

Giving credence to philosophical creeds: The cases of Buddhism and Veganism

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Abstract

Objectivity for jurists need not mean omniscience about all relevant matters, nor disrespect for subjective views. A more minimal, cautious objectivity can consider without prejudice what William James calls "the variety of religious experience," to see if there are any (non-)universal traits; objective preconditions for legal religious agency, including: (i) moral imperatives; (ii) sincerity; (iii) moral welfare; (iv) non-violence; and (v) mental competency; and a pluralism that errs on the side of diversity and respect for different views. A fictional case study suggests that a philosophical Buddhist may be substantively legally entitled to vegan meals in hospitals and prisons.

Introduction

Certain Christians or Jews claim that veganism (avoiding animal products) is a part of their religion. For example, British theologian Andrew Linzey is an Anglican who believes that God assigns animals "theos-rights," or rights based in divinity. (Linzey, 1976, p. 17) Linzey and his Judeo-Christian comrades are often considered eccentric, but vegetarianism is standard for many Buddhists, Jains, Zoroastrians, and Brahmans. Consider a fictional case study. Theo and Grace are Buddhists, jailed for non-violent civil disobedience at a protest. They are different. Theo worships Buddha, is a supernaturalist, has rituals, a lotus symbol necklace, is ascetic, and attends Buddhist study groups on reality as ever-changing. Such a Buddhist more than meets the Ontario Human Rights Commission's specification of creed:

Creed is interpreted to mean 'religious creed' or 'religion.' It is defined as a professed
[1] system and confession of
[2] faith, including both

[3] beliefs and
[4] observances or
[5] worship.

A belief in a God or gods, or a single supreme being or deity is not a requisite.
(OHRC, 1996, p. 4; numbers and vertical listing of items added)

Grace, however, follows Buddhist *philosophy*, and yet considers herself to have a religion. She has no rituals, worship, symbol, asceticism (she eats fairly indulgently), belief in the supernatural, professions of faith, and is affiliated with no temple. Yet she considers herself religious because:

1. She decides on religious questions, which is a form of religious agency.
2. She adheres to the Golden Rule as a universal religious creed, extended also to nonhuman animals: "That which is hurtful to you do not to your neighbour."
3. She views the Golden Rule as an ultimate, contemplative response to the universe, and therefore as a religious posture, unlike mere conformity.
4. She reveres all sentient beings (who have feelings and desires), and views this as important as another person revering God, the Buddha, etc.

Grace does not expect everyone to agree with her, but does wish everyone to respect her. Now Theo is served vegan meals because he is deemed to have a creed, whereas Grace is denied such fare. She feels miserable as a result. I will argue that the government has no business deciding the religious-philosophical question as to whether Grace is "genuinely" religious, and should let her decide for herself, thus respecting what she calls her "religion." Only in this way can the government give Grace, and others like her, the benefit of the doubt in favour of respecting diversity and the freedom to choose. Canadian law views legal religion as "subjective," but I will argue that this finding, plus a rather expansive definition of "creed," are compatible with minimal objectivity on the part of the state.

A legal definition of religion must objectively consider non-universal traits, and we must be very cautious about insisting on such traits by legal definition. I argue that it is discriminatory and without objective warrant for the OHRC (1996, p. 4) to insist on such traits. It is not the state's business illiberally to determine whether Grace is a religionist in any absolute sense, including for the purposes of the law. The freedom of religion framework that I conclude with will perhaps be more objectively impartial in allowing Grace to decide this question for herself.

Philosophers can be useful jurists or legal scholars since they seek consistency, conceptual clarity, and justification. There are three streams of orientation towards the law:

- (i) precedent
- (ii) policy
- (iii) substantive

The first looks to prior cases, the second to existing formal directives, and the third to fundamental legal principles such as rights, freedoms, and democracy. Legislators create or rescind laws in light of substantive ideals, and judges may strike down what they regard as “bad law” for contravening such principles. I will be doing substantive law here, deploying philosophy and anthropology in a way that is critical of traditionalist case and policy law. However, I will also touch on a few landmark cases.

Twelve characteristics that not all self-professed religions exhibit

A *pluralist* definition of religion, in my analysis here, would highlight what all religionists share in common. A **singularist** definition is a new term that I am introducing here, denoting what religion is to some individual, in terms of both thought and practice. It does not necessarily imply *exclusivism* or rejecting pluralism. Singularism versus pluralism turns out to be a crucial distinction. The following traits appear to belong to religions in a singularist sense. Objectively, they are not true of the plurality of possible religions. Note that in the following, I have added bold emphasis to those aspects of religion in 1. to 5. that are insisted on by the OHRC in the passage reproduced above.

