

## ON Tom Regan's Defence of Animal Rights

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### Abstract

There is no doubt that Tom Regan is the leading protagonist of the Animal Rights abolitionist project in philosophy. The abolitionist decry the use and exploitation of non human animals. This paper examines Regan's arguments in defence of non human animal rights and the abolitionist project. Using the philosophical method of critical analysis and argumentation, the paper examines Regan's thesis that non human animals are bearers of rights and revealed that there are some seeming inconsistencies in Regan's thesis.

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### I. INTRODUCTION

There are many reasons why non human animals are not accorded moral rights. The French philosopher Rene Descartes, and many others, taught that animals were no more than complicated biological robots and do not feel pain and denied them moral status and rights (Descartes R, 1965, 113-116). For this reason, contemporaries of Descartes treated nonhuman animals with total disregard for the pain they might suffer (Leonora C. 1941, 2).

Another reason why animals are denied rights is that animals cannot think rationally or abstractly, so it is acceptable to treat them the way we like or as our property "It is as difficult to deny that many animals are capable of rational or abstract thought as it is to deny dogs have tails" (Francione, G. 2000, 29). Historically, one might trace this line of argument back to Aristotle, who thought "that in none but [man] is there intellect" (Regan T. and Singer P, 1976, .55) and that animals as the lower sort are by nature slaves, and "it is better for them as for all inferiors that they should be under the rule of a master". (Regan T. and Singer P, 1976, .109)

St. Thomas Aquinas, like Aristotle and unlike Descartes who is of the belief that animals do not feel pain or pleasure and they are sentient and so it is possible to treat them cruelly, Aquinas holds that, it is wrong to treat animals cruelly. For Aquinas, we have no duty to them to abstain from treating them cruelly. This apparent contradiction can be understood by understanding the key to Aquinas position. For him, we can only have duty to those beings—ourselves, our fellow man and God—who have the capacity to reason (Regan T. and Singer P, 1976, .9). Since only beings that are rational are capable of determining their actions, they are the only beings towards which we should extend concern "for their own sakes" (Regan T. and Singer P, 1976, .5-12)

<sup>1</sup>Aquinas believes that if a being cannot direct its own actions then others must do so; these sorts of beings are merely instruments. Instruments exist for the sake of people that use them, not for their own sake. Since animals cannot direct their own actions, they are merely instruments and exist for the sake of the human beings that direct their actions. Aquinas believes that his view follows from the fact that God is the last end of the universe, and that it is only by using the human intellect that one can gain knowledge and understanding of God. Since only human beings are capable of achieving this final end, all other beings exist for the sake of human beings and their achievement of this final end of the universe. Saint Thomas Aquinas wrote that intellectual creatures hold the highest place in the universe "because they approach nearest to the divine likeness (Regan T. and Singer P, 1976, .57) ... [They] are ruled by God, as though He cared for them for their own sake, while other creatures are ruled as being directed to rational creatures." (Regan T. and Singer P, 1976, .56) From this it was a short step to the conclusion that "it is no wrong for man to make use of [animals], either by killing or in any other way whatever." (Regan T. and Singer P, 1976, .55)

However, many humans such as the severely senile, morons, young children, and the mentally retarded cannot think rationally or in abstract terms and yet are accorded rights. For this reason, we never think of using such human animals as subjects of experiments, as sources of food or materials for laboratory experiments or their skin for clothing, Regan then argues that if rationality or sentience is the basis for according right, non human animals should be accorded rights.

This paper therefore examines Tom Regan's arguments in defense of the rights of animals.

## II. METHODOLOGY

This research employed the philosophical methods of analysis, argumentation and criticism to study data collected. The sources of data collected included books, journals and the internet.

## III. REGAN'S 'LIKE-US' STRATEGY AND DEFENCE OF THE RIGHTS OF ANIMALS

Tom Regan's argument for the defence of the right of animals may be summarized as follows. If normal adult humans have rights by virtue of being rational beings then marginal humans – infants, young children, senile, the yet to be born, the cognitively impaired and retarded humans cannot have rights on the basis of rationality or intelligence, because they are not capable of being rational. Thus, either rationality is not the basis of rights or those marginal humans do not have rights. So, there is a dilemma, we either accept some consideration such as rationality or intelligence as the sole basis or criterion for rights and accept that infants senile and retarded humans have no rights and can be treated and eaten as we treat and eat cows, pigs, and chickens, or we accept that rationality or intelligence is not the sole basis or criterion for rights. Since infants, the yet to be born, senile, the retarded humans have rights then rationality or intelligence is not the sole basis for rights. If intelligence or rationality is not the sole basis of rights then, there must be some other criteria (Shawn, 2004, 3). What then are some of the criteria?

