THROWING A WRENCH INTO THINGS: THE STRATEGY OF RADICAL ENVIRONMENTALISM

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Introduction:

The current focus on Islamic terrorism has resulted in a lack of awareness of other forms of terrorism. Similarly, the focus on external non-conventional threats to security has meant that domestic threats are being overlooked. One such instance is that of the threat posed by radical environmentalist organizations, such as Earth First! (EF!)\(^1\), the Earth Liberation Front (ELF), and the Sea Shepherds Society. These organizations, which premise themselves upon the assertion of “No compromise in the Defense of Mother Earth!” have declared themselves Mother Nature’s armies and navies and represent the militarization of the environmental movement.\(^2\) The operations in which they engage, of which there have been more than 600 in the United States and Canada since 1996, have been responsible for an estimated $100 million in damages.\(^3\) Though the impact of these operations pale in comparison to those of the terrorist attacks on the World Trade Centre and Pentagon in 2001, they represent a growing trend in environmental organizations, and a growing non-conventional societal threat. The threat is especially real in Canada where many groups find their origins in Canadian-born organizations such as Greenpeace.

\(^{1}\) The name of the ‘Earth First!’ includes the exclamation mark, which places emphasis on their commitment to action.


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This paper will define actions carried out by environmental organizations which seek to cause material damage as acts of ecotage. Acts of ecotage can be separated into two theatres: naval, and land based operations. Several instances of ecotage in each of these theatres will be examined, and used to demonstrate ecotage strategy. An examination of various ecotage tactics and their relative successes, will be used to indicate why instances of ecotage are likely to increase. Ecotage is but one tool available to environmentalists, but if it is seen as effective, it is a tool which environmentalists are likely to reach for more often.

The radicalizations and militarization of the environmental movement is a result of highly successful non-violent direct action methods employed by more conventional organizations. Three primary reasons why ecotage has been adopted by environmentalists will then be considered. Firstly, that ecotage produces powerful images (mind-bombs) garnering media attention and in so doing generating public awareness and sympathy for a particular issue. Secondly, that ecotage is employed in order to cause extensive property damage, driving up the costs of doing business to the point where the profitability of environmental degradation is so high that companies are forced to halt operations. And thirdly, that organizations who engage in ecotage expand the environmental activist spectrum, resulting in other, more conventional organizations being considered as moderates.

The Emergence of Ecotage:

Very few people have not seen the powerful David and Goliath images created by Greenpeace; images of tiny zodiacs confronting enormous whalers in blood churned
waters, small figures suspending banners from soot spewing smoke stacks, or half sunken rainbow-covered fishing trawlers.\textsuperscript{4} Such images did not happen by accident, these “Mind Bombs” were carefully crafted along the lines recommended by Marshall McLuhan, and adapted for the environmental movement by Robert Hunter.\textsuperscript{5} Mind bombs are “influential, sometime archetypal images that can cut through the hypnotic drone of the day-to-day babbling to reach people at a deeper emotional level.”\textsuperscript{6} Such images were designed to attract mass media attention.

Each campaign has an ultimate goal, specifically the cessation of the environmentally unfriendly action (acts of environmental degradation such as illegal hunting, pollution, deforestation and so on), while the goal of the specific protest act is to garner media attention, and in so doing to generate public debate, educate the public on environmental matters, embarrass politicians and corporations, and to generate further revenue (for the environmental organization), and in so doing achieve the ultimate goal of halting the environmental degradation.\textsuperscript{7} In order to garner media attention, it is deemed necessary to appeal to the medias basic interest in sex, scandal, and violence.\textsuperscript{8} Earned media is extremely important to environmental organizations,
whose capacity to purchase media is often hindered by small budgets. The more an image causes people to view a program, or pause and reflect, the more likely that it will be aired, and thus the more likely that the environmental organization will get its message out to the world.

