

A MORAL AND ETHICAL FOUNDATION FOR SUSTAINABLE DEVELOPMENT

By

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Abstract

The vagueness and ambiguity of the concept of sustainable development can mask the shortcomings of law and policy and prevent the identification of priorities. This article responds by building upon scholars who have turned to religious doctrine to give moral and ethical force to sustainability and environmental justice. It surveys Biblical passages from the Old and New Testament about creation, sabbaths, justice, love of God and neighbor, and exhortations against hoarding and exploitation to argue that, rather than seek to balance metaphorical pillars or the triple bottom line, sustainable development should prioritize humanity so that individuals can fulfill the mandate to be stewards charged with creation care. It also argues that environmental justice should be treated as part of sustainable development, including a reconception of the social justice dimension as seeking the empowerment of individuals and communities.

INTRODUCTION: SEEKING A FOUNDATION FOR SUSTAINABLE DEVELOPMENT

The concept of sustainable development inspires law- and policy-makers and businesses to balance economic development, environmental protection, and social good, thus allowing for stakeholders with divergent interests to find consensus.¹ Numerous critics have nevertheless attacked sustainable development for its vagueness and ambiguity.² For example, the concept and its metaphorical pillars of economy, environment, and equity are so ambiguous that stakeholders can reach agreement at a general level that masks substantive shortcomings and points of genuine disagreement.³ Such ambiguity can result in laws that are labeled as “sustainable” but in actuality perpetuate the status quo of protecting economic development at the expense of the environment

¹ Allison Peck, *Sustainable Development and the Reconciliation of Opposites*, 57 ST. LOUIS U. L.J. 151, 158 (2012) (writing that the ambiguity of the term sustainable development creates a “‘big tent,’ spacious enough to accommodate three usually disparate factions—development proponents, environmental groups, and social justice advocates”); see PETER JACQUES, *SUSTAINABILITY: THE BASICS* 116 (2015) (relating the triple bottom line to the 3P’s of “people, profits, and planet” and the three “E’s” of “ecology, economy, and equity” and calling it “a way of operating multi-criteria accounting” to balance the trade-offs of economic growth, environmental values, and social justice).

² See, e.g., Jaye Ellis, *Sustainable Development and Fragmentation in International Society*, in *GLOBAL JUSTICE & SUSTAINABLE DEVELOPMENT* 57 (Duncan French ed., 2010) (recognizing, in analysis of the “discourses, debates and rhetoric about sustainable development,” that the concept “is virtually impossible to oppose outright, but it is far from possessing a taken-for-granted quality”); Scott Fulton, David Clark, & Maria Amparo Albán, *Environmental Sustainability: Finding a Working Definition*, 47 ENVTL. L. REP. 10,488, 10,488 (2017) (claiming that, “despite its expanding presence in environmental policy discourse [since 1987], sustainability still suffers from ambiguity that must be overcome if governmental and private-sector decisionmakers are to optimize the concept’s potential”); Becky L. Jacobs & Brad Finney, *Defining Sustainable Business—Beyond Greenwashing*, 37 VA. ENVTL. L.J. 89 (2019) (calling the lack of “a precise, authoritative definition” for sustainability a “threat . . . to a generally positive and important trend”).

³ Albert C. Lin, *Myths of Environmental Law*, 2015 UTAH L. REV. 45, 67 (2015) (writing that the myth of sustainable development “masks continuing harm and reinforces and perpetuates existing power dynamics”).

and of the most vulnerable people who inhabit it.⁴ Consider cap-and-trade permit schemes, which allow businesses to keep operating while on balance leading to a reduction of emissions that harm human health or contribute to climate change.⁵ Though sustainable in an overall sense, these schemes might lead to “hot spots” where some companies trade for permits and then increase rather than decrease their emissions, with a corresponding increase in harm for communities (often minority and low-income) located near those facilities.⁶

Although international statements like the Rio Declaration and Johannesburg Declaration seem to add specificity to sustainable development, their dozens of principles and statements are themselves vague, often aspirational, and sometimes contradictory.⁷ They therefore compound the problem by hindering efforts to identify and implement priorities, with the result that the most pressing issues may receive inadequate attention while the needs of marginalized persons may go unaddressed.⁸ Consider the North American Free Trade Agreement, which increased trade among the three member nations and boosted Mexico’s economic development.⁹ Such development came with environmental and social costs, however, because pollution near border maquiladoras skyrocketed in the 1990s¹⁰ and because many subsistence farmers were pushed toward migrant

⁴ Michael Burger, *The Story with Sustainability*, 43 ENVTL. L. REP. 10,356, 10,356 (2013) (describing one possible way that sustainability fits into contemporary environmental discourse as a “deceptive story that perpetuates existing power dynamics” because it “brackets big-ticket items like capitalism and consumerism, reifies existing actors and hierarchies, and affirms basic patterns of social organization, production, and consumption”); Ileana M. Porras, *Laudato Si’, Pope Francis’ Call to Ecological Conversion: Responding to the Cry of the Earth and the Poor—Towards an Integral Ecology*, 109 AJIL UNBOUND 136, 136-37 (2015) (noting the “impasse of ‘sustainable development,’ which contrary to its original intention, today mostly provides cover to the imperative of economic growth”); *id.* at 139 (“Under the guise of sustainable development, economic values have continued to govern, constraining action mostly at the level of rhetoric.”).