In "One Argument Concerning Animal Rights," Tom Regan (1982, 136) argues that there are basically two possible criteria for having rights. They are having interests and having sentience (i.e. the capacity to feel). But he is of the opinion that both criteria are inadequate for the same reasons. For him, it is the case that the primary reason for having interests and sentience is not substantive enough to having an adequate criterion for rights. This is because inherently they fail to illuminate why humans or animals have rights. The interests and sentience criteria fail to illuminate why humans or animals have rights because it cannot account for why it is wrong to treat these beings merely as means, that is, as if they have value merely as tools or instruments for some other being's ends. So, for Regan, in order to illuminate why certain beings have rights, a criterion of rights must explain why it is wrong to treat those beings merely as means. I think this is because part of what it means for a being to have rights is that it is wrong to treat that being merely as a means. But then, from a socio-political stance, people give up their rights willingly, ready indeed to be used as a means to somebody else ends. Do we then say they do not have the supposed rights as given to them or as said? They have rights because they have informed choice (Regan 2003. 68).

The purpose of Regan's arguments on the position of marginal humans and the rejection of rationality, interest and sentience, is to show that traditional theories of rights have failed to establish that humans including marginal and border line cases have rights. This then paved the way for Regan to develop a new theory which includes rights for animals presented.

Regan then, presented an inclusive criteria of rights which accommodate both humans and non-human animals. According to Regan, the only property that is common to paradigmatic humans - normal adult human beings and the marginal humans, is the property of being a subject-of-a-life. By subject-of-a-life, Regan means a being that has beliefs and desires, perception, memory, a sense of the future, feelings of pleasure and pain, preference- and welfare-interests, a psychological identity over time to mention a few (Regan, 1983, 243).

This means that the term subject-of-a-life conveys to us a feeling of how individuals of other species are similar to us; we are all individuals in our own right going through the process of life. Further still, Regan (1982, 135) in "*One Argument Concerning Animal Rights*," argues that entities are subjects-of-a-life if they possess a life that has value for them that is, that can be better or worse for them. He states further that each subjects-of-a-life is "the center of his or her own universe of value, living through slices of experience that bode well or ill for the subject himself or herself." (Regan, 1982, 135) The implication of this is that each non human animal has a unique life story, just as the story of your life is peculiar to you and no one else, and in this sense non human animals are like us. Regan expatiates further that, it is the case that all animals are somebody - someone with a life of their own. He is of the opinion that even if subjects-of-a-life cannot make moral choices or talk like humans, "what happens to them matters to them" (Regan, 1983, 243), so they should have moral rights..

In other words, central to Regan's philosophy is his subject-of-a-life criterion. This property is one that all human beings including marginal humans and animals have in common. Regan coined the concept subject of a life to stand for the characteristics or properties he found common to those who have an experiential life. This paper observes that a difficulty with this argument is that the list of features that constitute a subject-of-a-life is arbitrary. One can add or subtract features to include or exclude species to suite one's bias. Though the general idea of a subject-of-a-life is a sympathetic and descriptive expression, it may not bear up to examination too closely.

Unlike the interest or sentience criterion, the subject-of-a-life criterion reveals why certain beings have inherent value, or why it is wrong to treat certain beings merely as means (Regan, 1982, 136).

This means that non human animals do have inherent value for life and hence rights and the need to preserve their right for existence. Thus, we need to acknowledge and respect that they are subjects-of-a-life whose value is logically independent of any other beings taking an interest in it.”(Regan,1982, 136). He argues that we have natural duties toward these animals, and should treat them equally and not interfere with their normal life course. Being a subject-of-a-life is his criterion for inclusion of an individual in the moral community and those who satisfy this criterion are not to be viewed or treated as mere receptacles (Regan,1982, 136). .

