

ECOCIDE AND THE RIGHTS OF NATURE

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ABSTRACT

While recognizing economic development is important, it is necessary to strike a balance between such activities and its effect on the environment. With industrialization and economic prosperity being the underlining goals of various governments in various jurisdiction, the author indicates that these activities be carried out from an ecocentric view point, focusing on the importance of rights to nature and the problem of ecocide. History reveals the negative impact such activities have had on the environment. Environmental protections have been given international recognition; however, the modern approach of environmental activism has to be incorporated in the scheme of things. The author carefully explains the importance for the domestic and international community to move from an anthropocentric standard to an ecocentric one, by providing and statutorily recognizing the intrinsic value for nature. This is imperative in order to prevent events that have caused large scale destruction on the environment from repeating itself and preserve the original state of the earth for the benefit of both human and non-human life forms present in the ecosystem.

1. INTRODUCTION

With the continuous growth of the technological and industrial sector of the world, there is more concern on ensuring economic and social development irrespective of the effect it has on the environment. The world is a global village that encourages innovative ideas and discoveries to improve the standard of living and wellbeing of individuals. Government and international bodies in both developed and developing countries strongly prioritize wide scale economic

activities that contribute to productivity growth and economic prosperity. However, in a bid of caring out these activities, the adverse effects it sometimes has on the environment should not be underestimated. Also, technological improvement in weapons and war equipment are being made every day and tested is carried out in various manners. History is an evidence of the dangers it can exact on life forms, species and the environment at large. The environment which is our home has suffered collateral damage as a result of these actions of human activity. Not to leave out the natural components that contribute to the degradation of the environment; acts of god that has destroyed environmental components. It is therefore imperative to criminalize the colossal degradation of the earth and secure the rights of the elements of nature.

Environmental activism has improved over the 21st century, ranging from significant and land mark events from the 1970s till date. It is an indisputable fact that environmentalism has been institutionalized to a reasonable extent and various concepts are being championed so as to promote sustainability of the earth.¹ There has been the creation of international and national legislations that provide for environmental protection, still major proponents and environmental professionals are the forefront advocating for the rights of nature. It can be seen that a larger amount of the Sustainable Development Goals (SDGs) adopted by the United Nations (UN) bother on environmental sustainability. These efforts are commendable; however, conscious actions need to be made to give the needed priority to the environment. Nature has been seen for a very long time as a means to reach human needs and not as an entity of its own dignity to be protected. It is important to take the protection towards the earth we inhabit to the next level, where it is strongly institutionalized in our legislative books that they have inalienable rights, and the basic rational behind human rights is also available to them. That is, just as how we humans have certain rights because we have life and liberty nature too is to enjoy such rights so as to preserve its original form, which is vital to the existence of wildlife and ultimately, would be to the benefit for not just this generation but for many to come. Steps should be taken further to criminalize acts of violence done to nature knowingly and unknowingly, accustoming punishments in accordance to the level of damage. This brings us to the essence of this paper, to interrogate the nature of ecocide and the right of nature. These are separate concepts that are gaining recognition within the earth jurisprudence.²

¹ Christopher Rootes, 'The Transformation of Environmental Activism: An Introduction' (2013) 10.1093/0199252068.033.0001.

² Peter Burden, 'Wild Law: The Philosophy of Earth Jurisprudence' (2010) *Alternative Law Journal* 35. *Revista Argumentum – RA*, eISSN 2359-6889, Marília/SP, V. 21, N. 2, pp. 953-965, Mai.-Ago. 2020.

2. RIGHTS OF NATURE

It is a common truth that the human race has evolved over the years. There were practices carried out in previous centuries with legal backings that are forbidden and frowned upon in this present age. Take slavery as an example; slaves were seen as properties of their owners and could be treated as they (owners) deemed fit. A situation where a slave was intentionally killed was not a matter of human rights, but fell under the realm of property law. But with civilization and much advocating, actions like this were discouraged and deterred; things changed to accommodate humane interpersonal relations with legal backings. Professor Christopher Stones from the University of South California, was of the opinion that ‘it was easy to see how each change shifted the locus and quality of power ... each advanced in the law-legitimated concept of “ownership”, fuelling a change in consciousness, in the range and depth of feelings’.³ This exemplifies part of the reasoning behind the rights of nature, where trees, animals, rivers, lakes (and wildlife in general) are not just seen as properties owned by individuals and bodies, that could be utilized in such a manner as not to regard the adverse aftermath on these life forms. This emerging concept borders on ‘the rights of non-human species, elements of the natural environment and inanimate objects to a continued existence unthreatened by human activities’.⁴

