#### The Role of Radical Animal Activists as Information Providers to Consumers

### Joshua Frank

FIREPAW (The Foundation for Interdisciplinary Research and Education Promoting Animal Welfare, Inc.) <u>www.firepaw.org</u>

### **1. Introduction**

The use of illegal activity to fight the exploitation of animals has both costs and benefits. When utilized to liberate animals who are suffering in extremely cruel and inhumane conditions, it can have a direct benefit to those particular animals liberated. Direct action can also successfully gain media attention when legal means seem to have little impact. A good example of this is the recent increase in press devoted to fois gras following a series of animal liberation actions focusing on restaurants and production facilities in Northern California. Although the press accounts following these incidents were typically not favorable to the animal liberationists, there at least was some coverage of the issue. This was a dramatic change from the media treatment of the issue before illegal activity took place. In addition, the coverage explored the possibility that the production of fois gras may be inhumane, potentially increasing public knowledge on this topic. However, at the same time, a credible argument can be made that activities which leads the public to distance itself from animal causes may in the long-term erode public support, while activity which leads the public to identify with animal causes builds longterm public support (Carlisle-Frank & Frank, 2003).

In assessing the costs and benefits of illegal acts, one dimension that is often overlooked is the role of animal liberationists as information providers. There are institutional barriers between the public and industries that exploit animals which cause the public to base consumption and political decisions on very limited information. Often the only information available to the public has its origins in illegal activity. Animal liberationist activity plays an important role in bringing this information to the public—a role that has often been overlooked and that is explored further here.

#### 2. The Economics of Ethics and Ignorance in Consumption

Economists and policy makers often assume the relevant attributes of a consumer product to be either directly or indirectly observable upon consumption. This is inconsistent with reality since consumer preferences often contain important intangible components including an ethical dimension. In fact, almost every consumer product has been subject to boycotts or a change in demand due to some ethical consideration at one time or another. In addition, when it comes to regulation, proponents of an extreme free market perspective sometimes argue that regulation is unnecessary because ethical issues can be resolved within the marketplace by consumers making choices based on their ethical preferences (for example by choosing "humanely" farmed products).

However, for consumers to effectively "vote with their dollars", they must be fully aware of much information that is not visible in a final product. There is a growing movement internationally to provide greater information to the public in general known as the "Right to Know" movement. Much of what this movement is concerned with is the rights of citizens internationally to know information about their government. However, the movement also covers actions by corporations. In fact, a coalition of prominent organization have formed the "International Right to Know Campaign" to push for legislation providing the public with information on the conduct abroad of U.S. corporations regarding human rights, worker treatment, environmental damage (IRTK, 2004). Though the focus has not been on animal treatment domestically, increasing information available to the public on this subject fits in well with the goals of the movement.

The ethical dimension of a consumer good is generally intangible and therefore highly sensitive to the information environment. For industries that use animals, the production process is of vital importance to consumers if they are to make an ethical choice. However this is generally proprietary information that is not accessible to consumers. The recent case of Mad Cow disease in the United States demonstrated that there are other reasons in addition to ethical concerns for production process information to be considered relevant. The use of rendered animals as feed for livestock and the processing of downed animals both create risk for disease that cannot be observed in the final product by beef consumers.

If two final goods are identical, economists and policy makers often erroneously assume that the production process is irrelevant, and since this assumption is often unspoken, it goes unchallenged. The one arena where rules regarding the relevance of process have been made very explicit is in trade organizations such as the WTO, NAFTA, and GATT. According to WTO rules, mandatory labeling for process and production method information is not legitimate unless it is related to product safety (Hobbs, et al., 2002). Conclusions of these trade organizations which exclude ethical considerations as irrelevant to the final product have some very important implications.

The discourse in the United States over both recombinant bovine growth hormone (rBGH) and genetically modified (GM) foods implies an assumption that ethics and other process attributes unrelated to safety or final good characteristics are irrelevant. In the

debate over rBGH, although there were legitimate animal welfare concerns and other ethical concerns at issue with the use of the technology, the technology's proponents argued that labeling products would imply a safety hazard to the public that did not in reality exist (Buttel, 2000). Thus, the validity of labeling for non-safety issues was pushed aside. GM foods also present possible environmental and moral issues aside from any safety issues (Giannakas and Fulton, 2002). Yet nevertheless, the debate regarding GM food labeling again focused on whether food safety concerns were scientifically legitimate (Scandizzo, 2002), thereby once again marginalizing any ethical and environmental concerns.

