International Animal Welfare: Integrating Animal Ethics, International Law and Sustainable Development Goals

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Abstract

In today's globalised world in which the basic interests of nonhuman creatures continue to be unjustly thwarted, there is an urgent need to address ethical concerns surrounding nonhuman animal welfare and the treatment of nonhumans within global commercial practices. Improving animal health on a global scale is the goal of the intergovernmental World Organisation for Animal Health (WOAH). For this reason, among its many goals, WOAH prioritises the open and honest sharing of knowledge about animal diseases.[1] Other priorities include the 'surveillance and management of diseases and welfare in wild and domestic, terrestrial and aquatic animals'.[2] Yet nonhuman animals continued to be subject to systemic injustices on a global scale, enduring extensive sufferings, often for peripheral purposes, living in conditions which are far from conducive to their health and welfare. This paper discusses the topic of global animal welfare and its relationship to animal ethics and Sustainable Development Goals, emphasising such welfare as a key missing link, not just in respect of meeting such goals but also in terms of giving nonhuman animals what they are due in and of themselves. The paper's overall aim is to show the significance of international animal law for urgent global systemic change in relation to humans' treatment of other animals.

Keywords: Animal Ethics, Animal Welfare, International Animal Law, Sustainable Development Goals

Introduction

The United Nations' progress report on Sustainable Development Goals (SDGs) has indicated that as global citizens we are nowhere near to reaching the SDGs by 2030,[3] with the 'Emissions Gap Report' calling for urgent action in the form of 'rapid transformation of societies' across the globe[4] to limit global warming and its impacts. Many of the SDGs relate to sustainable food production, including but not limited to the following goals: ending poverty, eliminating hunger, reducing malnutrition, increasing food security and sustainable food production, improving sanitation and achieving sustainable management of water, reducing global inequalities, responsible consumption and production, ensuring sustainable use of the oceans and seas, ensuring sustainable use of forests and land, and halting further biodiversity loss.

And yet the 2023 analysis report by the Food and Agriculture Organization of United Nations states as follows:

> [T]he latest data indicate that most of the food- and agriculture-related SDG targets are still far from being achieved. The lingering effects of the COVID-19 pandemic, along with other crises such as climate change and armed conflicts, are having widespread impacts on all dimensions under the 2030 Agenda, including poverty, food security and nutrition, health and the environment. Progress made in the past two decades has stagnated, and in some cases even reversed, compounding the challenges in eradicating poverty and hunger, improving health and nutrition, and combating climate change.[5]

Admirable as the SDGs are, clearly governments are far off track in putting forward actionable plans for fulfilling the sustainable development agenda, posing serious present threats and future risks to humans, nonhumans and the environment more

1 Lesa Thompson, et al, 'Role of the World Organisation for Animal Health in Global Wildlife Disease Surveillance', 2024, p.1. PubMed Central Journal. DIO: 10.3389/fvets.2024.1269530. Accessed at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10993013/. Accessed 24/04/24.

2 Lesa Thompson, et al, 'Role of the World Organisation for Animal Health in Global Wildlife Disease Surveillance', 2024, p.6. PubMed Central Journal. DIO: 10.3389/fvets.2024.1269530. Accessed at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10993013/. Accessed 24/04/24.

3 United Nations, The Sustainable Development Goals Report 2022. Accessed at: SDG Indicators (un.org). Accessed 12/04/23.

4 United Nations Environment Programme, Emissions Gap Report 2022: The Closing Window—Climate crisis calls for rapid transformation of societies, p. XVI. Nairobi. Accessed at: https://www.unep.org/emissions-gap-report-2022. Accessed 12/04/23

5 FAO (Food and Agricultural Organization of the United Nations), 'Tracking progress on food and agriculture-related SDG indicators 2023' (Rome, 2023), p.5. Accessed at: https://doi.org/10.4060/cc7088e. Accessed 13/03/24.

generally.[6] The reasons for such inaction are complex, but are related to interlinking economic, political and societal factors, with the IPCC (Intergovernmental Panel on Climate Change) stating that 'There is a climate financing gap which reflects a persistent misallocation of global capital'.[7] But, in addition to infrastructural factors, the goals are limited in terms of their anthropocentric value-base: anthropocentrism being a normative stance that holds that only human interests are deemed to be morally and directly significant in decision-making policies and practices.

The aim of this paper is one that is related to the anthropocentric nature of the SDGs;[8] specifically, to an issue arising therefrom, that issue being the lack of attention given to sentient animals' interests or animal welfare within the goals. This paper's objective is to explore this gap in the SDGs in relation to the interests of sentient animals, particularly animals used in the practice of intensive farming and experimentation, and to discuss how it might be overcome in relation to international law.

Anthropocentrism, Animal Welfare and SDGs

The suggestion that anthropocentrism can stand as a sustainable ecological ethic is well criticised, not least within environmental philosophy (environmental philosophy being a sub-discipline of philosophy that itself emerged most notably in response to traditional human-centred approaches to our relationship with the natural world and its inhabitants).[9] Certainly, the good of sentient animals, creatures that have moral standing in their own right, is excluded from the goals' understanding of sustainability.[10] For example, in relation to the conservation of natural resources and healthy ecosystems, nonhuman animals are considered in relation to concerns about species loss and biodiversity issues, rather than as subjects that have a good in their own. This omission of animal welfare—what Franck L.B. Meijboom, Jan Staman and Ru Pothoven call a 'blind spot'—has some unwanted implications, one of those being that the goals ultimately end up undermining themselves as ones that could be genuinely sustainable for the planet and its inhabitants.[11]

With value supposedly being located in human beings only, axiologically the nonhuman world ends up being of extrinsic or instrumental value, rather than being recognised as having value in and of itself. As such, the United Nations' presentation of the goals presupposes that the nonhuman world and its inhabitants only have value in so far as they are of use to present and prospective humans (that is, the nonhuman world is presented as being of instrumental value only to the extent that its protection and preservation is necessary for the fulfilment of human interests in relation to intergenerational human equity). Yet this is the very normative presupposition that has historically worked as a driver

6 John Nolt, 'Climate Change and the Loss of Non-Human Welfare', in Brian Henning and Zach Walsh (eds), Climate Change Ethics and the Nonhuman World (Routledge, 2020), pp.10-22

7 IPCC (Intergovernmental Panel on Climate Change), Climate Change 2022: Mitigation of Climate Change, edited by Priyadarshi R. Shukla and Jim Skea, prepared by Working Group III Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, 2022, p.134. Accessible at: Climate Change 2022: Mitigation of Climate Change (ipcc.ch). Accessed 13/03/24.