An early example of the success of this imagery is that of the International Fund for Animal Welfare (IFAW) and Greenpeace’s campaign to stop the Newfoundland Seal Hunt. This campaign generated images of white-fluffy dark eyed seal pups held in the arms of Brigitte Bardot, along side those of blood soaked hunters wielding medieval-looking clubs. These powerful images were instrumental in turning the public opinion against the seal hunt and seal fur, and would ultimately result in a complete ban in Europe, the largest market for seal fur. Such startling success had ramifications however, as one commentator notes,

the most memorable campaigns have essentially been about blood…The images of confrontation and death on the high seas and later on the ice floes of Newfoundland secure their place in history long after the memory…What put them there was the simmering sense of conflict, the
smell of the blood. 13

This set a dangerous precedent, and led to the creation of continually more powerful images, pushing environmental organization's commitment to non-violence to the edge. Many did not hold to the principle of non-violence and broke away from such groups as Greenpeace, to form their own, more radical organizations. The Sea Shepherds Society is a clear example, Paul Watson distanced himself from the other founders of Greenpeace to form a more militarized and violent “Neptune’s Navy.” 14 The radicalization of environmental organizations due to the need to produce increasingly powerful images will be explored further when the imagery of ecotage is discussed.

Radicalization of the environmental movement also finds its roots in the perceived failures of traditional non-violent direct action (NVDA) methods to generate observable success. Some commentators, such as Martha Lee, argue that the radicalization of environmental groups, has been caused by the growing fear of irreversible anthropogenic environmental degradation, and such fears have taken on millenarian, or apocalyptic tones. 15 In other words, as mankind draws closer to the environmental 'point of no-return,' more radical actions are necessary and justified in order to save the planet.

Ecotage, A Definition and Code:

Ecotage, has been defined as the “practice of damaging property to prevent ecological damage,” 16 or similarly, acts of “sabotage carried out by environmental

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13 Dale, p. 149.
16 Manes, pp. 175, 111; Dave Foreman and Bill Haywood, Ecodefence: A Field Guide to Monkeywrenching, 2nd ed. Ed. Dave
activists that [are] intended to cause material damage to their opponents.” Ecotage includes acts of sabotage and property destruction, acts such as tree-spiking, ‘monkeywrenching,’ net and fence-cutting, being carried out in a way so as to avoid harm to humans. A second term related to ecotage which also requires a definition is that of ‘monkeywrenching.’ This term, drawn from Edward Abbey’s The Monkey Wrench Gang, originally included only sabotage to industrial machinery, but has since come to be used interchangeably with ecotage.

Actions that fall under the category of ecotage are broad based. The perception of what is radical and what constitutes material harm changes over time as more radical actions make previous actions appear tame. In much the same way as the early protests of the anti-Vietnam war, such as the 1964 March on Washington, appeared radical at the time but would later pale in comparison to the street violence during the protests at the National Democratic Convention in Chicago in 1968, early actions, such as Greenpeace activists imposing themselves between harpooners and whales, would in hindsight appear tame compared to the naval rammings of the Sea Shepherds.

17 Della Porta and Diani 1999, pp. 176-8, quoted by Alexandra Plows, et al., p. 199. Another method developed in Britain for distinguishing between NVDA, and acts of ecotage is presented by Andy Letcher. Through his anthropological study of radical environmental movements in Britain, he establishes that activist divides acts of protest into ‘Fluffy’ and ‘Spiky.’ Here ‘Fluffy’ actions include NVDA, whereas ‘Spiky’ actions are those which could be seen as ecotage (p. 68).

18 Tree-spiking is where a spike (usually a nail or clay stake) is driven into a tree. The goal of tree spiking is that a log with a ‘spike’ in it when being milled will cause damage to expensive mill blades causing production delays an increasing the cost to the logging company. Forman and Haywood recommend that spikes be placed in the winter or once the trees have been harvested to as to reduce the chance of harming the loggers themselves (pp. 26-38). Monkey-wrenching is the act of sabotaging the machinery used in environmental degradation (pp. 115-156). Forman, and Haywood.

19 Edward Abbey, The Monkey Wrench Gang, Illustrations, R. Crumb, Salt Lake City: Dream Garden Press, 1990. This work has been highly influential to radical environmentalists, along with Dave Forman, and Bill Haywood’s Ecodefense: A Field Guide to Monkeywrenching, is makes up both the core readings of radical environmentalists, and provides blue prints on how to conduct operations.

