#### Plan Text: The United States ought to recognize the unconditional right for teachers to strike.

#### Definition of unconditional right to strike:

NLRB 85 [National Labor Relations Board; “Legislative History of the Labor Management Relations Act, 1947: Volume 1,” Jan 1985; <https://play.google.com/store/books/details?id=7o1tA__v4xwC&rdid=book-7o1tA__v4xwC&rdot=1>]

\*\*Edited for gendered language

As for the so-called absolute or unconditional right to strike—there are no absolute rights that do not have their corresponding responsibilities. Under our American Anglo-Saxon system, each individual is entitled to the maximum of freedom, provided however (and this provision is of first importance), his [their] freedom has due regard for the rights and freedoms of others. The very safeguard of our freedoms is the recognition of this fundamental principle. I take issue very definitely with the suggestion that there is an absolute and unconditional right to concerted action (which after all is what the strike is) which endangers the health and welfare of our people in order to attain a selfish end.

### Advantage – Climate Change

#### Status Quo policies make the opportunity cost for teacher strikes too high

**Casey 20** Leo Casey, 12-2-2020, "The Teacher Strike: Conditions for Success," Dissent Magazine, <https://www.dissentmagazine.org/online_articles/the-teacher-strike-conditions-for-success>

The most essential organizational task is winning and keeping the allegiance of teachers to the strike. Teachers are knowledgeable and discerning political actors. They understand full well that strikes are a high-intensity and high-risk tactic, with the potential both to deliver advances and victories that could not be otherwise obtained and to end in major setbacks and defeats. The risk side of this equation is particularly acute in the three-quarters of all states where teacher strikes are illegal; in these states, striking becomes an act of civil disobedience and can result in severe penalties to teachers and their unions. To be willing to go on strike and stay out until a settlement is won, therefore, teachers need to be convinced on a number of different counts: first, that they are fighting for important, worthwhile objectives; second, that those objectives cannot be achieved through other means that are not as high-intensity and high-risk as a strike; third, that the strike has reasonable prospects of success; fourth, that the strike objectives have strong support in the community; and fifth, that the solidarity among teachers, which is essential to a strike’s success, is strong and will hold. In significant measure, the last of these points is dependent not simply on the organization and mobilization of the strike, but also on the four antecedent conditions. If teachers become doubtful on any of these points, it will become difficult to mount or sustain a successful strike.

#### That causes teachers uproot and quitting through unsatisfaction

**Carpenter 21** Jennifer Carpenter., 05-17-21, "Opinion: Protect local control for schools," Burlington Free Press, https://www.burlingtonfreepress.com/story/opinion/my-turn/2017/05/17/opinion-protect-local-control-schools/101726614/

The most crucial part of the proposal put forward by House Speaker Mitzi Johnson and President Pro Tem Tim Ashe is that it protects local control of schools. Statewide health insurance negotiations for teachers is the first step towards a statewide teachers’ contract, kneecapping school boards and paving the way towards a single, statewide school district. That is unacceptable, but it is the hill Gov. Scott and his Republican allies have decided to make their stand on. It is telling that Sen. Degree, one of Gov. Scott’s strongest supporters, included in his proposed amendment a clause that would have removed teachers’ right to strike. That shows their true intentions. When teachers’ needs are not met, students’ needs will not be met, and we will be unable to retain and attract a workforce of young families which is critical to the revitalization of our state’s economy. There will be no incentive for the teaching profession to attract and retain new teachers to the field if our state government teaches our community that teachers have no say over their working conditions and therefore are not valued. Schools need teachers and we need enrollment of students. Teachers and families of school age children will simply uproot and go elsewhere to have their needs met, jeopardizing our educational system, our school-age population and workforce. A “one-size-fits-all” approach from our state government cannot possibly work across the board for every school. Having worked in four different school districts in the state, I have been exposed to potential consequences of centralized control. I recall an emergency meeting at one of those districts in 2016 between administration and teachers where there were very tense discussions on what the initial proposal of Act 46 per-pupil spending cap would have meant for the school. Had the administration and teachers not pulled together to discuss and demand more for their programs and allowed a reckless centralized decision to go forth, to paraphrase one of the teachers present at this meeting, the initial Act 46 proposal would have destroyed the institution, as it would have meant dismantling most aspects of the curriculum that would render the students to be competitive for college and in the workforce, as the cuts were too severe of an impact on the school programs to justify sending anyone there. As a result, several teachers said they would have been prepared to pull their own children from the school and move out of the area. This is only one example of how allowing the state to have centralized control, which has proved to be an approach lacking in carefully frontloaded research and detailed examination of impact on programs and teachers, would have devastating consequences on local communities.

#### Current quality of education is sharply decreasing through teacher shortages

**Boyce 19** Paul Boyce, 9-17-2019, "The Teacher Shortage Is Real and about to Get Much Worse. Here's Why," No Publication, https://fee.org/articles/the-teacher-shortage-is-real-and-about-to-get-much-worse-heres-why/

Teacher Shortage According to research by the Economic Policy Institute (EPI), the teacher shortage could reach 200,000 by 2025, up from 110,000 in 2018. This shortage of workers is due to a number of factors. Among them are pay, working conditions, lack of support, lack of autonomy, and the changing curriculum. The shortage of teachers will inevitably cause a decline in educational standards. The shortage is crucially important to educational outcomes. Class sizes are rising, causing a detrimental effect on these outcomes. As the number of available teachers declines, class sizes have to increase to compensate. Having more kids in a class can also affect teacher performance—more books to mark, more children to monitor, more children's behavior that needs managing. The pressure on teachers to obtain high test scores amps up stress further. It creates a vicious cycle, and it is starting to snowball. The shortage is only set to increase unless something changes. Impact on Quality The shortage of teachers will inevitably cause a decline in educational standards. Principals face a shortage of highly qualified teachers. The natural response for them is to hire less qualified teachers, hire teachers trained in another field or grade, or make use of unqualified substitute teachers. This means students are being taught by teachers who lack sufficient skills and knowledge. According to the National Commission on Teaching and America's Future: Studies discover again and again that teacher expertise is one of the most important factors in determining student achievement, followed by the smaller but generally positive influences of small schools and small class sizes. That is, teachers who know a lot about teaching and learning who work in environments that allow them to know students well are the critical elements of successful learning. Teachers matter more to student achievement than any other factor. In fact, research by Chlotfelter, Ladd, & Vigdor states that teacher qualifications predict more of the difference in educational gains than race and parent education combined.

#### Quality of education is key for innovation to stop climate change

Kwauk et al 3/26’ [Christina Kwauk and Rebecca Winthrop, 3-26-2021, "Unleashing the creativity of teachers and students to combat climate change: An opportunity for global leadership," Brookings, <https://www.brookings.edu/research/unleashing-the-creativity-of-teachers-and-students-to-combat-climate-change-an-opportunity-for-global-leadership/>]

