

Why *Humanae vitae*
Is Still Right

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Only Union Plus Fruit Equals Love

*A Personalist Explains the Teaching of Humanae vitae**

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Introduction

The fiftieth anniversary of *Humanae vitae* gives us the opportunity to meditate once again on the Church's teaching on the generation of new human life, and on the magnificent articulation of this teaching in recent decades, coming from both magisterial documents and from the writings of many religious and lay faithful. While the Catholic Church's stance on contraception is perennial, over the last century an entirely new light has been shed that illuminates aspects of marriage and the marital act previously remaining in the shadows. Perhaps one could cautiously suggest that this new light might even constitute a development of doctrine in the Church's moral teaching.¹

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¹ Some examples of norms brought into focus in a new way in the course of recent reflection: see how *Donum vitae*, the document giving the Church's teaching on in vitro fertilization, illuminates the child's right to be conceived in an individual, the concrete act of love of the spouses for each other (Congregation for the Doctrine of the Faith, Instruction on Respect for Human Life in Its Origin and on the Dignity of Procreation *Donum vitae*—Replies to Certain Questions of the Day [February 22, 1987], http://www.vatican.va/roman_curia/congregations/cfaith/documents/rc_con_cfaith_doc_19870222_respect-for-human-life_en.html). See also the way in which Karol Wojtyła's *Love and Responsibility* shows with new clarity the absolute demand that each spouse approach the other as an end in himself or herself in the conjugal act; and see the way in which the Theology of the Body gives a deep grounding to the need for chastity within marriage—and we could give many more examples.

The new reflections on this old subject arose in the face of unprecedented challenges from the modern world, challenges that included the accusation that the Catholic teaching poses a threat to the love between the spouses. In response, the Church sought to pronounce more clearly on the dimension of love proper to marriage. The result was a great deposit of writings yielding a breathtaking depiction of the grandeur and sublimity of spousal love, which yielded, paradoxically, a new and deeper grounding of the essential fruitfulness of marriage, and of the marital act.

In spite of the countless resources now available on the topic, objectors to the Church's teaching continue to misunderstand and misrepresent it.² Just like the early dissenters, they interpret the prohibition against contraception as having its foundation in the person's biological dimension, as forbidding a disruption of the physical end of the act—a position that they label as "biologistic". Dissenters charge that the Church subordinates the love of the spouses to the physical, animal structures beneath them as persons, and thus denies the great scope it would otherwise have if the life of the spirit were allowed free play. But recent orthodox writing on the issue makes clear that the prohibition against contraceptive acts derives from the nature of love itself—the very thing the dissenters are so anxious to guard—rather than from the mere biological structure of the sexual act.

The central point of the teaching's new cast is found in a more precise interpretation of the traditional "two ends" of the marital act, the unitive and the procreative: firstly, they are both together affirmed as making up marital love, and secondly, they are declared to be inseparably united "meanings" of the sexual act,³ and more precisely, as co-implying each other—such that rejecting the procreative dimension is not merely to deny a possible consequence of the marital act, but would amount to a dismantling of the act as an act of love. What the Church, up to this point, had referred to as the two ends of marriage—without speaking of

² A secondary impetus for the writing of this article is a recent statement put out by the Wijngaards Institute, which repeats many of these misinterpretations: Wijngaards Institute, "Catholic Scholars' Statement on the Ethics of Using Contraceptives", August 2016, <http://wijngaardsinstitute.com/statement-on-contraceptives/>.

³ See Paul VI, encyclical letter *Humanae Vitae* (July 25, 1968), no. 12, trans. Janet E. Smith, in *Humanae Vitae: A Challenge to Love* (New Hope, KY: New Hope Publications, 2006) (hereafter cited as *HV*).

the organic connection between them—turns out to be more precisely two dimensions of one and the same reality: the reality of love.

What I offer here is not a technical philosophical analysis, but a philosopher's meditation on the centrality of love in this new vision reflected in recent Church instruction on the procreation of new human life. Since so many of the misunderstandings of the teaching on contraception center on a misunderstanding of the place of the bodily dimension in that teaching, I will focus on showing the particular way that the body has moral significance in the equation, thereby demonstrating that the Church's view is in no way biologicistic. On the contrary, it is not merely because of the natural biological end of the act, but because of the law of love that contraception goes against the truth about sexuality. I will show that it is because the bodily act is formed and shaped by the spiritual reality of love, and therefore in some mysterious, but real way, participates in it, that the bodily act of marital union is subject to its laws. This "law of love", as we will see, protects the essential fruitfulness of the marital act.