1. **Belief in God or worshipping of someone/something [OHRC: “beliefs” and “worship”]**
2. **Belief in the supernatural [OHRC: “beliefs”]**
3. **Rituals [OHRC: “observances”]**
4. **Faith [OHRC: “confession of faith”]**
5. **Ultimate answers [OHRC: “a professed system...of faith”]**
6. Symbols
7. Proselytizing
8. Formality, solemnity, and institutionalization
9. Asceticism
10. Moral absolutism
11. Inflexibility
12. Plausibility to others

Discussed in order, then:

1. Belief in God or worshipping someone/something. Religionists, it is agreed, do not need to believe in God. (OHRC, 1996, p. 5) However the OHRC’s requirement that creeds must have “observances or worship” would cut off Grace’s Buddhism from the plurality of religions. Given that not all religionists worship God, why need they worship, say, a human, angels, or idols instead? It is therefore prejudicial to require “observances or worship.” Also, is “observance” synonymous with “worship,” or does the former mean rituals? Jains worship some humans, but we cannot *require* such a practice of anyone. After all, traditional religionists would often balk at the idea of worshipping a human. Yet the OHRC may be implying that one had *better* worship some entity—or else one will be denied freedom of religion privileges.

2. Belief in the supernatural. Grace is not alone in disbelief here. Many Unitarian Universalists are materialists or agnostics on this matter too, as are some Taoists. Some of the latter subscribe to ancestral spirits or nature spirits, while others live strictly by what they can experience for themselves.

3. Rituals. Paul York applies Catherine Bell's theory, asserting that animal rights protests are ritualistic. (York, 2011) We can add that vegans ritually avoid animal products even as Jews oftentimes avoid non-kosher foods. Jewish law is sometimes based in compassion, as in, "Thou shalt not plow with an ox and an ass together," (Deuteronomy 22:10) presumably because the weaker ass cannot keep up with the mighty ox. And we cannot *require* "sacred" rituals if that implies the supernatural (see point 2.).

Yet even though a case can be made for vegan rituals (which I include here because many jurists tend to be conservative), rituals themselves are not universal to self-styled religionists. The Jain, Kanji Swami, sought to reform his religion, preaching that "...the soul is an eternal reality, therefore, we should strive to fully understand the nature of the soul without any emphasis on rituals." (Parikh, 2007, p. 186) Many Christians practice the Golden Rule, but not rituals such as prayer, church-attending, thanksgiving, confession, etc. To say that these persons' agency is non-religious seems rather non-objective. Grace, like the Jain mentioned above, *intentionally* is a non-ritualist because her Zen Buddhism typically dictates that enlightenment or *nirvana* can be achieved through direct insight, not reasoning or rituals. Buddhists may reject rituals as encumbrances for the ever-distractible "monkey mind," which obsesses with rationalizations and conventions. Zen is fluxist, insisting that change is the only constant, along with the ancient Greek philosopher Heraclitus, who wrote that we cannot step in the same river twice. Thus rituals may be seen as arbitrary and illusory attempts to lend stability to our existence.

Sometimes, though, Zen Buddhists use *koans*, or ritual riddles designed to free the mind from logical entrapments. A famous example goes: "What is the sound of one hand clapping?" Tibetan Buddhists craft elaborate pictures made from coloured sands, and then let the wind whisk it all away. It is a tribute to impermanence. But such rituals are optional, and do not constrain Grace. Taoists sometimes view rituals as unnatural, human-made rigidities characteristic of the Confucians, against whom many Taoists rebelled. The latter see spontaneity as more natural than ceremony. If a Hindu and a Christian have *no* rituals in common, then how could religionists be expected by the OHRC to have *any* fixed list of rituals? In light of these observations, it appears bullishly ethnocentric to require religionists to have rituals.