Rights of nature can be defined as that aspect of law that advocates inherent rights of entities or species within the ecosystem that conforms to the rationale behind fundamental human rights. It is the recognition that trees, oceans, animals, mountains have rights, striking a balance between what is good for human beings and what is good for the planet.⁵ It provides a regime where degradation of the environment would amount to a violation of rights held by elements of nature, thereby having standing in court, so as to better protect the environment. This is a move from the present status of most environmental laws which are reactive in nature to a right-based approach that is preventive in nature. Linda Sheehan in one of her works opined that, ‘Looking globally, extinction rates are now 1000 times more across history; at least 40 percent of amphibians and 25 percent of mammals are at risk of extinction in the near future. Even the

³ Peter Burden, ‘The Rights of Nature: Reconsidered’ (2010) *Australian Humanities* 49.

⁴ David R. Boyd, *The Rights of Nature: A Legal Revolution that could Save the World* (2018 ECW Press) 137

⁵ <<https://therightsofnature.org/what-as-rights-of-nature/>> accessed 2nd July 2020.

World Bank is saying that projected climate change may cause a transition of the Earth's ecosystems into a state unknown in human experience.⁶ She went further to explain that we operate a system of exclusion, where there is no relationship between human and nature; stressing there is a great need to recognize the inherent rights of nature so as to establish a strong relationship to the benefit of both entities.⁷

The concept of rights of nature began its formal early development from the United State case of *Sierra Club v. Morton*.⁸ In this case, the Sierra club was seeking to stop the development of a ski resort by Walt Disney at Mineral King Valley in the Sierra Nevada Mountains, on the ground that it would cause 'irreparable harm to the public's interest'. During the pendency of the case, Christopher Stones authored a law review article titled, 'Should Trees have Standing? – Towards Legal Rights for Natural Objects' where he argued that elements of nature ought to have standing to defend their ecological integrity. Although the court rejected the plaintiff's argument on the basis that they lacked the standing to sue, as they did not suffer any personal injury, the aforementioned article inspired the Supreme Court Justice William O. Douglas in giving his dissenting opinion. This case is popular because of the dissenting judgment of Justice William O. Douglas who opined that natural elements of the ecosystem should have standing for their own protection. In his own words he clarified;

The critical question of "standing" would be simplified and also put neatly in focus if we fashioned a federal rule that allowed environmental issues to be litigated before federal agencies and courts in the name of the inanimate object about to be despoiled, defaced, or invaded by roads and bulldozers and where injury is the subject of public outrage. Contemporary public concern for protecting nature's ecological equilibrium should lead to the conferral of standing upon environmental objects to sue for their own preservation. This suit would therefore be more properly labeled as *Mineral King v. Morton*...

It is important to note, although Sierra Club lost the case, in reality they won the fight. Influenced by the circumstances and pressure surrounding the case, the Governor Reagan withdrew his support and the Sierra Club stopped pursuing the matter. It was eventually struck out for lack of prosecution. Ultimately, the ski resort was not constructed and Sierra Club was able to prevent the Mineral King Valley from being destroyed.

⁶ Linda Sheehan, 'Implementing Rights of Nature through Sustainability Bills of Rights' (2015) 13 *NZJPIL* 89.

⁷ *Ibid* 6.

⁸ 405 U.S. 727 (1972)

This prompted various environmental scholars and enthusiasts to propagate the need for natural objects to have rights to be defended and enforced. Roderick Nash argues that morality ought to be included in the relationship between man and nature and ensuring rights for nature would lead to its the liberation.⁹ Thomas Berry, the foremost proponent of the philosophy and ethics of law called Earth Jurisprudence,¹⁰ defined the rights that both living and non-living components of the Earth Community should enjoy: the right to be, the right to habitat or a place to be, and the right to fulfill its role in the ever-renewing processes of the Earth community.¹¹ Gradually, as a result of the continuous efforts in promoting the rights of nature, various government have incorporated such rights into their legislative books, courts have enforced the rights of natural bodies and the regime of a right-based approach to nature is slowly gaining weight. This is evident in places like Ecuador, Bolivia, New Zealand etc. With this progress being made, it is important for individuals and government to shift from an anthropocentric view to a biocentric view.