Recent research shows that if only 16 percent of high school students in high- and middle-income countries were to receive climate change education, we could see a nearly 19 gigaton reduction of carbon dioxide by 2050. When education helps students develop a strong personal connection to climate solutions, as well as a sense of personal agency and empowerment, it can have consequential impact on students’ daily behaviors and decisionmaking that reduces their overall lifetime carbon footprint. Imagine if 100 percent of students in the world received such an education. New evidence also shows that the combination of women’s empowerment and education that includes everyone—especially the 132 million out-of-school girls across the developing world—could result in an 85 gigaton reduction of carbon dioxide by 2050. By these estimates, leveraging the power of education is potentially more powerful than solely increasing investments in onshore wind turbines (47 gigaton reduction) or concentrated solar power (19 gigaton reduction) alone. When we say that all climate solutions are needed to draw down greenhouse gases, we must also mean education solutions, too. When we say that all climate solutions are needed to draw down greenhouse gases, we must also mean education solutions, too. But beyond education’s potential impact on reducing carbon emissions, education—especially for girls—can save lives in the context of natural disasters exacerbated by climate change by reducing climate risk vulnerability. In a study of 125 countries, researchers found that the death toll caused by floods, droughts, wildfires, extreme temperature events, and extreme weather events could be 60 percent lower by 2050 if 70 percent of women were able to achieve a lower-secondary-school education. Imagine if 100 percent of women were to achieve a full 12 years of education. An equally important outcome of education is its potential to increase young people’s capacity to adapt to the harsh impacts of climate change by building important knowledge and a breadth of “green skills.” For example, young people need both a strong knowledge base around the causes of a warming climate but also a strong set of skills that will allow them to apply their knowledge in the real world, including problem-solving, critical thinking, teamwork, coping with uncertainty, empathy, and negotiation. Indeed these very “transferable skills” are needed equally to thrive in the world of work and to be constructive citizens. Today it is those communities that have historically contributed the least to present-day carbon emissions—such as minority and indigenous communities in the U.S. and many low- and middle-income countries and small island developing states✎ EditSign—that are often the most vulnerable to its risks and impacts. In the U.S. for example, 6,000 schools are located in flood zones and 1 million children had their learning disrupted during California’s 2018-2019 wildfire season, hitting students in low-income communities the hardest. Across the globe, schools and entire communities in the poorest countries in the world are regularly upended due to severe floods and hurricanes, all expected to worsen in intensity and frequency due to climate change. For example, in 2013 Super Typhoon Haiyan✎ EditSign killed more than 6,000 people in the Philippines, damaged or destroyed more than 3,200 schools and day care centers, disrupted the education of more than a million children, and placed 49,000 young girls and women✎ EditSign at risk of sex trafficking due to their displacement in crowded and unsafe shelters. For these communities, climate change is an unchecked threat multiplier. Combating climate change is a move toward climate justice and gender justice. And education has a role to play. High quality climate-change education can also help empower girls and youth to become powerful change agents for sustainability in their communities, charting new paths forward for what life can and should be like.

#### Climate change destroys the world.

Specktor 19 [Brandon writes about the science of everyday life for Live Science, and previously for Reader's Digest magazine, where he served as an editor for five years] 6-4-2019, "Human Civilization Will Crumble by 2050 If We Don't Stop Climate Change Now, New Paper Claims," livescience, <https://www.livescience.com/65633-climate-change-dooms-humans-by-2050.html> Justin

The current climate crisis, they say, is larger and more complex than any humans have ever dealt with before. General climate models — like the one that the [United Nations' Panel on Climate Change](https://www.ipcc.ch/sr15/) (IPCC) used in 2018 to predict that a global temperature increase of 3.6 degrees Fahrenheit (2 degrees Celsius) could put hundreds of millions of people at risk — fail to account for the **sheer complexity of Earth's many interlinked geological processes**; as such, they fail to adequately predict the scale of the potential consequences. The truth, the authors wrote, is probably far worse than any models can fathom. How the world ends What might an accurate worst-case picture of the planet's climate-addled future actually look like, then? The authors provide one particularly grim scenario that begins with world governments "politely ignoring" the advice of scientists and the will of the public to decarbonize the economy (finding alternative energy sources), resulting in a global temperature increase 5.4 F (3 C) by the year 2050. At this point, the world's ice sheets vanish; brutal droughts kill many of the trees in the [Amazon rainforest](https://www.livescience.com/57266-amazon-river.html) (removing one of the world's largest carbon offsets); and the planet plunges into a feedback loop of ever-hotter, ever-deadlier conditions. "Thirty-five percent of the global land area, and **55 percent of the global population, are subject to more than 20 days a year of** [**lethal heat conditions**](https://www.livescience.com/55129-how-heat-waves-kill-so-quickly.html), beyond the threshold of human survivability," the authors hypothesized. Meanwhile, droughts, floods and wildfires regularly ravage the land. Nearly **one-third of the world's land surface turns to desert**. Entire **ecosystems collapse**, beginning with the **planet's coral reefs**, the **rainforest and the Arctic ice sheets.** The world's tropics are hit hardest by these new climate extremes, destroying the region's agriculture and turning more than 1 billion people into refugees. This mass movement of refugees — coupled with [shrinking coastlines](https://www.livescience.com/51990-sea-level-rise-unknowns.html) and severe drops in food and water availability — begin to **stress the fabric of the world's largest nations**, including the United States. Armed conflicts over resources, perhaps culminating in **nuclear war, are likely**. The result, according to the new paper, is "outright chaos" and perhaps "the end of human global civilization as we know it."

### Advantage – Democracy

#### US Democracy is nearing its brink but has potential to spur back

House 3/22’ [Freedom House, 3-22-2021, "NEW REPORT: US Democracy Has Declined Significantly in the Past Decade, Reforms Urgently Needed," <https://freedomhouse.org/article/new-report-us-democracy-has-declined-significantly-past-decade-reforms-urgently-needed>]

Today, Freedom House released a special report, From Crisis to Reform: A Call to Strengthen America’s Battered Democracy, which identifies three enduring problems that have undermined the health of the US political system: unequal treatment for people of color, the outsized influence of special interests in politics, and partisan polarization. This report comes in response to a decade-long decline in US democracy and is based in Freedom House’s global comparative research. The report concludes that these three major problems compound one another, creating a vicious circle of distrust and dysfunction, and that addressing them with urgency and conviction is crucial to restoring Americans’ faith not just in their government, but also in democracy itself. “Our democracy is in trouble,” said Michael J. Abramowitz, president of Freedom House, “and the strength of American democracy is important for people everywhere, not just here at home. Congress and the Biden administration must make it a priority to strengthen our institutions, restore civic norms, and uphold the promise of universal liberty on which our nation was founded.” “The state of US democracy has implications for freedom and democracy around the world,” said Sarah Repucci, vice president of research and analysis at Freedom House. “Democracy movements in other countries look to the United States for inspiration and support, and authoritarian leaders falsely point to America’s problems as proof of democracy’s inherent inferiority and as a sort of license for their own abuses of power.”

#### Empirics confirm right to strike improves teacher union legitimacy

DiSalvo, Daniel, and Michael Hartney. “Teachers Unions in the Post-Janus World.” Education Next, 2 Sept. 2020, www.educationnext.org/teachers-unions-post-janus-world-defying-predictions-still-hold-major-clout/[ Daniel Disalvo

Professor and Chair of Political Science at the City College of New York Michael Hartney is assistant professor of political science at Boston College.]/dhsNJ

* Increases solidarity proven by survey
* Provides incentive to join union which increases member count
* Positive press coverage that empirically increases public support

