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RESEARCH ARTICLE

Bioethics and the Value of Human Life

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Abstract

Bioethics as a philosophical discipline deals with matters of life and death. How it deals with them, however, depends on the kind of life particular bioethicists focus on and the kind of value they assign to it. Natural-law ethicists and conservative Kantians emphasize biological human life regardless of its developmental stage. Integrative bioethicists also embrace nonhuman life if it can be protected without harming humans. Liberal and utilitarian moralists concentrate on life that is sentient and aware of itself, to the exclusion of biological existence devoid of these. Extinctionist and antinatalist philosophers believe that life's value is negative and that its misery should be alleviated and terminated by not bringing new individuals into existence. As the last-mentioned approach reverses the idea of life's positive value, it could be called oibethics.

Keywords: antinatalism; bioutilitarianism; integrative bioethics; oibethics; thanatoethics

Introduction

In October 2023, two Finnish philosophers published a guest editorial in the journal *Bioethics*.[1] They suggested that antinatalism, the philosophy and practice of not having children, would solve all the world's problems in one blow. In the absence of future sufferers, there would be no future suffering.[2,3,4,5,6,7]

The suggestion, in and of itself not new nor original,[8,9,10,11,12,13,14] received some attention. The editor of the conservative[15] newsletter *BioEdge* Michael Cook was among the earliest commentators. He voiced two main concerns.[16,17]

First, according to him, antinatalism is a nihilistic creed:

> [The authors] believe that having children is actually immoral. Their brand of nihilism is probably the world's most dangerous idea. If having children is immoral, then life itself must be evil. Love, laughter, tenderness, songs and joy are obscenities. What will prevent someone who truly believes this from becoming a mass murderer?

The concern is, I believe, conceptually exaggerated. Nihilism postulates that nothing is valuable. Sentiocentric antinatalism, the creed evoked in the article, holds that the absence of suffering is valuable. There is no genuine connection between the two. The formulation is also misleading. Sentiocentric antinatalists can appreciate love, laughter, tenderness, songs, and joy insofar as they reduce suffering. Mass murder, more likely to increase it, is more likely to meet censure,[18,19] although, interestingly, one renown philosopher of the twentieth century, G. E. Moore, argued that this may be a hasty conclusion.[20]

Cook's second concern goes to the core of bioethics as a discipline:

> [Is not] a bioethicist who questions the value of human life itself like a physicist who denies the existence of cause and effect or a theologian who denies the existence of God? Without an

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> unconditional commitment to the value of human life, a discipline like bioethics is in danger of losing its coherence.

This is a good question, although the analogies may be overstated. Quantum physics blurs causality at the most fundamental level[21] and theologians can query God's existence in their work.[22,23] The question, however, stands. Does being a bioethicist—doing bioethics—require an unconditional commitment to the value of human life? And if it does, what do life, human life, the value of human life, commitment, unconditional commitment, and bioethics mean in this requirement?

Bioethics—a commitment to preserving all human life

Judging by Michael Cook's other published views, he seems to hold a commitment to preserving all human life regardless of its medically, psychologically, or socially assessed quality, stage of development, or value to the individual experiencing it.[24] As an implication, he appears to believe that pregnancies should not be terminated lightly, that predicted disability should not be used as a justification for pre-implantation selection or abortions, and that euthanasia, including voluntary euthanasia, should not be allowed.

This is compatible, for instance, with a Neo-Thomist, conservatively Aristotelian view promoted by the Roman Catholic Church. We should pursue what is natural. For human beings, it is natural to aim at survival, reproduction, and the pursuit of knowledge. Natural law requires an unconditional commitment to human survival, both individually and collectively, hence to the value of human life.[25]

Cook's view is also, to a degree at least, compatible with standard readings of Kantian ethics. We should always treat humanity, in ourselves and in others, as an end in itself, never merely as a means. Although humanity in Kantian thinking ostensibly focuses on the autonomy of rational agents, interpreters like Jürgen Habermas have pointed out that the doctrine operates on a dual notion of human nature. We are mental subjects making our rational choices, but we are also physical beings irreducible to our psychological nature. Protection of this second nature, unreachable by thinking, can override the requirement to respect our choices, leading to natural-law-type normative demands when it comes to decisions concerning life and death. Unconditional commitment to the value of human life or dignity even despite the expressed wishes of those living them makes, with this reading, a comeback.[26,27]

To answer the questions of definition, then, life here means biological human life; its value is linked with human—God-given or socially evolved—nature; the commitment is unconditional because it is dictated by natural law or the categorical imperative; and bioethics, the ethics of human life, safeguards this unconditional commitment.

