

‘Until Every Cage is Empty’: Frames of Justice in the Radical Animal Liberation Movement

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Abstract

The Radical Animal Liberation Movement (RALM) in North America, including the notorious Animal Liberation Front (ALF) of Canada and the United States and the Frente de Liberación Animal (FLA) in Mexico, is a direct action-focused movement which has been condemned and heavily repressed by media, legislators, and animal industry lobbyists. The question of whether the criminalization of RALM activists is justified or not has been the source of lively activist and academic debate. Yet what is less often examined is how RALM activists perceive justice. Drawing on Pelton’s conception of frames of justice and Foucault’s understandings of intersubjective and diffuse power, this qualitative content analysis of 268 online documents from RALM activists explores how notions of just deserts and life affirmation justice are reflected through activists’ perspectives on innocence and criminality, solidarity, and critiques of the formal criminal justice system.

Keywords

frames of justice, animal liberation, qualitative content analysis, abolition, carceral politics

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Introduction

For a relatively small, isolated social movement, radical animal liberation has gathered both fervent supporters and powerful enemies across Canada, Mexico, and the United States. Despite claiming some major victories for justice against institutionalized and corporatized animal exploitation, such as the closing of the notoriously brutal animal experimentation laboratory Huntingdon Animal Sciences (McCoy, 2008), or the liberation of many thousands of mink from fur farms across the American Midwest (Best & Nocella, 2006), it is clear that the vast majority of North American society is still far from perceiving animals as sentient beings who deserve life, liberty, and justice. It is, of course, difficult to be neutral about a movement which calls into question the way we live our daily lives, making the very acts of eating a meal or getting dressed highly political and morally fraught. Public perception of the movement often remains sharply divided between those few who see RALM activists as heroes, risking their lives to free animals, and those who perceive them as misanthropic, dangerous extremists (Johnston & Johnston, 2017).

The Animal Liberation Front (ALF) is the longest-standing and most notorious radical animal liberation movement worldwide (Best & Nocella, 2004; Flükiger, 2009). Like the radical Earth Liberation Front (ELF), formed after the ALF with a similar structure and ideology, the ALF is not a group or organization in the traditional sense. The ALF is the name used by the global network of autonomous and anonymous cells of clandestine animal liberation activists who follow ALF guidelines¹ and engage in direct action against animal enterprises, such as freeing animals from fur farms, or damaging property and tools used to contain or kill animals.

Distinct from the ALF in tactics, but holding similarly radical perspectives on the complete abolition of all human use of animals, ELK (Earthling Liberation Kollektive) is a Canadian grassroots animal liberation movement based in British Columbia and Ontario that supports and defends the use of direct action in animal liberation activism, but engages in non-criminalized forms of organizing and public education. Using an intersectional frame, ELK connects the root causes of many forms of human and animal oppression (Johnston & Johnston, 2017). ELK engages in anti-oppressive community organizing around animal liberation-related issues. They seek to challenge hierarchy, domination, and inequality in all forms (Evans, 2015), which makes the group a useful resource for examining frames of justice in Canadian radical animal liberation activism.

Indeed, much literature explores how the RALM challenges underlying social structures that perpetuate animal use, suffering, and exploitation (Best & Nocella, 2004; Pellow, 2014; Scarce, 1990; Schnurer, 2004; Torres, 2007), and more recently, studies have also emerged that examine how their strategies for resistance intersect with other social movements (Johnston & Johnston, 2017; Kemmerer, 2011; Nocella et al., 2014). Yet little is known about how the movement conceptualizes justice beyond their concerns for the animal enterprise, and how those frames shape the movement's underlying ideologies. Considering the intense repression of radical animal activists in recent years, and their position at the fringes of progressive social justice movements, it is helpful to shed light on the broader conceptions of justice held by RALM activists, in order to destigmatize and better understand their efforts. To explore these questions, we engage in a qualitative content analysis of 268 documents gathered from North American RALM activist websites and public Facebook pages. Drawing on the notion of frames of justice,

particularly the work of Pelton (2005), as well as Foucault's understandings of capillary power structures, we explore how North American RALM activists express their perceptions of what it means to seek justice for animals, as well as how the struggle for animal liberation is intertwined with broader social justice issues and movements.

Frames of Justice and Power Relations

Goffman (1974) envisioned frames as packages of information that help people communicate with one another, as well as interpret and make meaning out of the vast body of knowledge and information to which they are exposed. Frames help give coherence and meaning to a text that involves 'selecting, omitting, expanding and giving salience to certain aspects of a perceived reality' (Moernaut et al., 2018, p. 216). They likewise help people identify and morally evaluate a particular problem and make recommendations for specific solutions (Benford & Snow, 2000), while simultaneously excluding other voices and potential remedies (Williams, 2012).

Frames of justice and crime become more salient and interpersonal when they align with the lives of their consumers, and reflect their local context (Noakes & Johnston, 2005; Snow & Benford, 1988). Ideologies and frames, however, are not mutually exclusive categories, as one ideology does not equal one frame. There can be overlap with other perspectives on the world and with other social movements; sometimes becoming capillary in terms of their direction and function, while at other times appearing to be linear and stable. How justice frames become dominant depends heavily on the positionality and cultural contexts of those controlling the framing process (Reese, 2007). For instance, Gottlieb (2017) found that people were more likely to support the elimination of incarceration for select non-violent offences when questions hinted to the

unfairness of punishment rather than who was being punished. Getting people to access environmental justice frames tends to be successful when there is a link to socio-economic policy, or when the local community can see the potential threat as embodying a national concern or part of a vision for greater justice (Benford, 2005; Capek, 1993; Walker, 2009).