The picture of sexuality presented here will be very different from the one found in our present culture. Sex is generally taken as not having much inherent meaning; rather, it is something into which one may enter casually. But the contrary is the case: because sex is related to the most intense kind of human love that exists in the depth of our being, and because it is related to the creation of new human life, sex is in fact inherently and deeply meaningful. As a bodily expression of marital love, and as the source of human life, sex will turn out to be as deep as these two realities, and to occupy a central place within the human person.

As a final point by way of introduction, some readers may notice that my defense here of *Humanae vitae* is not the traditional one. The traditional philosophical defense focuses on the natural teleology (goal-directedness) of the marital act toward the coming into existence of new human life. Since the goal of an act determines its nature, this position holds, the act is by its nature procreative, and so to contracept is to destroy the nature of the act. This position defends itself against biologism by adding that the workings of nature in this case belong to a personal being and so are not merely biological. I believe that something is missing in this traditional defense, which still leaves it vulnerable to the biologicistic objection. Without contradicting the traditional position, I seek to ground it more deeply by unearthing one more anthropological

layer underlying the teaching of *Humanae vitae*, according to which the physical structure of the act is not as such binding, or even binding simply by virtue of existing within a personal being, but only because it is in its *metaphysical*⁴ structure an embodiment of *love*, and therefore governed by the law of love which prohibits the separation of union from its proper fruit.

Initial Overview

We begin, then, by noting some essential truths about the nature of love. Firstly, love is made up of two dimensions: union—brought about through the mutual self-giving and receiving of two persons—and fruitfulness. That fruitfulness is part of love can easily be seen by anyone who has experienced love, and especially romantic love—this close union of persons gives rise to a new life within the souls of those who love, a kind of new way of being. But secondly, there is an inherent generosity to love, whereby it seeks to go beyond itself, to bestow good on others. In fact, going back to Plato, many authors have observed that new life has its source in love. John Paul II notes that only a being who loves goes outside itself to give the gift of existence to another being for its own sake. He writes about this essential connection between love and creation in the following passage:

The Creator is he who "calls to existence from nothingness," and who establishes the world in existence and man in the world, *because he "is love"* (1 Jn 4:8). We admittedly do not find this word love (God is love) in the creation account; nevertheless, that account often repeats: "God saw everything that he had made, and indeed, it was very good" (Gen 1:31). Through these words we are led to glimpse in love the divine motive of creation, the source, as it were, from which it springs: *only love, in fact, gives rise to the good and is well pleased with the good* (see 1 Cor 13).⁵

⁴For the reader who may not be familiar with this technical philosophical term, it refers to elements in a thing that make up its deep structure.

⁵John Paul II, *Man and Woman He Created Them: A Theology of the Body*, trans. Michael Waldstein (Boston: Pauline Books and Media, 2006), 13:3, emphasis in original. References are to the audience number and paragraph number. Hereafter, all Theology of the Body references will be cited as TOB.

This dimension of love becomes clearer when we consider how impossible it is to associate love with destruction, diminishment, negation, or even a self-directed, self-enclosed sufficiency. No, love is by its very nature superabundant, paradoxically always greater than itself.

Moreover, the giving of love is not merely a giving of something, but is always simultaneously—and even more centrally—a giving of self to the beneficiary. In a beautiful passage in *Dives in misericordia*, John Paul II refers to this essential, self-giving character of love, particularly in the gift of man's creation. There he tells us that the concept of "fatherhood" captures the sense of a creative act that is much more than simply an act of bringing a new person into existence, but an act that places the creature in a love relation with the one who creates:

God, as Christ has revealed him, does not merely remain closely linked with the world as the Creator and the ultimate source of existence. He is also Father: he is linked to man, whom he called to existence in the visible world, by a bond still more intimate than that of creation. It is love which not only creates the good but also grants participation in the very life of God: Father, Son and Holy Spirit. For he who loves desires to give himself.⁶

Even more, in *Donum vitae*—the Church's document on in vitro fertilization—the Church makes clear that because of the great dignity of the human person, the coming into existence of new human life in strict justice requires a love origin.