8 Franck L.B. Meijboom, et al, 'From Blind Spot to Crucial Concept: On the Role of Animal Welfare in Food System Changes towards Circular Agriculture', Journal of Agricultural and Environmental Ethics, 36 (3), 2023, 1-16; H. Kopnina, 'Anthropocentrism: Problem of Human-Centered Ethics in Sustainable Development Goals', in W. L. Filho, P. G. Özuyar, P. J. Pace, A. M. Azul, L. Brandli, U. Azeiteiro and T. Wall (eds.), Life on Land, Encyclopedia of the UN Sustainable Development Goals (Springer, Cham., 2020), pp.48-57; Sam Adelman, 'Chapter 1: The Sustainable Development Goals, Anthropocentrism and Neoliberalism', in Duncan French and Louis J. Kotzer (eds.), Sustainable Development Goals: Law, Theory and Implementation (Edward Elgar, 2018), pp.15-40; and Clara Brandi, 'Safeguarding the Earth System as a Priority for Sustainable Development and Global Ethics: The Need for an Earth System SDG', Journal of Global Ethics, 11 (1), 2015, 32-36.

9 It is beyond the scope of the essay to provide a discussion and critique of anthropocentrism, but see Robin Attfield, Environmental Ethics: An Overview for the Twenty-First Century, second edn., fully revised and expanded (Polity, 2014); Robin Attfield, 'Beyond Anthropocentrism', Royal Institute of Philosophy Supplement, 69, 2011, 29-46; H. Kopnina, 'Anthropocentrism: Problem of Human-Centered Ethics in Sustainable Development Goals', in W. L. Filho et al (eds.), Life on Land, Encyclopedia of the UN Sustainable Development Goals (Springer, Cham., 2020), pp.48-57; and Laura Fernandez, 'Climate Ethics Bridging Animal Ethics to Overcome Climate Inaction: An Approach from Strategic Visual Communication', in Brian Henning and Zach Walsh (eds.), Climate Change Ethics and the Nonhuman World (Routledge, 2020), pp.33-48.

10 Janice H. Cox and Peter Stevenson, 'Doughnut Economics: Incorporating Animal Welfare', Well Being International Studies Repository, 2022, 1-9, accessed at: https://www.wellbeingintlstudiesrepository.org/es_ee/4, on 17/12/2024; and Janice Cox and Jessica Bridgers, World Animal Net, 'Why is Animal Welfare Important for Sustainable Consumption and Production?', United National Environment Programme, Perspectives, Issue No. 34, 2019, 1-12, accessed at: Why is animal welfare important for sustainable consumption and production? (apo.org.au), on 17/12/2024.

11 For discussion of this 'blind spot', see Franck L.B. Meijboom, et al, 'From Blind Spot to Crucial Concept: On the Role of Animal Welfare in Food System Changes towards Circular Agriculture', Journal of Agricultural and Environmental Ethics, 36 (3), 2023, 1-16. For discussion of a genuine concept of sustainable development as one that is intricately bound to socially and ecologically sustainable practices, see Robin Attfield, 'Sustainable Development Revisited', Proceedings of the Twenty-First World Congress of Philosophy, Vol 3, 2007, 185-189; Robin Attfield, 'Saving Nature, Feeding People and Ethics', Environmental Values, 7, 1998, 291-304; and D. Griggs, et al, 'An Integrated Framework for Sustainable Development Goals', Ecology and Society, 19 (4), Article 49, 2014, accessed at: http://dx.doi. org/10.5751/ES-07082-19044, on 17/12/2024.

for our degradation of the nonhuman world in the first place, whether intentionally or not.[12] In addition, there are issues of justice at stake that go far beyond human interests alone. Moreover, developing healthy interactions with the nonhuman world will involve considering animals' own good; a good which should play a crucial part of what it means to produce food sustainability (with such production relating to many of the SDGs).[13]

But human-animal relations are currently far from ethical. Certainly, the two main practices that cause nonhuman animals to suffer on an unimaginable scale are factory farming (the intensive rearing of animals for food) and animal experimentation:

> The number of land animals confined in more or less industrial conditions is currently around 450 billion at any given moment[14]… In comparison to the number of animals slaughtered for food, the amount of animals utilised (and killed) in experiments is very small. It is estimated that worldwide between 126 to 150 million animals are used either for research and development or for the "regulatory testing" of products such as detergents (i.e. testing required by law for a given product's placement on the market)… But in contrast to frequent assertions about the reduction of animal experiments, no decline can be noted, not even in Europe[15]—contrary to the EU's commitment[16] to the so-called three Rs of replacement, reduction and refinement of animal use in experiments.[17]

12 Notwithstanding the other drivers of the climate and biodiversity crisis, for it is unlikely that there is only one cause: see further Robin Attfield, Environmental Ethics: An Overview for the Twenty-First Century, second edn., fully revised and expanded (Polity, 2014).

13 Janice H. Cox and Peter Stevenson, 'Doughnut Economics: Incorporating Animal Welfare', Well Being International Studies Repository, 2022, 1-9, accessed at: https://www.wellbeingintlstudiesrepository.org/es_ee/4, on 17/12/2024; and Janice Cox and Jessica Bridgers, World Animal Net, 'Why is Animal Welfare Important for Sustainable Consumption and Production?', United National Environment Programme, Perspectives, Issue No. 34, 2019, 1-12, accessed at: Why is animal welfare important for sustainable consumption and production? (apo.org.au), on 17/12/2024.

14 In text citation: Jonathan Safran Foer, Eating Animals (Little Brown and Company, 2009).

15 In text citation: Open letter of French NGOs to the Members of the European Parliament, Paris, 5 October 2019. Subject: Evaluation of the implementation of the Directive 2010/63/ EU on the protection of animals used for scientific purposes, and request for review (with the support of: Fondation Brigitte Bardot; fondation 30 millions d'amis; Comité scientifique Pro Anima; Association One Voice; Association La nuit avec un moustique).

