

# Game of Drones: On the Moral Significance of Deception in Modern Sport Hunting

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**Abstract:** *The seeming absence of mutual consent in interspecies sports makes it difficult to justify non-human animals participating on equal terms with humans in for example sport hunting. Nevertheless, hunted animals might appear to be ‘playing the game’ to the extent they resort to counter-deceptions, which often fool the hunters or their dogs. In this paper, we consider whether counter-deception by hunted animals is evidence that they are not playing the hunter’s game at all, or rather playing a different serious game of survival, one in which they repudiate the role of ‘worthy opponent’ instead by playing the role of trickster-resistors.*

**Keywords:** *Deception; Sports; Ethics; Hunting; Trapping; Animal Rights; Harm; Killing.*

## Introduction

It is not always easy to say where the line goes between skilful ruses of gamesmanship and outright deception in sports.<sup>1</sup> Scholars hence often try to find a moral compass for judging the moral permissibility of deception in sports originating in the pre-lusory (before game) agreement between participants. Such a source of moral guidance for deception is helpful when dealing with deception in sports that are on playing fields with presumed fairness and equitable conditions between participants.<sup>2</sup> This often implies tacit implicit (conventions) or explicit (prohibitive and proscriptive rules) contracts as to the categories and scope of deception that are permissible between players in a game, often even encouraged for sport.

We have a considerably more challenging task ahead of us in considering the nature and permissibility of deception in interspecies sports. Sport hunting is morally dubious by requiring the non-consensual participation of, and ultimate, lethal harm resulting from deception, to non-human ‘game-players’: animals. Is there scope for forms of deception to bring about this harm? In this case, one cannot so easily appeal to the content of and players’

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<sup>1</sup> Oliver Leaman, “Cheating and Fair Play in Sport,” in *Philosophic Inquiry in Sport*, ed. William John Morgan and Klaus V Meier (Champaign: Human Kinetics, 1995), 193–97; Kathleen M. Pearson, “Deception, Sportsmanship, and Ethics,” *Quest* 19/1 (1973): 115–18; Bernard Suits, *The Grasshopper: Games, Life and Utopia* (Ontario: Broadview Press, 2005).

<sup>2</sup> Adam G. Pflieger and Danny Roesenberg, “Deception in Sport: A New Taxonomy of Intra-Lusory Guiles,” *Journal of the Philosophy of Sport* 41/2 (2014): 209–31,

conformity to agreements as a source of legitimacy for deception and violence.<sup>3</sup> This is so, because non-human animals cannot enter into contracts<sup>4</sup>; consent to being harmed;<sup>5</sup> or opt out halfway through.<sup>6</sup> They do not enter a “mutually acceptable quest for excellence through challenge.”<sup>7</sup> This has been the key critique of sport hunting by ecofeminists.<sup>8</sup> To the animal, the stakes are fundamental welfare interests, whereas to the hunter, the hunt is an ulterior motive of sport excellence.<sup>9</sup> Certainly, there can be many virtues to be gained for the hunter through his participation, including flourishing and athletic prowess,<sup>10</sup> but on most ethical theories today, these ought not to override the fundamental rights of nonhuman animals to life. Sport hunting therefore reduces animals to mere means and objects and is morally problematic.<sup>11</sup>

Hunting has responded to the objection that it imparts frivolous violence for esoteric reasons by insisting it provides a wildlife management service to society.<sup>12</sup> Hence, hunters are keen to assert it as more serious than a game. Nevertheless, there are clear elements of modern hunting that testify to hunting being, at heart, a game valued for its own sake.<sup>13</sup> Why else would one willingly build in obstacles and challenges through codes like fair chase and choose unwieldy bows when there are efficient automatic rifles?<sup>14</sup> And why else would hunters continuously engage in what is often a ‘net drain on assets’<sup>15</sup> if not as a symbolic behaviour?

Moreover, from seeing contemporary hunting as a sport as our point of departure, we are interested in illuminating the ways in which deception is morally permissible or not. In the absence of a pre-lusory contract for the game entered into by the animals, what is the nature of deception in hunting? This inquiry involves considering to what extent hunting can

<sup>3</sup> Steven Weimer, “Autonomous Authorization of Deception in Sport,” *Journal of the Philosophy of Sport* 43/2 (2016): 179–98.

<sup>4</sup> Robert W. Garner, *A Theory of Justice for Animals: Animal Rights in a Nonideal World* (Oxford: Oxford University Press, 2013).

<sup>5</sup> Sam P. Morris, “Violence among Beasts. Why Is It Wrong to Harm Nonhuman Animals in the Context of a Game,” *The Philosophical Journal of Conflict and Violence* 2/2 (2018): 383–94.

<sup>6</sup> Sigmund Loland, ed., *Fair Play in Sport: A Moral Norm System*, 0 ed. (New York: Routledge, 2002), <https://doi.org/10.4324/9780203479049>.

<sup>7</sup> Robert L. Simon, *Fair Play: The Ethics Of Sport, Second Edition*, 2<sup>nd</sup> edition (Boulder, Colo.: Westview Press, 2003), 27.

<sup>8</sup> Marti Kheel, “License to Kill: An Ecofeminist Critique of Hunters’ Discourse,” in *Animals and Women: Feminist Theoretical Explorations*, ed. Carol J. Adams and Josephine Donovan (Durham, N.C.: Duke University Press, 1995), 85–125; Theodore Vitali, “But They Can’t Shoot Back: What Makes Fair Chase Fair?,” in *Hunting Philosophy for Everyone: In Search of the Wild Life*, ed. Nathan Kowalsky (Oxford: Wiley-Blackwell, 2010), 23–32.

<sup>9</sup> Sam P. Morris, “The Ethics of Interspecies Sports,” in *Sport, Animals, and Society*, ed. James Gillett and Michelle Gilbert, 1<sup>st</sup> edition (New York: Routledge, 2013), 127–39.

<sup>10</sup> Weimer, “Autonomous Authorization of Deception in Sport.”

<sup>11</sup> Morris, “The Ethics of Interspecies Sports.”

<sup>12</sup> Irena Knezevic, “Hunting and Environmentalism: Conflict or Misperceptions,” *Human Dimensions of Wildlife* 14/1 (2009): 12–20; M. Nils Peterson, “An Approach for Demonstrating the Social Legitimacy of Hunting,” *Wildlife Society Bulletin* 32/2 (2004): 310–21.

<sup>13</sup> Erica von Essen and Hans Peter Hansen, “Policing Peers and Selves between Law and Morality: A Socio-Legal Perspective on Managing Misconduct in Hunting,” 2018.

<sup>14</sup> Jesús Ilundáin-Agurrúza, “Taking a Shot: Hunting in the Crosshairs,” in *Hunting Philosophy for Everyone: In Search of the Wild Life*, ed. Nathan Kowalsky (Oxford: Wiley-Blackwell, 2010), 11–22.

<sup>15</sup> Matt Cartmill, *A View to a Death in the Morning: Hunting and Nature through History*. (Cambridge, M.A.: Harvard University Press, 1993), 231.

entertain positive readings of intra-sport deception, as manifesting skill,<sup>16</sup> excellence<sup>17</sup> and providing more exciting and dynamic games.<sup>18</sup> Our paper is committed to exposing the ways in which deception is manifested between hunter and game. That means we do not consider additional dimensions of deception, for example self-deception<sup>19</sup> on the part of individual hunters before, during, or after the hunt so as to neutralize their harm and killing through e.g. euphemisms or internal justifications.<sup>20</sup> Nor do we consider the deception that takes place between fellow hunters in the field, including ‘cheating’ landowners over game, accruing advantages through non-sport based lying,<sup>21</sup> spreading misinformation or using drones to drive wildlife from neighbors’ lands to their own.