⁵ Jonathan B. Wiener, *Disregard and Due Regard*, 29 N.Y.U. ENVTL. L.J. 437, 448 (2021) (writing that “cap and trade systems . . . are designed to increase the net benefits of environmental protection—internalizing and reducing external harms—by enabling the flexibility to undertake pollution abatement where it is least costly”).

⁶ *Id.* at 448-49; see L. Heinzerling & R.I. Steinzor, *A Perfect Storm: Mercury and the Bush Administration, Part II*, 34 ENVTL. L. REP. 10485, 10493 (2004) (arguing that cap-and-trade schemes governing mercury will lead to hot spots).

⁷ Jeff Todd, *A Rhetoric of Sustainable Development*, 42 PACE L. REV. (forthcoming 2022) (manuscript at 27-32) (on file with author) (citing The United Nations Conference on Environment and Development, UN Doc A/CONF.151/26/Rev. (1992) [hereinafter Rio Declaration]; World Summit on Sustainable Development, Johannesburg Declaration on Sustainable Development, U.N. Doc. A/CONF.199/20 (Sept. 4, 2002)).

⁸ See Ellis, *supra* 2, at 65-66 (decrying the lack of a “broad social consensus” for the implementation of sustainability measures); Duncan French, *Sustainable Development*, in RESEARCH HANDBOOK ON INTERNATIONAL ENVIRONMENTAL LAW 51, 53 (Malgosia Fitzmaurice, David M. Ong, & Panos Merkourris eds., 2010) (writing that nations have responded positively to the “rhetoric” of reports and declarations about sustainable development but that “implementation remains an acute problem”); Jorge E. Viñuales, *The Rise & Fall of Sustainable Development*, 22 REV. EUR. COMMTY & INT’L ENVTL. L. 3, 7 (2013) (writing that sustainable development “is no longer capable of guiding global environmental governance because it is ill-suited to taking clear stances where there are tradeoffs between environmental, social and economic considerations, and to setting a few (instead of dozens of) strategic priorities for action”).

⁹ Chris Wold, *Evaluating NAFTA and the Commission for Environmental Cooperation: Lessons for Integrating Trade and Environment in Free Trade Agreements*, 28 ST. LOUIS U. PUBL. L. REV. 201, 225 (2008) (reporting a 38 percent growth in Mexico’s GDP from the entry into force of NAFTA to five years afterward).

¹⁰ *Id.* (reporting increases in soil erosion, municipal waste, water pollution, and air pollution ranging from 29 to 108 percent in Mexico in the five years following the entry into force of NAFTA).

labor and wage-paying work.¹¹ When commentators recommend seemingly-sustainable solutions—such as providing subsidies to small-scale farmers of the global South so that they can compete with subsidized imported crops from global North agribusiness corporations¹²—they fail to consider that money itself contributes to unsustainable practices because it has vastly different effects in the hands of corporations compared to indigenous farmers.¹³

One way to throw off the constraints imposed by ambiguous terms may be to follow the lead of scholars who have considered how religious doctrine can give moral and ethical force to environmental law.¹⁴ For example, passages from the Bible address creation and humanity's role in its care,¹⁵ regulations limiting (and thereby sustaining) agriculture,¹⁶ and justice for the poor, widows, and resident aliens.¹⁷ Another topic that at first glance seems unrelated to sustainability is love. Consider the well-known account of a Pharisee (reported to be a lawyer) asking Jesus, “Teacher, which commandment in the law is the greatest?”¹⁸ Rather than select one of the ten commandments given to Moses on Mt. Sinai, Jesus answered, “You shall love the Lord your God with all your heart, and with all your soul, and with all your mind,” and that the “second is like it: ‘You shall love your neighbor as yourself.’”¹⁹ He concluded, “On these two commandments hang all the law and the prophets.”²⁰ Commentators have linked these greatest commandments to sustainability and justice, such as a warning not to waste resources since we all share in them.²¹ The answer of Jesus also suggests an approach to addressing the vagueness and ambiguity of sustainable development: we might set aside lists of metaphors and principles and instead consider how applying Biblical teachings can transform our understanding of sustainable development.

¹¹ Carmen G. Gonzalez, *Trade Liberalization, Food Security, and the Environment: The Neoliberal Threat to Sustainable Rural Development*, 14 *TRANSNAT'L LAW & CONTEMP. PROBS.* 419, 422 (2004); Nancy Ehrenreich & Beth Lyon, *The Global Politics of Food: A Critical Overview*, 43 *U. MIAMI INTER-AM. L. REV.* 1, 17 (2011).