Are rituals to relate to God? But Jains, Buddhists, Taoists, many Native spiritualists, and so on, do not believe in God. Yet there are only minds and mindless beings in this universe. The mindless entities presumably do not care if we practice rituals, and neither do a great many of the beings with minds. It becomes a puzzle, then, how more

or less mechanical forms of action can be *necessary* to practice. Unitarians Universalists say that people can set their own rituals, and that prophets were not specially privileged with divine insight or approval. Ethics is what the Unitarian Universalists emphasize. It would be contrary to religious freedom to require rituals of all religionists. Non-ritualists do not need to be deemed right, but only *respected* as a matter of rights.

4. Faith. Paul York, a doctoral student in religious studies, informs me that according to theologian, Paul Tillich, and philosopher, Immanuel Kant, a “religion” can be defined very broadly to mean “moral faith.” Well, vegans can have moral faith, but so can Friedrich Nietzsche, who prescribed, in *The Genealogy of Morals*, violently enslaving the majority of society in order to serve the gifted. So “moral faith” cannot be enough for a legal religion.

Grace, like many Buddhists, *rejects* faith. Walpola Rahula’s *What the Buddha Taught* reports Gautama Buddha’s own view, when he advised a town plagued by doubts:

...it is proper that you have doubt, that you have perplexity, for a doubt has arisen in a matter which is doubtful...[D]o not be led by reports, or tradition, or hearsay. Be not led by authority or religious texts, nor by mere logic or inference, nor by considering appearances, nor by the delight in speculative opinions, nor by seeming possibilities, nor by the idea: ‘this is our teacher’. But...when you know for yourselves that certain things are unwholesome...and wrong, and bad, then give them up...And when you know for yourselves that certain things are wholesome...and good, then accept them and follow them. (Rahula, 1974, p. 3)

Buddhism therefore does not necessarily have articles of faith, (*Ibid.*, p. 3) and so is not necessarily a “faith tradition.” Rather, ignorance is denounced as the root of all evil. (*Ibid.*, p. 3) A student struggling with a mathematical problem needs to *understand* the solution, not just *believe* it. (*Ibid.*, p. 3)

5. Ultimate answers. Gautama Buddha was humble before the great mysteries of existence, cautioning as we have seen against leaps of faith. A disciple once asked the Buddha to decide:

...(1) is the universe eternal or (2) is it not eternal, (3) is the universe finite or (4) is it infinite, (5) is soul the same as body or (6) is soul one thing and body another thing, (7) does the *Tahagata* [one who is said to have become fully enlightened, such as the Buddha—DS] exist after death, or (8) does he not exist after death, or (9) does he both (at the same time) exist and not exist after death, or (10) does he both (at the same time) not exist and not not-exist. (Rahula, 1974, p. 13)

Gautama Buddha reportedly suggested that we focus on suffering, which we *do* know about, (*Ibid.*, pp. 13-14) not a “wilderness of opinions.” (*Ibid.*, p. 12) Buddha is even cautious about the denial of self, so key to Buddhism. Therefore, even so much as an *interest* in ultimate questions cannot be expected of all religionists. One of the most

thoughtful Christians, Immanuel Kant, in *The Critique of Pure Reason*, expressed befuddlement over ultimate questions, and a Socratic duty to profess ignorance. Other religionists are mentally disabled or otherwise unable to grapple with such queries, and should not face that mode of harmful discrimination known as *ableism*. Even gesturing at ultimate questions may be profound, as is awe and wonder in the face of the universe, but it is too much for the OHRC to proclaim that a religious creed must have so much as a “**system**...of faith,” (1996, p. 4; emphasis added) in light of these reflections.

6. Symbols. Some find these to be deeply meaningful, but Grace does not need such a formality. Taoists similarly dispute language, among other formalities and conventions, sometimes using the Yin-Yang symbol. But the latter only stands for part of their beliefs—cosmic balance—and non-Taoists use that symbol too.

7. Proselytizing. Jamison *et al.* (2000, p. 314) try to show that animal rights adherents engage in this practice, but that does not describe all such believers, just as not all Jews or Jains support activism to “spread the word.”

8. Formality, solemnity and institutionalization. Vows, confessions, crosses or rosary beads, high holy days, and religious authorities are outside of Grace’s self-styled religion. Some Christians might have little more than the Golden Rule as God’s word. Grace is the sole practitioner in her neighborhood, and favours individual spontaneity. Should she face sheer discrimination as a consequence?

