necessary. For instance the suffering that infants would endure through infant torture is necessary if you want to study the effects of torture on infants, but that doesn't entail that the suffering of the infants is a *moral necessity*. [4]Likewise, the suffering that animals endure is indeed necessary for the majority of practices that involve the use of nonhuman animals, such as factory farming, the circus, zoos, hunting, pigeon shoots, rodeos, and so forth, yet it does not follow that the suffering of animals is of a *moral necessity*. In both cases of infant-torture and animal exploitation, the "necessary suffering" is only *causally necessary*: the infant suffering and animal suffering is necessary *given the nature of the activity*. However, the activity itself (such as torture, rodeos, and so forth) is not necessary in a moral sense; it is not necessary to bring about a significant good.[5]

For the remainder of this discussion, I will assume that the phrase *necessary suffering* refers to only suffering that is of a *moral* necessity. I will argue that in order for animal suffering to be characterized as morally necessary, it must meet two conditions:

1. The suffering caused to animals must be caused in the name of some end that is worth the cost, or proportional to, the suffering involved. As Clark (1977, 42–45) writes, "the human ends within which we calculate necessity must be of some weight."
2. The activity or practice which is responsible for causing animal suffering must itself be necessary for achieving some greater good. That is, there must be no other way to achieve the good end other than performing the activity or practice that causes the suffering.

To make this clear, consider the following two scenarios:

Scenario 1: In order to test the safety of a new makeup product, researchers subject a rabbit to excruciating pain through a toxicity test known as the Draize test. During this test, large quantities of the makeup product is forced into the eye of a rabbit, after which the rabbit might experience redness, swelling, discharge, ulceration, hemorrhaging, or even blindness in her tested eye.
Scenario 2: Farm animals are forced to suffer in intensive, confining, restrictive, and unsanitary conditions so that they can be mass produced for human consumption.

In the first scenario, the suffering caused to the rabbit is not in the name of a significant end that is worth the cost of the immense suffering that a rabbit endures

[4] Thank you to Nathan Nobis who enlightened this discussion and provided this example in personal conversation.

[5] Although one might point out that going to rodeos, circuses, and so forth brings about an important human good, such as pleasure or entertainment, the suffering of these animals still is not necessary because we could achieve similar pleasure or entertainment through some other activity, like going to a comedy show, watching a movie, and so forth. Since we have these other sources of entertainment, rodeos are not necessary for entertainment; it is just one, among many, opportunities for entertainment. Also note that there might be different conceptions of what counts as a significant good depending on one's cultural values. While I am sympathetic to this point, I will assume that there are at least a few obvious "goods" that are not significant, irrespective of one's culture (such as gustatory pleasure or entertainment).

in the Draize Eye test. Rather, the suffering is inflicted upon the rabbit for a trivial reason: vanity. This would be the sort of suffering that Engel classifies as suffering that "serves no greater, outweighing justifying good" (2000, 859). Undoubtedly, the suffering caused to the rabbit in this scenario is not of a moral necessity because it fails to pass the first requirement.

In the second scenario, the suffering of the farm animals is caused for a more substantial purpose: human nutrition. However, the suffering of the animals still is not of a moral necessity because there are non-animal alternatives readily available (especially in developed nations) that sufficiently meet the nutritional needs of humans, such as plant based foods. Thus, even though the end that is sought after is significantly important, the activity or practice that causes the suffering of animals is not necessary to achieve that end. Since we have other means of meeting the nutritional needs of humans, factory farming cannot be said to be necessary for providing nutrition to humans; it is just one, among many, possible ways of meeting the nutritional needs of humans.

Claim #2: It is Wrong to Kill Animals Unnecessarily

A minimally decent animal ethic, to some extent, is also concerned with preventing the unnecessary death of animals. While some self-proclaimed animal ethicists, such as Cigman (1980, 57), McMahan (2008, 66–76), Hare (1993, 226) and Singer (2011, 104) maintain that death is not a harm *for* animals since they do not have a desire to continue to live, the *killing* of animals still is not considered to be inconsequential. For instance, Singer points out that "many modes of killing used on animals do not inflict instantaneous death, so there is pain in the process of dying" (Singer 2011, 104). Furthermore, even a utilitarian finds it morally problematic to kill an animal painlessly without good reason because when animals die, there is usually a loss of good experiences in the world. Through death, animals are deprived of the pleasure of their existence and since a utilitarian finds a world in which beings are deprived of pleasurable experiences to be morally undesirable, moral agents ought not kill animals without good reason (Singer 2011, 120).

But more importantly, as Singer writes, to effectively liberate animals, we must "bring nonhuman animals within our sphere of moral concern and cease to treat their lives as expendable for whatever trivial purposes we may have" (Singer 1975, 20). To kill animals needlessly, however painless their deaths might be, is to undermine the goal of all animal liberationists. To dispose of animals when we feel like it or when they become "bothersome," however painless their death, is to send the message that the lives of all animals are insignificant, meaningless, unimportant, and inferior to the lives of all humans.

The animal ethicist's aversion to painlessly killing animals is evident when we consider her response to the phenomena of overpopulation of homeless cats and dogs. She does not find it acceptable to just painlessly kill these animals to quickly and "ethically" resolve the issue. Rather, as someone who cares about these animals, she struggles to find these animals a home. She feels an enormous sense of regret and sadness when she is presented with the statistics regarding the millions of healthy cats and dogs who are painlessly killed each year in animal shelters. She is

troubled each time she learns that a healthy cat has been painlessly killed because she believes that it is undesirable for the cat to be denied the opportunity to live the life he was given.