Intangible ethical considerations clearly have an effect on consumption. For example, a can of tuna may be labeled "dolphin safe." Without the label, the product cannot be differentiated by the consumer from a non-dolphin safe can of tuna; yet nevertheless, Teisl et al (2002) found the label to be relevant to consumers. When the authors estimated tuna consumption as a share of all canned meat products, the dolphin safe label was found to raise tuna's market share by about one percentage point, implying that the label increased tuna consumption between five and seven percent. It is worth noting that there are still significant ethical issues with the "dolphin safe" label. First, many consumers may not realize that thousands of dolphins are still killed even after implementation of the label. Furthermore, there are issues with international standards, with the Bush administration recently trying to loosen standards to allow Mexican tuna to be imported as "dolphin safe" (Defenders of Wildlife, 2004).

Economists have a long history of following the principle *De gustibus non est disputandum* (there is no disputing taste). In other words, economists must accept the preferences of consumers, whatever these preferences might imply. Using this principle, ethical attributes of consumer goods are relevant regardless of whether they are observable in product performance. They are relevant for the simple reason that consumers care about these attributes.

Strong proponents of free market capitalism should be the first to recognize and encourage the provision of full information in markets. Virtually all economists would agree that the proper functioning of economic markets depends vitally on access to information. Why should consumers not make decisions based on all information that they find relevant? Even if only human interests were assumed to matter, surveys suggest that most consumers find the treatment of farm animals relevant. Therefore, consumers should have full information regarding any production conditions that are relevant to their purchase decisions.

Animal exploitation is clearly of significance to consumers. A 1983 survey found that 15 percent of people said they had boycotted a company or product because they were believed to harm animals (DDB Needlam, 1983). A recent Gallup poll found that 62% of people believe that there should be strict laws passed regarding the treatment of farm animals (Moore, 2003). Another recent national poll found that two-thirds of people agreed that an animal's right to live free of suffering is just as important as the right for a human to live free of suffering (ICR Survey Research Group, 2003). A poll in New Jersey similarly showed high levels of concern regarding animal suffering (Murray, 2003).

Consumers clearly care about animal issues if they are adequately informed, but they have little to no direct information regarding these attributes of products. Without

labeling or other additional information, animal treatment during the production process is unobservable in the final good. But even when traits are unobservable, economists would generally acknowledge that a socially optimal market would provide consumers with all information they find relevant (note here that we are talking about what is socially optimal for the *humans* involved--this does not take into account the utility of the animals themselves). Therefore, with animal-based goods, there is an information deficit and consequently serious problems in getting markets to function properly.

#### 3. Ignorance in Consumption and Animal Exploitation

Ethical considerations and ignorance are particularly important to the consumption of animal products in society. Becoming aware of the process for creating animal products can have a powerful effect. Observing footage or otherwise being given detailed accounts of animal exploitation is a "moral shock" has often been the turning point in recruiting members of the public into the animal rights movement (Jasper, 1995). Observing footage of factory farming has also often been a catalytic event in the decision to become vegan (McDonald, 2000). From personal experience as the executive director of an organization that screens videos involving graphic animal exploitation, I have observed that this footage often has a powerful impact on people, even those who have low involvement and knowledge regarding animal issues.

It is likely that much of the public would be strongly opposed to many common practices in the production of animal-based goods if they were fully informed. Therefore, ignorance plays a large role in perpetuating the mistreatment of animals. One example of public opinion changing after a major revelation came following publication of Upton Sinclair's "The Jungle" in 1906. The book affected confidence in the meat supply and sales, and led to major legislation within six months. However, Upton Sinclair was not satisfied with the results, since the public focused on the book's health implications rather than the implications for labor, capitalism in general, and animal exploitation. Or as Sinclair put it, he had intended to reach the public's heart but instead only hit them in the stomach (Block, 2004).

A survey was conducted recently by Rutgers University of residents of New Jersey regarding humane standards for the treatment of livestock (Murray, 2003). The survey was prompted by new proposed animal treatment standards created by the New Jersey Department of Agriculture. Roughly nine in ten residents knew "not much" or "nothing" about the new standards. Yet between 74% and 83% of residents were opposed to common farming practices that would still be legal under the new regulations such as tail docking, severe confinement of veal calves and pregnant pigs, and forced molting after simply being informed of the practice. The researchers conclude that the public is largely ignorant of farm practices and that the public in New Jersey is concerned about humane treatment of animals.