Uncovering perspectives on justice are key to understanding political initiatives and social movements related to crime, or that take part in criminalized forms of activism, even though such perspectives are not always clear. This is because most people lack first-hand experience with serious crime and punishment (Baranauskas, 2018; Pickett et al., 2015), and the framing of crime and justice is heavily influenced by state and corporate interests. In thinking more about what it means to do justice, Pelton (2005) traces three major policy frames dating back to the first millennia: group justice, the justice of individual deserts, and the principle of life affirmation. Group justice applies the notion of desert not only to whole societies but even across generations who have yet to be born. Originating as far back as the Judeo-Christian creation story of the Garden of Eden, this conception of justice holds all of humankind responsible for the transgressions of Adam and Eve. The justice as individual desert holds that in a just world people who do wrong get what they deserve, and if they do not, then it is up to society to make sure that they do. It is this policy frame which underlies the current punishment-based criminal justice systems in North America. The idea of life-affirmation is in direct contrast to the notion of desert, and refers to ‘intrinsically moral action based on unconditional reverence for human life’ (Pelton, 2005, p. 11). Life affirmation as a frame of justice embodies conceptions of agape love (a Greco-Christian term referring to a self-

sacrificial, charitable, God-like love for all of creation), forgiveness, and a withdrawal from judgement (White, 2011). We see life affirmation in action in the New Testament in the promise of Jesus Christ that all may be forgiven, no matter their crimes or immorality, if they believe in Him and forgive others. Pelton's (2005) book also references the story of Abraham's bargain with God to not condemn what was biblically constructed as an unrighteous city, thus showing humankind's capacity to conceive of justice as something that is more merciful than punitive. How these frames of justice are reflected in the views of RALM activists is an important question, as they are often portrayed in the media as irrational misanthropes, and their conceptions of justice obscured by their tactical choices.

The friction that materializes when social movements strive to enact their conceptions of justice are always laced with relations of power and resistance. Discourses of power are linked to systems of thought and form parts of a system of social relations that create privileged and marginalized groups. For Foucault (1990), power is a research object that sidesteps concerns with discourse and ideology as well as blatant subjectivism. What this means is that power is simultaneously intersubjective and corporeal, but also strategic, capillary, and diffuse. The reason for that is simple: Foucault broadly conceives of a universe where power is a physical thing. It is very Nietzschean (2014) in the sense of his Will to Power which is not a will to domination, but the striving of various aspects of nature to achieve homeostasis. If we think of Deleuze and Guattari's (2009) desiring machine, there is no being of desire there, but rather there are a whole host of objects, beings, and things that desire. Both concepts come from the same Nietzschean source. Therefore it makes no sense for Foucault to speak of power as a thing people hold

because then you run into the problem of resistance, for if power is absolute then it follows that there is no resistance possible. So if resistance is possible, power must be either fractious, or diffuse and spread throughout the entire social fabric (see Elden, 2017). So to start an analysis from the perspective of power is to start with the idea that power is not something that is held or contained, but something that is produced discursively in social interaction with others.

Drawing on this conception of power, our analysis will examine the relationships in the RALM movement that are prone to tension, breakdown, and reversal through the chain of expression. We do not claim that the activists we study hold power singularly. Instead, we trace how their conceptions of justice intersect in capillary ways with other movements and historical conceptions of justice.

Tensions in the RALM Movement

We will now examine briefly what is known about how the RALM conceives of justice. An important aspect of RALM justice framing involves the exclusion of other, legal methods of advocating for animals, which are not seen as achieving justice. RALM activists often decry the mainstream animal welfare and rights movements for a variety of reasons, the most widespread being that animal rights and welfare movements are not abolitionist in the sense that they target specific abuses and industries and push for incremental change, rather than confronting animal suffering at its roots (Best, 2014; Cooke, 2013). Animal rights groups advocate for legal rights to be granted to animals, relying on lobbying, petitions, traditional protests, and letter-writing campaigns to persuade legislators and companies to change their ways (Munro, 2005), while placing most of the responsibility for animal suffering on consumers. ‘Victories’ cited by animal

rights and welfare movements, such as the banning of gestation crates for pigs in several states, or the recent ban in British Columbia, Canada on grizzly bear trophy hunting, are seen by some RALM activists to change little about the fundamental relationship of exploitation between humans and animals. This problematic tendency ultimately perpetuates the continuation of speciesism by giving rights or protections to some animals and not others.

For RALM activists, no amount of ‘cruelty free’ consumerism or animal welfare reform will ever end animal exploitation, and therefore direct action must be taken to free animals and damage the industries which exploit them. Animal liberationists often express frustration with the rights movement for its consumerism and moral crusading (see Johnston & Johnston, 2017; Best, 2014), which are not seen as forwarding the cause of justice. Animal rights philosophers, in turn, tend to condemn the RALM for damaging the reputation of the animal advocacy movement more generally, because of the negative media and corporate response to their actions. They argue that lasting change can only occur by appealing to consumers (Francione, 2004; Regan, 1983; Singer, 1975).

Animal liberationists envision radical changes to current political, economic, and social structures that oppress animals, and view grassroots social movements, rather than states, as the most important actors in gaining justice for animals (Luke, 2007). Similarities may be seen between this approach and, for example, the radical vision of the prison abolition movement, which seeks not to reform but do away entirely with the prison industrial complex (Piché & Larsen, 2010). Dixon (2012) describes this approach as being *in the world but not of it*, where activists directly confront existing suffering, while avoiding reformism that makes the end of carceral suffering impossible. A key part

of RALM framing is the need for direct, immediate action to achieve justice for animals. Related to the notion of confrontational forms of contentious politics (Tilly & Tarrow, 2007), direct actions are any acts in defiance of the state that directly create social change without negotiation or intermediaries (Sparrow, 1997). In the RALM, direct action is thought to access justice by involving particular forms of claims-making on individuals and corporations that are directly responsible for the exploitation of animals. Destructive methods of direct action (Graeber 2009), for example sabotage and arson, are used to inflict economic damage and to halt the operations of animal enterprises (Best & Nocella, 2004; Day, 2005; Flükiger, 2008). Disruptive actions such as freeing caged animals or blocking whaling vessels may also cause profit loss, but also discourage or prevent opponents from harming individual animals (Nocella et al., 2014; Scarce, 1990; Upton, 2012).

Method

We analyzed 268 documents gathered from North American RALM activist websites and public Facebook pages dating from 2005-2015. The documents are comprised of essays, communiqués, Facebook posts, published interviews, mission statements, and pamphlets. The data came from one grassroots group from Canada, the Earthling Liberation Kollektive (ELK), as well as Canadian, Mexican and American activists for the North American Animal Liberation Front (ALF)/Frente de Liberacion Animal (FLA), which are the signifiers used by autonomous cells of clandestine animal liberation activists who engage in direct action campaigns against animal enterprises. It is important to note here that ELK does not engage in criminalized direct actions such as animal rescues and property destruction, as the ALF does, although they do acknowledge

that a diversity of tactics are necessary. They are still radical in the sense that they envision that widespread, ground-level changes in society are necessary to achieve animal liberation.