It is probably not a coincidence that public-school teachers began engaging in strikes and work stoppages soon after the Janus decision was handed down. In 2018, teacher walkouts occurred in the Republican-leaning, weak-union states of Oklahoma, Kentucky, Arizona, West Virginia, North Carolina, and Colorado. Of these, the largest work stoppage was by the Arizona Education Association and involved 81,000 teachers. The second-largest strike, by the Oklahoma Education Association, included 45,000 teachers. Overall, the 20 major teacher strikes of 2018 involved the highest number of workers—485,000—since 1986. Aside from forcing local workplace issues to the bargaining table, strikes can also serve as a union recruitment and retention strategy. Calling a strike enlists the rank-and-file in a collective enterprise and thereby enhances union solidarity. Because only union members can vote to authorize a strike, union leaders can use such occasions to recruit nonmembers to join. Strikes also gain teachers unions sympathetic national press coverage. In 2019, a smaller wave of strikes occurred in Democrat-dominated, strong-union cities, including Los Angeles, Oakland, Denver, and Chicago, as well as in a number of smaller school districts in Oregon, California, and New Jersey. Prior to 2018–2019, only two notable teacher strikes had occurred in big cities in the past 20 years: a 7-day walkout in Chicago in 2012 and a 16-day walkout in Detroit in 2006. Besides pay, a major point of contention in these strikes was the demand that school districts hire more teachers to reduce class sizes and employ more support staff. Regardless of whether such measures make wise policy, they clearly serve to increase the pool of potential union members. Consider that, in Los Angeles, the district and the union settled on a deal that added 300 nurses, 82 librarians, 77 counselors, and some new teachers to reduce class sizes. In Chicago, the district and the union settled a five-day strike with a contract that included caps on class sizes, which necessitated adding more teachers, and promises to hire 250 nurses and 209 social workers. All of these new employees are potential union members. There is evidence that teachers-union activity post-Janus did increase solidarity. A survey by Educators for Excellence found that 54 percent of teachers in 2020 felt that union membership provided them with “feelings of pride and solidarity,” up from 46 percent in 2018. In addition, a little more than half of teachers who do not belong to the union say they are likely to join their union next year. The strikes have also increased public support for the teaching profession. Although a vigorous debate persists among analysts, it is now the popular wisdom that teachers are underpaid. West Virginia and Arizona both ended teacher walkouts by passing across-the-board pay increases. Early in the current presidential campaign, some Democratic candidates proposed using federal funds to top up teacher salaries. Public opinion has notably shifted in favor of increasing teacher salaries. The 2019 Education Next survey found that, among respondents who were not told the average salary of teachers in their home state, 72 percent said teacher pay should increase, while just 3 percent favored cutting it. Even among respondents who were told how much teachers currently make, 56 percent favored hiking these salaries—a 20 percent increase since 2017—and only 5 percent wanted to decrease them. Beyond pay, one study found that the recent strike wave increased support for teachers unions. The survey found that parents of school-age children with firsthand experience with the recent strikes supported greater legal rights for teachers unions and favored a stronger labor movement. This is a notable finding, given that teacher work stoppages make life difficult for parents, who must scramble to find childcare and things for kids to do. In short, the teachers unions have gained public sympathy, while education reformers have lost some. Consider the cover of Time magazine at the dawn of the education-reform movement in 1980: “Help! Teacher Can’t Teach.” Forty years later, in the aftermath of the Great Recession and red-state teacher strikes, Time once again put the image of a schoolteacher on its cover, but the headline told a different story: “I have a master’s degree, 16 years of experience, work two extra jobs, and donate blood plasma to pay the bills. I’m a teacher in America!”

#### Teacher union legitimacy is key to strengthen democracy – multiple internal links.

Khalenberg 16 Kahlenberg, — Richard D. “How Defunding Public Sector Unions Will Diminish Our Democracy.” The Century Foundation, 5 Oct. 2016, tcf.org/content/report/how-defunding-public-sector-unions-will-diminish-our-democracy/?session=1. [Richard D. Kahlenberg is director of K–12 equity and senior fellow at The Century Foundation. The author or editor of seventeen books, he has expertise in education, civil rights, and equal opportunity. Kahlenberg has been called “the intellectual father of the economic integration movement” in K–12 schooling and “arguably the nation’s chief proponent of class-based affirmative action in higher education admissions.” He is also an authority on teachers’ unions, private school vouchers, charter schools, community colleges, housing segregation, and labor organizing.]//dhsNJ