The greatest barrier to reform in the exploitation of animals for commercial purposes appears to be ignorance. Because of the institutional framework of the United States and developed countries in general, the information available to the public is limited. In addition, what information that does become available often comes in forms (such as the internet) that require active searching or are limited in their distribution. Animal exploiting industries have strong incentives to deceive the public or to downplay the nature and extent of the harm caused to animals. Furthermore these industries have repeatedly demonstrated in practice their willingness to mislead the public and even use false information when not diligently monitored and challenged.

Ninety-six percent of Americans say that animals deserve at least some protection from harm and exploitation (Moore, 2003). Yet often this concern does not translate into behavior given the high level of animal exploitation in a variety of industries such as factory farming. There is strong anecdotal evidence from people who work to educate the public regarding animal issues that (1) the public is largely ignorant of the details of animal abuses and that (2) many members of the public do react strongly against such exploitation when they learn the full details of the harm to animals. In animal use industries, the public is kept far-removed from the details of the production process. From re-labeling animal parts as something that does not resemble an animal to using euphemisms for killing and inflicting extreme suffering, the wording used in animal exploitation industries is designed to distance the public from the gory details of the production process (Dunayer, 2001). The public is generally not aware of the extreme level of confinement and sensory deprivation occurring in factory farms or animal laboratories, the high error rate in stunning animals that results in them being dismembered or boiled alive in slaughterhouses, the level of pain involved in many animal tests, the level of suffering inflicted by prevalent fur farming and trapping techniques, nor the death and suffering involved when elephants or marine mammals are captured from the wild to perform at a circus or amusement park. Generally, the public is highly sensitive to all these issues and many others, but they have little access to the relevant information. Examples of negative public reactions when animal exploitation information becomes available include the decline in veal sales when some of the public

gained partial awareness of the process, the decline in fur usage as awareness rose (though most of the public still had only a dim awareness of the process and fur sales have started to rise again), and the "dolphin-safe" tuna example previously discussed.

It is important to make a distinction between superficial information (such as a one sentence description of animal confinement in an opinion survey), and more rich information sources such as videotapes that actually show mass confinement facilities. Anderson (2003) demonstrates that the use of pictures can dramatically alter survey responses. Anderson hypothesizes that items without pictures may be discounted or dismissed. Among the examples he gives demonstrating the power of visual stimuli is the effect footage of seals being clubbed had on reducing the market for baby seal skins. Indeed it would be hard to imagine how the campaign could have been nearly as powerful without the images of seals actually being killed. While some may argue that such footage is emotive rather than information enhancing, it is probably closer to the truth that words like "baby seals were clubbed" simply cannot give a reader or listener the full impact of what is happening the way a simple photo or video clip can. In fact, this is true for most animal exploitation situations. Saying an animal was "severely confined", was "beaten into submission", "gnawed it own leg off in a steel-jawed trap", or "squealed while being cut up alive" simply cannot fully convey the reality of the situation. Only showing extreme suffering in photo or video images or other nonverbal stimuli can come close to bringing across the level of harm done. Even with a video, saturation with video violence and the general tendency towards protective denial suggests that, if anything, there will still be bias towards underestimating the harm done. Clearly even footage of the torture or death of a living creature is much less traumatic and powerful than actually being at the actual scene. And even the actual live viewing of the death or suffering of a person or other animal is far less powerful without full contextual background regarding that animal—i.e. seeing that creature in enough depth and varied settings to view it as a true individual with preferences, awareness, intelligence, personality, and the ability to suffer. Only in the last situation would a person be truly "fully informed" regarding the process behind the production of a hamburger. Thus, even providing every consumer regularly with graphic footage of factory farm conditions and slaughter is giving consumers only partial information, though it is vastly superior to the level of knowledge most consumers currently possess.