16 In text citation: European Parliament, Article 4 of Directive 2010/63/EU of the European Parliament and of the Council of 22 September 2010 on the protection of animals used for scientific purposes (OJ EU 2010 L 276, p. 33).

17 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), pp.25-26.

Considering these figures, the scale of the suffering endured by animals is quite hard to conceive. But we should at least try to conceive it, for these are individual animals, each with their own subjective experiences, and each with species-specific interests that are often purposely thwarted.

While accepting that not all animals will endure suffering in experiments, many will and do (for causing harm to the animals is part and practice of animal experimentation), and many continue to be subjected to what can be classified as 'severe suffering'.[18] In addition, when we consider nonhuman animals used for food, most of the world's meat comes from animals reared via intensive methods that pay little heed to animals' own good. Not only this, but in terms of sustainable food production, factory farming is an incredibly wasteful practice that requires a lot of land space, causes much environmental damage, and withholds plant crops that could (distribution problems notwithstanding) be used to feed human populations, rather than as animal feed utilised to rear the animals.[19]

Further, the conditions in which animals are kept in relation to many of our interactions are often a breeding ground of disease, posing as a risk factor for future pandemics, and require vast amounts of antibiotics to ward off disease, posing the threat of antibiotic resistance in human consumers. The negative ecological, welfare and health impacts on the environment, animals and humans respectively have been well documented elsewhere (see CIWF, 2024). Suffice it to say here that food system transformation is very much needed on a global scale, not just for the good of humans and the environment, but also for the good of animals themselves, who continue to suffer appalling treatment within commercial practices that utilise animals on a massive scale.[20] But what are the challenges to including nonhuman animals in policy matters on an international level, and how can the 'blind spot'[21] in relation to the SDGs be overcome so that animals' interests can be considered in and of themselves and in relation to the interests of other creatures (humans and nonhumans included)?

The International Context

Despite the animal welfare blind spot of the goals, there have been developments at an international level that recognise the importance of such welfare, particularly in relation to sustainable development,[22] with the World Organisation for Animal Health (WOAH, formerly known as OIE) claiming that 'Animal welfare is closely linked to animal health, the health and well-being of the people, and the sustainability of socio-economic and ecological systems'.[23] In their 2017 Animal Welfare Strategy, they state their vision of 'a world where the welfare of animals is respected, promoted and advanced, in ways that complement the pursuit of animal health, human well-being, socio-economic development and environmental sustainably'.[24]

The WOAH recognises animal welfare as a multi-faceted concern, an 'international and domestic public policy issue', with 'important trade policy implications'.[25] Certainly, regarding the latter implications, 'bilateral agreements can also cause problems for animal welfare if low welfare imports undermine domestic animal welfare standards'.[26] It also claims that it supports domestic countries' '**policy development and governance** related to animal welfare through training, advice, and policy research and analysis'. Further, it claims to make 'recommendations… on the inclusion of animal welfare in **national legislation and on implementing animal welfare standards**', working with relevant

18 RSPCA, 'Focus on Severe Suffering', 2023, online at https://focusonseveresuffering.co.uk/reports/. Accessed 12/04/2023.

19 That is, from birth to death for the production of meat. See, for example, R. Cockshaw, 'The End of Factory Farming: Alternatives to Improve Sustainability, Safety, and Health', Voices in Bioethics, 7, 2021; and J. Rossi and S.A. Garner, 'Industrial Farm Animal Production: A Comprehensive Moral Critique', Journal of Agricultural and Environmental Ethics, 27, 2014, 479-522.

20 The use of animals in the practices of intensive rearing and experimentation are already well documented. Suffice it to say here that the reader can source a wealth of information detailing their use: but see, for example, Peter Singer, Animal Liberation Now [1975] (The Bodley Head, 2023), chs. 2 and 3; Richard Ryder, Victims of Science: The Use of Animals in Research [1975], revised edn. (National Anti-Vivisection Society Ltd, 1983); Andrew Linzey, et al., Normalising the Unthinkable: The Ethics of Using Animals in Research, Andrew Linzey and Clair Linzey (eds.), A Report by the Working Group of the Oxford Centre for Animal Ethics (Oxford Centre for Animal Ethics, 2015); and Ruth Harrison, Animal Machines [1964] (CABI Publishing, 2013).

21 F. Meijboom, et al, 'From Blind Spot to Crucial Concept: On the Role of Animal Welfare in Food System Changes towards Circular Agriculture', Journal of Agricultural and Environmental Ethics, 36 (3), 2023.

22 See Iyan Offar, 'Animal Welfare, Bilateral Trade Agreements and Sustainable Development Goal Two', Scelg Dialogue, No. 8 (University of Strathclyde, Centre of Environmental Law and Governance, 2019), pp.1-5.

23 OIE (World Organisation for Animal Health), OIE Global Animal Welfare Strategy, May 2017, n.p. Accessed at: en-oie-aw-strategy.pdf. Accessed 17/12/24.

24 OIE (World Organisation for Animal Health), OIE Global Animal Welfare Strategy, May 2017, n.p. Accessed at: en-oie-aw-strategy.pdf. Accessed 17/12/24.

25 OIE (World Organisation for Animal Health), OIE Global Animal Welfare Strategy, May 2017, n.p. . Accessed at: en-oie-aw-strategy.pdf. Accessed 17/12/24.

26 Iyan Offar, 'Animal Welfare, Bilateral Trade Agreements and Sustainable Development Goal Two', Scelg Dialogue, No. 8 (University of Strathclyde, Centre of Environmental Law and Governance, 2019), p.4.

organizations, including NGOs. [27] In terms of such standards, it works on a national and international level to promote 'mutually recognized standards', 'to ensure that private or commercial animal welfare standards are consistent with OIE standards'.[28]

As stated by Cox and Stevenson,[29] the OIE's (World Organisation for Animal Health's) international guiding principles include the five freedoms and the three Rs (see below). Indeed, these are just two (of eight) principles stated in the OIE's 'Terrestrial Animal Health Code':

> 2. That the internationally recognized 'five freedoms' (freedom from hunger, thirst, and malnutrition; freedom from fear and distress; freedom from physical and thermal discomfort; freedom from pain, injury, and disease; and freedom to express normal patterns of behavior) provide valuable guidance in animal welfare.
>
> 3. That the internationally recognised 'three Rs' (reduction in numbers of animals, refinement of experimental methods and replacement of animals with non-animal techniques) provide valuable guidance for the use of animals in science.[30]

While these might be internationally accepted or recognised, they are not always enforced and, in relation to animals used in intensive rearing, the evidence shows that these animals in fact do not enjoy such freedoms, even if they are nationally binding on a legal level for some countries. This is compounded by the fact that governments do not always keep their promises with regards to animal welfare proposals, and such proposals are often sidelined in the face of opposition related to conflicts concerning trade issues and profit-driven vested interests.[31]

One example of governments not keeping their promises comes from the UK's decision to abandon the Kept Animals Bill, and their previous backsliding on promises to ban British live exports[32] although the latter has since become law in 2024 in the form of the Animal Welfare (Livestock Exports) Act 2024.[33] Of course, these challenges by animal welfare organisations have huge resources implications for such organisations, who continue to use their limited funds to overcome humongous legal and political obstacles presented by governments' broken commitments.