On January 11, the U.S. Supreme Court will hear oral arguments in Friedrichs v. California Teachers Association. The case pits the right of public employees to band together and form effective unions to pursue the common interests of workers against the free speech rights of dissenting public employees to abstain from funding collective bargaining efforts with which they disagree.1 A decision by the Court against the teachers association could not only significantly weaken public sector unions, but also endanger the nation’s core democratic values. In the suit, a public school teacher, Rebecca Friedrichs, argues that a state law requiring her to pay fees to the California Teachers Association (CTA) violates her First Amendment rights not to subsidize speech to which she objects. The CTA counters that in order to promote peaceful and orderly labor relations, and as a matter of basic fairness, the state may require Friedrichs to cover the costs of collective bargaining agreements, from which she benefits, preventing her from being a “free rider.” Union supporters worry that a decision in Friedrichs’ favor could devastate public sector unions across the nation. These unions, whose numbers were once small compared to the vibrant private sector union movement, now represent nearly a majority of unionized workers.2 The one bright spot in an otherwise deteriorating American labor movement, public sector unions are now under extraordinary legal and political assault. More broadly, many progressives see the Friedrichs case as an effort to defund the American left, given the financial support public sector unions provide a variety of liberal causes, from civil rights to raising the minimum wage.3 This report highlights an additional problem that should concern people across the political spectrum: defunding public sector unions could deal a substantial blow to a critical driver of American democracy. Public sector unions promote democratic values and practices in a variety of ways. They serve as a check on arbitrary government power and help sustain middle-class wages and benefits; serve as schools of democracy for workers; and, in the case of teacher unions, help support a public school system that promotes democratic values. These larger interests should enter into the calculus the Supreme Court uses to weigh free speech rights against state interests. Indeed, the whole idea of unionism is based on basic democratic values. The fundamental idea that duly-elected union leadership has the right to collect dues and advocate as the majority of workers wants is analogous to a democracy’s right to impose taxation in order to promote the common good. The 1935 National Labor Relations Act embodied this democratic vision. Section 1 provides: “It is declared to be the policy of the United States to eliminate the causes of certain substantial obstructions to the free flow of commerce and to mitigate and eliminate these obstructions when they have occurred by encouraging the practice and procedure of collective bargaining and by protecting the exercise by workers of full freedom of association, self-organization, and designation of representatives of their own choosing, for the purpose of negotiating the terms and conditions of their employment or other mutual aid or protection”4 (emphasis supplied). Subsequent state laws governing collective bargaining for public sector employees were modeled on the NLRA’s vision. The report proceeds in four parts. Part I analyzes the claims in Friedrichs under the current framework of balancing envisioned by the Supreme Court, and concludes that fair share fees are justified. Part II broadens the discussion to consider the state’s powerful interest in promoting institutions that strengthen American democracy. Part III considers an objection raised by supporters of Friedrichs: that public sector unions will do just fine if they lose the Friedrichs case. Part IV concludes. Balancing First Amendment Rights against the State’s Interests The current legal framework in which courts weigh cases such as Friedrichs is narrowly constrained, balancing the free speech rights of dissenting union members against the state’s interests in promoting stable labor relations with its public employees. In the 1977 case of Abood v. Detroit Board of Education, the U.S. Supreme Court reached a sensible compromise that properly balanced these two sets of interests by splitting union dues into two categories: those that support political speech, and those that support bread–and-butter collective bargaining. Because the First Amendment’s free speech clause provides a right to not be compelled by the state to subsidize speech with which one disagrees, dissenting public employees cannot be required by the state to join a union, or to subsidize the union’s political and lobbying efforts to promote certain positions of public concern.5 On the other hand, the Court recognized that the state, as an employer, has an interest in promoting harmonious labor relations. To discourage the formation of multiple unions with competing claims, the state has an interest in facilitating a single union negotiating on the behalf of all workers, whether or not individual employees choose to be a member of the union. Under an exclusive bargaining arrangement, the union has a duty to represent members and nonmembers alike. Accordingly, the Court held, the state may prevent employees from being “free riders” by compelling contribution to that portion of union membership dues that underwrite the cost of collective bargaining over issues such as wages and benefits. More recently, in Harris v. Quinn (2014), the Supreme Court was asked to apply the Abood principle to unionized home care workers. The Supreme Court rejected that extension, finding that home care workers, although paid with public funds, were only “partial public employees.” They work for individual patients in private homes and answer mostly to the patients for their work. The Supreme Court created a new test, as scholar Catherine Fisk notes, which suggests that fair share fees can only be justified when “the cited benefits” require imposition of such fees. “No such showing” was made in Harris, the justices held, noting that under Illinois law, the union negotiated a limited number of issues and had no role in enforcing contracts for nonmembers.6 Although Harris sustained the 1977 Abood holding, a majority hinted that it might be willing to overturn Abood in a future case.7 In Friedrichs, the petitioner explicitly seeks to have the Supreme Court overrule the longstanding Abood compromise.8 That would be a serious mistake, for reasons outlined below. Current Rules Balance Free Speech Rights The U.S. Supreme Court has long recognized that First Amendment rights extend beyond the right to speak to include the right not to be compelled to subsidize speech to which an individual objects. The lawyers for Friedrichs invoke Thomas Jefferson’s statement “to compel a man to furnish contributions of money for the propagation of opinions which he disbelieves is sinful and tyrannical.”9 The state cannot require that, as a condition of employment, public employees must contribute to an ideological cause they may oppose. Friedrichs tries to argue that the distinction between political speech and collective bargaining for public sector unions outlined in Abood is illusory; that because collective bargaining over wages and benefits impacts state budgets, it is inherently political speech. But respondents point out that if this were true—that collective bargaining is a form of political speech—how could it be legal for states to ban it among public employees, as several states currently do? Moreover, the Abood Court noted that dissenting public employees are still free to express their disagreements with the union publicly and vocally. A “public employee who believes that a union representing him is urging a course that is unwise as a matter of public policy is not barred from expressing his viewpoint.”10 And, of course, if teachers such as Friedrichs are upset with union leadership, they can seek to have leaders ousted through periodic democratic elections of officers, or even run for office themselves. Countervailing State Interests Recognized in Abood Free speech rights are never absolute. Jefferson’s statement about compelled contributions, for example, cannot be taken literally. For instance, the government may, in fact, compel taxation from an individual who is opposed to the war in Afghanistan, and then use those funds to engage in speech to recruit soldiers for the war effort. Free speech rights must always be balanced against other considerations. In the case of public sector unions, the Abood Court noted the state has two major interests. The opinion, written by Potter Stewart, an Eisenhower appointee, identified one as labor peace and workplace stability, and the other as reducing the risk of “free ridership” and unfairness.11 In the United States, a single union normally represents all employees in order to promote “labor peace.” “The principle of exclusive union representation,” the Court noted, “is a central element in the congressional structure of industrial relations.” The National Labor Relations Act—and many state collective bargaining laws—provide for a single representative to avoid “the confusion that would result from attempting to enforce two or more agreements specifying different terms and conditions of employment.” The Court noted that the arrangement also “prevents inter-union rivalries from creating dissension within the workforce and eliminating the advantages to the employer of collectivization.” Finally, the Court observed, exclusive union representation “also frees the employer from the possibility of facing conflicting demands from different unions, and permits the employer and a single union to reach agreements and settlements that are not subject to attack from rival labor organizations.”12 In the context of public employee unions, the Court noted, “confusion and conflict” could reign, for example, if rival teachers unions held different positions on issues such as “class hours, class sizes, holidays, tenure provisions,” and the like.13 A second, related, state interest is to prevent what is known as the “free rider” problem in cases of collective action. Because of exclusive representation, unions have a duty “fairly and equitably to represent all employees . . . union and non-union.” Given this arrangement, in which employees benefit from collective bargaining whether they are union members or not, a classic “free rider” issue arises, the Court noted, whereby employees could “refuse to contribute to the union while obtaining the benefits of union representation that necessarily accrue to all employees.”14 Free rider problems exist in many organizations. Why donate to a religious institution if you can still attend and enjoy services whether or not you pay? To counter this, some groups can provide “special advantages” to backers—a leadership position in the church, for example. Unions cannot take this approach, however. As Justice Kagan noted in Harris v. Quinn, because “the law compels unions to represent—and represent fairly—every worker in the bargaining union, regardless whether they join or contribute to the union,” the collective action problem is “of far greater magnitude than in the typical interest group.”15 She referenced Justice Antonin Scalia’s opinion in an earlier decision, making this point: “where the state creates in the nonmembers a legal entitlement from the union, it may compel them to pay the cost.”16 This principle, “there is no free lunch,” is something conservatives usually understand well. According to the counsel for Friedrichs, annual dues to the CTA amount to approximately $1,000 per teacher, of which nonmembers receive a refund of roughly $350 to $400 for expenses unrelated to collective bargaining.17 In other words, Friedrichs is happy to accept increases in wages and benefits the union negotiates hard to win, but does not want to pay the $600 to $650 per year that other members contribute in order to make those wage gains possible. Will she give back her raises, forgo health care benefits, give up the right to pursue grievances, and agree to teach larger classes that the union negotiated? The amicus brief of the American Federation of Teachers and the American Association of University Professors put it well: there is no “constitutional right to a free ride.”18 Promoting Democracy Should Be Considered in Balancing Free Speech and State Interests In balancing the rights of free speech and state interests, Abood came to the correct conclusion—free speech rights can sometimes be curtailed to serve state interests in labor peace and avoiding free ridership. But these are only a subset of state interests. Indeed, the Abood court substantially understated the interests of states in preserving fair share fees. For example, amici in the case, such as the National Women’s Law Center and seventy other civil rights groups, note that there are myriad ways in which labor unions generally—and public sector unions specifically—improve the conditions of minorities and women, a vitally important state interest.19 All unions—including, and perhaps especially, public sector unions—also contribute to one of the most important foundational interests of the state: democracy. And they do this in many different ways. Unions are critical civic organizations that serve as a check on government power. They are important players in promoting a strong middle class, upon which democracy depends. They serve as schools of democracy for workers. And teacher unions, in particular, help ensure that our educational system is sufficiently funded to teach children to become thoughtful and enlightened citizens in our self-governing democracy. Democracies Need Unions to Serve as a Check on Government Power Alexis de Tocqueville famously marveled at the thriving civic associations that keep American democracy vitalized; and for the past century, unions have been a critical part of that framework. Recognizing the important role of unions in liberal democracies, the 1948 Universal Declaration of Human Rights provides in Article 23 that “Everyone has the right to form and join trade unions for the protection of his interests.” In 1980, President Ronald Reagan championed the role of Polish unions in challenging dictatorial rule by the Communist Party. Reagan declared in a Labor Day speech that year, “where free unions and collective bargaining are forbidden, freedom is lost.” Albert Shanker, the legendary president of the American Federation of Teachers from 1974 to 1997, saw a pattern in authoritarian regimes. “There is no freedom or democracy without trade unions,” he noted. “The first thing a dictator does is to get rid of the trade unions.”20 Public sector unions, in particular, have played an important role in bringing down dictators in countries such as Chile.21 In free societies across the globe, from Finland to Japan, the rights of teachers and other public sector employees to unionize are well established. Indeed, when the United States attempts to plant the seeds of democracy in other countries, free trade unions—for private and public sector workers alike—are critical elements of what we advocate. If such unions are to have the capacity to wield influence, they cannot be starved of the fees from workers necessary to play that role. Democracies Need a Strong Middle Class to Avoid Plutocracy Going back to Aristotle, it has been recognized that democracies are more likely to thrive when a vibrant middle class can support them.22 Large inequalities of wealth can undermine democracy. As philosopher Sidney Hook observed, “It is possible for people to be politically equal as voters, yet so unequal in educational, economic, and social opportunities, that ultimately, even the nature of the political equality is affected.”23 In highly unequal societies, large income gaps can give wealthy interests an outsized role in electing officials. Theodore Roosevelt warned of the dangers of having “a small class of enormously wealthy and economically powerful men, whose chief object is to hold and increase their power.”24 More recently, Nobel Prize–winning economist Michael Spence told the New York Times that we have seen “an evolution from one propertied man, one vote; to one man, one vote; to one person, one vote; trending to one dollar, one vote.”25 Strong unions helped build the middle class in America after the Great Depression, and continue to have a positive effect on ameliorating extreme inequalities of wealth. By bargaining for fair wages and benefits, unions in the public and private sector help foster broadly shared prosperity. Research finds, for example, that unions compress wage differences between management and labor. According to one study, “controlling for variation in human resource practices, unionized establishments have an average of 23.2 percentage point lower management-to-worker pay ratio relative to non-union workplaces.”26 By the same token, as the Center for American Progress’s David Madland has vividly illustrated, the decline in union density in the United States between 1969 and 2009 has been accompanied by a strikingly similar decline in the share of income going to the middle class (the middle three-fifths of the income distribution; see Figure 1). &nbsp;The middle class is hollowing out: in 1971, 61 percent of Americans were middle class, but a December 2015 Pew Research Center report found that a slight majority of Americans now live in low- or upper-income households.27 Although there are many reasons for middle-class wage stagnation—including globalization and the rise in technology—Lawrence Mishel of the Economic Policy Institute finds that the decline in union bargaining power is “the single largest factor suppressing wage growth for middle-wage workers over the last few decades.” The International Monetary Fund, likewise, has linked decline in unions worldwide with rises in income inequality.28 Figure 1. chartDOWNLOAD International studies also connect the relatively low levels of U.S. union density (when compared with other nations) and the higher level of economic inequality found in the United States. According to a 2011 analysis by the Center for Economic and Policy Research looking at twenty-one wealthy nations, nine countries had more than 80 percent of their workers covered by collective bargaining agreements; nine had between 30 and 80 percent covered; and just three—the United States, Japan, and New Zealand—had coverage rates below 20 percent. Using data from the Central Intelligence Agency’s World Factbook on levels of income inequality, my colleague Moshe Marvit and I demonstrate in Why Labor Organizing Should Be a Civil Right that the three nations with the lowest collective bargaining coverage also were among the four countries with the highest degrees of income inequality, as measured by the Gini coefficient.29 Defunding public sector unions will only accelerate the extreme economic inequality that threatens our political democracy. Unions Are Needed to Serve as Schools for Democracy Civic organizations that are run democratically can be an important mechanism for acculturating citizens to the inner workings of democracy. Unions are among the most important of these organizations, bringing together rank and file workers from a variety of ethnic, racial, and religious backgrounds, and serving as what Harvard sociologist Robert Putnam calls “schools for democracy.” Union members learn skills that are essential to a well-functioning democracy: how to run meetings, debate one another, and organize for political action.30 Labor unions can also help create a culture of participation among workers. Being involved in workplace decisions and the give and take of collective bargaining, voting on union contracts, and voting for union leadership have all been called important drivers of “democratic acculturation.”31 In addition, union members routinely engage in civic activities, such as staffing phone banks and canvassing voters door to door. This involvement can boost civic participation among union members and nonmembers alike. One study found that for every one-percentage-point increase in a state’s union density, voter turnout increased between 0.2 and 2.5 percentage points. In a