While important dimensions of deception, we foremost consider the different levels of deception that take place between the hunter and the wildlife. We discuss baiting, luring, trapping, the use of camouflage, blinds and technologies. However, we also introduce animal agency.<sup>22</sup> Here, we see the sport of hunting as involving not just deception of animals, but also animal deception. This includes mapping out “opposing ruses”<sup>23</sup> in which the wildlife respond to, evade, misdirect, deceive and otherwise trick hunters and, commonly their hunting dogs in pursuit. This allows us to link deception to the concept of response-ability in characterizing how illusions interact with objective reality and targets, requiring the planner to wait to discover the impact of the ruse and respond effectively.<sup>24</sup> To capture animal response-ability to and use of deception, we consult a growing body of literature on the ‘natural wiles’ of animals, citing crafty foxes, deliberately mis-scenting hares and even plotting macaques.<sup>25</sup> We also draw on extensive anecdotal fieldwork with Swedish hunters from previous research.

How does our paper stand in relation to current ethical philosophies and debates in animal ethics? Animal rights popularly follow deontological or utilitarian foundations, corresponding to Regan’s subject-of-a-life and Peter Singer’s maximisation of happiness for sentient organisms respectively. These foundations evaluate lying and deception rather differently. On the face of it, deception between subjects-of-a-life on a Kantian rationale violates the categorical imperative.<sup>26</sup> In utilitarianism, on the other hand, deception may be more permissible, not treating entire classes of acts as wrong or right but evaluating deception on

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<sup>16</sup> Cesar R. Torres, “What Counts as Part of a Game? Reconsidering Skills,” *Journal of the Philosophy of Sport* 45/ 1 (2018): 1–21.

<sup>17</sup> Weimer, “Autonomous Authorization of Deception in Sport.”

<sup>18</sup> Dennis Hemphill, “Deeper Inside the Beautiful Game,” *Journal of the Philosophy of Sport* 32/ 1 (2005): 105–15.

<sup>19</sup> Leon Culbertson, “The Paradox of Bad Faith and Elite Competitive Sport,” *Journal of the Philosophy of Sport* 32/1 (2005): 65–86.

<sup>20</sup> See, for example, Gareth Enticott, “Techniques of Neutralising Wildlife Crime in Rural England and Wales,” *Journal of Rural Studies* 27/2 (2011): 200–208; Kheel, “License to Kill: An Ecofeminist Critique of Hunters’ Discourse.”

<sup>21</sup> Leslie A. Howe, “Gamesmanship,” *Journal of the Philosophy of Sport* 31/ 2 (2004): 212–25.

<sup>22</sup> Robert W. Mitchell, “A Framework for Discussing Deception,” in *Deception: Perspectives on Human and Nonhuman Deceit*, ed. Robert W. Mitchell and Nicholas S. Thompson (Albany: State University of New York Press, 1985), 3–40.

<sup>23</sup> J. Bowyer Bell, “Toward a Theory of Deception,” *International Journal of Intelligence and CounterIntelligence* 16/ 2 (2003): 250.

<sup>24</sup> Bell, “Toward a Theory of Deception.”

<sup>25</sup> John Knight, *Waiting for Wolves in Japan: An Anthropological Study of People-Wildlife Relations* (Oxford University Press, 2003); Giovanna Massi et al., “Too Many Hogs? A Review of Methods to Mitigate Impact by Wild Boar and Feral Hogs,” *Human-Wildlife Interactions* 5/ 1 (2011): 79–99.

<sup>26</sup> Sam P. Morris, “The Sport Status of Hunting,” *International Journal of Applied Philosophy*, 28/2 (2014): 391 – 407.

the basis of resulting in greater happiness. Animal harm in hunting is also often justified on the basis of virtue ethics, such as by Ortega y Gasset,<sup>27</sup> in that participating in hunting on nature's terms encourages the formation of virtues in the hunter. On this rationale, exercising restraint, minimizing advantage and honouring fair chase make for a virtuous hunter; deception and lying turns hunting into a vice.

Our concern in this paper is neither of the capacity-based ethical theories for animal rights nor an explicitly virtue based ethic, but instead with a broader relational animal ethics.<sup>28</sup> Here the concern is rather the *relationships* that are effected, or distorted, between hunter and animal when deception is invoked. Hence, we ask: what is the moral significance of how hunters *relate* to the hunted through practices of deception? In what sense, if at all, do these practices exemplify virtue and to what extent, if at all, are they compatible with respect for the welfare of their prey?

The paper is structured as follows. First, we present a framework of definitions to clarify our use of the concept of deception. Second, we introduce the maxim of fair chase in sport hunting, considering the ways in which it accommodates deception on an abstract level. In the third section, we engage with several events of deception, starting with trapping, using a literature synthesis study. A section on animal deception thereafter summarizes current discussions in cognitive ethology. We use this in informing a subsequent section that presents animal deception and counter-deception in hunting, showing cycles of ruses between the species. We consider critically whether this points to mutuality in deception and game-playing across humans and animals. Our paper marks a novel topical nexus for sports philosophy, animal ethics, multispecies anthropology, human-animal studies and hunting sociology. We hope to catalyze a discussion on the ethics of interspecies sports and insist on the moral dimensions that necessarily comprise any sport, but in particular where there is violence, harm and lack of consent. Contributing to a clarification on the morality of deception and lying between animals and hunters, moreover, can also inform future ethics discussions on what role deception has, if any, in this interspecies relation more broadly, also beyond hunting. We believe that our relational approach can unveil more nuances of deception than deontology or utilitarian perspectives, which categorically condemn it and evaluate its outcome respectively.

### *A. Framework & Definitions*

Deception is a key feature to most sports,<sup>29</sup> and an integral part of human society.<sup>30</sup> When we speak of deception in the human sporting context, we refer to a conscious action,<sup>31</sup> or in Bell's words: a "planned intrusion of an illusion seeking to alter a target's perception of reality, replacing objective reality with perceived reality."<sup>32</sup> Deceivers manipulate their opponents by consciously executing acts that suggest intentions other than their actual intentions.<sup>33</sup> That

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<sup>27</sup> Jose Ortega y Gasset, *Meditations on Hunting* (Wilderness Adventures Press, 1972).

<sup>28</sup> Steve Garlick, Julie Matthews, and Jennifer Carter, "Countering Brutality to Wildlife, Relationism and Ethics: Conservation, Welfare and the 'Ecoversity,'" *Animals* 1, no. 1 (January 27, 2011): 161–75.

<sup>29</sup> Pflieger and Roosenberg, "Deception in Sport: A New Taxonomy of Intra-Lusory Guiles."

<sup>30</sup> Bell, "Toward a Theory of Deception"; Leslie Boldt-Irons, Corrado Federici, and Ernesto Virgulti, eds., *Studies on Themes and Motifs in Literature: Disguise, Deception, Trompe-l'oeil: Interdisciplinary Perspectives* (Bern: Peter-Lang, 2008).

<sup>31</sup> Adam G. Pflieger, "Deception in Sport: A Conceptual and Ethical Analysis" (Brock University, 2011).

<sup>32</sup> Bell, "Toward a Theory of Deception," 244.