Another example of this is of the 1998 UK ban of animal testing for finished cosmetics products, a ban that went on to include ingredients of cosmetic productions to align with EU legislation. However, regulatory bodies in the EU have since tried to redefine the ban to allow for new tests on ingredients used in cosmetics, appealing to EU chemical regulations.[34] Since leaving the EU, instead of tightening up regulations regarding animal testing, the UK has aligned its policy on animal testing with that of the EU's chemical regulations to allow for testing (in the UK) of cosmetics ingredients. This is with some caveat so that some substances used exclusively as cosmetics ingredients are not permitted to be tested on animals. It is worth noting that this caveat was a partial reinstatement of the ban but it was only introduced after legal challenges by animal welfare organisations (who made such challenges once they had discovered that the ban had been abandoned, thereby sanctioning testing).[35] Such slow progress in terms of the three Rs is one reason why the charity Cruelty-Free International is urging for a Minister for Animal-Free Science.[36]

27 OIE (World Organisation for Animal Health), OIE Global Animal Welfare Strategy, May 2017, n.p. Accessed at: en-oie-aw-strategy.pdf. Accessed 17/12/24. Emphasis OIE's.

28 OIE (World Organisation for Animal Health), OIE Global Animal Welfare Strategy, May 2017, n.p. Accessed at: en-oie-aw-strategy.pdf. Accessed 17/12/24.

29 Janice H. Cox and Peter Stevenson, 'Doughnut Economics: Incorporating Animal Welfare', Well Being International Studies Repository, 2022, p.3. Accessed: https://www.wellbeingintlstudiesrepository.org/es_ee/4 on 17/12/2024.

30 OIE (World Organisation for Animal Health), Terrestrial Animal Health Code, 'Introduction to the Recommendations for Animal Welfare', Chapter 7, 2018. Accessed at: Chapter 7.1. (woah.org). Accessed 13/03/24.

31 See, for example, Steven Cooke, 'Animals Let Down by Broken Promises', Transforming Society, Transforming Society ~ Animals let down by broken promises, Bristol University Press and Policy Press, 28 June 2023, accessed 03/10/2024; and Animal Aid, 'Animal protection groups unite to confront government over broken promises', Animal protection groups unite to confront government over broken promises - Animal Aid, 8 May 2023, accessed 03/10/2024.

32 See further CIWF, 'Kept Animals Bill dropped and with it a key chance to ban live exports', 25 May, 2023. Online at: Kept Animals Bill dropped and with it a key chance to Ban Live Exports | Compassion in World Farming (ciwf.org.uk). Accessed 13/03/24.

33 Animal Welfare (Livestock Exports) Act 2024, Animal Welfare (Livestock Exports) Act 2024 (legislation.gov.uk), accessed 03/10/2024.

34 See FRAME (Fund for the Replacement of Animals in Medical Experiments), 'FRAME supports Cruelty Free International's petition calling for the government to rule out all cosmetic animal testing | FRAME, 7 Apr. 2022, accessed 03/10/2024; and Cruelty Free International, 'UK Government reinstates partial band on animal testing for cosmetics', 17 May 2023, online at UK Government reinstates partial ban on animal testing for cosmetics | Cruelty Free International, accessed 13/03/24.

35 Cruelty Free International, 'UK Government reinstates partial band on animal testing for cosmetics', 17 May 2023, online at UK Government reinstates partial ban on animal testing for cosmetics | Cruelty Free International, accessed 13/03/24; and Chelsea Munro, 'Victory! Animal testing of ingredients exclusively used as cosmetics has ended in the UK', PETA, Nov. 23, 2023, online at Victory! Animal Testing of Ingredients Exclusively Used in Cosmetics Has Ended in the UK (peta.org.uk), accessed 13/03/24.

36 Cruelty Free International, 'Despite disappointing

There are still many ingredients for which licensing for animal testing is permitted, not just for those classed as ingredients for cosmetics but for other products too (glues and washing up-liquid being just two examples). The fact is that many tests on animals are unnecessary, as well as unjustified, with many non-animal replacement tests already in use, including tests for skin irritation, skin sensitisation, botulin batch potency, veterinary vaccines safety, and antibody production.[37] Though alternatives exist for all these five tests, animals continue to be used instead. This reflects a serious failure by institutions and government to adequately implement the three Rs and address animal suffering involved in these experiments. Suffering of this kind would be considered abhorrent outside of the context of animal experimentation.[38] So, in relation to animals used in experiments, while the three Rs may, indeed, be recognised, animals are still being used for many tests for which there are alternatives, with an unacceptable number of animals being used in experiments that cause severe suffering[39]. Certainly, rules around animals used in experiments allow for issues of practicality to overrule the interests of animals in not suffering. Guiding principle 6 of the 'Terrestrial Animal Health Code' (of the OIE) states: 'That the use of animals carries with it an ethical responsibility to ensure the welfare of such animals to the greatest extent practicable'.[40]

While the three Rs is a statutory requirement in domestic law for some countries,[41] even at this level of national implementation they are applied inconsistently, not least because there is no unanimous agreement regarding how they are to be defined

rise in animal testing in Britain, figures show glimmers of hope', 30 June 2022, online at: Despite disappointing rise in animal testing in Britain, figures show glimmers of hope | Cruelty Free International. Accessed 13/03/24.