#### US democracy is the greatest international stabilizer and is key to democracy globally

Kelly Magsamen et. al. 18, Max Bergmann, Michael Fuchs, and Trevor Sutton, 9-5-2018, "Securing a Democratic World," Center for American Progress, https://www.americanprogress.org/issues/security/reports/2018/09/05/457451/securing-democratic-world/

Policy recommendations Revitalizing global democracy is an immense and complex task that will take many years. But in the short term, the threat presented by opportunist authoritarian regimes urgently requires a rapid response. That is why America’s democracy rebalance needs both an immediate defensive line of effort to protect democratic values at home and around the world from creeping authoritarianism and a sustained long-term effort to expand the global democratic community and address the drivers of democratic retrenchment. Strengthen democracy at home American foreign policy starts at home with the strength of our own democratic model. None of the initiatives proposed in this report is likely to succeed if the United States does not embrace its own democratic values and norms and lead by example. The next administration will need to simultaneously re-establish international credibility and strengthen the democratic compact with its own citizens. For the United States to compete effectively in the global battle of ideas, it must continue to perfect its own democracy and leverage its own comparative strengths: rule of law, strong institutions, the ability to self-correct as a nation, and the innovation and perseverance of the American people. While domestic policy is not the focus of this report, the authors felt it was essential to draw the connection between the health of American democracy and the strategic impact that the United States can drive globally in the context of rising competition.

#### Extinction

Yulis 17 (Max Yulis, Penn Political Review. In Defense of Liberal Internationalism. April 8, 2017. pennpoliticalreview.org/2017/04/in-defense-of-liberal-internationalism/)

Over the past decade, international headlines have been bombarded with stories about the unraveling of the post-Cold War world order, the creation of revolutionary smart devices and military technologies, the rise of militant jihadist organizations, and nuclear proliferation. Indeed, times are paradoxically promising and alarming. In relation to treating the world’s ills, fortunately, there is a capable hegemon– one that has the ability to revive the world order and traditionally hallmarked human rights, peace, and democracy. The United States, with all of its shortcomings, had crafted an international agenda that significantly impacted the post-WWII landscape. **Countries invested their ambitions into security communities, international institutions, and international law** in an effort **to mitigate** the **chances of** a **nuclear** catastrophe or another World **War**. The horrors and atrocities of the two Great Wars had traumatized the global community, which spurred calls for peace and the creation of a universalist agenda. **Today**, the world’s fickle and declining hegemon still has the **ability, but not the will**, to uphold the world order that it had so carefully and eagerly helped construct. Now, **the stakes are too high**, and **there must be a mighty and willing global leader to lead the effort of diffusing democratic ideals** and reinforcing stability through both military and diplomatic means. To do this, the United States must abandon its insurgent wave of isolationism and protectionism, and come to grips with the newly transnational nature of problems ranging from climate change to international terrorism. First, the increase in intra-state conflict should warrant concern as many countries, namely in Africa and the Middle East, are seeing the total **collapse of civil society and government.** **These power vacuums are being filled with** increasingly **ideological and dangerous tribal and non-state actors**, such as **Boko Haram, ISIS, and Al-Shabaab**. Other bloody civil wars in Rwanda, Sudan, and the Congo have contributed to the deaths of millions in the past two decades. As the West has seen, however, military intervention has not been all that successful in building and empowering democratic institutions in the Far East. **A civil crusade**, along with the **strengthening of international institutions**,may in fact be the answer to undoing tribal, religious, and sectarian divisions, thereby mitigating the prospects of civil conflict. During the Wilsonian era, missionaries did their part to internationalize the concept of higher education, which has contributed to the growth of universities in formerly underdeveloped countries such as China and South Korea.[1] In addition, the teachings of missionaries emphasized the universality of humanity and the oneness of man, which was antithetical to the justifications for imperialism and the rampant sectarianism that plagued much of the Middle East and Africa.[2] Seeing that an increase in the magnitude of human casualty is becoming more of a reality due to advancements in military technology and the increasing outbreaks of civil war, **international cooperation and the diffusion of norms that highlight the importance of stable governance, democracy, and human rights is the only recourse to address the rise in sectarian divides and civil conflicts**. So long as the trend of the West’s desire to **look inward** continues, it is likely that nation states mired in conflict will devolve into ethnic or tribal enclaves bent on **relying on war to maintain their legitimacy** and power. Aside from growing sectarianism and the increasing prevalence of failed states, an even more daunting threat come from **weapons that transcend the costs of conventional warfare.** The problem of nuclear proliferation has been around for decades, and on the eve of President Trump’s inauguration, it appeared that Obama’s lofty goal of advocating for nonproliferation would no longer be a priority of American foreign policy.[3] In addition, now that the American president is threatening to undo much of the United States’ extensive network of alliances, formerly non-nuclear states may be forced to rearm themselves.

### Framework

#### Only moral naturalism can explain the influence of moral facts on the physical world – ethics must be understood a posteriori.

Papineau David [Professor of Philosophy King's College London], First published Thu Feb 22, 2007; substantive revision Tue Mar 31, 2020 https://plato.stanford.edu/entries/naturalism/#MorFac