According to Regan, *inherent value* is equally possessed by all subject-of-a-life and he adds that all mentally normal mammals of at least one year old must be regarded as such. Unlike *intrinsic value*, that is, *inherent value* does not pertain to animals to a higher or lesser degree. An animal either has it, or not. It exists independently of awareness, interest, or appreciation. If, on the other hand, one maintains that the moral status of animals depends on things like needs and preferences, this would mean that moral status is something which is attributed, that it is generated by man.

However, it should be noted that, like us, other animals have a complicated unified psychology involving cognitive, communicative, affective volitional and other noteworthy psychological capacities including sentience (Cohen and Regan, 2001,270-271). Like us, their consciousness is complex. We know this not only through common sense, but because of their similarity to us, behaviorally and physiologically (Regan,1983,28-29) Thus, the welfare of non- human animals, according to Regan, is not different in kind from human welfare. This is because non-human animals are like us.

Regan employed this “like-us” strategy of identification to call into question, the presumed human exceptionality, that is, the idea that we are different from non-human animals. He also used this strategy to expand our moral community. If they are like us, subjects-of-a-life and we are entitled to moral consideration, they are also entitled to moral consideration. Such creatures can be harmed or benefitted like us (Regan, 1983, 235). This means that like us they are somebody and not something (Cohen and Regan, 2001,201), Like us they are more than animate matter. It means all animals are to be seen morally as having inherent value like humans. Thus, it is the case that chimpanzees, baboons, rats and chickens have moral selves just as humans have moral selves, according to Regan. Since non-human animals have moral selves like us, Regan argues that they deserve moral respect just as humans deserve moral respect.

Regan argues that the critical attribute that all humans have in common is not rational or autonomy or sentience but the fact that each of us have a life that matters to us that is, what happens to us matters to us regardless of whether it matters to anyone else. We each experience being a subject-of-a-life. It should be noted that experiencing subject-of-a-life involves more than just sentience – in Peter Singer’s sense of the ability to feel but requires some cognitive sophistication. An experiencing subject-of-a-life has a welfare that has importance to it, wants and prefers things, believes and feels things, recalls and expects things, has ends of its own. Since, non-human animals have the attributes that are common to all humans that are subjects-of-a-life; they have inherent value like us.

But then, having argued that animals are subjects of a life, Regan then moves to the second stage of his argument and argues that beings who are subjects-of-a-life have inherent value. What then is inherent value? Inherent value is a value that ‘inheres in’ or belongs to the individual (Regan,2003,68). For Regan, inherent value is a theory and so gives us a theoretical leg to stand on. According to this theory, it is the individual that has moral value or what Kant calls worth or inherent worth, according to Regan (2003,,67) While Kant gives the name, worth to this kind of value that Regan is talking about, Regan prefers the name inherent value because this value belongs to the individuals who have it unlike the contractarian kind of value that is conferred by contract (Regan,2003,67).

This kind of value is contrary to the utilitarian’s conception of value which belongs to the quality of other experiences, the satisfaction or frustration of our interests(Regan,1983, 235,236) For Regan, it is the cup (the individual) and not what the cup contains (quality of our experience) that has such value (Regan,1983, 236).

Furthermore, inherent value is not merely a factual feature shared by individuals but rather, it is what makes them morally equal. Inherent value may also be interpreted as “ends in itself”(Regan, 2003,68). This theory is not denying that we can be useful to one another but it says it is wrong to treat one another as means. Whenever it is the case that we take informed choice away from persons or force our will on them in pursuit of some selfish or social good what we do is morally wrong. Thus, we have reduced the moral worth (the inherent value) of persons to what is of instrumental value only (Regan, 2003,68)

Notably, what is central to the theory of inherent value is the duty of respect. By duty of respect, we mean that individuals who possess inherent value are owed the direct duty of respectful treatment. Individuals who possess inherent value must be treated as ends in themselves and whenever they are treated as “means to an end” as if they had the value of things, then they are treated with a lack of respect.