The first author selected these groups and websites because they are among a small number of publicly available online spaces for RALM activists. The North American ALF Press Office (NAALPO) website is the largest publically available body of current, regularly updated information on RALM activism in North America. It provides activist communiqués (written statements issued by activists following a direct action) from animal liberations and other direct actions which are rarely published elsewhere and offer insight into the justice frames of RALM activists through interviews, essays, and action guides written by above and underground activists. ELK is a grassroots animal liberation movement based in British Columbia and Ontario, Canada that engages in anti-oppressive community organizing.

The data was collected by visiting the websites of ELK and the North American ALF Press Office. All textual documents on the websites were copied and pasted into Microsoft Word files. Following Creswell (2014) and Hsieh and Shannon's (2005) systematic coding guidelines, we engaged in a qualitative content analysis of the data. An emphasis was placed on the interpretations and nuances of the activists' words that shed light on their justice frames and ideologies, and answered the question: How do RALM activists conceptualize and write about justice? All documents were initially read line by line to get a broad sense of the epistemological and theoretical connections activists shared with one another. Coding was done within Microsoft Word files using color-coded highlighting, with codes and comments added to the highlighted text using track change

functions. Where possible, in vivo codes were used that reflect the language used by activists themselves, for example, the commonly used slogan ‘until every cage is empty’ was used to code expressions of the ongoing commitment to end confinement and imprisonment of human and nonhuman animals. Other codes included ‘prison abolition’, ‘cells and cages’, ‘freedom’, ‘(in)justice system’, ‘for the prisoners’, ‘innocents’ and ‘the real criminals’.

The authors noted the initial themes and discourses in the margins of the Word document, and then later refined and expanded on them after sections of the data were compared with others (Morse, 1995). The structure of our analysis emerged as a response to the categories that were created (Joosse, 2012). We approach the data from a post-structural epistemology, given that the ideas and concepts surfaced in messy, non-linear ways (Khasnabish, 2008).

Findings

Liberation is Justice

The most prevalent theme found in the data set, perhaps unsurprisingly, was the expression of the need for captive animals to gain their freedom in order for justice to be achieved – even if this resulted in the activists’ own incarceration. This reflects a framing of species justice, for it is clear that these activists do not believe that the life of an animal is worth less than a human life, and thus animals must have a similar interest in experiencing a free and self-determined life. The word ‘free’ appeared 238 times in the data, while ‘wild’ appeared 164 times, emphasizing the importance of animals returning to their natural, wild state. A formerly imprisoned ALF activist in the U.S. stated in a

2010 radio interview that he felt that he must actually be involved in the work of freeing animals into the wild in order to align his actions with his beliefs:

When it came to my actual activism, had I directly intervened in this system of oppression that we're fighting against? Well, the answer was no...I began to escalate my tactics...which ultimately led to me going to fur farms, cutting down the fences, releasing the animals back into their native habitat, which ultimately led me to prison. But I can say that I felt that my beliefs were never so aligned with my life as when I was on a fur farm opening those cages.

Dismissing his previous actions, such as vandalizing fast-food restaurants, this activist frames the actual liberation of animals as the most direct and effective way of achieving justice, an idea which is widely shared by fellow activists within the RALM (Liddick 2006). Since animals cannot achieve justice on their own, he believes that human society must do their part to see that animals are rescued and obtain freedom.

Another ALF activist, speaking from a U.S. prison in a 2005 interview, reinforced this point when asked about the morality of releasing captive animals into the wild:

When we are talking about a species such as mink, fox, lynx, bobcat or any other animal which contains within its DNA the memory of natural survival, there can be no other form of liberation that is acceptable beyond rescue, rehabilitation and release back to their natural environment...[they] belong in the forest.

In the above quote, the invocation of the word 'rehabilitation' implies that it is society's responsibility to work with animals to heal the trauma they incur from incarceration. The activist frames the pains of incarcerating animals as similar to the ways in which humans experience confinement, and thus maintains that there is an absence of justice until those harms are reconciled and repaired.

A 2013 document from NAALPO reinforces the point that actions should focus directly on liberating captive animals, and specifically encourages potential activists to take part in fur farm liberations:

2013 has seen an unprecedented number of captive fur-bearing animals liberated from the terror they endure on these so-called “fur farms” in North America. As of this writing, eleven known raids on farms have taken place in the last 3 months and at least 9071 animals have been released into the wild, where they have a significant chance to live their lives as nature intended... There are only roughly 300 fur farms, in 23 states, remaining in the US... It is up to you, dear reader, to join the fight.

For those who do attempt liberations, there is often regret expressed that not all the animals could be freed, as in the following excerpts from U.S. communiqués issued after actions in 2014. The first quote comes from a rescue of pheasants from a game farm; the second, from an act of sabotage at a bobcat fur farm:

[T]he remaining pens and enclosures on the farm which imprisoned quail and partridge were unable to be breached. Tonight, direct action was able to give a few animals a chance at freedom, but there is no solace in the knowledge that some were left behind (U.S. ALF, 2014).

It is with tremendous sadness in our hearts that despite our best efforts, cages were unable to be opened before being run off-site by awoken residents. Our motives were borne of a fierce love for wildlife, and a torn heart forced to watch as bobcats and other wild creatures have been made to endure intense confinement and the inevitable fate of a horrendous death at the hands of those who seek to profit from their skins (Anonymous U.S. activist[s], 2014).

These communiqués reveal the deep emotional pain felt by activists when they cannot achieve justice for all of the animals who they attempt to aid, despite achieving some gains. In light of attempts by some animal rights philosophers (see Regan 1983) to appeal to rationality, rather than emotion, in order to gain support for animal advocacy, many RALM activists demonstrate what we might understand as unconditional love towards animals, both as individuals and collectively. Part of this, as discussed below, seems to be a response to the injustice of ‘innocent’ creatures being confined, abused and killed.