37 Cruelty Free International, 'Our UK RAT List Highlights animal tests that must be replaced for the sake of animals and good science', 10 Feb. 2023, online at: Our UK RAT list highlights animal tests that must be replaced for the sake of animals and good science | Cruelty Free International. Accessed on 13/03/24.

38 See Rebekah Humphreys, 'Moral Feelings, Compartmentalization and Desensitization in the Practice of Animal Experimentation', in Natalie Thomas (ed.), Animals and Business Ethics (Palgrave Macmillan, 2022), pp.229-250.

39 See RSPCA, 'Focus on Severe Suffering', 2023, online at https://focusonseveresuffering.co.uk/reports/. Accessed 12/04/2023.

40 OIE (World Organisation for Animal Health), Terrestrial Animal Health Code, 'Introduction to the Recommendations for Animal Welfare', Chapter 7, 2018. Accessed at: Chapter 7.1. (woah.org). Accessed 13/03/24.

41 Particularly members of the EU: see European Commission, 'Animals in Science', European Union, online at: https://environment.ec.europa.eu/topics/chemicals/animals-science_en#:~:text=EU%20legislation%20on%20animals%20in,the%20use%20of%20live%20animals. Accessed 15/03/24.

and applied.[42] Meanwhile, animals still continuing to suffer abysmally in animal experiments. In addition, at an international and national level, issues of practicality can end up trumping animals' basic interests in not suffering, and this can be seen in intensive farming too where animals' interests are ridden roughshod over for the sake of increasing efficiency. Such is the extent to which our moral judgments about animals are compartmentalised that animals used in commercial practices are often treated in ways that would be considered barbaric outside those practices.[43] This continues despite the extent of their suffering and despite their being, arguably, among the most exploited creatures on the planet.

But, in order to respect animals' interests, they need to be given genuine moral consideration in and of themselves, irrespective of their practical use for humans, and while this does not mean that animals cannot be used in various ways, it does and should put limits on how we use them. At the very least, such moral consideration should prevent some of the worst cases of exploitative from continuing, including, for example, continuing to experiment on animals for unnecessary purposes or where alternatives are available, and in the case of farm animals continuing to rear them in the cramped, overcrowded, unnatural conditions of the factory farm. As argued by Janice Cox and Jessica Bridges, 'Every effort should be made to find humane and sustainable solutions; and animal suffering and deaths should simply not be sanctioned where uses are inessential and / or proven alternatives are available'.[44]

Certainly, the global systemic injustices endured by animals are a reason for international collaboration and an acceptance of our collective responsibility.[45] Such collaboration is required to change our treatment of animals not just in relation to healthy human/animal relationships and overcoming systematic injustices, but also for the good of the animals themselves.

International Law for Animals

That said, returning directly to principles 2 and 3 (above), although such principles are internationally recognised, it should be noted that international standards on animal welfare—such as those outlined by organisations like the World Organisation for Animal Health (WOAH) and the Universal Declaration on Animal Welfare (UDAW)—are often non-binding. While these standards provide guidelines and recommendations, their enforcement depends on individual countries adopting and incorporating them into their national laws and regulations.

The level of compliance with international standards on animal ethics varies globally. Countries may choose to adopt international standards on animal ethics as part of their commitment to animal welfare, but the implementation and enforcement of these standards are ultimately within the jurisdiction of each individual nation. Some countries may have comprehensive laws and regulations that align with international standards, while others may have limited or no specific legislation regarding animal welfare.

As such, without international law, domestic law on animal welfare remains at threat from being undermined by the rules and regulations of other countries, economic infrastructures, and general trade policies and practices, as well as consumer choices. But an international law could counterbalance this. As Anne Peters claims in her important work Animals in International Law,

> In a range of other legal fields, various international instruments, notably trade agreements, unfold mostly detrimental effects for animal welfare. In order to outbalance these unintended negative repercussions, the instruments should be interpreted in a more animal-friendly way. New international rules on animal welfare could serve at this point. The pertinent prescription of the Vienna Convention on the Law of Treaties (VCLT) requires that "there shall be taken into account… any **relevant rules of international law** applicable in the relations between the parties" (Art. 31 (3) (c) VCLT [Peters' emphasis added]). Only international rules, not domestic ones, could perform this important function as a catalyst for a more animal-friendly reading of existing international trade agreements.

These observations, taken alone, justify an in-

42 J. Tannenbaum and B.T. Bennett, 'Russell and Burch's 3Rs Then and Now: The Need for Clarity in Definition and Purpose', Journal of the American Association for Laboratory Animal Science, 54 (2), 2015, 120-132.

43 Rebekah Humphreys, 'Moral Feelings, Compartmentalization and Desensitization in the Practice of Animal Experimentation', in Natalie Thomas (ed.), Animals and Business Ethics (Palgrave Macmillan, 2022), pp.229-250; see further Rebekah Humphreys, Animals, Ethics, and Language: The Philosophy of Meaningful Communication in the Lives of Animals, The Palgrave Macmillan Animal Ethics Series (Palgrave Macmillan, 2023), p.83.

44 Janice Cox and Jessica Bridgers, World Animal Net, 'Why is Animal Welfare Important for Sustainable Consumption and Production?', United National Environment Programme, Perspectives, Issue No. 34, 2019, p.3. Accessed at: Why is animal welfare important for sustainable consumption and production? (apo.org.au). Accessed 17/12/24.

45 Nussbaum, Martha, Justice for Animals: Our Collective Responsibility (Simon and Schuster, 2022), p.314.

ternational, even a global law approach to animal welfare.[46] The need for such an approach becomes dramatic when we consider the most important feature of globalisation, namely capital and labour mobility and global supply chains in the animal industries.[47]

In addition, it should be noted that, in liberalistic consumer societies at least, what is in animals' good often conflicts with people's own conception of the good and their freedom to consume that which is available to consume.[48] This is impacted by the fact that animals' interests are not properly represented in the political sphere, and so their interests can be ridden roughshod over, with the interests of big businesses often outweighing the basic, even vital, interests of animals in having their welfare taken into account. This has led some political theorists to argue for democratic reform to enfranchise animals.[49]