20 See for example Todd Gitlin, The Sixties: Years of Hope, Days of Rage, New York: Bantam Books, 1987; Frank Kusch,
comparison can be drawn between early Greenpeace efforts to prevent whaling by placing themselves between whales and whalers in small Zodiacs, and Sea Shepherd doing the same thing but in a more militant fashion, involving the threat of ramming and the use of projectiles. 21 Both instances attempted to prevent the act of whaling itself, and in this fashion, both organizations sought to cause material damage to the whalers by preventing them from harvesting whales, and therefore from profiting from the sale of whale meat and by-products. In many ways the Della Porta and Diani definition, which describes ecotage as an action which causes material damage to opponents, is more fitting, as this definition is broad enough to accommodate both actions.

Ecotage is typically seen as a last resort, one that should only be resorted to if other avenues of recourse fail. 22 Commentators and practitioners are careful to distinguish their acts from terrorism, as they are loath to be branded with the stigma attached to this term. 23 Towards this end, practitioners have imposed limitations and restrictions onto the acts themselves. The prohibition against violence towards living things features prominently within any discussion of ecotage, as such a prohibition is seen as being integral to the strategic success of ecotage, as well as broadening its appeal as a tool to activists. 24 Commentators such as Vanderheiden present conditions that must be fulfilled in order to justify ecotage. Vanderheiden establishes

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necessary conditions for the application of ecotage as a tactic of political resistance: (1) some act is being undertaken which is contrary to both law and justice; (2) state officials charged with enforcing relevant laws are unwilling or unable to do so; (3) serious damage is imminent and once complete, will be durable and irreversible; (4) legal means were attempted and proven unsuccessful; and (5) appeals to the sense of justice of the community have either already failed or would be frustrated by the unresponsive policy making or enforcing process.25

Such a framework allows activists to differentiate their actions from what they would consider terrorism, and in this way makes ecotage more appealing.

**Ecotage Strategy:**

Primary reasons as to why ecotage is seen to be effective are: that it generates public sympathy and awareness of a particular issue, the practice expands the spectrum of environmentalism and in so doing makes groups that do not engage in ecotage appear more moderate.26 Ecotage also seeks to cause enough property damage to drive up the costs of doing business to the point where the profitability of environmental destruction causes companies to halt their operations.27

As noted in ‘The Emergence of Ecotage,’ Greenpeace pioneered the use of the ‘mind bomb.’ Its success led to the need for increasingly more radical actions in order to produce more powerful images. As Doherty explains, the “vulnerability of protestors…is [a] symbolic and highly visible way of demonstrating both their own ‘moral commitment for a media and public captured by the epic quality of the confrontation’ and the hidden coercive power of the state [or corporation].”28 Furthermore, colorful and dramatic

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25 Vanderheiden, p. 443.
27 Ibid., pp. 426-427, 432; Lange, p. 473; Cohen, and Plows et al., p. 199.
images seek to instill viewers with “a vicarious thrill of living through the group’s activists who do things that members themselves would not do.”29 This has the added benefit of helping to increase a groups membership and fundraising efforts, for after showing activists risking their lives, the organization essentially “tells the readers that they will not be asked to subject themselves to these dangers, [that] [a]ll that they need do is send money, [and] the leaders will take the risks.”30 This is highly appealing, and allows members to practice “participation through contribution,” in other words, non-members are given the opportunity, for the price of a donation, of being part of this movement, and associated with and inspired by its ‘heroic’ actions, without any risk to themselves.31

Other than generating media bits and powerful graphic imagery, increasingly radical actions can illicit retaliation, which, if excessive, can further increase the image of the small non-governmental organization (NGO) facing off against a powerful corporation or state, effectively de-legitimizing their opponent, and exposing coercive power. The target of a campaign is not only the population in general, but also governments, corporations and international organizations, who ultimately create the policy changes an environmental organization desires. An environmental organization can use the backlash generated from excessive retaliation as a means of involving other international actors, which further increases the pressure on the perpetrator of environmental degradation. The case study of the bombing of the Greenpeace vessel the Rainbow Warrior offers an excellent example as to why ecotage is an effective

30 Ibid.
31 Ibid.
strategy for environmental organizations.

On the 10th of July, 1985, two explosions tore through the hull of the Greenpeace vessel in Auckland Harbor, New Zealand. The Rainbow Warrior was involved in the ‘Mauruao Mon Amour’ campaign against French nuclear testing in the South Pacific. The bombing resulted in the death of Fernando Pereira, a Dutch photographer, and triggered a complex and embarrassing international incident. Two days later, two French DGSE agents, Major Alain Mafrart and Captain Dominique Prieur were arrested and charged with manslaughter, willful damage and using forged passports.