Bio-ethics—a commitment to respecting all life

The Aristotelian-Habermasian confinement to human existence has been challenged during the last few decades by a school of thought called integrative bioethics. This, too, takes its cue from the Kantian categorical imperative but insists that the rule should be applied more widely to all living beings. Interestingly, this broadening of the scope of bioethics may weaken its commitment to human dignity, or at least draw attention away from it.

The root of integrative bioethics is in the writings of Fritz Jahr, a German theologian and educator who started in the 1920s to express strong views concerning moral matters, including what he coined bio-ethics (the hyphen differentiates his take from other approaches).[28,29] By bio-ethics he meant, like Albert Schweitzer a little later,[30] an all-embracing reverence and awe towards every form of life. People are important, but so are nonhuman animals, plants, and even living beings that cannot be classified in these categories. Schweitzer, as a physician, famously agonized about killing microorganisms to cure his patients.

Jahr suggested a new formulation of the categorical imperative, the bio-ethical imperative: "Respect every living being on principle as an end in itself and treat it, if possible, as such!"[31] It seems that

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Schweitzer's agony was not fully shared by Jahr, as the caveats "on principle" and "if possible" moderate the message considerably. All living beings may deserve some respect as God's creations, but humans, in the Aristotelian and Kantian way, hold the pride of place.

Jahr's bioethics was, without actual scholarly connection, partly revived in the 1970s in Van Rensselaer Potter's notion of bioethics as a bridge to the future.[32] Potter was less interested in divine matters and more focused on the wellbeing of humans and their natural environment. The core idea, respect for life in its many forms, was, nonetheless in evidence in his work. Environmental ethics as an academic discipline distanced itself from medically-oriented ethics soon after Potter's intervention,[33,34,35] and since the label bioethics remained in the medical domain, Jahr, Schweitzer, and Potter were marginalized until their kind of thinking was recognized at the turn of the millennium by integrative bioethicists.

How about the questions of definition, then? As said, the recognition of nonhuman beings does not have to decrease the commitment to human dignity in any way. People can be given special status, as both Jahr and Schweitzer did. There is an indirect consequence, though. Interspecies equality and animal rights can suggest changes to practices that see other creatures and the natural environment as subordinate to humans. Bioethics refuses to be confined to the protection of only one specific kind of life.

Bio-utilitarian thanatoethics and beyond—a commitment to respecting persons

Bioethics as an academic discipline emerged in the United States in the 1960s and the 1970s as a relatively non-hegemonic three-way dispute between major ethical doctrines.[36,37] Tom Beauchamp and James Childress, in their *Principles of Biomedical Ethics*,[38] managed to temporarily confine attention to only two schools of ethics, Kantian and utilitarian. The authors went on to recognize other approaches in later editions,[39] but their original omission of the teleological, Aristotelian model left a mark in bioethical debates. Although Neo-Thomists had been prominent in the field all along,[40,41] their views have, after Beauchamp and Childress, been presented as the moral alternative to the technical consideration of autonomy and preferences.[42]

In the 1970s and the 1980s, utilitarianism[43,44] established its position in Anglo-American-Australian philosophical healthcare ethics through the works of Michael Tooley,[45] Jonathan Glover,[46] Peter Singer,[47] and John Harris.[48] Early on, the main topics included abortion and infanticide,[49] euthanasia,[50] and the distribution of scarce medical resources,[51] making death central to these reflections (which could have been quite differently focused).[52] This was also visible in some of the book titles like Glover's *Causing Death and Saving Lives*,[53] Harris's *Violence and Responsibility*,[54] and, later on, Jeff McMahan's *The Ethics of Killing*.[55] No wonder, then, that the label thanatoethics (ethics of death) instead of bioethics (ethics of life) was suggested for this kind of endeavor.[56]

The concentration on issues involving death subsided quickly in the works of John Harris, who first became a critic of health-economic quality-of-life calculations,[57] then turned his attention to extending lifespans and having the best possible offspring we can have.[58,59,60] Embryos still lost their lives in reproductive selection,[61] but the stress was on the wellbeing of all living people regardless of their age or medical condition.