<sup>33</sup> Ronald Mawby and Robert W. Mitchell, "Feints and Ruses: An Analysis of Deception in Sports," in *Deception: Perspectives on Human and Nonhuman Deceit*, ed. Robert W. Mitchell and Nicholas S. Thompson (Albany: State University of New York Press, 1985), 316.

said, much deception in sports including feints, jukes and misdirection can be largely automatic and second-nature.<sup>34</sup>

The above definitions point to an important relational dimension: someone has to be the target of a ruse for it to be deception. Bell<sup>35</sup> usefully insists on strategic deception to incur a competitive advantage, wherein what is desired by the deceiver is not merely to have the illusion accepted, but for the target to respond in particular ways to the newly perceived reality. Here, the ruse itself may (1) copy reality, such as camouflage or mimicry, (2) create a novel reality, and (3) blurring reality. These deceptive ruses bring about an advantageous disposition to secure a pre-lusory goal.<sup>36</sup> For hunting, the prelusory goal is to attract and kill the animal. To be sure, one does not simply slaughter an animal. This is so, because pre-lusory goals require lusory means and creating conditions under which they will be suitably challenged. In hunting, the death of the animal is therefore hedged by a 'gratuitous logic'<sup>37</sup> that builds obstacles into the challenge. In western secular hunting contexts, this is best approximated through hunters adopting the maxim of fair chase<sup>38</sup>.

### *B. Deception under Fair Chase*

Boone & Crocket present fair chase as "the ethical, sportsmanlike, and lawful pursuit and taking of any free-ranging wild, native North American big game animal in a manner that does not give the hunter an improper advantage over such animals".<sup>39</sup> Different cultural manifestations of fair chase include jägarmässighet in Swedish, Waidgerechtigkeit in German, jaktetiket in Danish, and countless indigenous versions articulating taboos against too much efficiency in harvest, like fady in Malagasy.<sup>40</sup> Fair chase explains why despite the fact that "hunters have at their disposal a vast array of machinery capable of generating tremendous inequalities,"<sup>41</sup> they refrain from, and frown upon, using any and all technological advantages over wildlife.

Stated otherwise, hunting is a balancing act that requires careful negotiation between 'too little' and 'too much' success.<sup>42</sup> Indeed, hunting becomes dull in absence of fair chase restrictions: "boredom occurs when the hunt is always a failure or always a success."<sup>43</sup> This means the hunter needs to secure a balance between the naturalistic and contrived,<sup>44</sup> and between giving the animal a fair chance versus applying gamesmanship to outsmart it. Hence, canned hunts with guaranteed kills of docile, semi-tame animals that cannot escape is frowned

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<sup>34</sup> Pflieger, "Deception in Sport"; S. K. Wertz, "The Varieties of Cheating," *Journal of the Philosophy of Sport* 8/ 1 (1981): 19–40.

<sup>35</sup> Bell, "Toward a Theory of Deception."

<sup>36</sup> Pearson, "Deception, Sportsmanship, and Ethics."

<sup>37</sup> Robert L. Simon, "Internalism and Internal Values in Sport," *Journal of the Philosophy of Sport* 27/1 (2000): 1–16.

<sup>38</sup> S. P. Morris, "On Hunting: A Philosophical Case Study in Animal Sports" (The Ohio State University, 2010).

<sup>39</sup> Quoted in Norman Makoto Su and EunJeong Cheon, "Reconsidering Nature: The Dialectics of Fair Chase in the Practices of American Midwest Hunters," in *Proceedings of the 2017 CHI Conference on Human Factors in Computing Systems*, CHI '17 (New York, NY, USA: ACM, 2017), 6089–6100.

<sup>40</sup> Genese Marie Sodikoff, "Totem and Taboo Reconsidered: Endangered Species and Moral Practice in Madagascar," in *The Anthropology of Extinction*, ed. Genese Marie Sodikoff, Essays on Culture and Species Death (Indiana: Indiana University Press, 2012), 67–86.

<sup>41</sup> Morris, "The Sport Status of Hunting," 394.

<sup>42</sup> Ludek Broz and Rane Willerslev, "When Good Luck Is Bad Fortune : Between Too Little and Too Much Hunting Success in Siberia," 2012.

<sup>43</sup> Brian Luke, "A Critical Analysis of Hunters' Ethics," *Environmental Ethics* 19/1 (1997): 25–44.

<sup>44</sup> Ann S. Causey, "On the Morality of Hunting," *Environmental Ethics*, 1989.

upon.<sup>45</sup> But because wild animals are also seen to have an advantage in their natural habitat, including adaptations to flee from predators, heightened sense of smell and hearing, strategic deception to incur competitive advantage for the hunter is also used: most commonly as technology. Hanna captures the necessity of using technology to meet animals on equitable conditions by arguing that: “Limiting technology on the basis of fair chase is analogous to demanding that the wolf run on three legs to improve the chances of the deer escaping.”<sup>46</sup>

This quote suggests that hunters view human deceptive acts, including technology, as being on par with the natural wiles of animals in approximating equal starting conditions. Furthermore, in order to demarcate permissible and unacceptable forms of deception, scholars have tended to separate between intra-lusory skill-based deception or ‘strategic deception’ following Pearson<sup>47</sup> that applies and tests the very abilities that constitute the game, and ‘definitional deception’, where one violates the ‘spirit of the game’<sup>48</sup> and, indeed, on a formalist account, can no longer be said to play the game. Respective examples of this in hunting would be the hunter using natural vegetation as camouflage to conceal his position for incoming game, versus the hunter running the animal over with his car and bagging the trophy.

In a conventionalist interpretation of such kind of deception, which contrasts itself with the formalist account by emphasizing the importance of implicit agreements and changing norms, there are noticeable grey areas.<sup>49</sup> On a conventionalist account, the legitimacy of a deceptive act such as this is not given, but tends to depend on the cultural context and the ethos of the sport.<sup>50</sup> By ethos is meant the ‘unofficial, implicit, empirically determinable conventions which govern official interpretations of the formal rules of the game.’<sup>51</sup> If the ethos of hunting is understood to be the bringing about of game (such that one is in a position to kill it, but may choose not to do so) in a way that uses physical and intellectual skills befitting a competent outdoorsman, such hunting practices may be seen as ‘not real hunting’.<sup>52</sup> Because there is not one uniform ethos of hunting, however, conventions vary and offer different verdicts as to the permissibility of hunters incurring advantage through deception.

## I. Deceptions

### A. Trapping and Luring

Trapping is one such source of contention across hunters. In what follows, we focus on the moral permissibility of hunters trapping game by systematically considering trapping’s eligibility across different categories of deception. This discussion centers in large part on whether trapping can be said to be within the confines of hunting, or if it an external, and therefore illegitimate, tampering with the true process of hunting.

<sup>45</sup> Robert W. Loftin, “The Morality of Hunting,” *Environmental Ethics* (August 1, 1984).

<sup>46</sup> Edward Hanna, “Fair Chase: To Where Does It Lead?,” in *The Culture of Hunting in Canada*, ed. Jean Manore and Dale G. Miner (Vancouver: UBC Press, 2008), 246.

<sup>47</sup> Pearson, “Deception, Sportsmanship, and Ethics.”

<sup>48</sup> Leaman, “Cheating and Fair Play in Sport.”; William Morgan, “Moral Antirealism, Internalism, and Sport,” *Journal of The Philosophy of Sport - J PHIL SPORT* 31/ 2 (2004): 161–83.

<sup>49</sup> Bogdan Ciomaga, “Conventionalism Revisited,” *Sport, Ethics and Philosophy* 6, no. 4 (2012): 410–22.

<sup>50</sup> Fred D’Agostino, “The Ethos of Games,” *Journal of the Philosophy of Sport* 8/1 (1981): 7–18; Simon, *Fair Play*.

<sup>51</sup> D’Agostino, “The Ethos of Games,” 13.

<sup>52</sup> Erica von Essen, Eugenie van Heijgen, and Thorsten Gieser, “Hunting Communities of Practice: Factors behind the Social Differentiation of Hunters in Modernity,” *Journal of Rural Studies* 68 (2019): 13–21.