We have laid the groundwork for considering the creation of new human life. Now, we know that God is always faithful to these laws governing creation in love. But by a free decision, God does not bring about each new human life in the fullness of its being directly. He does make each human soul individual out of nothing, but he does not directly make the body which that soul will animate. Rather, he involves human agents in his creative act; in fact, parents are "co-creators" with God. How can this be? How can all the above conditions apply in the case of a creature?

⁶John Paul II, encyclical letter *Dives in misericordia* (November 30, 1980), no. 7, w2.vatican.va/content/john-paul-ii/en/encyclicals/documents/hf_jp-ii_enc_30111980_dives-in-misericordia.html.

The first question is about the love origin of human life: How is it to be preserved, considering the cooperation of human agents? Firstly, God has ordained that a child comes into existence in an act of loving union between two persons, an act in which the child then is the fruitful dimension of the parents' love. Coming into existence as the fruit flowing from the parents' union, the child is truly incorporated into a real act of love.

The second question is how it should be possible for a creature to bring a new being into existence, for only an omnipotent God can bring something out of nothing. It is here that we begin to see the significance of the human body. If a mere human person is somehow to take part in the creation of a new person, since he cannot bring it into existence out of nothing, his creativity would be about sharing something he already has. An angel, as pure spirit, does not have anything of himself to give away. But the human person, who has a body, does: he can share some of his own bodily existence with another.

But thirdly, the love origin of human creation would require one more element, as we have seen: a love origin requires self-giving to the one created, and not merely the giving of existence. How can this occur since a creature cannot give the life of his soul to another, as can God the Creator? The answer lies in the special nature of the personal body: since the human person's body is, in some important sense, truly identical with his being as person, in giving a share of his own body to another, the person does not just give the "stuff" of his body, but truly makes a gift of himself. And thus do the human progenitors truly participate in God's Fatherhood, truly becoming "parents" (and not just "efficient causes", to use philosophical language) of the child, making a gift of themselves to the child in and through their bodies.

In the creature that is the human person, then, we find that matter gives love a new power; because of the body, the fruitfulness of spousal love can take on a new dimension. A mere human person is incapable of creating a new being, much less a personal being. And yet, man is truly incorporated into the creative act of God, by virtue of the intrinsic generosity of love itself, which acquires a new ability in the life-generating capacity of the body.

The point at which we find the highest expression of love between human persons, we find the most profound meaning of the human body, in the sense of its "reason for being"—because of the body, the

human spouses' spiritual act of love is able to participate in bringing a new person into existence. As we have said, no angel can co-create. And while it would only be speculation, we might be able to go even further, and guess that the vast cosmos, the whole expanse of material reality as such, was created for one reason: so that some bits of this matter could become integrated into a personal being so that this bodily person could enter into a way of loving that grants him a participation in God's Fatherhood.

From all of this it becomes clear that to reject the coming-to-be of a child would be to compromise deeply the love itself between the spouses, for a child is the embodiment of one of the two essential dimensions of that love, as found in the particular embodied expression of marital lovemaking. In what follows, I offer a deeper explanation of these truths about love and procreation.

Deeper Reflection on Love and Procreation

John Paul II's illumination of the special nature of the body-soul unity, and his bringing to light the body's centrality in issues surrounding marriage, sexual morality, and bioethics, is to my mind one of the most important philosophical contributions of his pontificate. In his *Man and Woman He Created Them: A Theology of the Body*, he makes it clear that the human body is more than matter inhabited by a soul, but is rather a personal soul having become "enfleshed". This reality is difficult to put into language, but here are some of the ways that John Paul speaks about it: the body is "penetrable and transparent . . . in such a way as to make it clear who man is";⁷ it alone "makes visible the invisible".⁸ In his *Letter to Families*, he speaks of the soul as "embodied", and of the human body as "spiritualized".⁹ All of these ideas are meant to express that the human body is, as it were, the very incursion of a personal soul into the realm of matter, in such a way that the body truly is the person. We could say that the human person is one being existing in two dimensions.

⁷TOB 7:2.

⁸Ibid., 19:4.

⁹John Paul II, *Letter to Families* (February 2, 1994), no. 19, https://w2.vatican.va/content/john-paul-ii/en/letters/1994/documents/hf_jp-ii_let_02021994_families.html.