Claim #3: It is Wrong to be a Party to Animal Cruelty

My third assumption is that animal ethicists agree that it is wrong for one to be a party to acts or practices that cause, or are made possible by, unnecessary animal suffering even if her participation in these acts does not, in any way, cause animals to suffer. For instance, someone who claims to care about the well-being of animals would not accept a free ticket to a dog fighting show while reassuring herself that the "ticket would have just gone to waste." Someone who is concerned for animal welfare would not devour "kitty soup" that was produced by torturing cats even if the soup would go to waste if she refused to eat it. Someone who is truly concerned for the well-being of animals would feel revulsion at the prospect of participating in such activities and would thus refuse to be a part of these activities even if her participation does not, in any way, cause animals to suffer.

Claim #4: It is Acceptable to Harm Animals in Order to Prevent a Moral Catastrophe

While we can point to a number of exploitative practices, like factory farming and cosmetic testing, that cause animals to suffer unnecessarily, there might be times when it is morally necessary to: (1) inflict some amount of pain upon a number of animals, and (2) painlessly kill some number of animals. That is, there are instances where causing harm to a being is necessary to secure some end which is worth the cost, or proportional to, the suffering or death involved. One case of necessary suffering and death which I am concerned with in this paper concerns moral catastrophes: situations where the only way a moral agent can prevent the uncontrolled, continuation of significant animal suffering and death is by causing harm to some smaller number of animals. Since animals are: (1) unable to escape their suffering, and (2) unable, themselves, to take measures to control widespread animal suffering, humans, then, are the only beings in a position to intervene in some way. If the *only* way to minimize an epidemic of animal suffering and death is for human beings to either painlessly kill some animals or cause animals some degree of bearable suffering, then a moral agent *should* intervene and act to minimize this suffering, while lamenting the harm she causes. If she does nothing, then she sentences a significant amount of animals to a life of misery: misery that could have been prevented had she intervened. In such exceptional cases, causing nonhuman animals harm, according to the definition of necessity deployed in this paper, is *morally necessary*.

Utilitarianism: An Excessively Permissive Theory

Singer's preference utilitarianism, as presented in *Animal Liberation* (1975), is the dominant utilitarian approach used to promote an ethic for nonhuman animals. The

fundamental goal of Singer's project is to extend the basic principle of equality to animals. This principle requires moral agents to give everyone's interests equal consideration. Since sentient animals have interests, such as the interest in not suffering, we must take their interests into account and give equal consideration to their suffering as we would to the suffering of humans. That is, we should not discount the suffering of an elephant in moral decision making simply because she is "just an animal."

Singer argues that taking serious the principle of equal consideration does not require us to protect the interests of beings (human or nonhuman) with nonviolable rights; rather, the goal of the basic principle of equality is to ensure that, in moral decision making, we give equal weight to the interests of all sentient beings and that we do not arbitrarily discriminate against animals based on their species membership (Singer 1975, 34). Since Singer is a preference utilitarian, he operates under the assumption that the ultimate goal of morality is not to protect the interests of beings with rights, but rather, he assumes that the goal of morality is to maximize preferences (also referred to as interests) of all sentient beings.

If the ultimate goal of morality is to maximize preferences, then it follows that any being's preference can be overridden if the consequence of doing so outweighs the benefit of protecting the preference. Such a theory, as we will see, implies that there is no animal interest or preference that cannot be overridden by the preferences of a large number of human beings, despite how trivial the preferences of humans might be. This then entails that a basic interest of an animal, such as the interest in not suffering, can be overridden by even trivial interests of human beings. As Francione puts it, utilitarianism (classical and preference) allows us to "have our cow and eat her too" (Francione 2000, 133).

Utilitarianism: Unable to Condemn Exploitative Practices

While Singer's theory demands moral agents to provide equal consideration for the animal, as Francione (2000) points out, Singer's theory of preference utilitarianism does not preclude the exploitation of animals since we can *always* override the animal's interest in not suffering in the name of even trivial human interests, so long as preferences are maximized when all is said and done. Consider the story of Amy the Elephant, an infamous circus performer:

> Amy is famous for her ability to ride a bike, balance a ball on her head, and jump through fire. Evidently, Amy generates a large sum of happiness each year, as millions of people enjoy her performances. The only thing is, Amy does not perform these tricks willingly. In fact, Amy dreads having to stand on her head or jump through fire. Yet, Amy is aware that if she refuses to perform such tricks, she will face severe consequences. This is because during circus practice, Amy is continually shocked, hit, kicked, whipped and so forth if she refuses to perform her tricks. Not only is Amy physically abused, but she is also subjected to emotional pain. At the end of the day, Amy is confined to a

> cage, prohibited from playing and fulfilling her natural inclinations. Amy, thus, takes one for the team. She continues to suffer and endure pain so that human beings may derive happiness from spending a "fun" time in the bleachers of her show.

Certainly, Amy has a preference in not enduring this pain and suffering. Yet, those who attend the circus have an interest in seeing Amy perform in the circus and thus "Singer, as a preference utilitarian, cannot say that the interests of those humans involved in this practice are irrelevant" (Regan 1983, 222). According to preference utilitarianism, everyone's preferences must be taken into account: not just Amy's or those who oppose the circus industry. Keeping this in mind, Nussbaum (2007) points out that "it is not obvious that the pleasure that their performance affords large human audiences could not outweigh the pain suffered by a small number of animals." In fact, it may even be morally obligatory to raise circus animals in such a manner if it results in maximizing the preferences of large audiences. Thus, Amy's preference of not suffering is outweighed by the malicious preferences of circus goers and abusing Amy in order to condition her into performing circus tricks is morally praiseworthy according to preference utilitarianism.