Despite its divisive views on abortion, euthanasia, and selective discrimination, bioutilitarianism, as represented by the named authors, does hold human life in great value. It is just that it places more importance on having lives than being alive.[62] Bioutilitarians lean on the concepts of sentience and psychological personhood as the foundations of life's value. To experience good or bad in an ethically relevant sense, beings must be sentient and aware of themselves as continuous subjects of mental states. Sentience dictates that others should not unnecessarily cause us pain or anguish.[63] Personhood warns others against making us miss something that we have expected of the future.[64] Balancing these is a notorious challenge to utilitarianism,[65,66] but life's value is not radically questioned.

Nor is it necessarily questioned in the doctrines of transhumanism or posthumanism insofar as they lean on utilitarian ethics. People become better and better and perhaps eventually lose all their current weaknesses, evolving into a new species, but the lives of future individuals continue to be highly appreciated.

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As for the questions of definition, life here means the sentient and self-aware existence of human, nonhuman, transhuman, and posthuman beings. Human life is our prime example of existence that is sentient and self-aware, and all the philosophers mentioned above prioritize it when it comes to conflict with the lives of other species. The commitment to it may not be unconditional due to clashes, but it is strong.[67,68] Biological human life that lacks sentience and personhood falls, however, outside the scope of this commitment.

Natalism and pronatalism—a commitment to perpetuating the human race

According to Michael Cook's warning, "Without an unconditional commitment to the value of human life, a discipline like bioethics is in danger of losing its coherence."[69,70] As his contributions over the years indicate, bioutilitarianism has, in his mind, already put the field in jeopardy. Only Neo-Thomist sanctity-of-life doctrines and Conservative-Kantian human dignity (or the like) can help bioethics keep its coherence in the face of liberal[71]attacks. Preferences and autonomy are an unreliable foundation for what Cook sees as genuinely moral responses.

Cook's quick and sharp reaction to the editorial in *Bioethics* shows how deeply supporters of traditional views feel about having children. Antinatalism is not, as far as I can see, a bioethical view to begin with, the only connections here being the name of the journal and an emerging philosophical view being allowed a presentational slot. This is not the first time in history, however, when views on reproduction diverge.[72] Let me illustrate this.

Natalism—or pronatalism—is generally the default value of moralities and political ideologies. It rests on the belief that human and maybe other sentient reproduction is always valuable because it guarantees the continuity of life, human and nonhuman. The creed also sees childbearing and parenting as good and natural foundations for social life. When anyone tries to introduce deviations from this norm—by population control, less than fully restrictive abortion policies, and the like—the initial reaction is disbelief. Elizabeth Anscombe exemplified this well in the opening words of her address to the American Catholic Philosophical Association titled "Why have children?" in 1989:

> This very title tells of the times we live in. I would like you to imagine a title for a lecture eighty years hence: "Why digest food?" … As whole people in our time have regarded feeding babies at their breast as something for the savages, so might people of the future regard nourishment by digesting the lovely food we eat in the same way.[73]

Anscombe may have been inadvertently prescient about the way we consume food on our way to Mars,[74,75] in 2069. The point, however, is that natalism, her background view in the address, is a conservative one and presumes that things ought to stay as they are, even when technologies allow other solutions and when our old solutions can be detrimental. Antinatalism is one of the radical philosophies challenging this line of thought.[76]

Antinatalism—a commitment to reducing future evil

Antinatalism comes in many guises, and its commitment to the value of human life varies accordingly. For the purposes of this outline, the main variants are abolitionist vitalism, negative ethics, and analytic antinatalism.[77]

In her book *The Ahuman Manifesto: Activism for the End of the Anthropocene*, Patricia MacCormack presents a vision of abolitionist vitalism.[78] Its central tenet is that *homo sapiens* has wreaked havoc on planet Earth for long enough and it should now peter out and end its rule to leave room for other species. Human extinction should not be anticipated with fear but with celebration. By spending the rest of their time caring for other species and the environment, people could, in a sense, continue their collective existence in the remaining traces of their final caring practices. This is, at least, my understanding of her message.[79]

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In his *Discomfort and Moral Impediment: The Human Situation, Radical Bioethics, and Procreation*, Julio Cabrera summarizes his decades of work on negative ethics.[80] His starting point is the negation rather than affirmation of life's value, hence the name of the creed. As for producing offspring, for him, "*any* procreative act – whether intentional or not – can be considered as the *original inauguration of the discomfort of being*, as the primary harm that humans can inflict upon other humans, and as the very initiation of the moral impediment."[81] By having children, parents create, for their own ends, helpless beings whom they can and will manipulate, and this is morally wrong.[82]