3. ANTROPOCENTRISM VERSUS ECOCENTRISM

Anthropocentrism is defined in its most relevant philosophical form as the ethical belief that humans alone possess intrinsic value, in contradistinction that all other beings hold value only in their ability to serve humans, or in their instrumental value.¹² It connotes that human beings possess inherent rights and values, while every other things is an accessory to aid the need of human beings. Lawrence Atsegbua argues that in this theory, emphasis is centered on the welfare of mankind, as it is attributed the highest priority of importance in any environmental regime and ‘whatever happens to the environment appears immaterial provided the welfare and wellbeing of man is achieved’.¹³ Proponents of this view argue that mankind is at the center and every other living component in the ecosystems is a means to fuel man’s utility; a belief that

⁹ Roderick Frazier Nash, *The Rights of Nature: A History of Environmental Ethics* (Wisconsin, University of Wisconsin Press, 1989) 278.

¹⁰ This school of thought sees the earth’s law as imperative and that everything by reason of its existence therefore has an intrinsic right to be and evolve, <https://en.m.wikipedia.org/wiki/Rights_of_nature> accessed 5 July 2020.

¹¹ Thomas Berry, ‘The Origin, Differentiation and Role of Rights’ <<http://www.ties-edu.org/wp-content/uploads/2019/09/Thomas-Berry-rights.pdf>> accessed July 7 2020.

¹² Lissy Goralnik and Michael Paul Nelson, *Encyclopedia of Applied Ethics* (2nd edn San Diego: Academic Press, 2012) 145.

¹³ Lawrence Atsegbua and others, *Environmental Law in Nigeria: Theory and Practice* (2nd edn., Ambik Press 2010) 10.

other individual living component has inherent rights run contrary to it. They acknowledge humans as being the most significant creatures, while plants and animals are to provide life necessities, ranging from shelter, food, clothing to materials for construction and development. Certain academic scholars have vehemently submitted that firstly, although anthropocentrism is viewed as value being human-centered, critics of this theory are misguided and counterproductive as they fail to distinguish illegitimate and legitimate human interest. Illegitimate human interest being placing humans need above other life components is not the basis for anthropocentrism but legitimate human interest, which is man looking out for his own kind. That the problem is redefining anthropocentrism to accommodate the unavoidable situation of man looking out for its welfare and rule out the arbitral abuse of that welfare.¹⁴

On the other hand, ecocentrism is the worldview that recognizes intrinsic view in all life forms. It is defined as the holistic environmental theory, according to which not only living being, but the whole ecosystem, including the abiotic part of nature, is worthy of moral consideration.¹⁵ The theory of ecocentrism postulates a body of reasoning that advances seeing value in the ecosphere so as to preserve its original form and make the earth sustainable. Ecocentrism underpins the concept of rights of nature and the punishment of acts that results to massive degradation of the environment – ecocide (which would be deliberated upon in the later parts of this article). Stan Rowe beautifully captures the major essence of theory saying,

Ecocentrism is not an argument that all organisms have equivalent value... It does not deny that myriad important homocentric problems exist. But it stands aside from these smaller, short-term issues in order to consider Ecological Reality. Reflecting on the ecological status of all organisms, it comprehends the Ecosystem as a Being that transcends in importance any one single species, even the self-named sapient one... It proposes an ethic whose reference point is supra-human, placing Ecosphere health before human welfare.¹⁶

From the above aversion, one can draw a common denominator that reveals the need for a shift to an ecocentric view to corroborate the concept of rights of nature.

The argument between these two sharply contrasted theories is imperative to divulge a clearer path to achieve sustainability – focusing to reinvent the way individuals think and see the importance in legalizing environmental values. The ecosystem consists of all these various life

¹⁴ Helen Kopnina and others, 'Anthropocentrism: More than Just a Misunderstood Problem' (2018) *Journal of Agricultural and Environmental Ethics* 10.

¹⁵ <https://shodhganga.inflibnet.ac.in/bitstream/10603/8/08_chapter%204.pdf> accessed 10th July 2020.