Animal innocents and ‘the real criminals’

Although all RALM activists strive for justice through the liberation of non-human animals, not all feel that liberation equals justice for all *human* animals. The most

significant example of dissonance within RALM framings of justice was the question of whether prison is the rightful place for ‘real criminals’ or whether all forms of imprisonment should be abolished. Many activists repeatedly referred to ‘animal prisoners’ and ‘innocent animals’, drawing into relief the framing that it is an injustice to wrongfully incarcerate the innocent, as seen here in a US ALF communiqué from a fox farm liberation in Virginia:

it is our commitment to free your prisoners and cost you more than you make until you shut down. To those nationwide who also seek justice for the innocent, your nearest fur farm is at most a state away. Take action for animals.

Yet there is also the sometimes unspoken assumption that there are also those who are *not* innocent; for example convicted prisoners who are not charged with animal liberation-related offences, or the unpunished exploiters of animals. A communiqué from a Canadian ALF mink farm liberation in Montreal, QC expressed disgust that criminal charges had not been laid against the owner of the farm, despite such a recommendation from the Montreal SPCA (Society for the Prevention of Cruelty to Animals). One U.S. ALF communiqué detailing an act of property damage to a fur store in Portland offered a message of solidarity with an imprisoned ELF activist that juxtaposed her innocence with the guilt of those responsible for destroying wilderness: ‘We would like to dedicate this action to Marie Mason, serving a 22-year prison sentence for trying to stop the *real criminals*’ (emphasis added).

A direct action at the home of the owner of a fur store in Vancouver, British Columbia contained a more personal judgement upon those deemed to be guilty of animal abuse:

We know full well that our action [splattering paint] annoyed you, and yet it is not a shadow of the pain, psychological trauma, or fear that the tens of thousands of

animals you sentence to death every year live and die in... You are a criminal and a monster (Canadian ALF, 2011).

While not stated explicitly, there is a clear underlying message about the injustice of a legal system that would sanction the torture and murder of animals while prosecuting those who damage inanimate objects as an act of political resistance. These sentiments, however, also reflect a paradox in the leftist position that, on the one hand, is critical of tough-on-crime politics that result in greater reliance on incarceration, but simultaneously demands punitive carceral responses towards actors within the animal industry. This purview epitomizes the carceral feminist logic that more convictions of male offenders will advance gendered justice (Bernstein 2012). The fact that these tensions are teased out in the activists' calls for justice demonstrate how anger towards a seemingly corrupt or broken industry can manifest in both liberatory and punitive ways.

In another example, Canadian ALF activists taking action against a different fur store in Vancouver decried the arrest of 12 RALM activists in Spain on terrorism charges, while making clear their perspective about who was truly deserving of the label of terrorist:

This act of economic sabotage was done in solidarity with the 12 Spanish activists who were arrested and detained on bogus charges... Animal activists are not terrorists. The sick individuals who electrocute fur bearing animals in the anus and skin them while their innocent hearts are still beating are the true terrorists. (Canadian ALF, 2011)

Cooke (2013) notes that moralized conceptions of terrorism require that the targets of terrorism are innocents. As the targets of RALM actions are always those implicated in animal exploitation, they are (as we see in the above quote), deemed by activists to be morally responsible for committing wrongful acts.

Against Incarceration

Other U.S. ALF communiqués used phrases such as ‘empty cells, empty cages’ or ‘free all the prisoners’ to emphasize that *all* forms of incarceration are inherently unjust, regardless of the guilt or innocence of those condemned. Similar to the prison abolition perspective, this framing understands the criminal justice system as deeply flawed, serving the interests of a powerful, wealthy few and targeting those who, often out of necessity and sometimes following their own sense of justice, find themselves in violation of the law. The best articulation of this point came from a formerly imprisoned activist speaking at an ELK colloquium on intersectional animal liberation:

basically people and animals are both in cages to serve a colonialist, capitalist system...we should never have cages outside zoos, or Marineland or whatever, that say “Cages are for criminals”...we’re justifying the Prison Industrial Complex...And there’s also a lot of animal rights activists who demand imprisonment for people who abuse animals. But it’s so problematic, because the cops and the courts are oppressive institutions and they’re designed...to protect private property and the wealthy and they criminalize marginalized people and communities and they criminalize people who fight alongside...so we don’t want to support that. We don’t want to have anything to do with that. (ELK activist speech, 2014)

As this activist points out, animal rights activists have often demonized people accused of animal abuse, such as Michael Vick, the former football player charged with dogfighting, while ignoring the egregious operation of racist criminal justice systems that imprison Black Americans and Indigenous Canadians at rates highly disproportionate to their presence in the population (Childs, 2015; Murdocca, 2013). There is an obvious danger to conflating the difference in moral responsibility between wealthy, white, privileged consumers and owners of animal enterprises, and the impoverished minorities who are employed by them (often because they have no other viable options).

Other documents problematized criminalization and the prison-industrial complex, drawing analogies between the wrongs perpetrated by criminal justice system

and injustice against animals. A 2015 post on the ALF website in honour of Prisoner Solidarity Day offered this comment regarding the recent release of an ALF activist after 12 years of incarceration:

we're obviously thrilled beyond words that Eric can walk and talk among friends and Earth according to his own desires again, and with every step we affirm that we want the destruction of all prisons...As we practice solidarity with imprisoned comrades and loved ones, our goal goes beyond simply supporting them; we aim to build social momentum against an entire system of domination and ecological destruction.

This expression is not simply of solidarity with imprisoned activists, but a reminder that the ultimate goal is to destroy *all* prisons and *all* forms of domination, which are understood as irreconcilable with justice. Rather than exercise justice at the individual level by supporting imprisoned comrades, this activist responsabilizes society to work together for the greater cause of ameliorating human and animal suffering. Life affirmation, in this sense, is about overcoming struggle through a movement that builds and reinforces itself constantly. A similar abolitionist message came from a communiqué from a direct action in Mexico where activists freed a turtle from a pet store:

We did this as a small gesture, out of our conviction for total liberation, taking action against this system of cages and bars. We want to dedicate this action to the anarchist warrior Mario Antonio Lopez, 'El Tripa', and also to the eco-anarchist warrior Braulio Duran...We hope that within our ranks there is the ability to not only free the animals but also our imprisoned comrades (Mexican FLA, 2012)

While it is unclear as to whether this is an incitement to a prison break or to legal means of liberating prisoners, there is a clear linkage made between the systems of animal confinement and those that incarcerate people. Other FLA communiqués contained such statements as 'greetings to those who struggle...we continue fighting for your immediate freedom' (2010), 'for the destruction of prisons and cages!' (2010), and 'more than just animal liberation: Total liberation!!!' (2010).