This conclusion is a bit disquieting. Recall the first requirement of a minimally decent theory of animal ethics: it must condemn practices and industries which cause *unnecessary* animal suffering and death. Attending a circus show is by no means necessary because the end sought after, entertainment, is trivial and does not outweigh the significant harms that Amy endures. Yet, utilitarianism provides no restrictions on the harms inflicted upon nonhuman animals, so long as human preferences, even when trivial or malicious, outweigh the suffering of the animals. Since utilitarianism permits the harming of nonhuman animals in order to satisfy the most trivial of human preferences, it is doubtful that this theory can serve as a decent foundation for an animal liberation ethic.

Utilitarianism: Unable to Provide Individual Guidance

Utilitarianism encounters a further disquieting conclusion in regard to the ethics of animal consumption. Consider the morally reprehensible institution of factory farming: animals live in the most deplorable of conditions and are confined to cramped, restrictive, overcrowded pens and cages for the whole duration of their lives. Painful procedures are performed on these animals without anesthesia, such as the debeaking of chickens and tail docking of pigs. These animals are confined indoors, many of which never see the light of day. Such confinement restricts their natural inclinations and desires, forcing the animals to become psychotic and to exhibit neurotic behavior.[6] While the end sought after in this case, nutrition, is a substantial good, the use of animals is not necessary (especially in developed

[6] This description just touches on the basic atrocities that nonhuman animals endure daily on a factory farm; the list of factory farm atrocities is quite extensive and great length would be required to capture the whole picture. For a more thorough description, see Peter Singer's *Animal Liberation*.

countries) because there are plenty of non-animal alternatives that are readily available to consumers, such as plant based foods. Taking into consideration that the suffering animals endure in intensive farming is not necessary, one would expect a minimally decent animal ethic to proscribe individual consumption of animal flesh that was produced from such a farm.

While Singer (1975, 155) maintains that utilitarianism is committed to the claim that "each of us has a moral obligation to cease supporting the practice," Nobis (2002) and Shafer-Landau (1994) point to the unlikelihood that utilitarianism can make a moral demand for *personal* vegetarianism. This is because an individual's choice to become a vegetarian is unable to affect overall utility since the giant animal agriculture industry is insensitive to one person's decision to abstain from animal flesh and by-products (Rachels 1997; Hudson 1993).[7] Thus, it is highly unlikely that one person's choice to become vegetarian will substantially improve the state of affairs of farm animals (Gruzalki 1983, 265). So, according to utilitarianism, my choice to become vegetarian is considered to be morally neutral since it does not impact, i.e. decrease, the supply of animals who are brought into existence, abused, and slaughtered in the name of human consumption. Furthermore, since my refusal to buy and eat animal flesh will *not* result in any less pain, suffering, or death in the world, my choice to abstain from meat cannot be deemed morally commendable. Nor can we pass moral judgment on an individual for choosing to consume factory farm animal flesh, even if he is cognizant of its origins. If an individual's choice to consume meat does not increase the amount of animal suffering and death, then such a choice does not impact utility and thus cannot be deemed morally wrong.

Let us now return to my original characterization of the minimal requirement for a decent animal ethic. A decent animal ethic demands moral agents to *refrain from being a party to industries that cause animals to suffer when that suffering is not of a moral necessity*.[8] In this case, the suffering of factory farm animals is undeniably gratuitous: animals are treated as mere production units or machines from the moment they are born until the moment they die, just so that human beings may derive a gustatory pleasure that is anything but necessary (in developed countries). Yet, we are left with an ethical theory that provides no individual normative guidance concerning the consumption of factory farm products. The most utilitarianism can say is that factory farming is wrong and that collective vegetarianism is morally right.[9] While the condemning of factory farming is a

[7] This argument is referred to as "the impotence of the individual" or the problem of causal impotence.

[8] Shafer-Landau (1994, 96–98) also puts forth a similar version of this ethical principle: *one must refuse support of essentially cruel practices, if a comparably costly alternative that is not tied to essentially cruel practices is readily available,* and so does DeGrazia (1996, 285): *make every reasonable effort not to provide financial support for institutions or practices that cause or support unnecessary harms*.

[9] Although Frey (1983, 197–203) and Regan (1983, 221) point out that preference utilitarianism is not necessarily even committed to this conclusion, since this theory would give weight to not only the preference of nonhuman animals, but also to the preferences of those involved in the raising and killing of animals (farmers and slaughtering operations), those involved in the food business, such as food retailers and fast-food restaurants, the leather goods and wool industries, those involved in advertising the products of animal agriculture, and so forth.

noteworthy consequence of utilitarianism, the statement that "factory farming is wrong" is unhelpful for guiding individual moral conduct.[10]

Since factory farming is, without a doubt, responsible for generating the most unnecessary suffering of animals, it would seem odd that a theory aimed at animal protection cannot condemn an individual's participation in such an industry.[11] We might then question whether this theory is helpful for encouraging individuals to act ethically in regard to animals if it cannot even advise individuals against consuming animal flesh that has its origins in a disturbingly vicious and atrocious industry. If we assume that ethical theories should have practical force and that moral agents do in fact internalize these theories and use them to guide their actions in everyday life, then we must ensure that the theories we promote actually provide practical guidance that apply to *individual* actions, in addition to making general conclusions about practices as a whole.

Deontology and Moral Catastrophes #1

A deontological animal ethic ultimately aims at the abolition of nonhuman animal use and exploitation in agriculture, entertainment, science and medical research, the fur industry, and so forth. The aim is not "reformation" of current practices or "reduced" suffering: the aim is complete abolition. In advancing an animal rights theory aimed at abolition, Regan (1983, 2001) proceeds to argue that we should afford negative rights to nonhuman animals, which essentially reduces to a "hands off" policy of noninterference. Through such a policy of noninterference, it is assumed that nonhuman animals will best be afforded full protection from human induced harm, suffering, and death.