The literature suggests that many hunters across the world feel that trapping is:

...unfair compared with the exertions of the pursuit hunter. In addition to being unfair to themselves, some hunters consider trapping to be unfair to the wild boar [...] the trapping of a wild boar appears to some hunters as 'shameful conduct' because the animal is denied the chance to fight back.<sup>53</sup>

This quote raises questions as to whom the use of traps in hunting are unfair – the game or other hunters who toil in ways to fell wildlife that involve more physical exertion. It also invites us to think about whether trapping is an exercise in non-sport skill-based deception (NSSD) – that is, deception that employs valuable skills hard to come by, such as construction, but nevertheless which are not directly built into the game. There are three assessments on the legitimacy of traps.

First, in some cases, such deceptive acts are seen to add to the game even if they are divorced from the sport, at least if they are consistent with the ethos of the sport. Thus, if always retrieving your golf ball is in the ethos of golf, diving skills to navigate a body of water for your golf balls may be seen as laudable, but ultimately not a 'golf skill'. Second, they may be seen as too divorced from the sport to count, and are therefore cheating, in the form of acting as 'substitute for skill or other game-relevant virtues.'<sup>54</sup> That trappers are 'not real hunters' is a common refrain in the hunting literature.<sup>55</sup> They are engaged in pest control, culling and clean-up, rather than in the sport of hunting. Plato famously distinguished between 'sacred hunters' and 'lazy hunters' who hunted for food in utilitarian ways, and in the process subdued their prey with traps and snares; "he killed through deception instead of "on the victory of a soul that likes struggle."<sup>56</sup> In Gell,<sup>57</sup> a potentially pejorative distinction between hunting and trapping is similarly made in the observation that insofar as both involve deceit, trapping involves disguising in the past, whereas hunting involves disguising in the present. With this is meant that the trapper merely leaves a 'model' or ghost of himself in the trap, involving no direct engagement with wildlife. In a sense, this makes it outside of the remit of hunting in the sense of engagement, potentially turning it into extra-lusory (outside the game) interference and hence illegitimate deception.

Third, some hunters might argue that devising efficient traps is very much a hunting skill that is a part of the game of hunting. That is, it is sport skill-based deception, or strategic deception on Pearson's<sup>58</sup> framework for categorizing deception in sport. This category denotes the classical intra-lusory deceptive acts, which are seen to add to the game and be important built-in skills for the participant. That trapping is a sport skill-based deceptive act seems to be especially supported today in hunting communities that deal with intelligent animals that quickly become trap-wary and bait-shy and for which traps need to constantly evolve, like wild boars.<sup>59</sup> Here, a successful and durable trap exhibits elaborate construction

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<sup>53</sup> Knight, *Waiting for Wolves in Japan*, 92.

<sup>54</sup> R. Scott Kretchmar, "Game Flaws," *Journal of the Philosophy of Sport* 32/ 1 (May 1, 2005): 334.

<sup>55</sup> Tina Loo, "Of Moose and Men: Hunting for Masculinities in British Columbia, 1880-1939," *The Western Historical Quarterly* 32/3 (2001): 297–319; von Essen, van Heijgen, and Gieser, "Hunting Communities of Practice."

<sup>56</sup> Emma Griffin, *Blood Sport: Hunting in Britain since 1066* (New Haven and London: Yale University Press, 2007), 6.

<sup>57</sup> Alfred Gell, "Vogel's Net: Traps as Artworks and Artworks as Traps," *Journal of Material Culture* 1/1 (1996): 15–38.

<sup>58</sup> Pearson, "Deception, Sportsmanship, and Ethics."

<sup>59</sup> Massei et al., "Too Many Hogs? A Review of Methods to Mitigate Impact by Wild Boar and Feral Hogs."

and appropriate ‘channeling of the ruse’ to evidence of effect.<sup>60</sup> This evidence of effect is equivalent or superior to shooting an animal, because to many, it involves more preparation and skill. Accordingly, it also provides similar satisfaction:

“Challenge lies in hunter’s ability to fool the animal.” “You go through all the work. You plan your decoys. You get the set up that you want. You do a good job of calling [...] that’s your satisfaction right there.”<sup>61</sup>

In Knight’s<sup>62</sup> anthropological study of human-wildlife interactions in Japan, the problem posed by wild boars and the skill of trappers in capturing them means that trapper-hunters become heroes in their local community. They are not seen as ‘not true hunters.’ Whereas the hunter-shooter uses deception to conceal himself through e.g. natural vegetation, blinds or camouflage, trappers often boiled and clean their traps with tree barks and nuts to give them a natural scent.

The perhaps most powerful argument that trapping is a skill that is set within the confines of hunting is that hunting must be seen as a process rather than an end goal. This argument insists that activities which are prima facie ancillary to the kill shot form part of hunting.<sup>63</sup> Killing “...only involves a split second of the innumerable hours we spend surrounded by and observing nature.”<sup>64</sup> On this reading, manipulating the environment, tracking, building and customizing equipment are central skillsets of the ethos of hunting and constitutive skills. This appears a shared ethos across many hunting cultures and is particularly palpable on the Mediterranean islands. On Malta, a hunting culture is built around luring (insib) and trapping migrating birds to specially prepared sites where they can be netted.<sup>65</sup> Far from an activity that is seen as cheating, insib is transformed into an art *gebbieda* (‘pulling land’) in which landscapes are systematically transformed to attract birds to their patch. Such a culture is evident also in Cyprus, involving the planting of large swathes of acacia tree laced with nets to capture migrant birds.

### *B. Psychological and Verbal Deception of Animals: Beat Hunts and Flushing out*

In so-called beating hunts, hunters apply an opposite tactic to deception by concealment to instead exercise misdirection. In historical times, everything from pots and pans to special songs could be used to flush out game, including large carnivores, toward pits, traps, or more commonly to concealed shooters.<sup>66</sup> This is still in existence today, involving the beating of sticks against tree trunks that cause animals to bolt in a certain direction. This is an example of what may be classified as verbal sport deception:<sup>67</sup> it is similar to the use of psychological manipulation, like taunts and calls, in human sports, inasmuch as it is either to ‘break the nerve’ of an animal, or to generate sounds that imitate other hunted animals on the move, triggering a flee response in the target animal.

Sports scholars are not in agreement as to the moral permissibility of verbal taunts and psychological manipulation. When done in an extra-lusory manner, i.e. undermining the confidence of an opponent before the game, it seems to be considered illegitimate deception.

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<sup>60</sup> Bell, “Toward a Theory of Deception,” 257.

<sup>61</sup> Su and Cheon, “Reconsidering Nature.”

<sup>62</sup> Knight, *Waiting for Wolves in Japan*.

<sup>63</sup> Garry Marvin, “Challenging Animals – Project and Process in Hunting,” in *Nature and Culture: Rebuilding Lost Connections*, ed. Sarah Pilgrim and Jules N. Pretty (London: Routledge, 2013), 145–60.

<sup>64</sup> Broz and Willerslev, “When Good Luck Is Bad Fortune.”

<sup>65</sup> Mark-Anthony Falzon, “Flights of Passion,” *Anthropology Today* 24/ 1 (2008): 15–20, <https://doi.org/10.1111/j.1467-8322.2008.00560.x>.

<sup>66</sup> Carl-Herman Tillhagen, *Allmogejakt i Sverige* (Stockholm: Stockholm : LT, 1987).

<sup>67</sup> Pflieger, “Deception in Sport.”



Similarly, if taunts become too personal, too divorced from the sport, they may cease to be strategic deception and instead become what Kretchmar<sup>68</sup> terms substitutes for skills and game-relevant virtues.