‘Direct solidarity’ for ‘the silent ones and those on the run’

The phrase in the subtitle was often used by activists to reference solidarity with animals and with those fleeing from the long arm of the law. It was often stated by activists that real solidarity with prisoners convicted of animal activist offences involved not only supporting them personally with letters, legal help and money, but more importantly, by directly continuing their work through direct actions for animals.

Consider one 2015 posting on the ALF Press Office website:

Any real effort to aid prisoners cannot be based simply on passive support, but must also include a commitment to build on their struggles before and after their imprisonment.

‘Passive support’ here draws lines between those are complicit to inaction, and those who actively seek out justice by continuing the work of activists. The punishment and incarceration of RALM activists takes on a new meaning if their work does not fade away, and thus justice can be regained through renewed commitments to activism and direct action. Many activists take seriously this idea, as demonstrated in a communiqué from the 2010 firebombing of a bank in Mexico by the FLA, which stated that

we have taken action against this despicable bank...to show direct solidarity with our comrade...sentenced to 5 years in Mexico City's Reclusorio Norte prison...What if this was a reaction to the sentences that the eco-anarchists in Mexico City prisons have received? THEY GUESSED IT! And they can expect more attacks on their properties. Did they think that they had scared us with jail? No, they have only made us stronger.

Over half of the communiqués from direct actions across North America closed with a note that the action was a gesture of solidarity with imprisoned activists – often named specifically. For example, a 2014 US ALF animal liberation of ring-necked pheasants in Oregon was done ‘[i]n solidarity with animal liberation prisoner Kevin Olliff and the silent ones on the run. For anarchy and animal liberation’.

These actions, while attempting to seek justice for specific animals, also point to a broader framing of righting the injustice of imprisonment for activists who can no longer continue their own actions for justice. It is an act both of honoring their achievements against an unjust system of exploitation, while continuing to thwart the very ‘justice’ system which criminalizes and imprisons them. A communiqué from an FLA bomb hoax at a McDonald’s restaurant stated:

in solidarity and with full support for our comrades imprisoned in Mexico and throughout the world and with those who fight every day, the struggle will not wait, the struggle does not forget.

This is obviously not only an effort to show solidarity with other activists, but with the animals themselves. As one FLA communiqué from 2010 pointed out, ‘the animals do not need your pity; they need your solidarity!’. Likewise, the vandalism of an animal laboratory cages factory in Oregon, US in 2014 by anonymous activists was accompanied by this statement:

This act was done in solidarity with the Gateway To Hell campaign and with the 4,800+ nonhuman primates held captive at the Oregon National Primate Research Center located just down the street from this facility. Their pain is our own.

These statements reflect the potential for a shared camaraderie between human and non-human species. The incarceration of animals is likened to the horrors of human atrocity, and thus an absence of justice for animals is an absence of justice for people. Solidarity, in this vein, means empathizing with those who are condemned to a life of pain and suffering.

‘If not us, who?’

Animal liberation is understood in the movement as so fundamental to a just society that to fight for it may require the sacrifice of activists’ own liberty. This is

viewed by many activists as an acceptable risk given that there is little hope of ending animal exploitation without (often criminalized) direct actions. A longtime ALF activist, imprisoned for several years for the liberation of mink from a fur farm, had this to say in a 2005 magazine interview in regard to serving time:

Consider prison a rite of passage for anyone who is serious about achieving animal and earth liberation, because it is one of society's fears that if you step out of line, you will be punished by prison. And if we're serious, then we have to overcome our fears of imprisonment. After all, it is little compared to the price paid by freedom fighters in other countries who are tortured or given ridiculously long sentences for the least degree of resistance. And it is nothing compared to the animals in zoos and aquariums who are sentenced to solitary confinement without hope of parole, or the animals sitting in labs, factories and fur farms whose only escape is death.

The picture painted here is one that tries to instill fearlessness in other activists. The activist reflects on their own time served as instrumental to the greater cause for justice – a justice that transcends and ought not be suppressed by punishment. Obtaining justice means engaging in sacrifice, which is framed as a noble virtue despite the loss that comes alongside state punishment. Little consideration is given to people in the movement for whom incarceration carries secondary forms of punishment, such as potential hardship and fallout on their families and children.

Similar sentiments were found in this 2013 speech by an ELK activist, herself a former prisoner, acknowledging that effective actions are likely to be those that are criminalized. In this case however, this comment was made alongside the point that people of privilege should be the ones to commit criminalized actions as they face less repression than racialized, economically disadvantaged people:

I think we need to do those things that are going to be effective. So blockade the road, liberate the animals...in the end...our fear of going to jail, and our fear that our friends may go to jail, is a far, far, far more effective means of restraining us than prison actually is. So do what you need to do.

RALM activists, unsurprisingly, view state power as corrupted by economic ties with animal-exploiting industries, and do not believe that justice can ever be meted out through the formal justice system. The CJS, rather, is constructed as an instrument of fear that suppresses forms of activism that, likewise, instill a counter fear in their opponents. RALM activists are directly in conflict with this area of the establishment, as is made clear by this 2011 communiqué from a Canadian ALF cell who threw Molotov cocktails at a police car stationed outside a furrier's home:

The increased police presence will not stop our graceful and successful attacks. Make no mistake, this is war. This is a fur war. This is a class war. The elite and the police are the enemy and will be treated as such. It is without a doubt that oppression will come, whether it is in the form of arrests, harassment by the fascist state or by a former comrade turned snitch who can't take the heat...If you snitch, you are an element of the state and will be treated as the enemy.