Issues concerning trade and democratic systems are complex ones, treatment of which is beyond the scope of this paper.[50] However, suffice it to say here that injustices done to animals are systemic in nature, and whatever the laws of counties, national laws or domestic laws, animals continue to be abused on a massive scale internationally, experiencing unimaginable suffering at the hands of humans. As such, their treatment very much needs to be approached on an international level, not only a domestic one. The injustice of animals is entrenched within global economic systems and societal norms, and so international clout is needed to bring domestic policies into line with international guiding principles as a matter of justice and, from the animals' perspective, as matter of urgency. And, as plausibly suggested by Peters, international law can take the lead in setting a standard for others to follow. [51]

Given that, on an international level, it is no longer considered morally justified to treat animals as mere objects and in ways that do not respect their welfare (not only in relation to the five freedoms[52] but also in respect of a supposed commitment to replace, refine and reduce animal experiments[53]), what is needed at a statutory level is an international law to pave the way for a globalised approach to animal welfare, to ensure morally justifiable treatment and, at the very least, serious consideration of animals' basic interests in not being subjected to pain and suffering. As Peters claims, 'Crucially, the limited scope of national regulation of animal welfare within the states' confines hampers their effectiveness. They run aloof in the face of globalization. Because animal issues have "gone global"… they require global responses of the law, ideally in combination with local solutions'.[54]

International law plays a crucial role in protecting humans by establishing norms and standards that govern the behavior of nation-states and individuals. Treaties and conventions under international law set the foundation for promoting dignity, equality, and the well-being of individuals across borders. Enforcement mechanisms are imperfect, but they aim to hold violators accountable and contribute to a more just and humane world. Domestic jurisdictions play an active part in protecting animal welfare; but animal rights are usually unrecognised.[55] Moreover, as argued by Peters, 'animal rights would need to be universalized in order to deploy effects in a globalized setting'.[56]

Charlotte Blattner further argues that, just as it has transformed human rights law, extraterritorial juris-

46 In text citation: Anne Peters, 'Global Animal Law: What It Is and Why We Need It', Transnational Environmental Law, 5 (0), 2016, p.9; and T. G. Kelch, Globalization and Animal Law: Comparative Law, International Law, and International Trade, 2nd edn. (Wolters Kluwer, 2017), p.396.

47 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), pp.48-50.

48 See further Robert Garner and Siobhan O'Sullivan, 'Introduction', in Robert Garner and Siobhan O'Sullivan (eds.), The Political Turn in Animal Ethics (Rowan and Littlefield, 2016), p.4; and Robert Garner, 'Political Ideology and the Legal Status of Animals', Animal Law 8, 77 (2002), pp.88-89.

49 See further Robert Garner, 'Political Representation of Animals' Voices', in A. Vitale and S. Pollo (eds.) Human/Animal Relationships in Transformation, The Palgrave Macmillan Animal Ethics Series (Palgrave Macmillan, Cham, 2022), pp.341-62; Robert Garner, 'Animals and Democratic theory: Beyond an Anthropocentric Account', Contemporary Political Theory, 16, 2017, 459-477; and Alasdair Cochrane, Sentientist Politics: A Theory of Global Inter-Species Justice (Oxford University Press, 2018), ch.3.

50 But see Charlotte Blattner, 'An Assessment of Recent Trade Law Developments from an Animal Law Perspective: Trade Law as the Sheep in Wolf's Clothing?', Animal Law Review, 22 (2), 2016, 277-310; and Charlotte Blattner, Protecting Animals Within and Across Borders: Extraterritorial Jurisdiction and the Challenges of Globalization (Oxford University Press, 2019).

51 See Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), p.24; see also Cebuan Bliss, Review of Anne Peters, Animals in International Law (Brill, 2021), Journal of International Wildlife Law and Policy, 25 (1), 2022, p.97.

52 RSPCA, 'RSPCA Knowledge Base', online at: What are the Five Freedoms of animal welfare? – RSPCA Knowledgebase, updated May 18, 2021. Accessed 13/03/24.

53 European Commission, 'Animals in Science', n.p., European Union, online at: https://environment.ec.europa.eu/topics/chemicals/animals-science_en#:~:text=EU%20legislation%20on%20animals%20in,the%20use%20of%20live%20animals. Accessed 15/03/24.

54 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), p.37.

55 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), pp.23-24.

56 Anne Peters, 'Toward International Animal Rights', in Anne Peters (ed.), Studies in Global Animal Law, Springer Open, 2020, p.109.

diction has the potential to transform both domestic and international animal law[57] subject to careful design and scrutiny. Although extraterritorial jurisdiction in animal law could indeed be abused to force one's beliefs and values on other countries and their people, evaluating extraterritorial jurisdiction only based on this is an injustice to the idea and its ideals. A 'dense' jurisdictional web of 'overlapping and concurring laws' could be created. As she claims, States can react quickly to the worldwide issues caused globally by a state's widely accepted practice of extraterritorial jurisdiction. Legal pluralism could promote innovation and competition, provide avenues for political discussion and negotiation, and enable states to tailor broad or inadequate legislation to a specific situation. As such, 'extraterritorial jurisdiction can be used as a dynamic tool to improve social welfare in an age of globalization, including the welfare and lives of animals'.[58]

However, in relation to who can be classed as legal persons, Steven Wise claims that 'a high, thick legal wall' prevents nonhumans from being categorised as such.[59] He draws on an 'Animal Rights Pyramid' to elucidate the significance of recognizing sentient animals as legal persons[60] before any decision or discussion as to whether an animal has legal standing (about whether that animal has an injury that needs to be redressed) is brought to a court of law. Though nonhumans do not possess legal rights, they do have the capacity to possess them and therefore they should be called legal persons in the first instance in order that their sufferings can be considered in the legal context.[61]

While the EU has worked hard to provide a framework for its member nations, there is no regulatory body globally that deals with animal welfare. The Treaty on the Functioning of the European Union, which gives recognition to the sentiency of animals and the value of animal care, should imply a non-instrumental understanding of animals' interests.[62] But, of course, unanimous acceptance of the sentiency of many other than human animals in and of itself does not mean that such an implication is enacted in practice. That said, other states ought to recognise the significance of acknowledging animals in their national documents, as Germany and India have already done with regard to the protection of animals in their respective Constitutions.[63]

Furthermore, international law establishes mechanisms for accountability and justice, such as the International Criminal Court, to hold individuals responsible for widespread human rights abuses and war crimes.[64] By addressing the global aspects of animal protection, international law helps to prevent cross-border trafficking of endangered species and promotes wildlife conservation efforts on a global scale.[65] International organizations, such as INTERPOL, can play a crucial role in facilitating cross-border cooperation.[66] Whilst an international animal welfare law would not solve all the problems related to the use of animals in global commercial practices, approaching issues of justice for nonhuman beings through international cooperation and adherence to international law in the context of animal ethics could well lead to the strengthening of animal welfare standards globally. However, differing cultural attitudes towards animals, inconsistent enforcement capacities among nations, and jurisdictional complexities all contribute to the challenges involved.