In his *Better Never to Have Been: The Harm of Coming into Existence*, the best-known work on the topic, David Benatar "argues for the 'anti-natal' view – that it is always wrong to have children," adding, "Anti-natalism also implies that it would be better if humanity became extinct."[83] For want of a better name, I call this view analytic antinatalism. As a definition of the approach, it has the advantage of keeping antinatalism separate from its justification and its implications. The wrongness of having children could in principle be based on abolitionist vitalism, negative ethics, or—Benatar's own favorite—life's low quality. According to him, "even the best lives are very bad."[84]

As a detail, what is an outcome of universal abstinence for Benatar and Cabrera—human extinction—appears to be its justification for MacCormack. We must stop making babies to save the world.

These different versions of antinatalism yield different verdicts on my questions of definition, value, and commitment. MacCormack seems to be committed to the value of life on the planet in general, up to the point that humans should remove themselves from the picture to let it flourish. Cabrera and Benatar want to prevent the creation of further human lives because they would be a harm, not a benefit, to those born. Cabrera does not extend his concern to nonhumans and holds the view that abortions are wrong because human life, once here, must not be involuntarily extinguished. Benatar recognizes the plight of all sentient beings and considers abortions a moral duty before fetuses become conscious.

Details like Cabrera's view on abortion notwithstanding, whatever positions these philosophers take, they are not, in Michael Cook's sense, unconditionally committed to the value of human life. So how, if at all, could they be bioethicists?

Nihilism proper—an unconditional commitment to the negative value of human life

Combining Cook's two concerns, for him, antinatalism is a nihilist view in the sense that it does not adhere to his values and is unfit to guide bioethics insofar as this requires an unconditional commitment to the positive value of human life. Both claims are true. Neither of them proves, however, antinatalists to be paralyzed in moral matters. A historical illustration shows how their stand can be rethought.

In her 1892 public address, *The Pain of Living*, Marie Huot, a French poet, writer, feminist, animal rights and vegetarianism activist, laid the foundations of a view that is diametrically opposed to Cook and Anscombe's conservatism:

> We have often been accused of being revolutionaries, … anarchists, … and disruptors….
>
> Well, we are this and that, and better still: we are above all nihilists!
>
> Not those timid sectarians who confine themselves to religious or political questions and only follow the doctrine up until a point, terrified by the idea of nothingness, but rebels who say to life: you will go no further!
>
> We, who profess contempt for the human race …, who despise philanthropic duplicity and who keep intact … the proud misanthropy of the reprobate, have come to bring you a radical formula against misfortune — happiness being nothing but a myth on Earth.
>
> Happiness does not exist for anyone, because it is not in the immanence of nature. Misfortune is the common law … before which we must either submit or resign;
>
> *but the stupid love of life is so strong that the vast majority submit and resign themselves to suffering.*

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> Still, if man only accepted this burden for himself, he could be forgiven; but, passive to the core, he cowardly obeys his enemy: instinct, and perpetuates the cursed heritage by giving life to beings who do not ask to be born.
>
> More often than not, he commits this homicide unconsciously, and is usually punished enough by the disastrous consequences of this moment of absentmindedness.
>
> But when he premeditates the crime, no punishment is severe enough to make him atone for it:
>
> Whatever the instinct that those who procreate obey, if they act knowingly, knowing that they create an organism for pain, a soul for disappointment, and a harmful being – both victim and executioner – they are criminals and the child has the right to consider his father and mother as mere murderers.
>
> Yes, murderers! For he who gives life gives death.[85]

Not everybody agrees with Huot, of course,[86] but the case is clear. We do have an ethical alternative to conservatism: revolutionary, anarchist, disrupting nihilism. Nihilism in Huot's context and parlance means a commitment to nothingness in the face of the misery of life. The reduction and eventual elimination of that misery is the goal of her ethics and the ethics of many antinatalists.[87]

Oibethics: an alternative to bioethics, bio-ethics, thanatoethics, and bio-utilitarianism

What bioethicists do, what they should do, and what they should not do has been discussed for as long as the discipline has existed.[88,89,90,91,92,93,94,95] If we take our lead from Michael Cook's warning, the term "bioethics" should only be used in connection with conservative Neo-Thomist and Kantian contributions to the fields of medicine, healthcare, and biomedical research. The all-life-embracing bioethics of Fritz Jahr and Albert Schweizer are in danger of paying too much attention to nonhumans and making comparisons insensitive to the uniqueness of human beings. The liberal alternatives, including the thanatoethics and bioutilitarianism of John Harris, exclude from moral considerations people who are not sentient or aware of themselves as agents, such as embryos and early fetuses. No unconditional commitment to the positive value of human life at all levels of its development, no bioethics, it seems.