Taking for granted that nonhuman animals satisfy the criterion to be possessors of moral rights, let us consider what logically follows from attributing negative rights or a policy of noninterference to nonhuman animals.[12] For Regan, this means that nonhuman animals have inherent value and thus have the right to respectful treatment which entails that one's inherent value be respected (1983, 277). Respecting the inherent value of a being requires that we not harm the being, even

[10] Note that Singer responds to this problem of the "impotence of the individual" by claiming that "there must be some point at which the number of vegetarians make a difference to the size of the poultry industry. There must be a series of thresholds, hidden by the market system of distribution, which determine how many factory farms will be in existence." Yet, as Regan (1983, 225) points out, relying on talk of a "threshold" makes the rightness of what vegetarians do contingent upon the decisions of those who eat meat, who very well can demand more meat in order to offset the effects of the boycotts of vegetarians. This paradoxical nature of moral obligation provides non-vegetarians with an opportunity to avoid any moral obligation to become vegetarian: they can simply eat more meat in order to negate the collective effect of vegetarians.

[11] It is estimated that over 10 billion animals are killed each year in the United States alone (USDA 2011).

[12] In this paper, I will bracket the issue of whether or not nonhuman animals indeed meet the requirements for right bearers, and furthermore, I will bracket the issue of what sort of capacities are required in order to be a rights holder (such as sentience or more refined cognitive capacities). I take for granted that animals do indeed meet the requirements to be right holders, and from there, consider the consequences of attributing rights to them.

when doing so could "bring about the best aggregate consequences for everyone" (Regan 1983, 249). In treating animals as ends-in-themselves, rather than as a means, Regan writes that we must "respect their basic moral rights, including their rights to life, liberty, and bodily integrity" (Regan 2001, 37). And furthermore, "the principle of respect for an individual's rights should not be compromised in the name of achieving some greater good for others" (Regan 2001, 16).

According to rights theories, like Regan's, certain actions are morally unacceptable, regardless of the fact that they could maximize good consequences for all those affected. One example of such an action is killing a being with inherent value in order to promote social utility. A logical consequence, then, is the prohibition of killing or harming animals when the harm or death is not in that particular animal's own interest (or when the killing is not in self-defense).

Although the prohibition of killing or harming animals would, in most contexts, seem to promote the good of animals, Palmer (2003) points out that there are situations where the proscription of killing animals may in fact lead to a great calamity, such as massive overpopulation of certain animals. Yet, as she informs us, the rights position is committed to the claim that "painless killing is an unethical, harmful practice that takes the lives of beings entitled to respect" (Palmer 2003). According to Regan (1983, 110), *justified* euthanasia requires that the one who kills be motivated by the *right reason*: she must be concerned for the interest, good, or welfare of the particular animal being killed. Since killing healthy animals in shelters is not in the individual animal's interest, Regan is committed to the conclusion that killing a healthy animal in a shelter is a violation of the respect principle, which requires that we respect an animal's inherent value by not harming or killing the animal in order to "bring about the best aggregate consequences for everyone" (Regan 1983, 259).

The deontologist, then, is presented with a conflict: by killing a smaller number of innocent animals, a greater number of animal death and suffering could be prevented. This is what Bennett (1998) refers to as a *crisis*: a situation where an agent knows that only by performing some horrible action (in this case, killing healthy, innocent animals) can one avert a calamity that is still worse (Bennett 1998, 10). In such a scenario, complying with Regan's deontological principles engenders a moral catastrophe: in refusing to kill some small number of animals, a tragic amount of animal suffering and death will occur.

Regan might argue that when we kill animals in shelters, we are doing this for their own good. It is best that we painlessly kill shelter animals so that they are not forced to endure a life of pain, starvation, disease, or death by predation. Yet when we consider the practice of painlessly killing certain cats and dogs in animal shelters in order to prevent or minimize the effects of overpopulation or overcrowding, we find that the aim is to benefit other animals rather than to benefit the specific animals who are killed. Yet, promoting the total population of cats and dogs at the expense of other animals is clearly a violation of Regan's rights approach since he maintains that "harms intentionally done to anyone subject cannot be justified by aggregating benefits derived by others" (Regan 2001, 43). The animals who are painlessly killed are able to be sustained by shelters: since they are currently in a shelter, they evidently have a place to live, food, access to health care, and so forth. Yet, we

choose to kill these animals so that shelters are able to provide room for other, more adoptable animals.[13] Furthermore, shelters choose to euthanize a certain number of animals in order to prevent overpopulation. In doing so, they make a broad utilitarian calculus that killing 3–4 million cats and dogs each year will allow *y* number of feral cats and dogs to live a somewhat decent life in both shelters and the wild.[14]

Deontology and the Inability to Prevent Moral Catastrophes #2

An animal rights position, like Regan's, faces a similar problem when we consider the issue of spaying and neutering cats and dogs in order to prevent, or minimize, overpopulation. As Boonin (2003, 2) points out, the act of spaying or neutering imposes a number of harms on cats and dogs who are "confined and taken to the vet, placed in unfamiliar surroundings, exposed to a frightening environment. Most animals who go through such procedures will surely experience a great deal of anxiety if not outright fear and terror." He goes on to point out that the animals are given a general anesthesia, which can cause a variety of adverse reactions and, in some cases, even death. The spay procedures, in particular, come with various risks, such as the risk of infection and complications of procedures, such as excessive bleeding. After the procedure is complete, the animals are faced with nausea and physical discomfort that may last for days.[15]

Although Boonin (2003, 2) points out that the benefits of spaying and neutering are "quite substantial," they are not benefits for the animal who undergoes the procedure. Rather, "the benefits we appeal to are simply those which follow from reducing the population of unwanted animals: less overall suffering." But, according to a rights based approach, spaying and neutering cats and dogs is morally unacceptable since it involves harming individual cats and dogs in order to maximize consequences, which is a clear violation of the respect principle. As Regan (1983, 346–347) writes, "No one has a right to be protected against being harmed if the protection in question involves violating the rights of others… Justice *must* be done, though the heavens fall."