Legal developments in animal ethics have been evolving, with an increasing recognition of animals as sentient creatures who are entitled to legal protection. In addition, advances in alternative testing methods and technologies are influencing legal considerations regarding animal experimentation.[67]

57 Charlotte Blattner, Protecting Animals Within and Across Borders: Extraterritorial Jurisdiction and the Challenges of Globalization (Oxford University Press, 2019), p.409.

58 Charlotte Blattner, Protecting Animals Within and Across Borders: Extraterritorial Jurisdiction and the Challenges of Globalization (Oxford University Press, 2019), p.81.

59 Steven Wise, 'Legal Personhood and the Nonhuman Rights Project', Animal Law Review, 2010, p.5. Accessed at: https://www.animallaw.info/article/legal-personhood-and-nonhuman-rights-project. Accessed 28/04/24.

60 Steven Wise, 'Legal Personhood and the Nonhuman Rights Project', Animal Law Review, 2010, p.2. Accessed at: https://www.animallaw.info/article/legal-personhood-and-nonhuman-rights-project. Accessed 28/04/24.

61 Steven Wise, 'Legal Personhood and the Nonhuman Rights Project', Animal Law Review, 2010, p.5. Accessed at: https://www.animallaw.info/article/legal-personhood-and-nonhuman-rights-project. Accessed 28/04/24.

62 See Steven White, 'Into the Void: International Law and the Protection of Animal Welfare', Global Policy, 4 (3), 2013, p.392.

63 See Anne Peters, 'Toward International Animal Rights', in Anne Peters (ed.), Studies in Global Animal Law, Springer Open, 2020, p.111; see also Steven White, 'Into the Void: International Law and the Protection of Animal Welfare', Global Policy, 4 (3), 2013, p.392.

64 See Claire Klobucista and Mariel Ferragamo, 'The Role of the International Criminal Court', Last updated August 24, 2023, n.p. Online at: https://www.cfr.org/backgrounder/role-international-criminal-court. Accessed on 15/03/24.

65 See K. Consalo, 'Fighting from the Brink: International Efforts to prevent Illegal Trafficking in Endangered Species', ENVIRONS Environmental Law and Policy Journal, 43 (1), 2020, 84-99. Online at Fighting Back from the Brink: International Efforts to Prevent Illegal Trafficking in Endangered Species | UC Davis Environmental Law and Policy Journal. Accessed 15/04/24.

66 See Bruno Min, 'INTERPOL reforms and the challenges ahead for cross- border cooperation', 2017, n.p. Online at: The Foreign Policy Centre, https://fpc.org.uk/interpol-reforms-challenges-ahead-cross-border Steven -cooperation/. Accessed 15/03/24.

67 See A.K. Kiani, et al (International Bioethics Study

Some jurisdictions are enacting laws to ban certain cruel practices, such as cosmetic testing on animals. Moreover, there is a growing trend towards recognising animals' emotional and cognitive capacities in legal frameworks. Some jurisdictions are exploring the concept of animal 'personhood' to grant certain rights to specific animals.[68]

Some cultures may prioritise specific uses of animals or have unique perspectives on their treatment, and tailoring ethical guidelines to respect diverse cultural values could promote better understanding and compliance, but this in no way implies imply that a society's values should be insulated from moral criticism or are immune from evaluation. It should be noted here that some international law protecting human beings has a moral basis (as do many domestic laws), despite differences in cultural values; such laws are based on human beings as sentient subjects of a life who are capable of being unjustifiably subjected to great pain and suffering by other human beings. Animals used in commercial practices are also sentient subjects of a life, and the pain and suffering inflicted on such animals is abhorred internationally, despite such infliction being mostly normalised systematically on an institutional and international level. Given that humans and nonhumans are analogous in many respects, at the very least in respect of their sentience and the fact that they have their own lived experiences (they are, indeed, subjects in this sense), analogies can be informative in considering the basis of an international law to protect these animals and what such an international animal law might look like.

Indeed, animal sentience has played a role in the legal arena, in the EU for example. This is clearly outlined by Marita Gimenez-Candela: 'Since the beginning of the 90s, the category of animals as sentient beings has been introduced firstly by declarations, then in protocols, and finally in an article of the treaties of the European Community and now of the European Union'.[69] She further states that

> Animal sentience is not as obvious for the legislator, and perhaps it may be worth taking the time to consider the possible implications, its introduction into legal text up until now and what could be hoped for from a collaboration between scientists and jurists. Animal welfare science driven by the increasingly stronger verification of the sentience of animals,[70] opens a front of discussion that… puts into question whether animals can only be objects of Law, and has begun to consolidate that animals, as sentient beings, are destined to be subjects of the law, through the recognition that they are living beings endowed with sensibility.[71]

Animals as sentient beings deserve legal recognition, acknowledging their capacity to feel pain and experience emotions. Granting them the status of subjects of law could afford them, at the very least, some minimum protection from cruelty and could promote better treatment, reflecting an evolving understanding of their intrinsic value and rights within a legal framework.[72] Recognising animals as subjects of law could also lead to stronger animal welfare regulations, encouraging responsible stewardship. This legal shift could well promote a

Group), 'Ethical Considerations Regarding Animal Experimentation', Journal of Preventative Medicine and Hygiene, 17: 63 (2 Suppl. 3), June 2022, E255-E266. Accessed at: Ethical considerations regarding animal experimentation - PMC (nih.gov). Accessed 28/04/24.

68 See Steven Wise, 'Legal Personhood and the Nonhuman Rights Project', Animal Law Review, 2010, pp.4-5, accessed at: https://www.animallaw.info/article/legal-personhood-and-nonhuman-rights-project, on 28/04/24. See further Steven Wise, 'Nonhuman Rights to Personhood', Pace Environmental Law Review, 1278, 2013, accessed at: https://digitalcommons.pace.edu/pelr/vol30/iss3/10, 13/03/24. Pragmatically, the possession of 'personhood' is deemed sufficient for legal rights, or, at least, the autonomy associated with personhood is deemed sufficient (Wise, Drawing the Line: Science and the Case for Animal Rights (Perseus Books, 2002), p.24). However, it in no way follows that personhood or autonomy is necessary for moral standing or moral consideration.