RALM activists are all too aware of the failure of governments across North America to enact any meaningful protections for animals. They feel that there is no choice but to commit criminalized actions due to the repressive laws which protect property and profit while condemning animals to suffering and death:

In a country where our government not only ignores animal abusers, they reward them as with the case of the Whistler 100, it is time for Canadian citizens to take these issues into our own hands. If not us, then who, if not now then when?
(Canadian ALF, 2011)

This communiqué reveals the desperation with which RALM activists view the plight of animals in an unjust society. The only hope for justice is radical and immediate action on the part of caring individuals. Such statements clearly reflect the framing of life-affirmation justice, as to gain justice for animals, for these activists, requires agape love – that which is self-sacrificing and concerned only with the needs of others, rather than themselves.

Intersectionality

In addition to these critiques of the criminal justice system, there is also a strong framing present within the RALM literature examined here that acknowledges the intersection of a variety of social justice issues, linking issues such as racial and gender discrimination, environmental destruction, criminalization, animal exploitation, and work-related injustices (for a more detailed description of this, see Johnston & Johnston, 2017). Sometimes referred to as ‘total liberation’, as in the FLA communiqué above, this frame acknowledges the role of broad societal structures such as capitalism, white supremacy, and patriarchy in contributing to a wide array of injustices – including those framed as ‘justice’ by the criminal justice system (see also Best, 2014; Pellow, 2014). An ALF Press Officer stated in a 2013 interview that ‘laws are not always moral and many times reinforce systematic injustices, murder, enslavement, and genocide. Those laws are meant to be dismantled and destroyed’. It is clear from this dataset that the RALM intersects with logics mirrored in the prison abolition movement that constantly dissects social structures causing injustice, and seek out unfinished, constant contradictions to establishments that may grow stagnant and thus lead to further injustice (Mathiesen, 1974).

Discussion

RALM activists’ justice frames reflect strong critiques of animal and human captivity. Their purviews and sentiments emphasize the immediacy of the need for animals to be released from cages while also demonstrating anger and sorrow towards the injustices suffered by human prisoners. As found in the critical criminological literature, some of the biggest traumas of long-term incarceration of women and men include loss of

contact with family members, psychological disturbances, issues with trust, and concerns for privacy and intimacy (Wright et al., 2017). Thus not only do they encourage other activists to focus their efforts on liberations, but also to support prisoners, especially those imprisoned for their involvement in radical activism.

Direct action for animals is also heavily criminalized, most notoriously in the U.S. The Animal Enterprise Protection Act of 1995, the Agri-Terrorism Prevention Act of 2001 and the Animal Enterprise Terrorism Act (AETA) of 2006 criminalize all acts that interfere with operations of an animal enterprise (McCoy, 2008), painting even formerly legal protests and leafleting as acts of terrorism. Under the AETA, property damage over \$10,000 holds a minimum penalty of one year in prison, while other offences include life and even death sentences (Amster, 2006). Animal liberation activists charged under such acts have been given sentences ranging from several months to 22 years, for acts ranging from sending black paper faxes to arson (Liddick, 2006). Vancouver ALF activist Rebecca Rubin was sentenced to five years in prison by a U.S. court in January 2014 for her participation in two horse slaughterhouse liberations in 1997 and 2001, and in a 1998 Colorado ski resort arson. Prior to her surrender, she was listed among the FBI's Most Wanted Domestic Terrorists (MacQueen, 2013). In cases such as Rubin's, to do justice can require a lifetime of sacrifice, which is given freely without any guarantees of long-term or meaningful change – a demonstration of agape love in the deepest sense.

The question of whether the RALM engages in terrorism has been highly debated in the literature. The ALF is listed as a top domestic terrorism threat in the U.S., and some have argued that certain tactics used by the RALM, most notably the now-infamous case in the U.K. of Managing Director of Huntingdon Life Sciences being attacked with a

baseball bat, do indeed meet the definition of terrorism (Hirschmann, 2000; Humphrey & Stears, 2006; Liddick, 2006; Monaghan, 1999, 2013; Vanderheiden, 2005). Most of these claims, however, are based on speculation about what the movement *might* do or *may* be capable of. For example, Liddick (2006) argues that those in the RALM are misanthropists because they might choose to engage in large-scale biological warfare against humanity in order to save animals. Others conflate the nonviolent RALM movement (including the ALF and ELK) with those that specifically use violence as a tactic, for example the Animal Rights Militia (ARM) and the Department of Justice (see, for example, Monaghan, 2013). This is often due to a lack of distinction between property damage (including arson and pipe-bombing, which carry a *risk* of harm to people) and intentional physical violence against people. Others point out that the RALM does not meet the definition of terrorism because they do not intend to cause widespread fear and terror among the general populace, but rather choose specific, small-scale targets and attempt to directly prevent further harm to animals by incapacitating animal enterprises (Sorenson, 2009).

The connection between justice framing and the criminalization of RALM activism is made clearer if one considers how other social justice activists take part in civil disobedience as a means of drawing attention to a longstanding injustice that is ignored by the state. Lovell (2009) argues that civil disobedience is a cultural response to a particular political agenda, and that despite negative perceptions, activism which is criminalized often proves later on to have been the catalyst for justice. One well known example of this is the civil rights movement, where actions such as sit-ins drew attention to the injustices of racial segregation.

With respect to incarceration, Foucault's work on the punitive society shows how power relations between the juridical and religious factions of English society produced the model of the penitentiary that we are still living with today. Biopower, to use another example, is the knowledge of life and the creation of the idea of an average person, yet this requires a whole host of practices (censuses, schooling, infrastructure, hospitals, methods of recording, analysis, and so forth), which produces this figure. Yet indeed, it is not that the State comes up with the idea of a powerful figure and imposes it. It produces, out of the interaction of these multiple, semi-autonomous processes and forms of expression, a figure that is suitable or politically congenial to a desirable mode of rule. In the case of the RALM, it is clear that state power, in conjunction with other social forces and discourses, protects the interests of animal enterprises, and that any threat to their property and profits is deemed criminal. This is in part because of the highly influential political lobbying from meat and dairy industries in North America. Animal advocates must often directly confront this hidden power by engaging in criminalized forms of activism in order to seek justice, which we have argued intersect with similar movements and struggles in critical criminology.