Since the body is an extension of the person himself, John Paul emphasized that the body participates in the human person's subjectivity—and is not merely an "object" or instrument that he uses.¹⁰ It is "co-subject" with the person in his performance of bodily acts. This is already a hint that the spouses do not give "merely" of their bodies in the creation of a child; rather, they give themselves to the child because of their presence in their bodies.

However, this mutual "indwelling" of body and soul, found in the embodied person's way of being, is not all that underlies the gift of self in the case of the spousal act. According to Dietrich von Hildebrand, there is a uniquely deep intersection of body and soul in the sexual sphere. Sex is inseparably bound up with the center of the person. Because of this, the bodily act of sex is never merely bodily, but is, firstly, by its very nature, connected with deep spiritual and psychological experiences in the human person; secondly, it allows the spouses to make a gift of their very selves in the deepest part of their being.¹¹ Sex, he says, occupies a most deep and intimate place within the person, so that "when [sex] speaks, it is no mere *obiter dictum* (casual expression), but a voice from the depth, the utterance of something central, and of the utmost significance."¹²

Now, based on this unique character of sexuality, the marital act itself is a special kind of bodily act: it is a bodily act with an "interior space", fashioned to be "animated" from within by a spiritual reality, specifically by the reality of spousal love.¹³ Compare this with other bodily actions—such as, for example, a wave of the hand. This bodily behavior has no "inner side" and, therefore, has no intrinsic meaning. Its meaning is given to it from the outside, by convention, and can therefore

¹⁰"Man is a subject not only by his self-consciousness and by self-determination, but also based on his own body. The structure of this body is such that it permits him to be the author of genuinely human activity. In this activity, the body expresses the person; it is thus, in all its materiality . . . penetrable and transparent as it were, in such a way as to make it clear who man is" (TOB 7:2).

¹¹Dietrich von Hildebrand, *In Defense of Purity* (Steubenville, OH: Hildebrand Press, 2017), p. 3. This is why the Church has always taught that the union of marriage is not complete until the spouses enter into the marital act: the act "consummates" the marriage.

¹²Ibid. This depth of sexuality explains the privacy that surrounds the sexual sphere, as well as the salutary shame associated with it.

¹³"In virtue of its profound centrality and intimacy, as also of its mystery, sex is capable of a particular relationship with love, the most spiritual and the deepest of all experiences" (ibid., p. 5).

legitimately be changed, and the act used to mean something different. The bodily act of sex, by contrast, because it has an interior that is filled out with love, “speaks” the language of spousal love in unison with the soul, as a kind of “second dimension” of the act of love. The depth at which this act takes place—based on the unique structure of sexuality described above—means that a unique degree of reciprocal self-giving is accomplished, which is often referred to as a “consummation” of spousal love. Because of the inherent love meaning of this bodily act, it cannot be separated from this interior dimension without suffering violence.

All love is, at its heart, self-donation. Spousal self-donation takes on a particular, concrete nature or form, insofar as it incorporates the bodily dimension of the human person. But we must go further: the body augments the human act of love, adding something that it would otherwise not possess. Thus, we must say that the body “acts on” the soul, deepening both the reality and the experience of communion between the spouses. Benedict XVI refers to this marvelous exchange in *Deus caritas est*: “Christian faith . . . has always considered man a unity in duality, a reality in which spirit and matter compenetrates, and in which each is brought to a new nobility.”¹⁴ The body also augments the fruitful dimension of the spouses’ love, by allowing it to take the form of an entirely new being, a new human person.

We must note the significance of the fact that it is by means of just such an act that the human person is created. We are so accustomed to this that it no longer makes us pause. But it is not something that should be taken for granted—since God could have arranged for the creation of the human person to happen in any number of ways. In fact, however, a child is conceived in an act of love that takes place between the spouses, such that sex is not a “procreative faculty” in a straightforward manner, as it is in the animal world; rather, it is “spousal” by its very structure. John Paul writes:

The human body, with its sex—its masculinity and femininity—seen in the very mystery of creation, is not only a source of fruitfulness and of procreation, as in the whole natural order, but contains “from the beginning” the “spousal” attribute, that is, the power to express love: precisely