9. Asceticism. Jamison *et al.* suggest that veganism is “bordering on asceticism,” (2000, p. 317) However, many vegans are indulgent epicures, and Tantric Buddhism, well-known for its sexual practices, counsels indulgence as a partial means for overcoming suffering in this life. (Most Buddhists preach Buddha’s so-called “Middle Way” between asceticism and indulgence though.) Yet vegans need not be pressed with the indignity of being forced to grope for practices shared by other religionists.

10. Moral absolutism. Although this reflects majority religion, consider Buddhist ethical diversity that encompasses both vegetarianism and meat-eating; self-liberation and deferring self-liberation in order to help others; liberation through monasticism or lay pursuits; seeking relief from suffering by abstemiousness or Tantric indulgence; worshipping Buddha as divine or not; and viewing the *dharma* or laws of Buddhism as eternal versus seeing them as also subject to change. Buddhism and moral pluralism go hand-in-hand, and many Buddhists assert that reality is so ever-changing that even moral laws are not constant. Other Buddhist thinkers such as Kapleau (1982) assert a general duty to be vegetarian.

11. Inflexibility. People change their mind without dishonour, which can often happen due to radical uncertainty about transcendental matters. Yet such a restless spirit might still be devoutly spiritual or religious.

12. Plausibility to others. Minority views may not seem plausible to many jurists, but no one should so much as denigrate even animism out of respect for many Native North Americans, to take one example, or the “triune” nature of God in the Holy Trinity. Similarly, Grace’s Buddhism need only be plausible to herself.

The twelve traits considered here have been shown to be non-universal among the religions. They are only true of many *singularist* views, whereas a pluralistic definition of religion should respect the diversity that objectively exists. I do not yet see any objective grounds for arbitrarily reducing this plurality of people—including Grace—who profess to be religious. If freedom of religion means anything, it must mean that singularist views of religion should not dictate society’s pluralistic sense of religion. Separation of church and state (or spirituality and government, to be more precise) is not enough: we need a separation of pluralist and singularist senses of “religion.” Yet the state needs to define religion, or else *anyone* can claim religious freedom.

Non-violence as a necessary component of pluralistic religion

Non-violence seems required for the law *in general*, and so can be insisted upon without intruding on being free as to the contents of one’s religion. The utilitarian, R. G. Frey, suggests that not only nonhuman animals but also mentally disabled humans should be used for harmful medical research, (Frey, 1987, p. 89) rationalizing that the benefits would outweigh the harms. Ethical egoists, who can be ruthlessly selfish, and ethical nihilists, for whom “anything goes,” may also support violent practices. But virtually everyone who is mentally competent demands non-violence towards the self, so it is only consistent and fair to apply the same rule to everyone. This does not necessarily mean total pacifism. Many different moral theories support the principle of non-violence. We could even aim for non-violence as a predicted possible consensus, since most *everyone* wants it in some sense, and a consensus would prove particularly potent in a democracy. Consensus, paradoxically, would be useful for helping us deal with both religious and ethical diversity.

A pluralistic definition of religion

I agree with legal theorists Gary Francione and Anna Charlton (1992) that we can adopt the concept of a “functional religion.” In *United States vs. Seeger*, Seeger convinced the U.S. Supreme Court that his creed is: “devotion to goodness and virtue for their own sakes,” (USSC, 1965) and the court concurred that this “ultimate concern” (a phrase explicitly borrowed from Tillich’s 1948 book, *The Shaking of the Foundations*) occupied a place in the man’s life parallel to that filled by God in traditionally religious persons. (see also USSC, 1970, and Francione and Charlton, 1992, p. 27) However, violent Nietzscheans, egoists, and nihilists have “ultimate concerns” too. Francione and Charlton suggest that people should decide for themselves if they have a religion, since the law “should not burden the exercise of religious freedom.” (Francione and Charlton, 1992, p. 5) Not at all? So then

violent Satanist practices are part of freedom of religion? These nihilistic implications are not effectively vindicated by their declaration that we “cannot define a religious belief with any real precision.” (*Ibid.*, p. 28) They end up calling virtually any altruistic ethic “spiritual,” (*Ibid.*, pp. 20, 28, 29) but that seems gratuitous. In this paper, we are trying to be at least minimally objective about the concept of religion.