¹⁶ Stan Rowe, 'Ecocentrism and Traditional Ecological Knowledge' <<https://is.gd/rkSgP5>> accessed 10th July 2020. *Revista Argumentum – RA*, eISSN 2359-6889, Marília/SP, V. 21, N. 2, pp. 953-965, Mai.-Ago. 2020. 958

forms, plants and animals, which are essential to balance the natural makeup of the earth. The argument to reject the superiority of humans above nature is seeking to ensure the earth is not plunged into an irreversible state that it would become inhabitable. When there is a regime that grants rights backed up with legal consequences to protect the ecosystem, we enter into an era where we desire to keep enjoying a continuous and possible euphoria. The stress has to be placed on amending the relationship man has with nature; disregarding man is above nature and upholding he has an integral role to play as the advocate of environmental values, rights and interest.¹⁷ Instead of redefining anthropocentrism, we should embrace the evolving tenets of ecocentrism. Ecocentrism ought to be viewed as an ideology to help build the future and not a defeated cause. This theory has led to the birth of ‘notable policies, legislations and international treaties aimed at preserving the ecosystem such as the principles of Sustainable Development, Polluter Pay amongst others’.¹⁸ It has improved the way man sees his environment and ensure previous devastating past events that cause irreparable damage to the ecosystem are not repeated. History has revealed several activities, particularly in human conflict and colossal industrialization that has caused grave environmental alteration that we still witness the adverse outcome to this very date. This would bring us to our next and equally important concept in the earth jurisdiction, which raises the question whether ecocide – the criminalization of certain acts, will help realize a regime where nature enjoys inherent protection?

4. NATURE OF ECOCIDE.

The argument that certain activities carried out by man, either consciously or inadvertently, which has led to environmental degradation should entail levels of criminality and attract penal consequences has been put forward for global recognition. That is, a realization for a ‘green perspective of criminology’ and a demand to classify certain anti-environmental acts as crimes. A wide range of activities impair the lives of human, non-human life form and the earth at large. Examples such as military testing of weapons in land, air and water bodies, construction and industrial pollution, corporate and governmental agreement to undertake improper waste disposal, bypassing and no-compliance to environmental regulations, oil spillage, unregulated

¹⁷ Bulent Alagoz & Ozkan Akman, ‘Anthropocentric or Ecocentric Environmentalism? Views of Univeristy Students’ (2016) (6)4 Higher Education Studies 34.

¹⁸ Ibid 13 page 14.

deforestation and exploitation of natural resource e.t.c. The accumulative effect of these activities results to severe harm and alteration to various life forms. The aforementioned activities can be considered as ecocide. Polly Higgins defined Ecocide ‘as the extensive damage to, destruction of or loss of ecosystem(s) of a given territory, whether by human agency or by other causes, to such an event that peaceful enjoyment by the inhabitants of that territory has been severely diminished’.¹⁹ Ecocide originates from the Greek word ‘oikos’ and the Latin word ‘caedere’ which the prefix and suffix; ‘eco’ and ‘cide’ are respectively coined from. ‘Oikos’ meaning ‘house, dwelling place, habitation, family’ and ‘caedere’ meaning ‘to strike down, chop, beat, hew, fell, slay’ and therefore directly translated to ‘the killing of our home’. In order words, ecocide conceptualizes the destruction of our environment to a point it becomes uncomfortable for its inhabitants. It is the criminalized human activity that violates the principles of environmental justice, such as causing extensive damage or destroying ecosystems or harming the health and well-being of a species (including humans).²⁰

The injustice surrounding ecocide has prompted environmental experts to propagate the codification of ecocide as a fifth crime against peace, alongside genocide, crimes of aggression, crimes against humanity, and war crimes.²¹ The reasoning behind criminalizing ecocide promotes an ecocentric view towards defining the intrinsic value in nature. The journey to criminalize ecocide can be traced as far back as 1970, when Arthur Galston fashioned out the name at the Conference on War and National Responsibility. He was an American Biologist who had worked on creating a chemical weapon used in the Vietnam War that destroyed plants and affected the natural component of the environment. Aggrieved by the outcome, he became an activist and described such acts as ‘killing our home’ – Ecocide and ‘proposed a new international agreement to ban ecocide’.²² In 1972, during the United Nations (UN) Stockholm Conference on Human Environment (which led the to the Stockholm Declaration that recognized a right to a healthful environment) Olof Palme, in his opening speech, talked about the event of the Vietnam war as an ecocide, and in the unofficial events running parallel to the conference, it was elaborated upon.²³ There was therefore extensive study and efforts to include ecocide as the fifth international crime

¹⁹ Polly Higgins, ‘Eradicating Ecocide: Laws and Governance to Prevent the Destruction of our Planet’ (2nd Shephard-Walwyn 2015).