Conclusion

The very nature of clandestine, autonomous activist cells such as those that make up the North American RALM make it difficult to draw broad assumptions about specific ideologies held by *all* activists. Indeed, Joosse (2007) argues, in reference to the Earth Liberation Front that by virtue of their lack of centralized structure and anonymous membership, such movements are ideologically inclusive across the political spectrum. Although there is evidence presented here of deeply opposing viewpoints on some

aspects of justice for animals, for example the divide between those who take an abolitionist perspective to punishment and those who seek vengeance against animal abusers, we find that there are many common threads regarding how justice is framed that are found across the North American RALM.

We assert that RALM activist frames of justice encompass the justice of just deserts, as reflected by their perspective on the need for activists to take justice into their own hands because the wider society, and the legal system, is incapable of defending animals from suffering and death. Their radical actions are an expression of their deep distrust of the formal justice system, which they understand as failing on several counts – as it is seen neither to protect the innocent and vulnerable nor to punish or curtail the actions of those who would harm and exploit animals, the earth, and their fellow human beings for the sake of profit. The notion of just deserts is also seen in activists’ assertions that any punishment in the form of economic losses or fear imposed upon animal enterprises is deeply deserved. This justice frame impacts RALM ideology deeply, most obviously in the realm of influencing tactical choices, but also in their perception of animals as ‘innocents’. RALM activists believe that there can be no justice for animals without radical actions that seek to undo the very structures of animal oppression, and therefore hold much in common with other radical and emancipatory struggles for justice.

Still stronger, however, is the framing found herein of justice as life-affirmation, the unconditional and agape love towards fellow beings, regardless of species difference. The repeated assertions of love and empathy towards wild and captive animals, prisoners, other activists, and all those who suffer from injustice in the contemporary world reflect a perception that to do justice is to love others. This is reflected in movement ideology in

the critique of speciesism, for activists assert that human animals do not have any inherent right to exploit, harm, incarcerate or kill other beings, regardless of species difference. Such activists put the need to end suffering and to facilitate freedom for others before their own needs. In literally placing themselves between animals and their exploiters, often at great personal risk of capture, public shaming, and incarceration, their actions reflect more than words can say about what it means to do justice in a deeply unjust world.

Declaration of Conflicting Interests

The authors declare no potential conflicts of interests with respect to the authorship and/or publication of this article.

Notes

1. ALF Guidelines:

- (i) To liberate animals from places of abuse...and place them in good homes where they may live out their natural lives, free from suffering.
- (ii) To inflict economic damage on those who profit from the misery and exploitation of animals.
- (iii) To reveal the horror and atrocities committed against animals behind locked doors, by performing direct actions and liberations.
- (iv) To take all necessary precautions against harming any animal, human and non-human.
- (v) Any group of people who are vegetarians or vegan and who carry out actions according to these guidelines have the right to regard themselves as part of the

Animal Liberation Front.

References

- Amster, R. (2006). Perspectives on ecoterrorism: Catalysts, confluences and casualties. *Contemporary Justice Review*, 9, 287-301.
- Baranauskas, A.J., & Drakulich, K.M. (2018). Media construction of crime revisited: Media types, consumer contexts, and frames of crime and justice. *Criminology*. doi: 10.1111/1745-9125.12189
- Benford, R.D., & Snow, D.A. (2000). Framing processes and social movements: An overview and assessment. *Annual Review of Sociology*, 26, 611-639.
- Benford, R. (2005) The half-life of the environmental justice frame: Innovation, diffusion and stagnation. In D.N. Pellow & R.J. Brulle (Eds.), *Power, Justice and the Environment: A Critical Appraisal of the Environmental Justice Movement* (pp. 37-54). Cambridge, MA: MIT Press.
- Bernstein, E. (2012). Carceral politics as gender justice? The “traffic in women” and neoliberal circuits of crime, sex, and rights. *Theory and Society*, 41, 233-259.
- Best, S., & Nocella, A. J. II. (Eds.). (2006). *Igniting a Revolution: Voices in Defence of the Earth*. Oakland, CA: AK Press.
- Best, S., & Nocella, A. J. II. (2004). *Terrorists or freedom fighters? Reflections on the liberation of animals*. New York, NY: Lantern Books.
- Best, S. (2014). *The Politics of Total Liberation: Revolution for the 21st Century*. New York, NY: Palgrave Macmillan.
- Capek, S.M. (1993). The “environmental justice” frame: A conceptual discussion and an application. *Social Problems*, 40, 5-24.
- Childs, D. (2015). *Slaves of the State: Black Incarceration from the Chain Gang to the Penitentiary*. Minneapolis, MN: University of Minnesota Press.
- Cooke, S. (2013). Animal rights and environmental terrorism. *Journal of Terrorism Research*, 4, 26-36.
- Creswell, J.W. (2014). *Research Design: Qualitative, Quantitative and Mixed Methods Approaches*. Los Angeles, CA: Sage.
- Deleuze, G., & Guattari, P. F. (2009) *Anti-Oedipus: Capitalism and Schizophrenia*. New York, NY: Penguin Books.

- Dixon, C. (2012). Building 'another politics': The contemporary anti-authoritarian current in the US and Canada. *Anarchist Studies*, 20, 32-60.
- Elden, S. (2017). *Foucault: The Birth of Power*. Maiden, MA: Polity Press.
- Evans, M. (2015). Structural violence, socioeconomic rights and transformative justice. *Journal of Human Rights*, 15, 1-20.
- Flükiger, J.M. (2009). The radical animal liberation movement: Some reflections on its future. *Journal for the Study of Radicalism*, 2, 111-132.
- Foucault, M. (1990). *The History of Sexuality (1st Vintage Books ed.)*. New York, NY: Vintage Books.
- Francione, G. (1996). *Rain Without Thunder: The Ideology of the Animal Rights Movement*. Philadelphia, PA: Temple University Press.
- Goffman, E. (1974). *Frame Analysis: An Essay on the Organization of Experience*. Boston, MA: Harvard University Press.
- Gottlieb, A. (2017). The effect of message frames on public attitudes toward criminal justice reform for nonviolent offenses. *Crime & Delinquency*, 63, 636-656.
- Graeber, D. (2009). *Direct Action: An Ethnography*. Oakland, CA: AK Press.
- Hirschmann, K. (2000) The changing face of terrorism. *Internationale Politik und Gesellschaft*, 299-310.
- Hsieh, H., & Shannon, S. E. (2005). Three approaches to qualitative content analysis. *Qualitative Health Research*, 15, 1277-1288.
- Humphrey, M., & Stears, M., (2006). Animal rights protest and the challenge to deliberative democracy. *Economy and Society*, 35, 400-422.
- Johnston, G., & Johnston, M. S. (2017). "We fight for all living things": Countering misconceptions about the radical animal liberation movement. *Social Movement Studies*, 16, 735-751.
- Joose, P. (2012). Elves, environmentalism, and 'eco-terror': Leaderless resistance and media coverage of the earth liberation front. *Crime, Media, Culture*, 8, 75-93.
- Joose, P. (2007). Leaderless resistance and ideological inclusion: The case of the earth liberation front. *Terrorism and Political Violence*, 19, 351-368.
- Kemmerer, L. (Ed.). (2011). *Sister Species: Women, Animals, and Social Justice*. Urbana, IL: University of Illinois Press.