There is a certain irony in this line of thinking. Through much of the 1990s, conservative forces in Germany held the word "bioethics" in contempt because it was linked with Peter Singer's advocacy of animal welfare, his lenience towards prenatal diagnoses, and his other attempts at "unsanctifying human life."[96] The polarity has been switched around.

Whatever liberal ethicists in the field feel about losing the certificate, Cook's demarcation does not have to alarm antinatalist philosophers in the slightest. If they are unconditionally committed to the negative value of human life, they can carry on without being identified as bioethicists, a recognition they never sought in the first place. If their work needs a matching title, it could be *oibethics*, as in the ethics of life reversed.

Oibethics is considerably less controversial than Cook and his cronies may think, and it has as much, and more, moral content than bioethics in any of its forms.

As for the controversy, oibethics accepts human extinction and therefore says no to life as a collective phenomenon, but this is not particularly scandalous. Life, human or otherwise, is not eternal—it will end eventually, whether or not we try to perpetuate it on Earth or by attempting to colonize other parts of the universe. In the words of Marie Huot:

> Obviously, the world will come to an end sooner or later, and I for one have no problem with that. I do not even mind glimpsing into the mists of eternity and seeing the earth finally purged of its human microbes — left to the wild flora and fauna, awaiting the blessed day when it is stripped of this last instance of life.[97]

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A similar message was repeated a century later by a very mild-mannered Finnish philosopher, Georg Henrik von Wright, who wrote:

> I do not consider the perspective that humanity as a biological species is heading towards its destruction to be unrealistic. This perspective has often confused people in times of unrest and upheaval. … For my part, I cannot find it particularly upsetting. Humans as a species will surely die out sometime; whether it happens within a few hundred thousand years or a couple of centuries is just a pinch of snuff in the cosmic perspective.[98]

Huot's enthusiasm and von Wright's nonchalance are simple commitments to realism, alien to those "professional optimists" who apparently rely on an eternal life beyond this one.[99,100]

As for moral content, here, in full, is what Huot observed nihilists of her ilk to be accused of, with details that show her own normative leanings:

> We have often been accused of being revolutionaries, because we demand a share in social rights for animals; anarchists, because we do not accept that intelligence should arrogate to itself a tyrannical omnipotence over our less gifted brothers; and disruptors, because we want to change the order that is as stubborn as it is unforgiving, which mercilessly hands over the weak to the whims of the strong.[101]

In a nutshell, then, oibethics could advocate at least rights for animals, the end of oppressive meritocracies, and a political order without unresponsive and wanton cruelty. I would take those any day of the week. If the bioethics police disagree, I will return my badge and my quill first thing in the morning.