In the hunting of wolves in historical time, there are references to so-called ‘Swedish model’ of mutilating and snaring wolf pups up a tree to lure the mother into coming there, from their cries.<sup>69</sup> This would appear an obvious case of an extremely personal extra-lusory form of psychological deception that results in the harm of not only the opponent but collateral others, which is consistent with the principle of minimizing harm in sports.<sup>70</sup>

### *C. Cutting Edge Technology*

As the world of technology increases in innovation, ethical concerns arise over the massive advantages that hunters can choose to employ. Already in 2005 it was reported that people could hunt virtually via websites by aligning a camera, aiming a rifle and shooting live bullets at real animals from their lounges.<sup>71</sup> An extreme case is where the hunter does not even have to be in the same country, let alone have any skills beyond that of an average computer gamer. The deception could be said to lie with the physical removal of the hunters, manipulating a situation that needs minimal effort on their part, while the animals pay a heavy price. This is similar to trapping in that the hunter is not actually physically present in the situation of killing, but leaves only a ‘trace’ of himself. Unlike trapping, however, which features embodied work at an earlier point in setting up the trap, remote hunting eliminates the need for an embodied interaction at any and all points.

Not only are these practices are condemned by a majority of the hunting community but they are also seen as the least rewarding.<sup>72</sup> That said, drones, thermal imaging and triggered trail cameras are currently increasingly employed for scouting purposes and taking inventory of game,<sup>73</sup> However, there are now emerging cases within the hunting community about “driving” animals with drones, much like the use of dogs or beaters who encourage fleeing in a desired direction.<sup>74</sup> Videos on YouTube such as “Texas Hog Problem Solution”<sup>75</sup> show drones used specifically to drive boars in the direction of the ambushing hunters. In the final part of the video, a small group of boars are left hiding in the brush with 3 hunters waiting in the open; one boar takes flight into the open field, with the waiting hunters, and is shot. The boars are tactically lured by the threat of the drone onto the actual threat of waiting hunters, the final stage where the boar leaves the somewhat protective cover of brush as it gives in to its instinct of “flight” into the hunters’ trap. Helicopters are used for such purposes but also

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<sup>68</sup> Kretchmar, “Game Flaws.”

<sup>69</sup> Tillhagen, *Allmogejakt i Sverige*.

<sup>70</sup> Loland, *Fair Play in Sport*.

<sup>71</sup> Steven Bell, “Virtual Hunting: Click, Click, You’re Dead,” *Voices* 6 (2005).

<sup>72</sup> Erik Cohen, “Recreational Hunting: Ethics, Experiences and Commoditization,” *Tourism Recreation Research* 39/1 (2014): 3–17.

<sup>73</sup> David A. Butler, Warren B. Ballard, Shawn P. Haskell, Mark C. Wallace, “Limitations of Thermal Infrared Imaging for Locating Neonatal Deer in Semiarid Shrub Communities,” *Wildlife Society Bulletin* 34/5 (2006): 1458–62; Nicholas James Reo and Kyle Powys Whyte, “Hunting and Morality as Elements of Traditional Ecological Knowledge,” *Human Ecology* 40/ 1 (2012): 15–27; Jarrod C. Hodgson et al., “Drones Count Wildlife More Accurately and Precisely than Humans,” *Methods in Ecology and Evolution* 9/ 5 (2018): 1160–67.

<sup>74</sup> RifleOpticsTeam, “Hunting With Drones - Ultimate Guide And Best Drone Review [May 2019],” *Your Guide to Scopes, Sights, Zeroing and Shooting* (blog), May 8, 2019, <https://rifleopticsworld.com/best-drone-for-hunting/>.

<sup>75</sup> Thermal Wildlife Drones, *Texas Hog Problem Solution?* 2017, [www.youtube.com/watch?v=IVnA-BYUdes](http://www.youtube.com/watch?v=IVnA-BYUdes).

involve hunters shooting from the helicopter itself such as in the YouTube video “2017 Texas helicopter Hog Hunt.”<sup>76</sup>

Certainly, there are several technological tactics that can be used to strip animals of their own survival adaptations and tactics such as camouflage, hiding in cover, keeping still, their sense of smell and heightened hearing. Night vision and thermal imagery effectively negate the cover of night and vegetation that animals use to deceive predators. Remotely triggered cameras allow hunters to survey and “window shop” prey according to some<sup>77</sup> but also create a false sense of security for animals, where the usual sense of being observed by a predator is also negated as the hunter is not even present and vital indicators for prey, such as smell, are neutralized or entirely replaced by technology. Drones and helicopters, on the other hand, provide a Birdseye view and speed, playing on the animal instinct to take flight, often out of cover, when threatened.

As technology evolves, so does hunting; therefore, many adoptions of technology within hunting are now acceptable and commonplace, most apparent is the hunting rifle compared to prehistoric bows and spears. Yet, this is constantly weighed against principles of fair chase versus a clean death that minimizes suffering. Some hunting gear and gadgets are so efficient to the point where evolutionary advantages of camouflage, instinct or smell are neutralized thus stripping animals of their deceptive skills whilst enhancing those of the hunter (beyond measure).

#### *D. Perspectives on animal deception*

It might be asked whether or not deception is a general class of phenomenon.<sup>78</sup> Can it be applied to the less cognitively complex, even instinctive or adaptive behaviors of non-human animals? If so, does it include too much to have analytical utility, and is it guilty of uncritical anthroporphism of animal behaviour? We do not seek to provide answers to these questions, but summarize key points by cognitive ethologists, sociobiologists and philosophers regarding animal deception.

At the extreme end are those that interpret deception broadly as involving miscommunication for strategic advantage.<sup>79</sup> It is simply behaving as if you are in one situation, when you are in another.<sup>80</sup> The means of deception can be variable, from psychological manipulation, non-verbal feints, selective retaining of information or communication of false information to get the target to act in a way that benefits oneself.<sup>81</sup> There was early interest among ethologists in mapping out animals’ abilities to perform deception and other socially intelligent behavior.<sup>82</sup> This interest saw a simultaneous broadening of the meaning of deception, which to some did not need to include knowledge

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<sup>76</sup> Hunting Dimock, *2017 Texas Helicopter Hog Hunt*, 2017, [www.youtube.com/watch?v=gXESZERb1dc](http://www.youtube.com/watch?v=gXESZERb1dc).

<sup>77</sup> Reo and Whyte, “Hunting and Morality as Elements of Traditional Ecological Knowledge.”

<sup>78</sup> Russow Lilly-Marlene, “Deception: A Philosophical Perspective,” in *Deception: Perspectives on Human and Nonhuman Deceit*, ed. Robert W. Mitchell and Nicholas S. Thompson, SUNY Series on Animal Behavior (New York: State University of New York Press, 1986),

<sup>79</sup> Mitchell, “A Framework for Discussing Deception.”

<sup>80</sup> Russow, “Deception: A Philosophical Perspective.”

<sup>81</sup> Charles F. Bond and Michael Robinson, “The Evolution of Deception,” *Journal of Nonverbal Behavior* 12/ 4 (1988): 295–307.

<sup>82</sup> Konrad Lorenz, *Animals That Lie. Man Meets Dog* (New York: Penguin, 1953).

of the relations between means employed and ends attained.<sup>83</sup> This ostensibly makes it a far cry from Pearson's<sup>84</sup> emphasis on intentionality as criterion.