Moore took this argument to show that moral facts constitute a distinct species of non-natural fact. However, any such non-naturalist view of morality faces immediate difficulties, deriving ultimately from the kind of causal closure thesis discussed above. If all physical effects are due to a limited range of physically-grounded natural causes, and if moral facts lie outside this range, then it follow that moral facts can never make any difference to what happens in the physical world (Harman 1986). At first sight this may seem tolerable (perhaps moral facts indeed don’t have any physical effects). But it has awkward epistemological consequences. For beings like us, knowledge of the spatiotemporal world is mediated by physical processes involving our sense organs and cognitive systems. If moral facts cannot influence the physical world, then it is hard to see how we can have any knowledge of them. The traditional non-naturalist answer to this problem is to posit a non-natural faculty of “moral intuition” that gives us some kind of direct access to the moral realm (as explained in Ridge 2014: Section 3). However, causal closure once more makes it difficult to make good sense of this suggestion. Presumably at some point the posited intuitive faculty will need to make a causal difference in the physical world (by affecting what people say and do, for example). And at this point the causal closure argument will bite once more, to show that a non-natural intuitive faculty would implausibly imply that some of our actions are strongly overdetermined by two metaphysically independent antecedents. Moral non-naturalism has had something of a revival in recent years, with defenders including Russ Shaffer-Landau (2003), Ralph Wedgwood (2007), Derek Parfit (2011) and David Enoch (2011). Still, the challenge of accounting for our access to non-natural moral facts remains, and it is debatable whether any of these writers has found a satisfactory alternative to a causally problematic faculty of intuition. Perhaps the most developed suggestion is Enoch’s (2011) appeal to the indispensability of non-natural moral facts to moral reasoning, a line of argument that is analogous to Hilary Putnam’s case for non-natural mathematical objects, to be discussed in the next section below. But Enoch’s appeal arguably faces many of the same general objections as Putnam’s argument, as well as objections specific to the moral realm (see Leng 2016). In light of the difficulties facing moral non-naturalism, most contemporary moral philosophers opt instead for some species of naturalist view. We can divide the naturalist options here into two broad categories: irrealist and realist. Irrealist moral naturalists aim to account for moral discourse by offering naturalist accounts of the social and linguistic and practices that govern it, but without supposing that moral utterances report on moral facts with a substantial independent existence (Joyce 2015). By contrast, naturalist moral realists agree with moral non-naturalists that substantial moral facts exist, but seek to locate them in the natural realm rather than in some sui generis non-natural realm (Lenman 2014). Both these broad categories have further sub-divisions. Among the irrealists, we can distinguish explicitly non-cognitivist views like emotivism and prescriptivism which deny that moral judgements express beliefs (Hare 1952, Blackburn 1993, Gibbard 2003) from cognitivist views that accept that moral judgements do express beliefs but deny a substantial reality to the putative facts to which they answer; and among the latter cognitivist views we can distinguish error-theoretic fictionalist options which view moral judgements as simply false (Mackie 1977, Kalderon 2005) from projectivist options which hold that moral discourse is sufficiently disciplined for its judgements to qualify for a species of truth even though they do not report on independently existing causally significant facts (Wright 1992, Price 2011). Naturalist moral realism also comes in different varieties. In recent debates two versions have figured prominently; “Cornell realism”, which includes moral facts among the causally significant facts but resists their type-reducibility to non-moral facts (Sturgeon 1985, Boyd 1988), and “moral functionalism” which is happy to equate moral facts with straightforwardly descriptive facts (Jackson 1998). Any kind of moral naturalist realist needs to reject Moore’s open question argument. There are two alternatives here. One is to insist that Moore’s posited openness is relatively superficial, and that there is no principled barrier to inferring moral facts a priori from the non-moral natural facts, even if such inferences will sometimes require a significant amount of information and reflection. The other is to argue that the constitution of moral facts by non-moral natural facts is an a posteriori matter, akin to the relation between water and H2O, and that therefore Moore’s openness only points to a conceptual gap, not a metaphysical one (Ridge 2014: Section 2).

#### Only naturalism can resolve evolutionary debunking arguments.

Lutz Matthew Lutz, “Moral Naturalism”, First published Thu Jun 1, 2006; substantive revision Wed May 30, 2018, <https://plato.stanford.edu/entries/naturalism-moral/#WhyMoraNatu>

The first argument against normative non-naturalism concerns normative supervenience. The normative supervenes on the natural; in all metaphysically possible worlds in which the natural facts are the same as they are in the actual world, the moral facts are the same as well. This claim has been called the “least controversial thesis in metaethics” (Rosen forthcoming); it is very widely accepted. But it is also a striking fact that stands in need of some explanation. For naturalists, such an explanation is easy to provide: the moral facts just are natural facts, so when we consider worlds that are naturally the same as the actual world, we will ipso facto be considering worlds that are morally the same as the actual world. But for the non-naturalist, no such explanation seems available. In fact, it seems to be in principle impossible for a non-naturalist to explain how the moral supervenes on the natural. And if the non-naturalist can offer no explanation of this phenomenon that demands explanation, this is a heavy mark against non-naturalism (McPherson 2012). It is highly controversial whether this argument succeeds (for discussion, see McPherson (2012), Enoch (2011, Ch. 6), Wielenberg (2014, Ch. 1), Leary 2017, Väyrynen 2017, Rosen forthcoming,). But if it does succeed, then it provides a good reason to think that moral properties, if they exist, must be natural properties. The second argument against moral non-naturalism concerns moral epistemology. According to evolutionary debunking arguments, our moral beliefs are products of evolution, and this evolutionary etiology of our moral beliefs serves to undermine them. Exactly why evolution debunks our moral beliefs is a matter of substantial controversy, and the debunking argument has been interpreted in a number of different ways (Vavova 2015). Sharon Street, whose statement of the evolutionary debunking argument has been highly influential, holds that debunking arguments make a problem for all versions of moral realism—her paper is entitled “A Darwinian Dilemma for Realist Theories of Value.” But according to another popular line of argument, these debunking arguments are only problems for moral non-naturalism. The fundamental worry is that our moral beliefs are the product of evolutionary facts rather than moral facts. If this is so, this would serve to debunk our moral beliefs, either because it is a necessary condition on justified belief that you take your beliefs to be explained by the facts in question (Joyce 2006, Ch. 6; Bedke 2009; Lutz forthcoming) or else because the non-naturalist is left with no way to explain the reliability of our moral beliefs (Enoch 2009, Schechter 2017). But if moral naturalism is true, the realist needn’t grant the skeptic’s premise that our moral beliefs are the product of evolutionary facts rather than moral facts. If moral facts are natural, then we needn’t see moral facts as being contrary to natural, evolutionary facts. The moral facts might be among these evolutionary facts that explain our moral beliefs. If, for instance, to be good just is to be conducive to social cooperation, then an evolutionary account that says that we judge things to be good only when they are conducive to social cooperation would not debunk any of our beliefs about goodness. This account would, instead, provide a deep vindication of those beliefs (Copp 2008). It is open to naturalists to say that the moral facts are wholly or partly responsible for us having the moral beliefs that we have. This allows them to address any number of different epistemic objections that the moral non-naturalist seems ill-equipped to answer. If these objections do succeed against only the non-naturalist, that’s a good reason to think that moral properties, if they exist, must be natural properties.

#### The standard is act hedonistic util. Prefer –

#### 1 – Pleasure and pain *are* intrinsic value and disvalue – everything else *regresses* – robust neuroscience.

Blum et al. 18 Kenneth Blum, 1Department of Psychiatry, Boonshoft School of Medicine, Dayton VA Medical Center, Wright State University, Dayton, OH, USA 2Department of Psychiatry, McKnight Brain Institute, University of Florida College of Medicine, Gainesville, FL, USA 3Department of Psychiatry and Behavioral Sciences, Keck Medicine University of Southern California, Los Angeles, CA, USA 4Division of Applied Clinical Research & Education, Dominion Diagnostics, LLC, North Kingstown, RI, USA 5Department of Precision Medicine, Geneus Health LLC, San Antonio, TX, USA 6Department of Addiction Research & Therapy, Nupathways Inc., Innsbrook, MO, USA 7Department of Clinical Neurology, Path Foundation, New York, NY, USA 8Division of Neuroscience-Based Addiction Therapy, The Shores Treatment & Recovery Center, Port Saint Lucie, FL, USA 9Institute of Psychology, Eötvös Loránd University, Budapest, Hungary 10Division of Addiction Research, Dominion Diagnostics, LLC. North Kingston, RI, USA 11Victory Nutrition International, Lederach, PA., USA 12National Human Genome Center at Howard University, Washington, DC., USA, Marjorie Gondré-Lewis, 12National Human Genome Center at Howard University, Washington, DC., USA 13Departments of Anatomy and Psychiatry, Howard University College of Medicine, Washington, DC US, Bruce Steinberg, 4Division of Applied Clinical Research & Education, Dominion Diagnostics, LLC, North Kingstown, RI, USA, Igor Elman, 15Department Psychiatry, Cooper University School of Medicine, Camden, NJ, USA, David Baron, 3Department of Psychiatry and Behavioral Sciences, Keck Medicine University of Southern California, Los Angeles, CA, USA, Edward J Modestino, 14Department of Psychology, Curry College, Milton, MA, USA, Rajendra D Badgaiyan, 15Department Psychiatry, Cooper University School of Medicine, Camden, NJ, USA, Mark S Gold 16Department of Psychiatry, Washington University, St. Louis, MO, USA, “Our evolved unique pleasure circuit makes humans different from apes: Reconsideration of data derived from animal studies”, U.S. Department of Veterans Affairs, 28 February 2018, accessed: 19 August 2020, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6446569/>, R.S.