Regardless, we can accept the Court’s “functional religion” doctrine alluded to above. The logical alternative is deeming to be a religion what does *not* function like a religion, or denying that something is a religion even though it truly *functions* as one. However, we can invoke another aspect of objectivity: **objective preconditions**. The latter specify what is absolutely needed for something to occur, such as soil, water, and light being needed for trees to grow, other things being equal. This is objectively the case. Similarly, any religion, for freedom of religion purposes, must have the following functions:

1. a **moral imperative** (without which we have essentially aimlessness)
2. **sincerity** (or else one would not care about the given liberty)
3. **moral welfare** being at stake (without which unfreedom would seem no burden)
4. **non-violence** (as a necessary precondition for self-consistent *law*, as argued above)
5. **mental competency** (as an objective precondition for what needs to be respected under religious freedom, or else psychotics would need to be catered to; that said, the mentally ill may have normal preferences such as for vegetarian meals which should be honoured, respectfully giving such people the benefit of the doubt)

Each function, as briefly indicated, seems necessary for the functioning of religious freedom under the law. They are also perhaps sufficient, if we cannot require any of our twelve traits listed earlier. Unfortunately, I only have room to sketch this argument here, rather than to develop it in any robust sense. Suppose it is objected that the five aspects of pluralistic religion do not sufficiently resemble religion. I have established that the basic religionist need not so much as have a serious interest in ultimate questions. However, advanced inquiries into religious questions will indeed meditate upon matters traditionally considered religious, and so one will find “normal” religious content after all. It could be objected that the pluralistic sense of “religion” does not resemble any original, historic sense of “religion.” True, but that objection commits the genetic fallacy. The U.S. Constitution did not start out respecting both sexes and people of colour either, but that document has been pluralistically amended as well.

If a majority of singularist religionists were to “gang up” on Grace, that is not necessarily democratic in the best possible sense. Democratic rights and freedoms should be given to *all* citizens alike, not just to the majority. Grace and others should be pro-actively informed of a suitably generous religious freedom too, or she may not have any real choice about what to eat in prison for example, unlike Theo. Grace should not face arbitrary and harmful discrimination as compared to Theo.

The OHRC proclaims, in dated fashion: “Creed does *not* include secular, moral or ethical beliefs or political convictions.” (*Ibid.*, p. 5) My analysis, however provisional, implies a contrary result. Not *all* secular ethics conform to the necessary pre-requisites of a “religion” for our purposes, though, e.g., pro-violent Nietzscheanism. But Grace’s view would qualify as a religion, as would any secular vegan’s practices that are mentally competent, non-violent, and that heed a sincerely held moral imperative which, if blocked, would degrade his or her moral welfare, leaving such an agent forlorn.

Objectivity requires absence of bias. It is unclear how the state could *objectively* reject Grace as a *bona fide* religionist. The following are substantive reasons why the state should not deny Grace’s claim to be a religious practitioner. The first four address, respectively, her four reasons listed earlier as to why she views her philosophical Buddhism as religious:

1. The state might deny that Grace is exercising religious agency even when she is addressing religious questions, and even though atheists likewise have religious agency when they are fired for their beliefs.
2. The state might deny that the Golden Rule is a universal creed, contrary to what many religious studies have long established.
3. The state would have to show that adopting the Golden Rule as a contemplative response to ultimate reality is somehow *not* a religious posture, contrary to what Grace believes.
4. The state might try to show that revering sentient beings is irrelevant, even though it is germane to Jains, and Theo’s Buddhism, to use only a few examples.
5. The state cannot rightly get on a pulpit and declare what “true religion” is. That is a private, singularist matter, and just because the state *can* be harshly dogmatic does not mean that it *should* be so.
6. The state as such **cannot** objectively decide this issue: panels of experts would be biased if they happen to insist on any of the non-universal traits, thus dismissing views that are different (which nears the heart of oppression); governments issuing dogmas is neither reasonable nor appropriate; public polls involve a popular mass which may know nothing about the subtleties of views such as Grace’s; debates would be inconclusive and divisive, as would be the hiring of academic consultants.
7. Many religious Buddhists such as Theo might also concede that Grace is religious.
8. Philosophy is at the *heart* of Buddhism and, say, Unitarian Universalism, so how could Grace’s philosophy not be “religious” enough?
9. Can we have “too much” philosophy in a religion? Many “mainstream” religionists base their practices in philosophical arguments for the existence of God, or sympathy with the Christian ethic, etc.
10. Buddha himself, being putatively nondogmatic, refused to control his order of monks, (Rahula, 1974, p. 2) so it is extremely unlikely that he would insist on any of the twelve non-universal traits.