69 Marita Gimenez-Candela, 'Animal Law: What Is Left to be Said by the Law About Animals', in A. Vitale and S. Pollo (eds.) Human/Animal Relationships in Transformation, The Palgrave Macmillan Animal Ethics Series (Palgrave Macmillan, 2022), p.373; Gimenez-Candela cites Enrique,Alonso García, 'El bienestar de los animales como seres sensibles-sentientes: su valor como principio general, de rango constitucional, en el derecho español', in Los principios generales del derecho administrativo, ed. Juan Alfonso Santamaria Pastor, (España: La Ley, 2010), pp.1427–1510; and Marlene Wartemberg, 'Art. 13 Lisbon Treaty/TFUE—Historical, Constitutional and Legal Aspects', in David Favre and Teresa Giménez-Candela (eds.), Animales y Derecho, (Tirant Lo Blanch, 2015), pp.353-370.

70 Roger Brambell, Report of the Technical Committee to Enquire into the Welfare of Animals Kept Under Intensive Livestock Husbandry System (Her Majesty's Stationary Office, 1965), pp.13-15, and 84-86

71 Marita Gimenez-Candela, 'Animal Law: What Is Left to be Said by the Law About Animals', in A. Vitale and S. Pollo (eds.) Human/Animal Relationships in Transformation, The Palgrave Macmillan Animal Ethics Series (Palgrave Macmillan, Cham., 2022), pp.369-70; Gimenez-Candela here cites Anne Peters, 'Liberté, Egalité, Animalité: Human-Animal Comparisons in Law', Transnational Environmental Law, 5 (1), 2016, 25-53.

72 This is not to say that legal protection is sufficient for promoting animals' interests. Gary Francione argues that the status of animals as property continues to undermine significant changes in the ways we treat animals (Francione, Animals as Persons: Essays on the Abolition of Animal Exploitation (Columbia University Press, 2008), p.71), with Joan Dunayer claiming that 'Freedom from enslavement (property status) is the prerequisite for legal rights', and that constitutional personhood for nonhuman animals is the path to such freedom (Dunayer, Speciesism (Ryce Publishing, 2004), p.139).

change in societal attitudes towards animals, fostering compassion and empathy. It may also spur advancements in animal rights, ensuring fair treatment and addressing issues such as exploitation and inhumane practices in various industries. Overall, better legal protection for nonhuman animals would contribute to a more ethical and humane coexistence between humans and the other sentient beings that share the planet. Such coexistence is certainly needed if the SDGs are to be met, and international legal rights for animals would be a driver for a change in values and attitudes towards the nonhuman world that does not undermine efforts to address current and intergenerational injustices.[73]

Conclusions

While international rights would be only a step on the road to better treatment for nonhuman animals, such law does set a precedent for changing behaviour and attitudes, and is significant in '[u]niversal norm-building'.[74] But as Peters claims, this normative aspect of the law 'must respect cultural diversity, but it need not shield animal cruelty under the guise and pretext of culture'.[75] The role of international law in animal ethics is pivotal, as it establishes norms and standards to address cross-border issues. While progress has been made, gaps remain, and enforcement challenges persist, necessitating ongoing efforts to enhance global legal frameworks for the ethical treatment of animals. International law contributes to animal ethics by fostering cooperation among nations, shaping treaties. However, its effectiveness depends on enforcement mechanisms and commitment from states to prioritise ethical considerations in their policies and practices. Strengthening these aspects can further elevate the impact of international law on promoting humane treatment and conservation of animals worldwide.

International collaboration on animal ethics is crucial for advancing global standards. Nations can share research, best practices, and policies to ensure ethical treatment of animals. This collaboration could well lead to the development of comprehensive guidelines and regulations that prioritise the well-being of animals across borders. Indeed, collaborative efforts could facilitate the exchange of expertise and resources, enabling nations to address common challenges such as animal testing, conservation, and ethical farming practices. Establishing international frameworks for ethical standards encourages accountability and promotes a collective commitment to the humane treatment of animals on a global scale.

Continued efforts in education and awareness could also foster a societal shift towards more ethical treatment of animals. Supporting and promoting cruelty-free practices in industries, as well as advocating for the implementation of stricter regulations on animal welfare, are key actions. Collaboration between governments, NGOs, and industries is essential to drive comprehensive policies that address the diverse facets of animal ethics. Public engagement through ethical consumer choices and activism also plays a vital role in shaping the future landscape of animal welfare.

To enhance the effectiveness of international animal protection laws, it is crucial to reform and strengthen legislation, improve enforcement, cooperate globally, raise awareness, monitor and report, and incentivise compliance. By combining these efforts, there is a greater likelihood of creating a more effective and comprehensive framework for international animal protection. Furthermore, to address cultural considerations in the application of animal ethics laws, it is essential to promote cross-cultural dialogue, education and awareness with regards to animal welfare, customised guidelines that do not undermine animal welfare, collaborative frameworks, inclusive decision-making including political representation for animals, respect for traditions—without, as Peters' claims, attempting to justify 'animal cruelty under the guise and pretext of culture'[76]—and global consensus. By incorporating these approaches within a framework that recognises the good of animals in and of themselves, it is possible to create a more inclusive, culturally sensitive yet international approach to the application of animal ethics laws.

73 It is worth noting here that the fact that an international law has a moral basis need not make any claims about moral rights (whether of nonhumans or humans). The establishment of laws against certain treatment of humans is based on their interests; interests that are moral considerably, that is, they matter morally. So, while legal rights that have a moral basis are invaluable in protecting interests, they need not be based on claims about moral rights (Rebekah Humphreys, 'Rights, Interests and Moral Standing: A Critical Examination of Dialogue between Regan and Frey', in Issues in Ethics and Animal Rights, ed. Manish Vyas (Regency Publications, 2011), pp.132-133). This is as true in the case of nonhuman beings, as it is in the case of human beings.

74 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), p.24.

75 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), p.24.

76 Anne Peters, Animals in International Law (Brill | Nijhoff, 2021), p.24.