²⁰ <<https://en.m.wikipedia.org/wiki/Ecocide>> accessed 10th July 2020.

²¹ Femke Wijdekop, ‘Against Ecocide: Legal Protection for Earth’ <https://greattransition.org/images/GTI_PUBLICATIONS/Against-Ecocide.pdf> accessed 11th July 2020.

²² Ibid 21.

²³ <<https://ecocidelaw.com/the-law/history/>> accessed 10th July 2020.

against peace before the UN and include such amendment in the Rome Statute which spanned all through the 1970s and 80s. In 1978, discussions for the Draft Code of Crimes Against the Peace and Security of Mankind begun and included ecocide as a crime, which was supported by Romania and the Holy See, Austria, Poland, Rwanda, Congo and Oman, discussions continued up till the 90s. However, in 1996, all aspect concerning ecocide was deleted from the Draft – which became the Rome Statute and only recognized four crimes against peace.²⁴ However, a war crime on the environment causing ‘widespread, long-term and severe damage’ and also severe injury to human health was present in the Rose Statute.²⁵

5. OPERATIONALIZATION OF THE RIGHTS OF NATURE – A LAWYER FOR THE EARTH.

The struggle for the recognition of ecocide as a crime against peace gradually continued in the new millennium in a more subtle manner until the wakeup call by the Scottish environmental lawyer and lobbyist Polly Higgins who is often described as the lawyer for the earth.²⁶ In April 2010, she brought forth a proposal before the UN Law Commission for the inclusion of Ecocide as the fifth crime against peace. This proposal spiked up a much larger campaign, which was also complimented by the arguments put forward in her book.²⁷ She strongly opined in her book, ‘Eradicating Ecocide: Laws and Governance to Prevent the Destruction of our Planet’²⁸ that a ‘tipping point’ would be reached where the earth will get to a state of irreversible damage and man would become mere spectators. In order to prevent that, we are to take ‘responsibility of our actions and put in place the means to ensure the well-being of our oikos’. She outlined the illustration of Buckminster Fuller, who compares the law of ecocide to a trim tab of a boat, stating it is the tool to direct and ensure the prosperity of the planet. In the

²⁴ <<https://repository.gchumanrights.org/bitstream/handle/20.500.11825/501/Curcio%20Lamas.pdf?sequence=1&isAllowed=y>> accessed 10th July 2020.

²⁵ Hannibal Travis, ‘Ecocide: A Brief History of an Explosive Concept’ (2016) Columbia Journal of European Law available at <<http://cjel.law.columbia.edu/preliminary-reference/2016/ecocie-a-brief-history-of-an-explosive-concept/>> accessed 10th July 2020.

²⁶ <<https://www.bbvaopenmind.com/en/science/environment/the-history-of-ecocide-a-crime-against-humanity/>> accessed 11th July 2020.

²⁷ Anastacia Greene, ‘The Campaign to Make Ecocide: Quixotic Quest or Moral Imperative?’ (2019) (30)3 *Fordham Environmental Law Review* 2, 5.

²⁸ *Ibid* 19.

heart of her work, she presents the creation of a legal duty of nations to act ‘before mass damage, destruction or ecosystem collapse...’ occurs.²⁹