¹⁴Benedict XVI, encyclical letter *Deus caritas est* (December 25, 2005), no. 5, http://w2.vatican.va/content/benedict-xvi/en/encyclicals/documents/hf_ben-xvi_enc_20051225_deus-caritas-est.html.

that love in which the human person becomes a gift and—through this gift—fulfills the very meaning of his being and existence.¹⁵

As spousal, the sexual act is an act of tremendous depth and significance for the spouses themselves, involving their most intimate being—it is the consummation of the longing for union to which their spousal love for one another has impelled them; it is an act in which it is imperative that the spouses be truly conscious and aware, and focused on one another in mutual self-giving. The full meaning of marriage is achieved in the family—that is, in the coming-to-be of a child; but what we are seeing here is that the whole situation is deeply defined by the fact that it is just such an act that is at the origin of the child’s being. In the case of human generation, quite unlike animal generation, the coming-to-be of the child is the “outflow” of an act distinct from the event of its creation: an act between the spouses of mutual self-donation.¹⁶

In this concrete instantiation of love in its two dimensions, the mutual self-donation of the spouses that occurs in the marital act ends up simultaneously effecting the spouses’ gift of self to the child—as the overflow of their union. And so the coming into being of the child is also the completion of the union between the spouses, insofar as the child is the highest instance of the fruitful dimension of their love. The union of the spouses flowers into a new being that is a “living reflection of their love, a permanent sign of conjugal unity.”¹⁷ As a new agent of love, drawn into and expanding the already existing circle of love between the spouses, the child is truly the “ultimate crown” of their union.¹⁸ Having discovered this ultimate fruitfulness of the spousal act, we see that even if conception does not result from every act of intercourse, the full

¹⁵TOB 15:1.

¹⁶This is perhaps one of the reasons that the Church has never to my knowledge spoken of the parents as being required to aim at the coming into existence of the child, but only of the requirement for them to be open to its coming into existence. The argument of *Donum vitae* rests wholly on this dimension of procreation: that the conception of the child is not something that the parents “do”, but a reality of which they are the recipients. See William May’s insistence on this same point in “Begetting vs. Making Babies”, *Christendom Awake*, November 14, 2004, christendom-awake.org/pages/may/begetting.htm#_ednref8.

¹⁷John Paul II, apostolic exhortation *Familiaris consortio* (November 22, 1981), no. 14, http://www.vatican.va/holy_father/john_paul_ii/apost_exhortations/documents/hf_jp-ii_exh_19811122_familiaris-consortio_en.html.

¹⁸Vatican Council II, Pastoral Constitution on the Church in the Modern World *Gaudium et spes* (December 7, 1965), no. 48, http://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_cons_19651207_gaudium-et-spes_en.html.

meaning of the spousal exchange is found in the concept of parenthood. At the same time, we see how the spousal act, understood in this way, safeguards the love origin (required in justice) of the child.¹⁹ The child is truly incorporated into the equation of love, as a kind of "incarnation" of the fruitfulness of the spouses' union with one another.

Here, in the fruitful dimension of love, as in the case of union, the body gives the spirit a new power: through it, the spouses can be co-creators with God the Father. The spirit is indeed "brought to a new nobility" through the human person's bodily being.

We said above that the love origin of the child is safeguarded by the fact that the act in which it is conceived is an act of love between the parents. Now we can add, it is this fact that is one important reason why the Church does not allow contraception. The coming into being of a child is organically connected to the union of the spouses: the child is the concrete embodiment of the fruitfulness of spousal love in this particular manifestation—that is, in its deepest, embodied manifestation. Just like all love, the marital act "embodies" both dimensions of love, the unitive and the fruitful. And it does so in an extraordinary fashion: the total self-giving found in the union between the spouses is absolutely unsurpassed by any other human relationship of love, and the fruitfulness characteristic of love is, in this case, the coming into being of an individual person with an immortal soul, a person in his own right. Even though God could have arranged matters differently, it is clear that there is a deep correlation between the kind of union of persons taking place in and through the bodily spousal act, and the kind of fruitfulness into which it flowers.