This theory of inherent value or worth is central to Regan’s theory of morality just as pleasure and pain are central to utilitarianism. For Regan, acts are right when “inherently valuable individuals are treated with

respect, wrong when they are treated with a lack of respect”, not to be used as a means entails the right to be treated with respect which includes the right not to be harmed. Regan rejects Kant's idea that respect is due only to rational beings (Kant, 1998, 428). Rather Regan holds that the right to be treated with respect is due to “subject-of-a-life”. A significant point to note here is that if experience of being a ‘subject-of-a-life’ is the basis for ascribing inherent value to individuals, to be consistent we must ascribe inherent value and hence, moral rights to all subjects-of-a-life, whether human or animal. This is because, in Regan view, justice involves viewing certain individuals as having inherent value, that is to say, individuals— man or animal- who are subjects-of-a-life have values in themselves and independently of their utility to anyone. Such individuals also have inherent value or worth which is distinct from their intrinsic value which attaches to the experience they have, for instance, their pleasure or preference satisfaction. Hence, it becomes obvious that one cannot determine the inherent value of an individual by simply totalling the intrinsic values of their experiences. For Regan, inherent value means that individuals have worth in themselves and that they are not reducible to the value attached to their experiences, preference or interest as the utilitarian's wants us to believe. Regan argues that ‘they have value in their own right, a value that is distinct from, not reducible to and incommensurate with the values of those experiences which as receptacles, they have or undergo’ (Regan 1938, p 236)

So, instead of subscribing to utilitarianism like Singer's proposal of interests as qualification for moral consideration, Regan proposes inherent value which only subjects- of-a- life have or possess. Regan rejects the utilitarian moral theory because it can justify the harm done to one individual by the production of a greater net benefit to other individuals (Regan, 1983,235) Non-human animals cannot be harmed on the basis that the net benefit justifies it. non-human animals, like us, have inherent value.

According to Regan Inherent value, is a feature of all individuals who are subject-of-a-life’, including humans and mammals over the age of one year. He specifies this because he believes that it is not simply in virtue of being conscious or alive (like plants) that something has inherent value. Non-human animals are surrounded by “no trespassing”(Cohen and Regan, 2001,152, 197) signs because they have inherent value different from their values or usefulness to us.

In Regan's view, the criterion that best illuminates why humans or animals have rights is what he calls the criterion of “inherent value.”( Regan,1982,133)) This is because a being's possession of inherent value “makes it improper a sign of disrespect to treat (that being) as though it had value only as a means.”(Regan,1983 , 133)

Together the principles of respect and harm gave rise to moral rights which are defined as valid claims to certain goods and against certain beings (agents). Since, rights and duties are correlates, moral rights also generate duties not to kill or to refrain from inflicting harm on individuals with inherent value but also to assist when they are in danger or threatened. The respect principle underlies the harm principle which holds that we have a prima facie duty not to harm individuals who have inherent value. So, it is not justifiable to harm beings that have inherent value merely on the grounds that doing so would produce the greatest net benefit for all(1983, 235-236).

According to Regan, the criterion of inherent value best illuminates why certain beings have rights because it is uniquely able to account for why it is wrong to treat those beings as mere means. For Regan an action is right simply because individuals with inherent value are treated with respect while actions are wrong because they are treated without respect. For instance experimenting on beings with inherent value is wrong because it violates their right to be treated with respect - even if done painlessly. While refusal to inflict pain on or harm beings with inherent value shows respect for their right not to be disrespected (Regan,1983, 68).

This means that the respect principle holds that individuals who have equal inherent value should be treated in ways that respect their inherent value. Further still, the respect principle sets up an egalitarian, non-perfectionist interpretation of formal justice (which requires that we give each individual his or her due).

The principle enjoins us to treat individuals, all individuals having inherent value, in ways that respect their values, not some individuals. Thus, the principle requires respectful treatment of all who satisfy the subjects-of-a-life criterion. Be it humans or animals, we must treat them in ways that respect their equal inherent value. The respect principle being a principle of justice also imposes prima facie duty (there can be exceptions) to assist those who are the victims of injustice at the hands of others. “All who have inherent value are to be given their due and sometimes what they are due is our assistance” ( Regan,1983,249) Moral rights generate duties not only to refrain from inflicting harm upon individuals with inherent value but also to come to their aid when they are threatened by other moral agents (Mary,1987,346).

From the foregoing, it becomes obvious that Regan's position seems to be an uncompromising one. Practically, Regan condemns the use of animals for experiment, testing, as specimen, and research. For him, the rights view requires the abolition of all of these activities.. The use of animals for experiment, specimen, testing, and research involves treating animals merely as means to an end and not as ends in themselves, and this constitutes a violation of the respect principle.