Mitchell,<sup>85</sup> notes that not all forms of deception have the same origin. Some may derive from genetically pre-programmed deceptive patterns that have been naturally selected for, like forms of mimicry or camouflage in insects. These are non-cognitive processes with an outward effect of deception. Others may derive from higher-order, cognitive, planned and intentional forms of deception that involve a more sophisticated self-awareness, including anticipation of how the target will act upon registering the false information in deception. Richard Dawkins, for example, suggests that while the origin and infrastructure of such deceptive acts are notably different, they are functionally equivalent. This has led some scholars to consider plants as engaging in deception, especially pollinating plants that rely on bees.<sup>86</sup>

In Mitchell,<sup>87</sup> a four-tier order is proposed to differentiate between deception based on degree of consciousness and cognition. The first level involves mere design programming in the species; the second entails greater coordination of perceptions, as in for example the injury-feigning behaviour of some birds; the third level involves a mind capable of learning, inasmuch as the deceiver can modify its behaviour based on contingencies of rewards and benefits; the fourth level entails a mind that only intentionally deceives, but does so in a way that responds to course correction, change, and anticipation of the reaction of generalized others. Imperative to level four deception is the ability to compute the visual perspective of others.<sup>88</sup> It is not that these four levels are reserved, respectively, for different species. Humans are capable of engaging in all four levels of deception, from behaviourally selected concealed ovulation in females to the use of bird decoys, to sophisticated forms of lying. Chimpanzees exhibit signs of approximating level four deception, but this remains an evolving and divisive topic.

Limited attention may have been paid to the connection between these levels of deception. There is clearly a connection between non-cognitive and cognitive deception, or between intention and adaptation, and between individual and collective deception. Scholars have been increasingly tempted, and find support for, inviting animal agency into the realm of deception. 'Deception: Perspectives on human and non-human deceit'<sup>89</sup> is an anthology that examines a breadth of animal deception from contexts like captive cetaceans, to dogs, chimpanzees and birds. Recent sociobiobiology research vividly account of animals caching items both from trainers and conspecifics to unveil them at strategic times, or little by little so as to incur the maximum rewards. In everyday relations with domestic animals, feigning and deception are employed by both owners and pets to achieve desired effects.

While establishing that animals can practice deception, can we also argue that animals practice deception as part of games? This is a more tenuous claim to support, inasmuch as it rests of the ability of animals to partly consent to a lusory disposition divorced from everyday life. Interestingly, research shows that not only can animals play with humans in interspecies

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<sup>83</sup> D. C. Dennett, *Brainstorms: Philosophical Essays on Mind and Psychology* (Montgomery, Vt.: Bradford Books, 1978).

<sup>84</sup> Pearson, "Deception, Sportsmanship, and Ethics."

<sup>85</sup> Mitchell, "A Framework for Discussing Deception."

<sup>86</sup> Bond and Robinson, "The Evolution of Deception."

<sup>87</sup> Mitchell, "A Framework for Discussing Deception."

<sup>88</sup> Richard William Byrne and Andrew Whiten, "Cognitive Evolution in Primates: Evidence from Tactical Deception," *Man* 27/3 (1992): 609–627, <https://doi.org/10.2307/2803931>.

<sup>89</sup> Robert W. Mitchell and Nicholas S. Thompson, *Deception: Perspectives on Human and Nonhuman Deceit* (Albany: State University of New York Press, 1985).

games, but that they exhibit an understanding of its lusory context and constitutive rules. For example, human-dog play is different than dog-dog play by having its own set of implicit rules. A dog is also able to enter into the second-nature level of reality of a game, divorcing practices that take place within the game from real-life, such as distinguishing a playful tug-of-war through play signals from real-life power play.<sup>90</sup> This ensures that the dog does not interpret the outcome of that interaction as indicating any sort of status change in terms of dominance. Dogs enter into play mode through cues and play signals, such as ‘tease’.<sup>91</sup> This often takes the form of deception, in the sense of falsely conveying a reality (such as hiding, pretending to jump, acting as if you will bop the dog on the nose etc). Once in this lusory mode, an implicit ‘interspecies etiquette’<sup>92</sup> structures interactions, suggesting that animals can understand, respond to and deploy deception.

### *E. Animals fooling hunters*

Prey animals are intuitive hidiers. They can camouflage and conceal their presence in a way that could be construed strategic deception to incur an advantage, both in capacity as prey to evade predators, and as predators to capture prey. Ethnographic and sociological research show hunting narratives are replete with colorful anecdotes about cleverly hiding animals, from beavers submerged and using a stick like a periscope on the water to breathe while the hunter scouts for it, to ubiquitous stories of animals just lying in wait for the hunter to leave. The latter is especially reported in the context of baiting. Leaving out food to lure animal presence seems to be cleverly outmaneuvered by wild boars that show up just after the hunter has left the premises. Lynx and foxes move in and out of circles and seem to be content to gaze upon confounded hunters who have lost their trail, by lounging on a porch nearby. Trickster animals have long been a feature of history, as anthropology tells us,<sup>93</sup> but today hunters can verify their deceptive behaviors using trail cams. This phenomenon is increasingly popular to broadcast on social media, resulting in virally shared clips of mischievous animals, wild as well as tame.

Some forms of animal deception, like the above boar lying in wait, seem to be conscious acts to incur a strategic advantage. The camouflaging stripes of boar piglets, by contrast, appear a design adaptation favored by natural selection, that is: an unconscious first level deception. Yet they are functionally equivalent in terms of their effects on fooling the hunter. There are some cases that while clearly exhibiting a deceptive effect, we cannot make reliable assessments as to the intention of the act. A bear that regularly raids a feeding table for deer, causing deer to scatter frantically, only to run into the nearby brook and walk upstream for a kilometer before sneaking back to the feeding station, appears to show some degree of conscious planning and concealment. Yet an (added) effect of the ruse is to cause a large number of deer bolting, which made it much harder for the hunter and his dogs to get a clear scent around the table, which had been visited by a mass of animals. In a potentially anthropomorphizing reading of this event, one could be tempted to say the bear acted in solidarity with the deer, deceiving the hunter and his dogs not just of his own presence, but

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<sup>90</sup> Nicola J. Rooney, John W. S. Bradshaw, and Ian H. Robinson, “Do Dogs Respond to Play Signals given by Humans?,” *Animal Behaviour* 61/4 (2001): 715–22.

<sup>91</sup> Alexandra Horowitz and Julie Hecht, “Examining Dog–Human Play: The Characteristics, Affect, and Vocalizations of a Unique Interspecific Interaction,” *Animal Cognition* 19/ 4 (2016): 779–88.

<sup>92</sup> Paula Danby, “Post-Humanistic Insight into Human–Equine Interactions and Wellbeing within Leisure and Tourism,” in *Domestic Animals, Humans, and Leisure: Rights, Welfare, and Wellbeing*, ed. Janette Young and Neil Carr, 1<sup>st</sup> ed. (Abingdon: Routledge, 2018), 58–176.

<sup>93</sup> Michael P. Carroll, “The Trickster as Selfish-Boffoon and Culture Hero,” *Ethos* 12/ 2 (1984): 105–31.

ensuring they would struggle to catch up and fell the deer. Perhaps this was out of empathy for the deer, perhaps it was to conserve the deer for himself.

Animals also play dead for hunters. Wild boar piglets, upon having their sibling shot, lay flat and do not move out of the way until the hunter all but steps on them. Some opt for only feigning injuries so as to misdirect predators.<sup>94</sup> Deflective tactics, often in the form of feigning labored flights and calls of distress, make the parent nesting birds the target rather than their offspring.<sup>95</sup>

In response to flushing out hunts, which as mentioned constitute a psychological manipulation-based deception of game, some animals try to find narrow crevasses that the beaters often miss, only to stand there and move back against the direction of the beating team when they have passed. Indeed, this has given rise to a counter-ruse by hunters, who nowadays often make sure to position an ‘ambush shooter’ in the other direction. This testifies to an interplay of deceptive acts and turns.