**Pleasure** is not only one of the three primary reward functions but it also **defines reward.** As homeostasis explains the functions of only a limited number of rewards, the principal reason why particular stimuli, objects, events, situations, and activities are rewarding may be due to pleasure. This applies first of all to sex and to the primary homeostatic rewards of food and liquid and extends to money, taste, beauty, social encounters and nonmaterial, internally set, and intrinsic rewards. Pleasure, as the primary effect of rewards, drives the prime reward functions of learning, approach behavior, and decision making and provides the **basis for hedonic theories** of reward function. We are attracted by most rewards and exert intense efforts to obtain them, just because they are enjoyable [10]. Pleasure is a passive reaction that derives from the experience or prediction of reward and may lead to a long-lasting state of happiness. The word happiness is difficult to define. In fact, just obtaining physical pleasure may not be enough. One key to happiness involves a network of good friends. However, it is not obvious how the higher forms of satisfaction and pleasure are related to an ice cream cone, or to your team winning a sporting event. Recent multidisciplinary research, using both humans and detailed invasive brain analysis of animals has discovered some critical ways that the brain processes pleasure [14]. Pleasure as a hallmark of reward is sufficient for defining a reward, but it may not be necessary. A reward may generate positive learning and approach behavior simply because it contains substances that are essential for body function. When we are hungry, we may eat bad and unpleasant meals. A monkey who receives hundreds of small drops of water every morning in the laboratory is unlikely to feel a rush of pleasure every time it gets the 0.1 ml. Nevertheless, with these precautions in mind, we may define any stimulus, object, event, activity, or situation that has the potential to produce pleasure as a reward. In the context of reward deficiency or for disorders of addiction, homeostasis pursues pharmacological treatments: drugs to treat drug addiction, obesity, and other compulsive behaviors. The theory of allostasis suggests broader approaches - such as re-expanding the range of possible pleasures and providing opportunities to expend effort in their pursuit. [15]. It is noteworthy, the first animal studies eliciting approach behavior by electrical brain stimulation interpreted their findings as a discovery of the brain’s pleasure centers [16] which were later partly associated with midbrain dopamine neurons [17–19] despite the notorious difficulties of identifying emotions in animals. Evolutionary theories of pleasure: The love connection BO:D Charles Darwin and other biological scientists that have examined the biological evolution and its basic principles found various mechanisms that steer behavior and biological development. Besides their theory on natural selection, it was particularly the sexual selection process that gained significance in the latter context over the last century, especially when it comes to the question of what makes us “what we are,” i.e., human. However, the capacity to sexually select and evolve is not at all a human accomplishment alone or a sign of our uniqueness; yet, we humans, as it seems, are ingenious in fooling ourselves and others–when we are in love or desperately search for it. It is well established that modern biological theory conjectures that **organisms are** the **result of evolutionary competition.** In fact, Richard Dawkins stresses gene survival and propagation as the basic mechanism of life [20]. Only genes that lead to the fittest phenotype will make it. It is noteworthy that the phenotype is selected based on behavior that maximizes gene propagation. To do so, the phenotype must survive and generate offspring, and be better at it than its competitors. Thus, the ultimate, distal function of rewards is to increase evolutionary fitness by ensuring the survival of the organism and reproduction. It is agreed that learning, approach, economic decisions, and positive emotions are the proximal functions through which phenotypes obtain other necessary nutrients for survival, mating, and care for offspring. Behavioral reward functions have evolved to help individuals to survive and propagate their genes. Apparently, people need to live well and long enough to reproduce. Most would agree that homo-sapiens do so by ingesting the substances that make their bodies function properly. For this reason, foods and drinks are rewards. Additional rewards, including those used for economic exchanges, ensure sufficient palatable food and drink supply. Mating and gene propagation is supported by powerful sexual attraction. Additional properties, like body form, augment the chance to mate and nourish and defend offspring and are therefore also rewards. Care for offspring until they can reproduce themselves helps gene propagation and is rewarding; otherwise, many believe mating is useless. According to David E Comings, as any small edge will ultimately result in evolutionary advantage [21], additional reward mechanisms like novelty seeking and exploration widen the spectrum of available rewards and thus enhance the chance for survival, reproduction, and ultimate gene propagation. These functions may help us to obtain the benefits of distant rewards that are determined by our own interests and not immediately available in the environment. Thus the distal reward function in gene propagation and evolutionary fitness defines the proximal reward functions that we see in everyday behavior. That is why foods, drinks, mates, and offspring are rewarding. There have been theories linking pleasure as a required component of health benefits salutogenesis, (salugenesis). In essence, under these terms, pleasure is described as a state or feeling of happiness and satisfaction resulting from an experience that one enjoys. Regarding pleasure, it is a double-edged sword, on the one hand, it promotes positive feelings (like mindfulness) and even better cognition, possibly through the release of dopamine [22]. But on the other hand, pleasure simultaneously encourages addiction and other negative behaviors, i.e., motivational toxicity. It is a complex neurobiological phenomenon, relying on reward circuitry or limbic activity. It is important to realize that through the “Brain Reward Cascade” (BRC) endorphin and endogenous morphinergic mechanisms may play a role [23]. While natural rewards are essential for survival and appetitive motivation leading to beneficial biological behaviors like eating, sex, and reproduction, crucial social interactions seem to further facilitate the positive effects exerted by pleasurable experiences. Indeed, experimentation with addictive drugs is capable of directly acting on reward pathways and causing deterioration of these systems promoting hypodopaminergia [24]. Most would agree that pleasurable activities can stimulate personal growth and may help to induce healthy behavioral changes, including stress management [25]. The work of Esch and Stefano [26] concerning the link between compassion and love implicate the brain reward system, and pleasure induction suggests that social contact in general, i.e., love, attachment, and compassion, can be highly effective in stress reduction, survival, and overall health. Understanding the role of neurotransmission and pleasurable states both positive and negative have been adequately studied over many decades [26–37], but comparative anatomical and neurobiological function between animals and homo sapiens appear to be required and seem to be in an infancy stage. Finding happiness is different between apes and humans As stated earlier in this expert opinion one key to happiness involves a network of good friends [38]. However, it is not entirely clear exactly how the higher forms of satisfaction and pleasure are related to a sugar rush, winning a sports event or even sky diving, all of which augment dopamine release at the reward brain site. Recent multidisciplinary research, using both humans and detailed invasive brain analysis of animals has discovered some critical ways that the brain processes pleasure. Remarkably, there are pathways for ordinary liking and pleasure, which are limited in scope as described above in this commentary. However, there are **many brain regions**, often termed hot and cold spots, that significantly **modulate** (increase or decrease) our **pleasure or** even produce **the opposite** of pleasure— that is disgust and fear [39]. One specific region of the nucleus accumbens is organized like a computer keyboard, with particular stimulus triggers in rows— producing an increase and decrease of pleasure and disgust. Moreover, the cortex has unique roles in the cognitive evaluation of our feelings of pleasure [40]. Importantly, the interplay of these multiple triggers and the higher brain centers in the prefrontal cortex are very intricate and are just being uncovered. Desire and reward centers It is surprising that many different sources of pleasure activate the same circuits between the mesocorticolimbic regions (Figure 1). Reward and desire are two aspects pleasure induction and have a very widespread, large circuit. Some part of this circuit distinguishes between desire and dread. The so-called pleasure circuitry called “REWARD” involves a well-known dopamine pathway in the mesolimbic system that can influence both pleasure and motivation. In simplest terms, the well-established mesolimbic system is a dopamine circuit for reward. It starts in the ventral tegmental area (VTA) of the midbrain and travels to the nucleus accumbens (Figure 2). It is the cornerstone target to all addictions. The VTA is encompassed with neurons using glutamate, GABA, and dopamine. The nucleus accumbens (NAc) is located