# 4. The Role of Animal Liberation Activity

Fur processors, factory farmers, puppy mills, animal laboratories, circuses/animal parks, and other animal exploiting industries all have a strong vested interest in minimizing the amount of information that the public receives. General privacy laws limit the ability of the public to gain access to these facilities, and additional legislation with very harsh criminal penalties for anybody attempting to trespass at animal-related facilities was introduced in seven states in 2003 (Nguyen, 2003), including California, New York, and Texas. The Bush Administration has also drafted legislation that would expand on the original Patriot Act including targeting "domestic terrorism." What would qualify as illegal activity under this potential federal legislation could be interpreted to include investigative reporting or other nonviolent actions such as photographing the abuse of animals (Best, 2003).

One early example of a law specifically designed to suppress information regarding animal exploitation was Canada's "Seal Protection Act." The law was hastily put together in 1976, specifically in response to plans of activists to campaign against the seal hunt. Contrary to what the title suggests, the law did not protect seals, but rather protected seal hunters by preventing people from approaching areas where the seal hunt was taking place. The law appeared to be enforced with the intention of suppressing information. In 1981, the law was used to impound an International Fund for Animal Welfare aircraft used to take photographs of the hunt. When Paul Watson of the Sea Shepherd Conservation Society was sentenced to 21 months in prison under the Seal Protection Act, the case was taken to the Canadian Supreme Court, which resulted in the law being overturned.

Although government inspections are required at some types of animal facilities, the regulatory bodies are closely linked with the industry and may have a shared interest in maintaining the status quo. Individual "whistle-blowers" and pro-animal organizations give a long list of specific examples of information regarding animal cruelty and regulation violations being suppressed. For example, Fleshler (2003) cites an example of a whistle-blower allegedly being fired for complaining about animal cruelty, while SHAC (2003) cites an alleged example of USDA inspectors finding violations and reportedly being told by supervisors that "this is political" and that the alleged breaches should not be filed. Food producers have also been fighting an active campaign to suppress public information. "Food disparagement" laws have been passed in at least 13 states and there is an orchestrated campaign by food producers to pass similar laws in all 50 states (Lilliston and Cummins, 1997). These laws make free speech difficult by shifting the

burden of proof onto the speaker for proving that their claims are scientifically sound. In addition, often the threat of legal action by a powerful industry is enough to suppress the speech of individuals who are not in a position to pay for a court battle. In fact the use of "SLAPP" (Strategic Lawsuits Against Public Participation) has been an ongoing strategy by animal industry organizations to suppress critics by intimidation rather than by winning actual monetary awards (Munro, 1999).

Given the huge barriers to legally obtaining animal exploitation information, illegal animal liberation and undercover activities play a vital role in recording and publicizing information that is currently inaccessible to the public. Some of the effort to record and publicize information on animal exploitation can be conducted legally using undercover methods. The undercover method has been used both by the media (e.g. by shows such as Dateline) and by animal organizations (e.g. PETA has sent workers undercover into animal laboratories). However, legal undercover investigations have their limitations. The media has shown a strong reluctance to investigate systematic animal abuse by industry. Perhaps this is due to the great influence these industries have both as advertisers and through political channels. Legal undercover work by animal organizations is limited by the time, expense, and the difficulty of successfully passing an investigator off as a legitimate employee with the skills needed for a particular job and keeping them on the job for a sufficient amount of time to gather evidence. It also requires finding a person who cares deeply about animals yet who is simulatneously willing to stand by and not take action when they potentially observe horrific acts of cruelty and abuse. Surreptitiously filming some activities, particularly in secured facilities, may also prove difficult. In addition, even filming animal exploitation could be illegal. In addition to recent laws that specifically seek to prohibit the free flow of information regarding animal abuse, recording without consent is illegal in some states. Furthermore, confidentiality and other contractual agreements between the employer and employee could also leave the undercover investigator vulnerable to legal action. Therefore, in many situations illegal activity is necessary to uncover animal exploitation

Some of the most compelling information on animal exploitation has come from taking possession of existing records and footage, which typically requires breaking the law. A good example of this was a videotape taken from the Head Injury Clinic at the University of Pennsylvania by the ALF. The tape not only clearly showed severely painful head injuries being inflicted on baboons at up to 1,000X the force of gravity, but also the unprofessionalism of the researchers, who joked about, mocked their subjects and treated them roughly. The video also revealed that the baboons were not properly anesthetised, contrary to the researcher's claims. Importantly, we might note that this case illustrates that cooperation between underground activist groups and above ground organizations can be both politically efficient and successful, since PETA used the ALF footage to create the well-known video "Unnecessary Fuss" (Newkirk, 2000).