Boonin (2003, 7) suggests that the rights-based approach be amended so that it allows individuals to "impose relatively minor harms on animals (and relevantly analogous humans) in at least some cases where this produces great benefits for others." Since spaying and neutering seems to be a "minor harm" in comparison to the benefit of saving lives, we might then be justified in spaying and neutering cats

[13] The Humane Society of the United States (2013) reports that animals with poor temperament and health are the first to be euthanized. What we can conclude from this is the following: we should not spend a significant amount of funds to cover the medical costs of one animal in poor health (even if she would live a decent life with adequate treatment) because these funds could be used to help a greater number of animals.

[14] These numbers come from a 2013 report from the Humane Society.

[15] Boonin also considers and debunks the flawed argument that spaying and neutering dogs and cats is done to benefit the individual animals who undergo these procedures. Due to space constraint, I cannot address these arguments in this paper.

and dogs according to a modified rights-based approach. But note that even if we were to modify the rights position in this way, it still would preclude the painless killing of animals in animal shelters since killing an animal, as opposed to just spaying or neutering it, is not just a "minor harm." Rather, death is the ultimate harm since it is the ultimate loss (Regan 1983, 100). So, even Boonin's modified rights position remains committed to prohibiting the good intentioned, painless killing of healthy animals in shelters that is necessary to prevent a considerable amount of animal suffering. This, of course, is a significant flaw of the animal rights position, given that a respectable animal rights theory should attempt to at least minimize animal pain and suffering if elimination is not possible.

In response, Regan might point out that, under certain conditions, the respect principle requires more than just negative duties of noninterference: it also calls for duties of assistance, which means that moral agents have a duty to assist those individuals who are victims of injustice—individuals who have had their rights violated (Regan 1983, 249). Regan might then point out that dogs and cats are victims of injustice since, their state of overpopulation is perpetuated by human beings who have acted unjustly by creating animals so that they are dependent on human beings for welfare and survival. Thus, we acquire positive duties to assist domesticated animals since we have acted unjustly toward them. The moral solution, then, is not to painlessly kill these animals or to cause them harm by sterilizing them; rather, the morally right course of action is to provide a home for these animals while responsibly ensuring that they do not procreate with other animals.[16]

While this solution, in theory, provides appropriate moral guidance, it incorrectly assumes that we have the resources and funding needed to provide assistance to animals and it ignores the imperfect reality of our world. In a perfect world, moral agents would feel compelled to provide a home, nutrition, and companionship for homeless domesticated animals. Yet, the current state of affairs affords us no such ideal. We live in a world where 3–4 million cats and dogs must be killed annually in order to prevent mass animal suffering: overcrowding of shelters, overpopulation, the creation of feral cat colonies and dog packs, uncontrolled diseases, infestations, and a decrease in supply in food for both feral cats and dogs.[17] If we have the means of at least minimizing animal suffering and death in a seemingly humane way, shouldn't we, as concerned animal ethicists, be moved to act to minimize this suffering rather than passively sitting by, claiming that we cannot intervene for fear of getting our hands dirty?

By the standard of necessity initially described in this paper, we find that painlessly killing millions of nonhuman animals each year is a tragic moral necessity: a necessary evil needed to prevent a great calamity. Yet, a theory of rights, like Regan's, simply cannot account for the reality of the current conditions of our imperfect world. As Garner (2013) points out, the abolitionist position

[16] See Palmer (2010) for an in-depth discussion regarding the positive duties of assistance that are owed to domesticated animals.

[17] These numbers come from a 2013 report from the Humane Society.

essentially attempts to provide a theory fit for a utopia: a utopia that is out of our reach for the time being. Thus, deontology is an unsuitable framework for an animal ethic because it demands restrictive principles that are impractical for our non-ideal world.

Non ideal Theories in a Non-ideal World: Utilitarianism and Deontology

Thus far, I have considered the flaws of the two most influential approaches to animal ethics. Although these theories are significantly problematic, there is a sense in which Regan's deontology and Singer's utilitarianism correctly identify morally questionable practices. Utilitarianism rightly concludes that factory farming is a morally corrupt industry while deontology accurately points out that, in general, killing and harming nonhuman animals is morally problematic. Yet, with both theories, there is a sense in which we can continue to make general, abstract moral judgments about what actions are right and what actions are wrong without these judgments carrying normative force or making practical sense given the current non-ideal conditions of the world.

In our non-ideal world, the current disconcerting states of affairs for animals stem from the general public's apathetic and objectifying attitude toward them. When collectively, most human beings foster such an attitude, they leave a small number of individuals to attempt to rectify these moral injustices. This, in turn, makes it unrealistic to rely on moral theories such as deontology or utilitarianism which are unhelpful in a non-ideal world. Since, collectively, a significant number of human beings have contributed, and continue to contribute, to animal exploitation at a level so extreme, even seemingly common sense moral principles (such as do not harm or do not kill nonhuman animals in order to benefit others) have lost all practicality. So, although we might find the conclusion from an animal rights position useful in advising moral agents to not kill or harm nonhuman animals (unless it is for that animal's own good or in self defense) in an *ideal* world, one glaring problem remains: the reality of our depraved circumstances has made deontological principles implausible. Along the same lines, we might find it intuitive that we should maximize preferences in an ideal world, yet, in a non-ideal world, we find that individuals often foster preferences that are shaped by ignorance, greed, and fear, thus it becomes dangerous to maximize preferences (Nussbaum 2007, 341). Utilitarianism and deontology might stand as intelligible theories if an attitude of respect for nonhuman animals were fostered in our society; however, an honest reflection will inform us that moral navigation in a non-ideal world requires moral agents to act in accordance with a character based theory like virtue ethics.