within the ventral striatum and is divided into two sub-regions—the motor and limbic regions associated with its core and shell, respectively. The NAc has spiny neurons that receive dopamine from the VTA and glutamate (a dopamine driver) from the hippocampus, amygdala and medial prefrontal cortex. Subsequently, the NAc projects GABA signals to an area termed the ventral pallidum (VP). The region is a relay station in the limbic loop of the basal ganglia, critical for motivation, behavior, emotions and the “Feel Good” response. This defined system of the brain is involved in all addictions –substance, and non –substance related. In 1995, our laboratory coined the term “Reward Deficiency Syndrome” (RDS) to describe genetic and epigenetic induced hypodopaminergia in the “Brain Reward Cascade” that contribute to addiction and compulsive behaviors [3,6,41]. Furthermore, ordinary “liking” of something, or pure pleasure, is represented by small regions mainly in the limbic system (old reptilian part of the brain). These may be part of larger neural circuits. In Latin, hedus is the term for “sweet”; and in Greek, hodone is the term for “pleasure.” Thus, the word Hedonic is now referring to various subcomponents of pleasure: some associated with purely sensory and others with more complex emotions involving morals, aesthetics, and social interactions. The capacity to have pleasure is part of being healthy and may even extend life, especially if linked to optimism as a dopaminergic response [42]. Psychiatric illness often includes symptoms of an abnormal inability to experience pleasure, referred to as anhedonia. A negative feeling state is called dysphoria, which can consist of many emotions such as pain, depression, anxiety, fear, and disgust. Previously many scientists used animal research to uncover the complex mechanisms of pleasure, liking, motivation and even emotions like panic and fear, as discussed above [43]. However, as a significant amount of related research about the specific brain regions of pleasure/reward circuitry has been derived from invasive studies of animals, these cannot be directly compared with subjective states experienced by humans. In an attempt to resolve the controversy regarding the causal contributions of mesolimbic dopamine systems to reward, we have previously evaluated the three-main competing explanatory categories: “liking,” “learning,” and “wanting” [3]. That is, dopamine may mediate (a) liking: the hedonic impact of reward, (b) learning: learned predictions about rewarding effects, or (c) wanting: the pursuit of rewards by attributing incentive salience to reward-related stimuli [44]. We have evaluated these hypotheses, especially as they relate to the RDS, and we find that the incentive salience or “wanting” hypothesis of dopaminergic functioning is supported by a majority of the scientific evidence. Various neuroimaging studies have shown that anticipated behaviors such as sex and gaming, delicious foods and drugs of abuse all affect brain regions associated with reward networks, and may not be unidirectional. Drugs of abuse enhance dopamine signaling which sensitizes mesolimbic brain mechanisms that apparently evolved explicitly to attribute incentive salience to various rewards [45]. Addictive substances are voluntarily self-administered, and they enhance (directly or indirectly) dopaminergic synaptic function in the NAc. This activation of the brain reward networks (producing the ecstatic “high” that users seek). Although these circuits were initially thought to encode a set point of hedonic tone, it is now being considered to be far more complicated in function, also encoding attention, reward expectancy, disconfirmation of reward expectancy, and incentive motivation [46]. The argument about addiction as a disease may be confused with a predisposition to substance and nonsubstance rewards relative to the extreme effect of drugs of abuse on brain neurochemistry. The former sets up an individual to be at high risk through both genetic polymorphisms in reward genes as well as harmful epigenetic insult. Some Psychologists, even with all the data, still infer that addiction is not a disease [47]. Elevated stress levels, together with polymorphisms (genetic variations) of various dopaminergic genes and the genes related to other neurotransmitters (and their genetic variants), and may have an additive effect on vulnerability to various addictions [48]. In this regard, Vanyukov, et al. [48] suggested based on review that whereas the gateway hypothesis does not specify mechanistic connections between “stages,” and does not extend to the risks for addictions the concept of common liability to addictions may be more parsimonious. The latter theory is grounded in genetic theory and supported by data identifying common sources of variation in the risk for specific addictions (e.g., RDS). This commonality has identifiable neurobiological substrate and plausible evolutionary explanations. Over many years the controversy of dopamine involvement in especially “pleasure” has led to confusion concerning separating motivation from actual pleasure (wanting versus liking) [49]. We take the position that animal studies cannot provide real clinical information as described by self-reports in humans. As mentioned earlier and in the abstract, on November 23rd, 2017, evidence for our concerns was discovered [50] In essence, although nonhuman primate brains are similar to our own, the disparity between other primates and those of human cognitive abilities tells us that surface similarity is not the whole story. Sousa et al. [50] small case found various differentially expressed genes, to associate with pleasure related systems. Furthermore, the dopaminergic interneurons located in the human neocortex were absent from the neocortex of nonhuman African apes. Such differences in neuronal transcriptional programs may underlie a variety of neurodevelopmental disorders. In simpler terms, the system controls the production of dopamine, a chemical messenger that plays a significant role in pleasure and rewards. The senior author, Dr. Nenad Sestan from Yale, stated: “Humans have evolved a dopamine system that is different than the one in chimpanzees.” This may explain why the behavior of humans is so unique from that of non-human primates, even though our brains are so surprisingly similar, Sestan said: “It might also shed light on why people are vulnerable to mental disorders such as autism (possibly even addiction).” Remarkably, this research finding emerged from an extensive, multicenter collaboration to compare the brains across several species. These researchers examined 247 specimens of neural tissue from six humans, five chimpanzees, and five macaque monkeys. Moreover, these investigators analyzed which genes were turned on or off in 16 regions of the brain. While the differences among species were subtle, **there was** a **remarkable contrast in** the **neocortices**, specifically in an area of the brain that is much more developed in humans than in chimpanzees. In fact, these researchers found that a gene called tyrosine hydroxylase (TH) for the enzyme, responsible for the production of dopamine, was expressed in the neocortex of humans, but not chimpanzees. As discussed earlier, dopamine is best known for its essential role within the brain’s reward system; the very system that responds to everything from sex, to gambling, to food, and to addictive drugs. However, dopamine also assists in regulating emotional responses, memory, and movement. Notably, abnormal dopamine levels have been linked to disorders including Parkinson’s, schizophrenia and spectrum disorders such as autism and addiction or RDS. Nora Volkow, the director of NIDA, pointed out that one alluring possibility is that the neurotransmitter dopamine plays a substantial role in humans’ ability to pursue various rewards that are perhaps months or even years away in the future. This same idea has been suggested by Dr. Robert Sapolsky, a professor of biology and neurology at Stanford University. Dr. Sapolsky cited evidence that dopamine levels rise dramatically in humans when we anticipate potential rewards that are uncertain and even far off in our futures, such as retirement or even the possible alterlife. This may explain what often motivates people to work for things that have no apparent short-term benefit [51]. In similar work, Volkow and Bale [52] proposed a model in which dopamine can favor NOW processes through phasic signaling in reward circuits or LATER processes through tonic signaling in control circuits. Specifically, they suggest that through its modulation of the orbitofrontal cortex, which processes salience attribution, dopamine also enables shilting from NOW to LATER, while its modulation of the insula, which processes interoceptive information, influences the probability of selecting NOW versus LATER actions based on an individual’s physiological state. This hypothesis further supports the concept that disruptions along these circuits contribute to diverse pathologies, including obesity and addiction or RDS.

#### 2] no intent foresight distinction – if I forsee a consequence it becomes part of my deliberation which makes it intrinsic to action since I intend it to happen

#### 3] Weighability – only consequentialism can explain the ethical difference in breaking a promise to take someone to the hospital and breaking a promise to take someone to lunch – that outweighs –

#### A] Resolvability – there’s no way to weigh between competing offense under their fw which means their fw can’t guide action

#### B] Intuitions – they’re a necessary side constraint on all ethics – if a very well justified, logical theory concluded "rape good” you wouldn’t say “huh I guess rape is good” you would abandon it

#### 6] Preserving life is a pre requisite to the ideal conditions their theory assumes -- all value stems from experienced wellbeing.