Taking a view point from the modern debates for the law of ecocide, one can see the operationalization of the rights of nature and ultimately an overwhelming reposition to the guiding principles of ecocentrism. The underpinning of the duty of care to protect the environment and the life forms within it is the goal, and in a circumstance of a breach of such duty would amount to a breach of nature’s rights and simultaneously, ecocide. Taking an example of a sovereign state that already operates a green legal system and has codified the rights of nature would further explain the operationalization of these two concepts and how they go hand in hand to corroborate each other. Ecuador became the first state to constitutionalize rights of nature. Prior to this, it had been a victim to several ecocides. Ecuador has been used as a dumping site by wealthy corporations and states in a bid to bypass environmental regulations for proper waste disposal; ‘Texaco dumped nearly 16 million gallons of oil and 20 billion gallons of waste into 17,000 acres of pristine forest’.³⁰ Ecuador has one of the highest deforestation rates which are attributed to oil exploration. Oil exploration activities has contributed a major amount to its GDP; consequently leading to better economic standards with an enormous negative impact on biodiversity.³¹ The proper state of its ecosystem was compromised in order to develop Ecuador economically. But continuous debates to move to a more ecocentric legal system and need to protect the Amazons led to an amendment of the Ecuadorian constitution to include the rights to nature in 2008. Article 10 (Rights Entitlement) provides that ‘Nature shall be the subject of those rights recognized by the Constitution’³² setting what is seen as the ‘most progressive constitutional text’ relating to environmental rights.³³ Chapter 7 which bothers on Right for Nature; provides in Article 71-74 for the regeneration, maintenance, restoration and existence of Nature, with members of the public empowered to defend these rights and enjoy the benefit of the environment.³⁴

²⁹ Polly Higgins, Damien Short and Nigel South, ‘Protecting the Planet: A Proposal for a Law of Ecocide’ (2013) (59)1 *Crime, Law and Social Change*.

³⁰ *Ibid* 3.

³¹ <https://www.iucn.org/downloads/6_ecuador_ceesp_policy_matters_18_macroecconomics.pdf> accessed 11th July 2020.

³² 2008 Constitution of Ecuador.

³³ Hugo Echeverria ‘Rights of Nature: The Ecuadorian Case’ (2017)9 *Revista Esmat* 77,

³⁴ *Ibid* 32, <<https://therightsofnature.org/wp-content/uploads/pdfs/Rights-for-Nature-Articles-in-Ecuador-Constitution.pdf>> accessed 11th July 2020.

One can decipher how the Ecuadoran government responded to the overwhelming issues of excessive environmental degradation and climate change rate. Case laws are in that effect to show the utilization of legal tools to enforce the Rights of Nature.³⁵ The emergence of the earth jurisprudence in various national states differs. While few operate more of a green legal system (like Ecuador), many are yet to transit from having just environmental protection laws to the codification the rights of nature. These environmental protection laws are sometimes limiting and in the long run counterproductive. Polly Higgins indicates the need to make this shift;

‘In legal terms this means the journey of moving away from laws premised, either deliberately or accidentally, on compromise. Laws that are often put in place with the promise of robust sounding enforcement restrictions ... They can have the appearance of being radical, or are touted as innovative, but the reality is that they ensure the status quo remains.’

Environmental destruction occurs at an alarming rate admits the environmental legislations at hand. The argument here is that government bodies, private institutions and individuals would still be involved in large and small scale ecocide if the legal system fails to define vehemently the intrinsic rights of nature in their legislative books. The concept of environmental justice can only be attained when legislations are in place to limit the possibility of environmental destruction in our various jurisdictions; justice that ensures that a motivated individual or a community at risk can seek redress from courts, when harm has been done, irrespective of the fact that the victim is the environment.³⁶

6. CONCLUSION

The importance surrounding the struggle for rights of nature is one that is for the general benefit of man. The Earth being our home needs to be treated with ultimate priority and man has to see it as his duty to ensure favorable laws and policies are created for that purpose. It is in fact possible to shift from the dominant paradigm that sees nature as resources to fuel our economic agenda to embrace a judicial system that recognizes the legal personhood of our environment. Man should develop that ecocentric relationship with the environment so as to reach sustainable

³⁵ Craig M. Kauffman and Pamela L. Martin, ‘Testing Ecuador’s Rights of Nature: Why Some Lawsuits Succeed and Others Fail’ Paper Presented at the International Studies Association Annual Convention, 2006.

³⁶ Diane Westerhuis; South, Nigel & Avi Brisman (eds), ‘Routledge International Handbook of Green Criminology’ (2014) 22 *Critical Criminology* 10.

development. Economic prosperity and ensuring a high standard of living is necessary in any jurisdiction, we should therefore promote environmental friendly projects for development, which in the long run would ensure future generations can enjoy both economic opportunities and live in a health environment. This can only be achieved until we take environmental activism to the next level and engage major stakeholders in this conversation; lawyers, academic scholars, judges, legislators, Non-Governmental Organizations (NGOS), Multinational Corporations (MNCs) and governmental agencies. With such innovations, the rights of nature would be recognized worldwide.

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