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Notes

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43. I am not differentiating between consequentialism in general and utilitarianism in particular here. All these authors are consequentialists, seen by non-consequentialists, if not always by themselves, as utilitarians. An explanation of how I have seen John Harris's position, see note 44, Häyry 1999.
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60. Harris J. *Enhancing Evolution: The Ethical Case for Making Better People*. Princeton, NJ: Princeton University Press; 2007.
61. Häyry M. *Rationality and the Genetic Challenge: Making People Better?* Cambridge: Cambridge University Press; 2010.
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63. The expressions "unnecessarily" and "us" can have varying interpretations. A purely sentiocentric, non-speciesist view has it that all sentient human and nonhuman animals, as well as sentient machines and extraterrestrial beings, are included in "us". Strict inequality would deem that pain and anguish are always inflicted "unnecessarily" unless (this is utilitarianism, after all) significantly greater pain and anguish can thereby be prevented.
64. Since most of us usually expect to have a future in the first place, personhood provides the basis of our entitlement not to be killed against our own will. It also gives others a reason to respect our autonomous choices and actions (unless they restrict the autonomous choices and actions of others). If we expect and hope our life to be ended, voluntary euthanasia can be justified with the same principle that gives us our right to life.
65. Häyry M. *Liberal Utilitarianism and Applied Ethics*. London: Routledge; 1994.
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67. Insofar as the clashes occur between human lives, bioutilitarians can claim that other ethical approaches have to resolve these situations, as well, and that distinctions like acts and omissions and killing and letting die are artificial and inapplicable. See note 68, Takala 2006.
68. Takala T. Acts and omissions. In Ashcroft RE, Dawson A, Draper H, McMillan JR, eds. *Principles of Health Care Ethics*. Chichester: Wiley; 2006:273–6. doi:10.1002/9780470510544.ch36.
69. See note 16, Cook 2023a.
70. See note 17, Cook 2023b.
71. I use this term descriptively. Cf. note 15.
72. See note 3, Häyry, Sukenick 2024, at 4–25.
73. Anscombe GEM. Why have children? *Proceedings of the American Catholic Philosophical Association* 1989;**63**:48–53.
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76. Others include veganism, anticapitalism, anti-consumerism, and anarchism.
77. I am excluding all doctrines that advocate partial "antinatalism" – that some should restrict their reproduction for philanthropic, environmental, or religious reasons while others are allowed, even encouraged, to continue having offspring. For me, these represent selective pronatalism rather than consistent antinatalism. See note 2, Häyry 2024; note 3, Häyry, Sukenick 2024.
78. MacCormack P. *The Ahuman Manifesto: Activism for the End of the Anthropocene*. London: Bloomsbury Academic; 2020. The term "abolitionist vitalism" does not appear in the book but it describes MacCormack's view in marking both the abolition of humankind and the preservation of the vitality of all other life.
79. I may be horribly wrong – in which case my sincere apologies. I am, by training, an analytic philosopher, MacCormack's approach differs from what I have learned, and I may misunderstand what she says. I think, however, that my description of her version of extinctionism, which implies her antinatalism, is relatively safe. The clash of styles is in evidence in the book's take on analytic antinatalism, which is, partly quite dismissively, critical – see note 78, MacCormack 2020, at 52–3.
80. See note 13, Cabrera 2019.
81. See note 13, Cabrera 2019, at 120.

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82. Although Cabrera, like MacCormack, draws from philosophies that I am not familiar with, I am more confident that I have captured his indignation towards parents who wantonly impose lives of hardship to innocent new beings.
83. See note 11, Benatar 2006, at back cover. Benatar is hailed for introducing the term "antinatalism" into the English language in this very book, but the word appears only in the introduction and in section headings. The best definition can be found in the back cover – no doubt, written only when the book had already been accepted for publication.
84. See note 11, Benatar 2006, at61.
85. Huot, M. *The Pain of Living* [orig. 1892; published in French 1909]; available at https://archive.org/details/marie-huot-the-pain-of-living-1909/page/n1/mode/2up?view=theater (last accessed 26 September 2024).
86. I do, but that is neither here nor there.
87. If I am not mistaken, a notable subsection of antinatalists has called this type of approach *efilism* (the ism of "life" spelled backwards).
88. Caplan AL. Can applied ethics be effective in health care and should it strive to be? *Ethics* 1983;**93**:311–9.
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90. See note 51, Häyry, Häyry 1994.
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96. Singer P. *Unsanctifying Human Life: Essays on Ethics*. Edited by Helga Kuhse. Oxford: Blackwell; 2002.
97. See note 85, Huot 1909.
98. von Wright GH. *Science and Human Reason* [in Finnish, *Tiede ja ihmisjärki*]. Helsinki: Otava; 1987:141.
99. The term "professional optimist" was evoked by Clarence Darrow, the defense attorney in the Scopes Monkey Trial, in his explanation of his view of life's worth to himself: "Emotionally, I shall no doubt act as others do to the last moment of my existence. With my last breath I shall probably try to draw another, but, intellectually, I am satisfied that life is a serious burden, which no thinking, humane person would wantonly inflict on some one else. The strange part of the professional optimist's creed lies in his assertion that if there is no future life then this experience is a martyrdom and a hideous sham." See note 100, Darrow 1996, at concluding para of chap. 42.
100. Darrow C. *The Story of My Life* [orig. 1932]. New York: Da Capo Press, Inc.; 1996; available at https://gutenberg.net.au/ebooks05/0500951h.html (last accessed 26 September 2024).
101. See note 85, Huot 1909.

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