The goal of the crew was to enter the 12 nautical mile limit established as a no-go-zone by the French navy surrounding Mauruao atoll. Their presence would force the French government to decide between canceling the tests, or taking responsibility for the fate of the crew. This strategy was known, and the DGSE took steps to assure that the Rainbow Warrior was destroyed before it could carry out its mission. The results could not have been worse for the French government. Instead of damaging and silencing Greenpeace, the ill-conceived actions of the French, which were described by one commentator as “a French intelligence flop that read like a James Bond movie interpreted by Monty Python,” were far reaching. The French action actually helped strengthen its increasingly powerful and vocal opponent.

The graphic images conjured by the half-sunken Rainbow Warrior in Auckland Harbor became part of Greenpeace’s most successful publicity campaign ever. At the

32 “Ruling Pertaining to the Differences Between France and New Zealand Arising from the Rainbow Warrior Affair,” p. 325; Findlay, p. 377; Davidson, p. 446.
34 The Sunday Times Insight Team.
36 Dickson, p. 948.
time Greenpeace used direct mail outs as a means of eliciting funds and members, and
in a single mailing shortly after the bombing, Greenpeace gained 43,000 new members with a response rate of almost 10%, a rate unheard of in the direct mail industry. The mail out received the Echo Awards from the direct-marketing industry as the best piece of non-profit direct mail in 1986.\(^\text{37}\)

Greenpeace capitalized on the publicity generated by the tragedy by launching a powerful media campaign. Thanks to this campaign the groups’ membership doubled from 400,000 to 800,000 in two years. Greenpeace also tripled its revenues.\(^\text{38}\)

Compensation that was eventually paid by the French government went to the purchase of a new and superior ship, which was extremely useful in future campaigns.\(^\text{39}\)

The excessive French actions had involved other actors, such as the government of New Zealand which at the time of the bombing was in the process of negotiating the Rarotonga Treaty, which sought the permanent denuclearization of all inhabited areas in the South Pacific and was the final step in the designation of the South Pacific as a nuclear-weapon-free zone (NWFZ).\(^\text{40}\) The timing of the bombing of the *Rainbow Warrior* could not have been worse for the French, who were clearly not in favor of the treaty. Though the process was well under way when the bombing occurred, the scandal played an important role in galvanizing public opinion in favor of the Treaty, giving its supporters the moral high ground.\(^\text{41}\) The bombing drew attention to the atavistic nature of French policy in the South Pacific. France did not cease testing in the South Pacific

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\(^\text{37}\) From personal interview, Vicky Monrean, Membership Development, Greenpeace USA, Washington, DC, 29 June 1988, quoted by Shaiko, p. 93.

\(^\text{38}\) Spencer, "Not So Peaceful World of Greenpeace," quoted by Shaiko, p. 93.


\(^\text{40}\) Power, p. 455.

until 1992, and when it did so, it was principally because it had succeeded in alienating most of the states in the region through its actions.42

This case also illuminates the very thin line between NVDA and ecotage. The crew of the *Rainbow Warrior* intended to 'bear witness' to the tests, an action which in itself is not ecotage but would have resulted in the disruption of French testing, which could have been costly (the cost of mobilizing naval vessels to prevent Greenpeace from reaching its destination for example), not to mention, embarrassing for the French. This event produced such powerful images, that it overshadowed others, and was catalytic to the radicalization of naval operations by environmental organizations. The Sea Shepherds Society produced high seas dramas that, in some instances, “exceed[ed] the swashbuckling-quotient of the early Greenpeace campaigns.”43 Under the captaincy of Paul Watson, the Sea Shepherds Society engaged in actions that went beyond the non-violent tactics employed by Greenpeace. The Sea Shepherd Society seeks to cause more immediate and dramatic material damage to their opponents.44 Such motivations go beyond seeking media attention, and endeavor to hinder the polluters ability to pollute.