An Ideal Theory for a Non-ideal World: Virtue Ethics

In suggesting that virtue ethics can provide an adequate framework for a minimally decent account of animal ethics, I will draw on Hursthouse's (1999) and Rowlands (2012) accounts of virtue ethics which, according to Hursthouse, "direct us to think

about the rights and wrongs of our treatment of nonhuman animals in terms of virtues and vices rather than in terms of consequences, or rights and duties" (Hursthouse 2011, 119). Rather than focusing on specific rules or actions (like deontology) or consequences (such as utilitarianism), virtue ethics affords moral attention to the character of the agent performing the action. Someone with good character is someone who is fully virtuous; thus our goal, as moral agents, is to become fully virtuous whereby being fully virtuous entails that one possesses all virtues (compassion, justice, integrity, honesty, courage, and so forth) at some threshold level.

Rowlands defines a moral virtue as a character trait that is: "(i) a morally good, admirable, or otherwise praiseworthy character trait, where (ii) this character trait consists in a relatively stable set of behavioural dispositions that are (iii) embedded in an appropriate surrounding milieu of judgments and emotions (broadly understood)" (Rowlands 2012, 30). A virtue is multi-factorial: it is not only a disposition to act in an appropriate way, but it is also a disposition to have appropriate feelings, emotions, and thoughts since "actions and emotions are bound up in an indissoluble whole" (Rowlands 2012, 30). A morally good person is one who not only acts (stably) as a virtuous person would, but a morally good person is one who *feels* (stably) in the way a virtuous agent would. Thus, the motivation and emotion of a moral agent are central to assessing one's moral character.

Virtue ethics, then, does not encourage moral actors to adhere to unchanging moral principles which are assumed to hold in all conceivable situations, such as "always perform the action which maximizes preferences" or "never kill a healthy animal unless it is in self-defense." However, as Hursthouse (1999) points out, virtue ethics does provide rudimentary action-guiding principles, what she coins as "V-Rules" (for example, "do what is compassionate"). The right action, then, is one a virtuous agent would perform, yet determining what the right action is will vary according to the specific circumstances of a given situation. So, virtue ethicists find it highly unlikely that there is a straightforward answer to the following question: "is it wrong to harm a healthy animal who poses no direct threat to us?" In *most* situations, a virtuous person will find that compassion (or justice) requires her not to harm such an animal, yet in a disparate situation she might finds that compassion (or justice) requires her to harm such an animal.

Because moral virtues, like compassion, are central to a virtuous life, virtue ethics offers a substantial contribution to animal ethics. Action guiding principles such as "do what is compassionate" apply directly to our interactions with nonhuman animals. Since compassion involves being moved by and desiring to help relieve the suffering of others, animals who are capable of suffering are appropriate recipients of compassion. Thus, as virtuous agents, we can be compassionate toward nonhuman animals or as vicious individuals we can act cruelly. Furthermore, we can also act justly toward animals by giving to them what they are due. We can also act empathetically toward animals because we can, as fellow sentient beings, attempt to imagine the pain and suffering that they endure.

While there are arguably a number of virtues that have implications for our treatment of animals, in the following discussion, I will argue that the virtue of compassion is the relevant virtue that can be used to provide a satisfactory solution

to the specific issues discussed in this paper: attending the circus, eating factory farmed animal flesh, painlessly killing healthy animals to prevent overpopulation, and sterilizing cats and dogs. This is not to say that compassion should be the guiding principle of virtue ethics or that the virtue of compassion should always have primacy over other virtues, but rather, it is to say that compassion is the relevant virtue that is useful for understanding the specific scenarios discussed in this paper. There might be situations which demand that we direct our attention to other virtues, such as justice, yet for the purpose of this discussion, the virtue of compassion will be of particular importance.

Virtue Ethics and Unnecessary Pain/Suffering

Recall that a minimally decent animal ethic would require moral agents to refuse to indulge in a trivial pleasure that is made possible only by massive animal suffering, such as consuming the flesh of nonhuman animals who were confined, abused, and lonely their entire lives, even if consuming such flesh will not cause an increase of animal suffering or death (Shafer-Landau 1994, 96–98; DeGrazia 1996, 285). While utilitarianism is unable to make a simple move from the claim "the practices are cruel and cause unnecessary suffering" to "we should not be party to them," Hursthouse points out that virtue ethics can make this move quite easily (Hursthouse 2011, 129). This is because one cannot be compassionate while being a party to cruel practices, i.e. practices that inflict pain and suffering upon another being for an unjustified reason.