The cases where illegal or undercover documentation have been key to advancing knowledge and public debate regarding animal exploitation are too numerous to fully cover here. Some recent examples include the previously mentioned fois gras activity in Northern California, which resulted in activist footage of fois gras farm conditions being aired on television, an undercover investigation of Iams animal testing conducted by PETA, and footage of a dolphin slaughter in Japan by Sea Shephard Conservation Society. Well known films such as "Meet your Meat" and "The Witness" have used such footage for a powerful effect. "Unnecessary Fuss", as already discussed, came from footage obtained illegally through the ALF. Many other well-known raids by the ALF have resulted in footage or documents which were later used by the media or investigators. The 1984 raid of "City of Hope" included video documentation and logs that helped to lead to the loss or suspension of millions in grant funding. A 1985 raid of University of California at Riverside resulted in powerful footage of "Britches," a baby monkey whose eyes had been sewn shut for questionable experiments. A 1986 raid at the University of Oregon again resulted in documents and photos that had a media impact. This tactic has been so successful that an animal liberation-affiliated publication declared that, "it was the A.L.F.'s steps to 'expose' which would ultimately be the vivisectors' biggest threat and what would bring the A.L.F. and the animals their greatest victories" (No Compromise, 1999).

There can be no doubt that such illegal and covert entry is vital to monitoring animal exploitative industries, particularly in an environment where regulators are frequently lax or have an unhealthy connection with the industries they regulate. Again, one of the chief problems facing animal welfare advocates today is of disseminating accurate information to the public, which is countered by the ease with which animal exploiting industries can simply discount or deny the accuracy of charges from whistleblowers. This is a simple yet effective tactic on the part of such industries since there is so much assymetry in the information producers have relative to that available to the public, and since animal exploiters and their allies have been successful in portraying the perspectives of animal advocates as radical in the minds of ordinary people. The best method of counteracting this tactic is to have well-documented evidence that cannot be

easily denied. Yet this information is simply not readily available to the public or other outsiders. The media, just like any other third party, also does not have wide access to this information. Furthermore, there are strong corporate interests that can exert influence to limit journalistic investigations towards gathering such information. In the current institutional structure, therefore, obtaining and publicizing documentation of animal abuse often requires non-violent illegal action.

## 5. Conclusion

Even when they are for a worthy cause, direct action strategies have both positive and negative consequences that must be weighed carefully. However, regardless of the other social consequences of these actions, covert and sometimes illegal animal liberation/animal rights activity is necessary to provide information to the public in the current institutional system.

It has been established here that providing additional public information about animal exploitation is important and socially beneficial, even when only human interests are taken into consideration. When animal interests are taken into consideration, this information becomes even more vital. This information, though important, is also generally inaccessible to the public through legal means. Therefore, animal liberationists play an important and socially beneficial role as information. With animal exploiters attempting to direct public attention to the property damage and alleged intimidation conducted by animal activists, the role of animal activists as providers of valuable and socially beneficial information has often been overlooked. Given the frequent criticism

of animal liberation activity in the media, those in the movement would be well-served to focus attention on the important role they have played in monitoring animal exploitation and providing much-needed industry scrutiny to the public.

Animal liberation activists do have a credibility problem among the public and mainstream media. This reduces their effectiveness in bringing instances of animal exploitation to light. One way to help counter this, as previously mentioned, is to bring forward hard evidence that speaks for itself and is difficult to dispute, such as the footage from "Unncessary Fuss." Even then, building credibility is a slow building process since cases that are brought forward are often dismissed by the opposition as "exceptions" or even as somehow "staged". This argument may be convincing to the public in individual cases. However, it can be countered if the animal advocates are viewed by the public as credible, or if the weight of evidence is strong enough that these counterarguments start to ring hollow (i.e. if enough cases are brought forward, it is hard to call them all exceptions.)

Animal liberationist credibility issues could also be partially addressed by putting more of a focus on media relations and being more savvy and organized in handling this aspect of their efforts. However, this is difficult to do given the considerable power, sophistication, and media access of the organizations attempting to discredit animal activists. Some credibility can be gained simply by highlighting the role of activists discussed in this essay—i.e.; liberationists' role as providers of socially beneficial information.