A second reason as to why ecotage has been adopted by environmental organizations is that it seeks to raise the costs to those who cause environmental degradation, as well as to hinder their ability to continue their destructive practices. These include all forms of ecotage (monkey-wrenching, vandalism, tree-spiking, guerilla theatre, and so on), as well as more destructive actions such as fire-bombing, and

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43 Dale, p. 148.
44 Val Plumwood, “Inequality, Ecojustice and Ecological Rationality,” *Ecotheology*, 5 and 6 (1998-99), p. 188; Porta, and Diani quoted by Plows et al., p. 199.
ramming on the high seas. The purpose of these actions is the “manipulation of economic incentives surrounding ecologically destructive activities,” through property damage. This is premised on the assumption that “[m]ost businesses, both large and small, operate... at relatively small margins of profit, frequently a single digit percentage of overall gross sales. This small net profit is vulnerable to outside tampering.” Thus the goal is to raise the costs of production to the point where engaging in the act of environmental degradation is no longer profitable, and therefore causes the perpetrator to stop. Increasing expenses can be achieved in several ways. The actual destruction of property is in itself costly. It costs money to repair a bulldozer that has been monkey-wrenched, a fence that has been cut, or a road that has been washed-out. For example, at least twelve tree-spikings occurred in Northern California in 1990, and it was estimated that in the same year the costs of such actions in the United Sates cost the timber industry $25 million dollars. Similarly, in July of 2006, ELF claimed responsibility for the sabotage and destruction of dozens of construction vehicles at a Toronto condo development which resulted in over $2 million dollars of damage. More recently, on March 3, 2008, in Woodinville, Washington, ELF slogans were left at the site of the ‘Street of Dreams’ development project, that was consumed by arson resulting in over $7 million in damages.

45 Vanderheiden, p. 438; Plows et al., p. 199.
46 Hellenbach, p. 18; Letcher, p. 64; Plows et al., p. 208.

Attacks are carefully documented in such magazines as Green Anarchy, which maintains a section dedicated to listing instances of “Ecological Resistance,” including locations, damages, and excerpts from communiqués, in every issue. See for example
Ecotage can also increase the long-term cost of doing business, adding to a companies production cost by increasing the need for security in order to prevent future acts of ecotage, leading to increased insurance premiums. Not all corporations or companies operate at a narrow profit margin however; in these instances more drastic action have been employed. The company may be able to sustain profits, but continued attacks can frighten share holders and generate negative publicity.

Several instances of ecotage demonstrate that it can greatly increase the cost of harming the environment. Three case studies will be elaborated upon: 1) Sea Shepherd Society naval rammings, and other operations on the high seas, 2) the Sea Shepherd Society’s destruction of the Icelandic whaling fleet, and 3) the Vail fire-bombings conducted by ELF.

On July 16, 1979 the Sea Shepherd Society’s 206-foot-long ship Sea Shepherd, bristling with barbed wire, its bow reinforced with several tons of concrete, and under the command of its radical captain Paul Watson, rammed and disabled the pirate whaling ship Sierra, off the Portuguese coast. In the end, the crippled Sierra would struggle into harbor, and the Sea Shepherds would scuttle their ship in order to prevent it from being turned over to the whaling company as compensation. The Sierra was irreparably damaged. Considering the number of whales a single whaling vessel can harvest, the act of destroying the Sierra resulted in the Sea Shepherd Society saving a considerable number of whales. Thus the Societies goal of saving whales was

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52 In March 2008, the Australian reported, “Japanese authorities believed their whaling mission in the Antarctic [killed] little more
achieved by attacking the companies capacity to harvest those whales.

Following the Portuguese acceptance of the whaling moratorium, the Society carried out similar attacks against the Japanese whaling fleet which continues to harvest whales.\textsuperscript{53} Member of the crew of the Sea Shepherd vessel, the \textit{Farley Mowat}, have attempted to “bolt metal plates over outlets in the hull of the Japanese ship \textit{Kaiko Maru}, to prevent the outflow of the blood of butchered whales.”\textsuperscript{54} They have also fired canisters of butyric acid (improvised stink bombs), pie filling and flares from the \textit{Farley Mowat}.\textsuperscript{55} As recently as March 3, 2008, Japanese government officials alleged that the crew of the Sea Shepherd vessel \textit{Steve Irwin} threw canisters containing butyric acid at the \textit{Nisshin Maru}, allegations which were later confirmed by the Sea Shepherd Society.\textsuperscript{56} These actions hinder the ability of these vessels to engage in whaling activities, while they are embroiled with Sea Shepherd vessels they are unable to hunt whales.