Possessing a virtue, like compassion, requires that an agent not only habitually act compassionately (one acts to relieve another's suffering), but it also requires one to *feel* compassionately. So, even though it is not in one's power to effectively relieve suffering by performing some action, one still can *feel* compassionately. Someone who feels compassionately is one who finds discomfort, revulsion, and disgust at the prospect of enjoying a mere luxury that is made available only because another has suffered (Stephens 1994; Sapontzis 1987). Since, factory farm flesh is available to us only because nonhuman animals have been subjected to a considerable amount of pain and suffering, we can conclude that someone who derives enjoyment from consuming such meat does not *feel* appropriately: she does not feel how the compassionate person should. The central point is that, as compassionate individuals, the suffering of animals should compel us to *feel* that it is inappropriate to receive trivial benefits from the suffering, regardless of whether we can do anything about it. Since a virtue is a "disposition of a very complex sort that is expressed in a variety of sorts of actions," a virtue ethicist is able to illustrate that an individual's choice to consume factory farm products, regardless of the actual consequences, is problematic because it impedes one from cultivating the virtue of compassion (Hursthouse 2011, 129).

Keeping in mind that, since those who regularly consume commercially farmed meat are a party to a significant amount of animal suffering, it is also appropriate to characterize them as lacking integrity (Stephens 1994; Dixon 1995) or being selfish since only those who give consideration to their trivial desires, and not the basic interests of others, would accept the current intensive system of agriculture and

continue to consume meat simply because they enjoy the taste (Hursthouse 2011; Tardiff 1996; Dixon 1995). Hursthouse goes on to describe the typical flesh consumer as simply greedy or self-indulgent (2011). Furthermore, in consuming such meat, the actor fails to cultivate the virtue of temperance, which requires that one not pursue a pleasure if doing so entails that they must ignore other virtues like compassion, integrity, and so forth (Hursthouse 2011).[18]

A virtue ethicist will provide a similar response to Amy the Elephant's situation. A truly compassionate person would feel revulsion and disgust at the prospect of enjoying a circus show that is made possible only because an elephant was forced to suffer from repeated abuse. Since those who attend circuses are a party to a significant amount of animal suffering, they can also be characterized as selfish, lacking integrity, self-indulgent, and greedy since only these sorts of individuals with vicious character would continue to attend (and enjoy) circus shows when they know about the abuse that circus animals are forced to endure.

Keep in mind that since our legal system treats businesses as persons, like persons, businesses can be vicious. Thus, we might call certain industries "vicious industries" insofar as those who participate in them manifest vice. Those who participate in the circus industry or factory farming clearly manifest vice, for all of the reasons noted above. Thus, we can conclude that both the circus industry and factory farming are vicious industries that are condemned by virtue ethics. Here, we find that once again, virtue ethics is able to account for something utilitarianism cannot: it is able to morally condemn the practices of industries which involve *unnecessary* animal suffering

Virtue Ethics and Moral Catastrophes: Compassion, Harming, Killing, and Necessity

Although virtue ethics provides us with rudimentary action-guiding principles (V-Rules), these rules may become somewhat unhelpful in moral dilemmas where one is forced to choose between performing at least one of two actions that a virtuous agent would normally both oppose. This is what Hursthouse refers to as the "conflict problem": extraordinary circumstances where a virtuous agent might be compelled to act out of character (Hursthouse 2011, 127).

To put the conflict problem into context, let us first consider the issue of harming animals by sterilizing them in order to prevent, or at least reduce, overpopulation. On the one hand, the harming of the sterilized animals is problematic, but so too, is the consequence of not sterilizing them: overpopulation. Since the virtuous agent is compelled to act compassionately toward nonhuman animals, she would

[18] By exploring the virtue of justice, one might also illustrate that virtue ethics can provide an account as to why one should not consume meat even if the animals are humanely raised and killed painlessly. As Nussbaum (2007) points out, nonhuman animals have capacities beyond sentience, such as forming social networks, pleasures of moving and eating at will, mobility, play, and so forth and they are harmed when these capabilities are thwarted. Keeping this in mind, we can argue that it is an issue of *justice* when we deny nonhuman animals the opportunity to embrace and exercise their capabilities at some threshold level (Nussbaum 2007, 381). Yet, for the purpose of this discussion, I only intend to provide a minimally decent account of an animal ethic, which only requires that we proscribe an individual from eating animals who were subjected to unnecessary pain and suffering.

characteristically refrain from harming them under normal circumstances. Yet, although in most situations the virtuous person would find it cruel to inflict pain upon a harmless animal, in this situation, we would not call her cruel or deficient in compassion if she were to cause animals pain by sterilizing them. This is because cruelty involves inflicting *unnecessary* pain on an animal; that is, cruel actions are those which cause a being to suffer for a purpose that does not justify the pain (Hursthouse 2006, 144). The question, then, is whether one inflicts pain upon an animal for a purpose that does not justify it when she spays or neuters the animal.

Consider the following: by not spaying one female cat, it is possible that 420,000 additional kittens will be born within 7 years (Zawistowski et al. 1998). Multiply this by the millions of female cats who, as Regan would have it, would go unsterilized. Prudence enables the virtuous agent to recognize that: (1) animal shelters are overcrowded and have insufficient resources to provide for every homeless cat or dog, (2) although morality would seem to *require* individuals to assist these homeless animals by adopting them into their homes, the unfortunate fact remains that most people will continually refuse to acknowledge their moral obligation to assist these animals, and finally (3) an uncontrolled population of domesticated animals will generate significant pain and suffering: billions of animals will be subjected to a life consumed with disease, starvation, and predation. In this situation, causing an animal minimal pain and suffering through spaying or neutering is of a *moral necessity* because: (1) we cause the animal to suffer for a significant reason that is worth the cost of the minimal suffering animals endure through sterilization: the prevention of a moral catastrophe, and (2) as it currently stands, there is no other way of preventing the moral catastrophe that is more humane. So, although in most cases, we would assume that only a cruel person would harm a healthy animal who poses no direct threat to us, clearly, *in this circumstance*, we have no reason to assume that the agent demonstrates cruel or callous behavior.