Once we have discovered the connection between spousal self-giving and its specific fruit in this particular incarnation of love, we see that to directly make impossible the overflowing of this expression of love into physical fruitfulness is to rend love asunder, and thus (to one degree or another) to destroy it. We have seen that union and fruitfulness are

¹⁹ Safeguarding the love origin of the child is one of the main concerns expressed in *Donum vitae*: "In his unique and irrepeatable origin, the child must be respected and recognized as equal in personal dignity to those who give him life. The human person must be accepted in his parents' act of union and love; the generation of a child must therefore be the fruit of that mutual giving which is realized in the conjugal act wherein the spouses cooperate as servants and not as masters in the work of the Creator who is Love. In reality, the origin of a human person is the result of an act of giving. The one conceived must be the fruit of his parents' love" (II.B.4.c).

inseparably intertwined to make up the single reality of love. We have seen how embodied spousal love is a particular expression of this law of love: just as this act of union is wholly specific and concrete—in virtue of its bodily nature, of the special faculties employed, of its specific gestures, of its specific dynamism, of the specific spiritual and psychological experiences, of its tremendous depth—so also is the highest fruitfulness flowing from this union of a wholly specific nature. And so now we understand why the two cannot be directly separated from one another without both being undermined and destroyed. This is why earlier in the very same sentence in *Humanae vitae* in which the Church says that spouses *may not* on their own attempt to separate the union from the fruit, it first says that the connection between the two *cannot* be broken:

The doctrine that the Magisterium of the Church has often explained is this: there is an unbreakable connection [*nexu indissolubili*] between the unitive meaning and the procreative meaning [of the conjugal act], and both are inherent in the conjugal act. This connection was established by God, and Man is not permitted to break it through his own volition.²⁰

This implies that removing the fruitfulness is not to retain the union on its own, but it is also to destroy the union: because the two are organically connected, to remove one is to undo the whole.

Let us pause over this. Both dimensions of union and fruit are deeply related to the body: the body in its sexuality provides a new totality and depth of union, and the body in its fertility provides the possibility of a new person, a new immortal soul. Just as any union that rejects its specific fruit is by definition corrupted, so to make the marital act directly infertile is to give an infallible witness that the act was not entered into as an act of spousal union—that is, that the act was vacated of its intrinsic meaning. For this *particular* expression of love has tied to it this *particular* expression of fruitfulness, at least as its highest possibility. To attempt to separate the fruitfulness from the union is to witness that the bodily act, now vacated of its soul, was used as an instrument for the achievement of some end external to the act itself—perhaps pleasure or some other end.

The fact that the act is not in every individual instance fruitful in the highest possible way does not change things. Its "occasional" fruitfulness

²⁰ *HV*, no. 12, in Smith, *Humanae Vitae: A Challenge to Love*, p. 550.

in this particular way has to do with the particular conditions of human fertility—one of them being the direct action of God in creating the soul; another is the bodily rhythms that God put in place by his free decision, or even the fact that some people's reproductive faculties do not function well or at all because of a defect, disease, or age. But the fact that the conditions of fertility make it so that not every act culminates in conception in no way obscures the deep connection between the union, and the fruitfulness, and its moral implications.

Conclusion

While *Humanae vitae* reaffirmed the age-old doctrine of the Church on the generation of human life, it offered something new in casting the teaching in terms of the inseparable connection between the marital act in its two dimensions of union and fruitfulness. What I have done in these reflections is to bring out the personalist metaphysics of the marital act underlying this new cast of the old doctrine, and in doing so, have offered a strong defense against the charge that this teaching is biologicistic. While participating in some way in the rhythms of the natural world, the internal form of human sexuality is not that of animal nature; rather, insofar as human sexuality is just that—*human*—it is structured from within to be an embodiment of the personal reality of spousal love. The marital act, then, “repeats” in an incarnated way the reality of love, and as such, it is governed by the law of love. So while the specific fruitfulness of the act certainly depends on the contribution of the body, the marital act is far from being merely biological; it is spousal love become incarnate. This means, firstly, that its procreative capacity follows from its unitive character, and secondly, that the moral norms surrounding it arise from the moral norms proper to love itself. When the Church forbids contraception, it is not on the grounds of the marital act's sheer biological ordination to generation, but on the grounds that this ordination is an expression of a spiritual reality—the reality of love—that may not be rent asunder. And so Paul VI writes in *Humanae vitae* that only “if both essential meanings [*ratio*] are preserved, that of union and procreation, the marital act fully maintains its capacity for [fostering] true mutual love”.²¹

²¹ Ibid.