One of the most successful operations carried out by the Sea Shepherd, was their 1997 bombings of the Icelandic whaling fleet. Society members in collaboration with several locals, sunk two whaling ships using limpet mines, half of the countries whaling fleet.\textsuperscript{57} Watson was latter charged with the bombings and flew back to the country to stand trial, only to be promptly deported by the Icelandic government which wanted to avoid any further scandal. This incident was significant for two reasons. It had

\textsuperscript{53} Japan does so via a loop hole which allows for hunting to continue for scientific research, Ibid.
\textsuperscript{56} ABC News, “Japan Says Sea Shepherd Protesters Threw Acid.”
\textsuperscript{57} Telegram, (St. John’s Newfoundland), May 7, 2005.
a serious impact on the fleet’s capacity to whale, and led to extensive policy changes within Iceland. As noted, the bombings were carried out with the help of several locals, this “violated a strongly held code of social behavior in that close-knit, law abiding society.” The fact that one of their own would participate in such an action caused many Icelanders to reflect, and many came to the conclusion that whaling was wrong. Iceland has had a checkered history with whaling, joining the International Whaling Commission’s moratorium in 1989, and then leaving in 1992, only to rejoin in 2002. As recently as 2006, Iceland has announced its intentions to resume commercial whaling once more. Regardless of Iceland’s future whaling operations, it is clear that her ability to hunt whales was significantly reduced by the incident.

In 1998 fire-bombs ignited the ski lodge and damaged two chairlifts in Vail Colorado. The ski hill had been the site of controversy, as many locals claimed that proposed expansions threatened lynx habitat. Along with the bombing, the Earth Liberation Front released a statement warning of future attacks if the plans for expansion went ahead. The estimated cost of the damage was between $12-26 million. This operation stimulated debate within the community and on March 11, 2007 the resort announced it would once again develop the ski hill. However, the $1 billion development is described as “the largest ‘green’ project at a North American ski resort,” a project that has received certification from the Leadership in Energy and

58 Dale, p. 182.
59 Ibid.
63 Vanderheiden, p. 426.
Environmental Design system (LEED). This case study demonstrates the reason why ecotage is seen to be effective strategy by radical environmental organizations, ELF made community environmental organizations in Vail appear more moderate, and thus increased the likelihood that developers would constructively engage them.

Dave Foreman, a founder of Earth First! is quoted in his book, *Confessions of an Eco-Warrior*, that “A major accomplishment of Earth First!... has been to expand the environmental spectrum to where the Sierra Club and other groups are perceived as moderates.” Such a statement illuminates the third reason as to why some environmental organizations have adopted ecotage. By radicalizing, groups expand the available spectrum of environmental organizations, the result is that other, more conventional organizations are considered moderate in comparison. Polluters are given the choice between the lesser of two evils. By adopting radical positions, groups who engage in ecotage assure that other, more moderate groups will be given a seat at the bargaining table. Foreman continues, noting that “[e]very available tool needs to be employed; every style... [t]he conservationist spectrum needs to be fleshed out and thoroughly filled in.” The problem of environmental degradation is such a vastly complex, and multifaceted one, that “no one true path” exists to the solution, the expansion of the environmental conservationist spectrum provides for greater creative potential. Foreman is also arguing, that an expansion of the spectrum is also accompanied by greater numbers in the marketplace of ideas.

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65 Dave Foreman quoted by The Centre for Consumer Freedom.
67 Ibid., p. 172.
Conclusion:

Vanderheiden asked whether “a defense of ecotage depended upon its effectiveness as political strategy?” 68 The answer can be drawn from the aforementioned case studies, which demonstrate that ecotage can be a successful strategy, demonstrating why its use has and will continue to increase, and thus why it poses a growing non-conventional security threat. Dale declares that it is “now an almost universally acknowledged fact that political power in today’s world comes not so much from the barrel of a gun as through the lens of a camera.”69 The media has never before been so important to a movement that depends upon getting its message out to the greatest number of people possible. Radical environmental groups have adopted the strategy of ecotage as a means of “firing off a press release[s] instead of ballistic missiles.”70 Ecotage has been effective at mobilizing popular support, aiding groups in achieving their goals, hindering the activity of those who cause environmental degradation by attacking them in the public eye and the pocket book.

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68 Vanderheiden, p. 436.
69 Dale, p. 121.
70 Hunter quoted by Dale, p. 17.
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