#### *F. Do Animals Play the Game?*

We have above presented the case that both animals and hunters engaging in acts of deception to incur strategic advantages in the predator-prey balance. To this end, we have noted, much like Richard Dawkins observes, that these deceptions have different origins and levels of intention. What is common to these deceptions in hunting, however, is that they are relational and characterized by response-ability. By this, we mean that ruses instigate cycles of counter-deceptions across both species. This coheres with an understanding of games and sports as “dynamic, [...] ever-changing enterprises,”<sup>96</sup> precipitating behavioural adaptations on both collective and individual levels continuously. For one, it seems intuitive that if increasingly flushed out by drones as the latest form of deception, animals may come to be drone-wary and invent strategies to evade or fool them in the future.

One possible reading of the cycle of deception in hunting starts with the premise that the natural wiles of animals in going about their lives through camouflaging, silence and alertness in the woods can be construed as unintentional first-level deception that has been naturally selected for. It is relational deception only in the sense of shielding the animal from exposure and harm from a generalized other. When hunters engage these animals, they are in fact undertaking counter-deceptive ruses to balance the odds. Insofar as animals have superior initial conditions, especially in the outdoors, hunters may be seen to simply seize the opportunity to compensate for inequalities.<sup>97</sup>

Indeed, hunters will bait animals, using luring calls, and use decoys to bring about the presence of naturally evasive game. Much of hunting trades on the successful luring out of the wildlife so it may be killed by a concealed hunter. But some animals will inevitably outsmart the deception. This may be due to any number of factors involving the interaction of the illusion with objective reality, such as the weather, or even past experience.<sup>98</sup> A sudden gust of wind, low evening sun, or high snow cover can make all the difference. The animals that discover the deception may then set in motion a second wave of deception to evade killing. For example, a hare will bolt and then zig-zag in its path to throw the tracking dog off

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<sup>94</sup> Carolyn A. Ristau, “Before Mindreading: Attention, Purposes and Deception in Birds?,” in *Natural Theories of Mind: Evolution, Development and Simulation of Everyday Mindreading*, ed. Andrew Whiten, Reprint edition (Oxford: Blackwell Pub, 1991), 209–22.

<sup>95</sup> Ivan R. Tomkins, “The ‘Injury-Feigning’ Behavior of the Florida Nighthawk,” *The Wilson Bulletin* 54/1 (1942): 43–49.

<sup>96</sup> Pflieger and Roesenberg, “Deception in Sport: A New Taxonomy of Intra-Lusory Guiles,” 218.

<sup>97</sup> Loland, *Fair Play in Sport*.

<sup>98</sup> Bell, “Toward a Theory of Deception.”

the scent. This in turn may be countered by another counter deception by a hunter, such as concealing a second shooter in the direction that the hare bolted, to ambush it in its escape from the baited or luring area.

Hunters would likely favour this reading of continuous deceptive cycles in hunting across the species. For one, it presupposes that animals have in-built, unintentional, collective adaptations of deception against which the hunter is wholly justified to employ counter-deceptions on his own to even the score, often through technology and gadgets. Given that Morris defines gamesmanship as the “voluntary attempt to overcome unnecessary obstacles”,<sup>99</sup> hunters’ attempts at deception to even the balance might be understood as removing unnecessary obstacles to the kill. This could be seen in Hanna’s observation that a wolf, by having four legs, was on par with hunters having technological equipment. It also suggests that in one sense, the animals ‘started it’ and hunters become the responders to their action rather than instigators. Nevertheless, more critical perspectives may favour the view that hunters set in motion an artificial cycle of deception when they lure, bait and camouflage themselves for wildlife, and that any counter-responses by cleverly adapting wildlife are necessary adaptations.

Even hunters demonstrably laud wildlife for counter-deceptive ruses. The animals that they most appreciate to hunt are more often than not animals with fighting spirit and that give the hunter an even match.<sup>100</sup> Dahles shows Dutch hunters value “those animals which can be manipulated in a way that they are seen to play the game according to the hunters’ rules.”<sup>101</sup> This appreciation for the gamesmanship and counter-deceptions of animals appears to be built into the very sport of hunting, inasmuch as hunters invent new ways and techniques to have the animal presented in a way that suggests game-playing. Hence, we declare the value of hunting is very much tied to animals resorting to deceptions.

We consider this an important claim: animal deceptions are crucial components to creating the value of the sport, whether these deceptions are functions of adaptation or intentionality. Indeed, this is a value that cannot be created by the hunters alone. The animals are thus integral participants in the sport of hunting, not just in the sense that they are there to be killed, but in the sense that they make the sport interesting and exciting by creating obstacles and challenges for skilled hunters to overcome. Nevertheless, these are not obstacles created by any self-imposed rules of the game willingly adopted by the hunters, but rather the deceptive actions taken the hunted for whom the ‘game’ may have dire existential consequences.

This brings us back to the issue we focused at the outset of this article concerning the differential stakes of playing the game for hunters and animals. Even if animals substantively create the value of the game for the hunters, we cannot plausibly say they are willing participants in the game. That is, we cannot say they are willing participants consenting to their assigned role as ‘worthy adversaries’ in a competition likely resulting in their death, while the hunters might never leave their couches, as in the case of hunting by drones. While clearly not giving their explicit consent, however, can we still say that they give their implied, or tacit, consent to being participants through their counter-deceptions that set about game-like characteristics? We say no.

In his *Second Treatise of Government*, the political philosopher John Locke famously argued that citizens give their tacit consent to the constitutional ‘rules of the game’ to the extent they

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<sup>99</sup> Morris, “The Sport Status of Hunting,” 391.

<sup>100</sup> Erik Cohen, “Tiger Tourism: From Shooting to Petting,” *Tourism Recreation Research* 37/3 (2012): 193–204, <https://doi.org/10.1080/02508281.2012.11081708>.

<sup>101</sup> Heidi Dahles, “Game Killing and Killing Games: An Anthropologist Looking at Hunting in a Modern Society,” *Society & Animals* 1, no. 2 (1993): 177.

do not remove themselves from the territorial jurisdiction of the state. However, any Lockean conception of tacit consent to the game by participating in it obviously does not apply to hunting wild sovereign animals<sup>102</sup> whose territory they invade. If the animal trespasses onto someone's backyard, this remains a tenuous claim predicated on animals understanding and respecting the concept of human borders.<sup>103</sup>

Nevertheless, the case can be made that some animals seem to exhibit a rudimentary understanding of rules of engagement and fair play with humans when it comes to territory. Although denning with cubs on a farm with chickens, the fox does not ever attempt to kill the farmer's stock of chickens, despite these being free-ranging chickens easy for a fox to catch. But to do so may be a violation of co-habitation residence etiquette. Instead, the fox takes the hens on the farm some kilometres away. This resulted in both farmers trying their utmost to get foxes to den on their land, as this seemingly made their chickens off-limit. The example may point to a sober understanding on the part of the mother fox that certain things are simply not done, and if I want to safely reside here, I must abide by certain rules. Here we return to the concept of interspecies etiquette,<sup>104</sup> if out of survival rather than play.

This point is critical because it divorces the interaction from game. Viz, if a game is premised on creating unnecessary obstacles to overcome, then the animals aren't playing a game at all or they are not playing the same game as the hunters, as ecofeminists have suggested in their critique of sport hunting. Indeed, they create obstacles for the hunters to overcome that are necessary for their own survival. In other words, they do not resort to deception to make the game that the hunters are playing more exciting and challenging, but rather to stay alive.