A more extreme but perhaps appropriate measure would be to organizationally delink efforts to expose animal abuse from other illegal activities by creating a new organization that is solely focused on exposing abuse and providing information to the public by whatever means are necessary. Currently, these two functions often share information, personnel, and resources. Sometimes, documenting abuse and other illegal actions are done in the same event. However, from the public's perspective, activities linked with vandalism, sabotage, and intimidation will be viewed disfavorably. At the same time, documenting abuse depends critically on the documentor's credibility. Therefore, it would be beneficial to isolate the important job of documenting industry abuse. This would also serve to highlight the information gathering function for the public, making it more difficult for supporters of animal exploiting industries to portray illegal activity as only about property damage and intimidation (in their efforts, for example, to push for anti-activist laws).

From a public policy pespective, activities which the public may find objectionable should become transparent, thereby making illegal activity unnecessary for information collection purposes. Most likely, consumers will not have the time or resources to individually monitor industry activities even if they are publicly accessible. Therefore, intermediaries such as animal advocacy organizations should be encouraged and enabled to perform such monitoring. As a starting measure, the current trend in laws that increases penalties for nonviolent activities that have been labeled "domestic terrorism" should be reversed.

# **References**

Anderson, D.A. 2003. A Picture is worth \$10 million: Adult Object Permanence and the Neglected Power of Sight. United State Society for Ecological Economics Annual Meeting, May, Saratoga Springs, New York.

Best, S. 2003. The Son of Patriot Act and Revenge on Democracy Animal Liberation, Philosophy and Policy Journal, 1:1.

Block, M. 2004. Interview: Morris Dickstein discusses Upton Sinclair's classic novel "The Jungle", National Public Radio, All Things Considered, January 2.

Buttel, F.H. 2000. Recombinant BGH Controversy in the United States. Agriculture and human values, 17(1):5-20.

Carlisle-Frank, P. & Frank, J. 2003. Cutting Away the Fringe: Legitimizing the Fight to Stop Animal Suffering, *Submitted for publication*.

DDB Needlam Worldwide, 1983. Attitudes toward using animals in laboratory experiments, April.

Defenders of Wildlife, 2004. Dolphin-Safe Tuna Status Report, <u>http://www.defenders.org/wildlife/dolphin/tundolph.html</u>.

Dunayer, J., 2001. Animal Equality: Language and Liberation. Ryce Publishing, Derwood, Maryland.

Fleshler, D. 2003. Veterinarian fired by UM, Mount Sinai after speaking out on alleged animal cruelty. South Florida Sun-Sentinel, July 21.

Giannakas, K. and Fulton, M. 2002. Consumption effects of genetic modification: what if consumers are right? Agricultural Economics 27:97-109.

Hobbs, A.L., Hobbs, J.E., Isaac, G.E., and Kerr, W.A. 2002. Ethics, domestic food policy and trade law: assessing the EU animal welfare proposal to the WTO. Food Policy 27:437-454.

ICR Survey Research Group, 2003. Associated Press Poll: Animal Rights, November.

IRTK, 2004. International Right to Know (IRTK) website, <u>http://www.irtk.org</u>.

Lilliston, B., Cummins, R. 1997. Food slander laws in the US: the criminalization of dissent. The Ecologist, 27(6):216-220.

Moore, D. W. 2003. Public Lukewarm on Animal Rights. Gallup News Service, May 21.

Munro, L. 1999. Contesting Moral Capital in Campaigns Against Animal Liberation. Society & Animals, 7(1).

Murray, P. 2003. New Jerseyans' Opinions on Humane Standards for Treatment of Livestock. Eagleton Institute of Politics Center for Public Interest Polling, Rutgers University, New Jersey.

Newkirk, I. 2000. Free the Animals, Lantern Books, New York. Nguyen, D. 2003. New California law targets animal rights activists. Associated Press, December 2.

No Compromise, 1999. Blast From the Past—'80s Lab Raids, Issue 15.

Scandizzo, S. 2002. International Trade and the Labeling of Genetically Modified Organisms. Briefing Notes in Economics, 54.

SHAC (Stop Huntingdon Animal Cruelty), 2003. USDA Covers up for HLS. 3(2):4.

Teisl, M.F., Roe, B., Hicks, R.L. 2002. Can Eco-Labels Tune a Market? Evidence from Dolphin-Safe Labeling. Journal of Environmental Economics and Management, 43:339-359.