- Khasnabish, A. (2008). A tear in the fabric of the present. *Journal for the Study of Radicalism*, 2, 27-52.
- Liddick, D. (2006). *Eco-terrorism: Radical Environmental and Animal Liberation*. Westport, CT: Praeger.
- Lovell, J.S. (2009). *Crimes of Dissent: Civil Disobedience, Criminal Justice, and the Politics of Conscience*. New York, NY: New York University Press.
- MacQueen, K. (2013) How a shy animal lover became America's most wanted eco-terrorist. *Maclean's*, 12 October. Available: <https://www.macleans.ca/news/canada/rebecca-rubin-how-a-shy-animal-lover-became-americas-most-wanted-eco-terrorist/>
- Mathiesen, T. (1974). *The Politics of Abolition: Essays in Political Action Theory*. Oslo: Universitetsforlaget.
- McCoy, K. (2008). Subverting justice: An indictment of the Animal Enterprise Terrorism Act. *Animal Law*, 14, 53-70.
- Moernaut, R., Mast, J., & Pauwels, L. (2018). Framing climate change: A multi-level model. In W.L. Filho, E. Manolas, A.M. Azul, U.M. Azeiteiro, & H. McGhie (Eds.), *Handbook of Climate Change Communication: Theory of Climate Change Communication (Volume 1)* (pp. 215-271). Switzerland: Springer.
- Monaghan, R. (2013). Not quite terrorism: Animal rights extremism in the United Kingdom. *Studies in Conflict & Terrorism*, 36, 933-951.
- Monaghan, R. (1999). Terrorism in the name of animal rights. *Terrorism and Political Violence*, 11, 159-169.
- Morse, J.M. (1995). *Qualitative Research Methods for Health Professionals*. London: Chapman & Hall.
- Munro, L. (2005). Strategies, action repertoires and DIY activism in the animal rights movement. *Social Movement Studies*, 4, 75-94.
- Murdocca, C. (2013). *To Right Historical wrongs: Race, Gender, and Sentencing in Canada*. Vancouver: UBC Press.
- Nietzsche, F. (2014). *On the Genealogy of Morals: A Polemical Tract*. Trans. By Ian Johnston. Nanaimo: Vancouver Island University.
- Noakes, J.A., & Johnston, H. (2005). *Frames of Protest: Social Movements and the Framing Perspective*. Lanham: Rowman & Littlefield Publishers, Inc.

- Nocella II, A., Sorenson, J., Socha, K. and Matsuoka, A. (Eds). (2014). *Defining Critical Animal Studies: An Intersectional Social Justice Approach for Liberation*. New York, NY: Peter Lang.
- Pellow, D.N. (2014). *Total Liberation: The Power and Promise of Animal Rights and the Radical Earth Movement*. Minneapolis, MN: University of Minnesota Press.
- Pelton, L.H. (2005). *Frames of Justice: Implications for Social Policy*. New Brunswick, NJ: Transaction Publishers.
- Piché, J., & Larsen, M. (2010). The moving targets of penal abolitionism: ICOPA, past, present and future. *Contemporary Justice Review*, 13, 391-410.
- Reese, S.D. (2007). The framing project: A bridging model for media research revisited. *Journal of Communication*, 57, 148-154.
- Regan, T. (1983). *The Case for Animal Rights*. London: Routledge and Kegan Paul.
- Schnurer, M. (2004). At the gates of hell: The ALF and the legacy of holocaust resistance. In: Best, S. and Nocella II, A J. (Eds.), *Terrorists or Freedom Fighters? Reflections on the Liberation of Animals* (pp. 106-127). New York, NY: Lantern Books.
- Singer, P. (2009). *Animal Liberation* (4th ed.). New York, NY: Harper Collins.
- Sorenson, J. (2009). Constructing terrorists: propaganda about animal rights. *Critical Studies on Terrorism*, 2, 237-256.
- Snow, D.A., & Benford, R.D. (1988). Ideology, frame resonance, and participant mobilization. *International Social Movement Research*, 1, 197-217.
- Sparrow, R. (1997). *Anarchist politics & direct action*. The Anarchist Library. Retrieved from:
https://archive.org/details/al_Rob_Sparrow_Anarchist_Politics_Direct_Action_a4. Accessed January 31, 2019.
- Torres, B. (2007). *Making a Killing: The Political Economy of Animal Rights*. Oakland, CA: AK Press.
- Vanderheiden, S. (2005). Eco-terrorism or justified resistance? Radical environmentalism and the “war on terror”. *Politics & Society*, 33, 425-447.
- Walker, G. (2009). Globalizing environmental justice: The geography and politics of frame contextualization and evolution. *Global Social Policy*, 9, 355-382.
- White, R. (2011). *Transnational Environmental Crime: Toward an Eco-Global*

Criminology. London: Routledge.

Williams, F. (2012). Care relations and public policy: Social justice claims and social investment frames. *Families, Relationships and Societies, 1*, 103-119.

Wright, S., Hulley, S., & Crewe, B. (2017). The gendered pains of life imprisonment. *British Journal of Criminology, 57*, 1359-1378.