### **A Critique of Regan's Defence of Animal Rights**

To begin with, contrary to Regan's view, Frey argues that since animals do not have language, they lack not only self-consciousness but beliefs also. Since they lack beliefs and self-consciousness, they cannot have consciously held desires. Lacking such desires, Frey concludes, animals have neither interests nor moral rights (Frey, 1989, 40). Thus, for Frey, since animals lack language, they cannot have interest. Since it is interest that entitles humans to moral consideration and since animals lack this quality, they have no claim to moral status or rights. Frey argues further that one cannot have a desire without a corresponding belief. Animals cannot have beliefs because they are unable to comprehend the concept of a belief, that is, they are unable to hold a second order belief - a belief about belief. For example, if a goat gets close to the doorway and turns back because the door is locked, if someone says "the goat believes the door is locked", then that person is claiming, according to Frey, that the goat holds the declarative sentence, "The door is locked", to be true (Frey, 1989, 40). There is no ground whatever for crediting the goat which lacks language with entertaining declarative sentences. Thus, goats or animals in general have no interests. Since, interest is what gives moral consideration to humans on the preference utilitarian theory, then non-human animals do not deserve moral consideration and so have no moral rights, according to Frey (Frey, 1989, 40).

However, DeGrazia David (1991,48-70), has argued that the first order beliefs may be held in the absence of second order beliefs. A human or non-human animal can hold a belief while failing to understand the concept of belief. So, human infants and non-human animals can hold beliefs. Thus, language is not necessary to having a belief and consequently interest. Humans could not have developed language without some preverbal beliefs, according to DeGrazia(1991,48-70),

However, Regan, like DeGrazia, also criticized Frey's view on language. Regan rebuts Frey's view that some mental terms such as belief, memory, desire etc cannot be applied to non-human animals that do not use a human style language. For Regan, only animals that are subjects-of-a-life are qualified for moral consideration. This is because they have inherent value and so are subjects of life which should be treated as ends in themselves and not as a means to an end.

Like Kant's philosophy, Regan's rights view has its own problems or flaws. Given the rights view some humans such as newly fertilized human ova and encephalic neonates, infants born without a brain or brain activity above the brain stem are not subjects -of-a-life. Regan's rights view; interpreted consistently, these humans do not satisfy the subjects-of-a-life criterion and thus judged on this basis, do not have a right to respectful treatment (Cohen and Regan,1991,48-70).

Nevertheless, Regan's rights view leaves the question of whether these human beings can possibly have rights open. The subject-of-a-life criterion is offered as a sufficient condition for having inherent value, meaning: all who are subjects-of-a-life possess inherent value. If we are to be consistent these human beings could not possess inherent worth and moral rights because they are not subjects-of-a-life.

Whether only those who are subject-of-a-life possess inherent value is a question Regan's rights view does not foreclose. In other words, Regan's rights view allows for the possibility that individuals who are not subjects-of-a-life might nonetheless have a kind of value that is not reducible to instrumental value alone. However, the onus of proof will be on those who wish to attribute such value beyond subjects-of-a-life to offer a principled, non-arbitrary, non-pre-judicial and rational defense of doing so. Further still, Regan also fails to show how to resolve conflicts between competing rights held by humans and nonhumans such as the right of scientists to carry out their duty to society, or society member's right to survival and the right of non-human animals not to be treated as means to an end (Omotosho,2017,162-164).

For Regan, animals should not be used in experiments. This is because animals are subjects of life and have equal inherent value like us. However, if Regan thinks that a dog should be thrown out of a lifeboat so that the humans in it can be saved, he cannot deny that we should experiment on a non human animal to save diseased humans in an epidemic. This is because in Regan's view it is morally obligatory to kill the only dog in a boat of five individuals – one dog and four humans to save the lives of four human survivors in the life boat situation since there is room for only four survivors (Regan,1983, 324). Thus, it may be argued that Regan is not totally against the use of animals in experiments when disaster is looming. This is because Regan further adds that even if the decision were between four humans and a million dogs..