Hence, on the one hand, we might say that this is no game at all because the stakes for the animals are existential. In Morris's words, human participants enter autonomously into a 'second world' or meta-reality of sport.<sup>105</sup> This means two things: first, that they willingly agree to the lusory rules of the game, including acts of skill-based deception by their opponents that are in the spirit of the game, and two, that they can opt out of this world at any time. Animals, needless to say, do not have the capacity for either and animals cannot opt out of the second-nature world of the game. This is clearly not the same game played by the hunters for whom the stakes are rarely, if ever, existential. On the other hand, if the animals are playing a game at all, then this is a serious game of survival they play against rather than with the hunters who seek their deaths for non-serious purposes of entertainment.

Of course, it might be objected here that hunting is not purely lusory for the hunters. As we noted in the introduction, modern hunters seek additional grounds of legitimation for hunting beyond entertainment based on meat procurement, wildlife management, the euthanization of traffic-injured wildlife, species and disease eradication and more. Elsewhere it has been argued that hunting's dual claim of being simultaneously serious business and a hedonistic sport is difficult to resolve philosophically.<sup>106</sup> Moreover, even if hunters fail to secure support for the belief that they are undertaking a societal service when they hunt, the

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<sup>102</sup> Sue Donaldson and Will Kymlicka, *Zoopolis: A Political Theory of Animal Rights* (Oxford University Press, 2011).

<sup>103</sup> Sanna Ojalampi and Nicholas Blomley, "Dancing with Wolves: Making Legal Territory in a More-than-Human World," *Geoforum* 62 (2015): 51–60.

<sup>104</sup> Danby, "Post-Humanistic Insight into Human-Equine Interactions and Wellbeing within Leisure and Tourism."

<sup>105</sup> Morris, "Violence among Beasts. Why Is It Wrong to Harm Nonhuman Animals in the Context of a Game," 329.

<sup>106</sup> von Essen and Hansen, "Policing Peers and Selves between Law and Morality."

sport remains serious business in terms of its involving existential stakes of life and death, for the hunted animals if not the human hunters.

Nevertheless, our point is that animal deceptions are properly interpreted as evidence of animals playing a different and more serious game than their human hunters for whom the stakes are rarely, if ever, existential. To this extent, we contend hunted animals do not tacitly consent to being participants in the game played by the hunters. Instead, we see their ‘survival games’ of counter deceptions as effective de facto resistance games. Consistent with our neutrality on whether animal counter-deceptions are adaptive or intentional, we say these counter-deceptions are ‘effective’ and ‘de facto’ resistance<sup>107</sup> because their practical effect is to thwart the hunters. Consequently, the animals participate not in the hunters’ game – as terminating in their own demise – but rather an alternative game of resisting their being reduced to the disposable means for the latter to realize a more satisfying sporting experience of overcoming obstacles and triumphing against worthy opponents.

Where does this leave us regarding the moral permissibility of deception in hunting? Do hunters have a claim to moral permissibility in deceiving the animal they hunt? We argue the hunters’ claim is remarkably weak, if hunting is purely lusory. It is weak because, as we have argued, attributing tacit consent to the animals based on their counter-deceptions is quite implausible. Moreover, their hedonistic pleasure in hunting animals is based on exploiting the animals in their capacity to create an entertainment value for the hunters through their counter-deceptions and resistance. Aside from concern over exploiting the animals as uncompensated labor producing an added value for the hunters, purely lusory hunting demonstrates a fundamental disrespect for their fundamental welfare interests.

## II. Concluding Remarks

We have argued that the role of deception by hunters is, at best, morally ambiguous. Indeed, hunters’ claims to justification in resorting to deceptions against the animals they hunt depend on exploiting them to provide a value to sports hunting it would otherwise lack. This, however, fails to pass any reasonable justification-test for deception based on consent to the rules of the game. Consequently, hunted animals do not plausibly consent to this game through their various counter-deceptions but rather play a quite different game of survival, if we may rightly say that they play any game at all. Indeed, this disqualifies any purely lusory justifications for sports hunting, although it leaves unresolved non-lusory justifications purporting to advance the existential interests of hunted species rather than hunted individuals.

It is critical that research going forward attend to the dynamic interplay or response-ability of human and non-human animal deceptions, whatever their origin. This involves seeing animals as more than just passive victims of human deception, and as potentially doing more than merely following instinct when they channel counter-ruses. This, however, could also open a space for seeing potentially positive experiences from interspecies games that do not involve harm. Such a perspective should be respectful of animal agency, and consistent with the literature and observations presented here that these animals show sophisticated strategies of deception that respond to, build on, and use the deceptive technologies that hunters have originally foisted upon them. At an extreme, hunters could perhaps see the animals as having welfare interests in honing their skills in counter deception. Not only would the hunters hone

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<sup>107</sup> Michael Allen, *Civil Disobedience in Global Perspective: Decency and Dissent over Borders, Inequities, and Government Secrecy*, Studies in Global Justice (Springer Netherlands, 2017); Michael Allen and Erica von Essen, “Animal Resisters: On the Right of Resistance and Human Duties of Non-Return and Abolition,” *Journal of Critical Animal Studies* 15/6 (2018): 3–28.



their skills as hunters, but they would also help the animals do the same to increase their chance of survival generally against a range of dangers in the forest. Indeed, this might promote the abilities of the animals to survive in the wild when encountering non-human predators. This would provide a utilitarian justification for deception. To be sure, such a justification would be unacceptable from a deontological animal rights perspective, where lying is categorically immoral. However, it is equally unacceptable from a virtue perspective to the extent deception is widely regarded as vice or a failure of excellence in any given practice. Indeed, these observations apply to the ethics of deception generally and not just deception in interspecies sport.

In the context of interspecies sports, though, our concern is that anthropomorphizing animals as fellow game-players mutually oriented toward a lusory attitude within the same game clearly ascribes the wrong kind of agency, falsely serving to make animals willing and complicit in sports that make light of their welfare and life. This fails to capture the specific relation of animals to hunters as primarily concerned not with virtue or excellence within a game but rather survival. This emphasis on how animals relate to hunters as existential threats defines our paper's impact as a contribution to relational animal ethics. Indeed, in modern interspecies sports, deception is less a concern over the moral significance of vice or failures of excellence among hunters than the agency of animals driven to relate to them through counter ruses in a game to which they did not consent and for whom the stakes are so much higher.

Finally, we remark on how our relational analysis stressing the animals' relation to the hunter might bear on the defence of hunting by Ortega y Gasset. On the one hand, Ortega y Gasset,<sup>108</sup> plainly endorses a virtue ethics justification of hunting, in which fair chase and challenging oneself on nature's terms are central to making a virtuous hunter. In this justification, lying and deception run counter to virtue. Indeed, Ortega y Gasset stresses that the virtuous hunter should strive to be on the same wavelength as the animals, suggesting minimization of technology and deception.<sup>109</sup> Doing so, Morris,<sup>110</sup> interprets, provides a source for human flourishing. On the other hand, Ortega y Gasset has also indicated a belief that hunting is a fundamentally unequal relation, directed from above to below. His admission that "hunting is a relationship between two animals which excludes an equality of vital level between the two" may suggest that there is no original parity between animal and hunter, with little in the way of fairness to be honored. Hence, it should perhaps not matter whether we use additional technologies of deception, for the relation can never be equal to start with, and we must recognize this. Clearly, Ortega y Gasset cannot have it both way. Being open to the animals entails hunters developing a conscious and empathetic awareness of how the animals relate to them. In other words, it entails attributing to them a form of morally significant agency in resisting hunters' efforts to kill them through counter-deceptions and wiles.

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