11. Democracy should represent “the people,” but it does not respectfully represent *all* of the people if Grace is dismissed as “not genuinely religious.”
12. If the state arrogates to itself the right to decide this issue, then it might as well start intervening in philosophy of religion seminars at universities in the form of an ideological police force. The late Canadian Prime Minister, Pierre Trudeau, once warned: “The state has no business in the bedrooms of the nation.” Well, it should not reserve seats in seminar rooms either.

I find that these are overwhelming reasons why the state has no business simply denying that Grace is a religionist. She should have the freedom to decide for herself, since she is non-violent and otherwise satisfies the five objective preconditions for religious agency. The state should not side with the forces of intolerance when facing the diversity of those who claim to be religious. The heart of oppression relates, after all, to bare rejection of differences.

The OHRC has stated: “‘Creed’ is defined subjectively.” (OHRC, 1996, p. 5) Yet the state can nevertheless be minimally objective in concluding:

1. There is an array of religious traits that are objectively non-universal among self-professing religionists. None of the five traits quoted from the OHRC (1996, p. 4) above, including “observances or worship,” are universal to all phenomena labeled “religions” in this world by intelligent and well-meaning people.
2. There are five objective preconditions for religious agency as pertains to legal freedom of religion.
3. There seems to be a lack of objective grounds for narrowing the diversity of views that claim to be religious except for the objective pre-requisites ruling out violent Satanism, psychotic messianism, etc.
4. It is objective to acknowledge that there are plausible arguments that the state should *not* decide philosophy of religion questions, such as whether Theo is religious but Grace is not. These arguments include Grace’s own reasons as to why her own Buddhism is religious (which may be virtually irrefutable if we do not resort to prejudice or singularist preconceptions), and also the inference that the state lacks any objective means of answering our question about Grace (e.g., state declarations of law and policy, debates, panels of experts, consultants, polls, etc.), and therefore should not “police” citizens in relevant respects.

I realize that the aspect of objectivity relied upon in the fourth point listed above—acknowledging plausible arguments—is more nebulous and inconclusive than objectively surveying types of phenomena, identifying objective preconditions, or even identifying a seeming lack of objective grounds. *But that is part of the point.* In a pluralistic society, we *respect* plausible claims from others, and do not pretend to have a monopoly over acceptable assertions, as the state seems to do in frequently arrogating to itself the right to weld “religion” to *any* of the twelve non-universal characteristics.

It might confusedly be thought that minimal objectivity conflicts with the “subjective” nature of creed outlined in the *Syndicat Northcrest v. Amselem*, Supreme Court of Canada decision. The court explicitly explicates creed as “subjective or personal,” rather than as “some sort of objective religious dogma,” and *personal* views are not necessarily dictated by “official religious dogma or...conformity with the position of religious officials.” (SCC, 2004, p. 4) This fits perfectly with my resistance to singularist religions imposing either upon people, or indeed the pluralistic sense of “religion.” Instead, let Grace “personally” decide for herself. Being reserved about pretensions of religionists that they are “objective” in their statement of dogmas is entirely different from denying minimal objectivity to the *state*, including in relation to matters religious. (Also, the Court’s emphasis on sincerity (*Ibid.*, p. 5) is identical with the second of my five objective preconditions.) The judiciary needs to be as objective as possible in general.

A fuller discussion of the issues related to this paper could certainly lead to a book. I have not had space to discuss more than a tiny bit of the literature; non-violence theory; the Golden Rule as universal creed; answering of key objections; testing my quintuple-preconditions framework on cases such as Sikh boys wearing ceremonial knives known as *kirpans* to school; and so forth.

Conclusion

Justice and non-violence demand that we must consider equivalent, preventable harms, such as degradations of moral welfare from Grace’s current lack of religious freedom as compared to the case of Theo. The latter innocently enjoys the spoils of arbitrary favoritism. If the results of this paper are taken seriously, it seems that objective grounds empower us to suggest that secular veganism, just as Grace’s Buddhism, may be deemed either a creed or a *component* of a creed, and this is wholly coherent with the cited 2004 Supreme Court of Canada ruling. The state cannot *objectively* deny that Grace or the vegan is “religious,” although OHRC policy implies such a denial. Moreover, democracy impels us to promote pluralism and diversity. The OHRC embraces these ideals, (OHRC, 1996, p. 16) but not yet fully in its rather twentieth-century sense of “creed.”

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