It should be noted that Regan holds in "One Argument Concerning Animal Rights," that different entities can have varying degrees of inherent value depending essentially on whether a subjects-of-a-life possesses "intellectual virtues" such as moral agency, autonomy, and rationality. He argues that moral agents are capable of leading lives that have a range of values not obtainable by moral patients and that this might justify attributing greater inherent value to moral agents. However, in *The Case For Animal Rights*, Regan explicitly rejects this view(Regan,1983,241)He argues that there are not varying degrees of inherent value; on the contrary, every entity that has inherent value has it equally(Regan,1983,236-237). To support this view, Regan argues that all moral agents have equal inherent value. According to Aaron Simmons:

*Of course, not all subjects of a life are moral agents. Regan uses the term "moral patients" to refer to those subjects of a life that are not moral agents (i.e. not capable of moral reasoning). Whereas in OACAR, Regan suggested that moral patients may have less inherent value than moral agents, he rejects this view in Regan, The case for animal rights, insisting that "All who have inherent value...have it equally, whether they be moral agents or moral patients(Aaron Simons, 2006, 164)*

Since inconsistency is not a good virtue in philosophy, Regan needs to resolve this inconsistency. It has been argued that Regan commits the fallacy of equivocation This is because he uses the concept, inherent value in two different ways according to Judith (1999, 779).

However, Regan is right to some extent when he submits that rights are not based on special ability or sensibilities as some suppose. However, there is a sense in which we can say it is based on special ability because non human animals cannot organize themselves into a moral and political community. Human beings have rights because they belong to a moral and political community. Human beings have rights because they belong to a moral community in a moral sphere.

Thus, the author of this paper agree with Cohen that to say that a rat has a right is to commit a category mistake, to apply to its world a moral category that which have content only in the moral human world (Omotosho20017,152,153). Rights, according to cohen, is a valid claim or potential claim made by animal agents under principles that govern both the claimant and the target of the claim. Since only moral agents can assert moral claims, only moral agents have rights. Only human beings can have rights. (Carl, 2006, 817-823).

### REFERENCES

- Aaron Simons(2006) "In Defense Of Animal's Right To Life" A thesis submitted to the, Graduate College of Bowling Green State University, Ohio in partial fulfillment of the requirement for the award of the degree of Doctor of philosophy in philosophy.
- Carl C. (2006) " The Case for the Use of Animals in Biochemical Research" in *Ethics, History, Theory and Contemporary Issues* Oxford; Oxford University Press., Carl, C. and Regan (2001), *The Animal Rights Debate*. Lanham: Rowman and Littlefield Publishers.
- DeGrazia, D. (1991): "The Moral Status of Animals and Their Use in Research" *A Philosophical Review Kennedy Institute of ethics journal* vol. 1 no 1 March, 1991. 48-70.
- Descartes, R. (1965). *Discourse on Method, Optics, Geometry, and Meteorology*. Trans. with Intro. by Paul J. Olscamp. Indianapolis, IN: Bobbs-Merrill
- Francione, G. (2000), *Introduction to Animal Rights: Your Child or the Dog?* Philadelphia, PA: Temple University Press.
- Frey R. (1980) *Interest and Rights: The Case Against Animals* Oxford: Clarendon Press.
- Judith Barad-Andrade(1992) "The Dog in the Lifeboat Revisited"*Between the Species*.Spring 1992
- Kant, I. (1998),. *Groundwork on the metaphysics of morals* (.ed.) Mary Gregor. New York: Cambridge university press,
- Omotosho I.F.(2017) "A philosophical Defence of Animal Rights" A thesis submitted to the Obafemi Awolowo University in partial fulfillment of the requirement for the award of the degree of Doctor of philosophy in philosophy.
- Regan T,(2003) *Animal Rights, Human Wrongs An Introduction to Moral Philosophy*.Rowman and Littlefield Publishers, Inc. Lanham,
- Regan, (1982). "One Argument Concerning Animal Rights," *All That Dwell Therein*, Berkeley: University of California Press,1982,136-140.
- Regan T. (1983), *The Case for Animal Rights*; Berkeley; University of California press..
- Regan T. and Singer P. (1976) (eds.) *Animal Rights and Human Obligations* Prentice Hall Inc. Englewood Cliffs, NJ.
- Wise, S. (2000), *Rattling the Cage - Towards Legal Rights for Animals*, London: Profile Books

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