While the above discussion demonstrates that one who spays or neuters an animal in order to prevent overpopulation does not act cruelly, we can furthermore illustrate that the actor who painlessly kills animals in order to prevent overpopulation acts compassionately. Recall that a compassionate person feels compelled to end animal suffering and would refuse to stand by as millions of nonhuman animals are brought into existence simply to suffer and starve to death as a result of mass overpopulation. An uncompassionate person is one who would maintain that millions of animals should endure a painful life in the name of a negative duty to not kill or cause harm to beings with inherent worth. Clearly, then, in killing or spaying a cat or dog in order to prevent overpopulation, the agent's overall reason and motivation for acting stems from compassion and not *cruelty*: she acts (in this case, she harms or kills an animal) so to prevent the suffering of billions of nonhuman animals. Once again, the virtue ethicist can make sense of why it is acceptable to harm nonhuman animals in conflict scenarios: preventing a moral tragedy from occurring is worth the cost of the death of a smaller number of animals thus the killing is a *moral necessity*. While virtue ethics can make sense of why it is acceptable to cause certain animals harm or death in cases of moral necessity, deontological theories cannot.

An Objection: Does a Theory of Virtue Retreat into Vagueness?

While one of the most appealing features of virtue ethics is its flexibility, it might be argued that this feature of flexibility is actually to the detriment of virtue ethics for the following reason: flexibility retreats into vagueness. The objection is that, since virtue ethics cannot provide moral agents with concrete rules or principles for moral decision making, it is an inadequate theory of ethics.

There are at least two possible responses to this objection. First, it might be argued that virtue ethics does in fact offer action guiding principles, such as Hursthouse's V-Rules mentioned earlier in this paper (Hursthouse 1999). Other virtue ethicists, such as Zagzebski (2010), have argued that diligently observing moral exemplars can provide moral agents with action guiding principles such as the following: do what the virtuous agent would do. The second response, and that which is supported by the discussion in this paper, is to acknowledge that virtue ethics cannot provide us with universally binding principles, but to emphasize that this is a benefit, and not a deficiency, of virtue ethics. As Aristotle has written, the nature of ethics is imprecise and the imprecise nature of ethics cannot be governed by a single rule. According to the anti-codifiability thesis, as presented by McDowell (1979), a single moral rule or decision procedure cannot possibly accommodate the complexity of the differing moral situations we will continue to encounter. Rather, we must morally evaluate these complex situations individually and determine, on a case by case basis, the most appropriate moral response.[19]

Concluding Remarks

While the failures of Regan's deontology and Singer's preference utilitarianism are evident from the above discussion, I have illustrated that, through a wide range of cases, virtue ethics has the ability to capture the intuitions of animal ethicists and this is reason enough for animal liberationists to pursue and develop an account of virtue ethics. Virtue ethics, unlike utilitarianism, provides individuals with reasons to refuse to participate in industries that inflict unnecessary pain and suffering upon animals, such as the circus or factory farm industry. Although a deontological position might succeed in proscribing the harming of animals for trivial reasons, it fails in another respect: it prohibits the harming and killing of nonhuman animals when causing harm and death is necessary to prevent moral catastrophes. Virtue ethics can account for why it is acceptable to harm or end the life of nonhuman animals in cases of moral necessity.

Note that I have not provided a complete account of virtue ethics in this paper. A complete account of virtue ethics and its comprehensive application to our

[19] Note that a virtuous person is one who continuously develops her moral sensibility (practical wisdom), thus a truly virtuous person is able to discern the best course of action in cases of conflict. Also note that that in some situations, there might not be just one "right" response; there might be two equally tragic actions that one must choose between. In this case, the virtue ethicist does her best to discern what to do in such a situation (also, there might be situations where there are two equally good options in the sense that two different sets of goods could be realized).

interactions with animals would require an in-depth discussion regarding the virtue of justice and what it means to treat animals justly. Furthermore, a complete account of virtue ethics would need to take seriously the virtue of prudence, or practical wisdom, which if properly cultivated, will enable moral agents to navigate situations of moral conflict, directing the virtuous agent to discern the best course of action.

A thorough application of virtue ethics to the ethical treatment of animals would have implications for all types of animal agriculture (such as "happy" farms) and implications for the use of animals in biomedical research, both of which I am unable to address in this paper due to the space constraint. Yet, the purpose of this paper is not to provide a complete analysis of how virtue ethics might govern every single human–animal interaction. Rather, the goal of this paper is twofold: (1) to illustrate that the two dominant approaches to animal ethics are defective frameworks for an animal liberation ethic, and (2) to demonstrate that there is at least one alternative theory that can meet the basic standard of a minimally decent animal liberation ethic: virtue ethics.[20] Thus, one cannot defend Singer's theory of utilitarianism or Regan's account of deontology on the ground that "every theory has its problems." While every ethical theory has its own weaknesses, not every ethical theory has a fundamental flaw such that it cannot even provide minimally decent moral guidance in respect to our interactions with animals. While virtue ethics might have its own insufficiencies, it is not plagued by the inability to account for minimally decent guidance in regard to human interactions with animals. This is reason enough to: (1) question the widespread use of deontological and utilitarian frameworks in regard to our ethical discussions concerning animals, and (2) consider whether we should deploy and develop an account of virtue ethics to govern our relationship with animals since it, at the very least, fulfills the requirements of a minimally decent animal ethic.

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[20] Although I have argued that virtue ethics provides a minimally decent framework for an animal ethic, I do not claim that virtue ethics is the *only* suitable framework for an animal ethic. I leave open the question of whether there might be other ethical frameworks which can satisfy the three requirements of a minimally decent animal ethic put forth in this paper.

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