¹² Alison Hope Alkon, *Resisting Environmental Injustice through Sustainable Agriculture: Examples from Latin America and Their Implications for U.S. Food Politics*, in *ENVIRONMENTAL INEQUALITIES BEYOND BORDERS: LOCAL PERSPECTIVES ON GLOBAL INJUSTICES* 185, 191 (JoAnn Carmin & Julian Agyeman eds., 2011).

¹³ Christopher P. Guzelian & Jeff Todd, *Sustainable Money*, 94 *TEMPLE L. REV.* 453, 470-71 (2022).

¹⁴ *E.g.*, Nadia B. Ahmad, *Faith-Based Approaches to Ecological Harmony and Environmental Protection*, 21 *RUTGERS RACE & L. REV.* 1, 3 (2020) (“Faith-based approaches can help formulate an international order that is more ethically driven, more ethically consistent, and less contradictory.”); Daryl Fisher-Odgen & Shelley Ross Saxer, *World Religions and Clean Water Laws*, 17 *DUKE ENVTL. L. & POL'Y F.* 63, 65 (2006) (writing that “religious principles will serve as a ‘stepping stone[.]’ in bridging the gap between human-centered utilitarianism and the environmental moralist approach”); Holmes Rolston III, *Saving Creation: Faith Shaping Environmental Policy*, 4 *HARV. L. & POL'Y REV.* 121, 122 (2010) (claiming that the “ethical authority” of religion mandates that the use of the Earth be both just and charitable).

¹⁵ See Part I(A) and Part II(B), *infra*.

¹⁶ See Part I(B), *infra*.

¹⁷ See Part I(B) and II(A), *infra*.

¹⁸ *Matthew* 22:34-36. All Biblical quotations are from the New Revised Standard Version unless otherwise indicated.

¹⁹ *Id.* 22:37-39.

²⁰ *Id.* 22:40. These greatest commandments are also recounted in the Gospel of Mark. *Mark* 12:28-31.

²¹ W. Wade Berryhill, *Creation, Liberation, and Property: Virtues and Values Toward a Theocentric Earth Ethic*, 16 *REGENT U.L. REV.* 1, 36 (2003); *see, e.g.*, Jonathan C. Augustine, *Environmental Justice and Eschatology in Revelation*, 58 *LOY. L. REV.* 325, 326 (2012) (writing that love of neighbor means recognizing that earth's resources are shared with others); *id.* at 345-46 (citing John Dernbach, Earth Day Sermon at The Cathedral Church of St. Stephen, Harrisburg, PA (Apr. 22, 2001)) (explicating the two great commandments to argue that “the commandment to love God with all of our being also requires us to care for what God has made” in ways that do not hurt other people).

This article therefore surveys Biblical passages to show how they can help reimagine sustainable development to have a stronger moral and ethical foundation. Part I examines the Old Testament, including the creation account in Genesis and its directive for all humans to be stewards of God’s creation as well as passages about sabbaths and regulations for harvests that guide sustainable land use and justice for the poor and aliens. Part II turns to the New Testament and how it continues the themes of creation care, sustainability, and justice for the poor and powerless but frames them as love of God and love of neighbor. This Part also highlights some examples of sustainable living and discusses the Book of Revelation as concluding the creation narrative.

Part III then reconsiders sustainable development in light of the Biblical survey. While the Bible and sustainable development both recognize the need to consider the connections among the economic, the environmental, and the social, the Bible supports jettisoning attempts at balancing the metaphorical three pillars or triple bottom line and instead prioritizing humanity, which is both a part of creation and set above it by being tasked with the responsibility of stewardship. Further, because justice recurs throughout the Bible (including being linked with the use of land and other natural resources as well as the particular needs of the poor and powerless), environmental justice should be viewed as a part of sustainable development. In particular, the sustainability of laws, programs, and projects should be guided by a notion of social justice wherein all people are empowered to act as stewards of creation. The article concludes with suggestions for additional research, including a consideration of specific Christian and non-Christian faiths.

I. SUSTAINABLE DEVELOPMENT IN THE OLD TESTAMENT

A. The Book of Genesis: Humanity as Both Part of Creation and Its Steward

The first verse of the first book of the Bible states that “God created the heavens and the earth.”²² Genesis goes on to describe how, through successive decrees over six days, he created light, the sky, “the dry land Earth” with seed- and fruit-bearing vegetation as well as the seas, celestial bodies to mark the days and seasons, the creatures of the ocean and birds of the sky, and the domesticated and wild animals of the earth.²³ On the sixth day, he also decreed, “Let us make humankind in our image, according to our likeness; and let them have dominion over the fish of the sea, and over the birds of the air, and over the cattle, and over all the wild animals of the earth, and over every creeping thing that creeps upon the earth.”²⁴ He then blessed man and woman and told them, “Be fruitful and multiply, and fill the earth and subdue it; and have dominion over the fish of the sea and over the birds of the air and over every living thing that moves upon the water.”²⁵

In this account, all of creation comes from God, so nature and natural resources belong to God but are also a blessing for created beings.²⁶ Humankind, being “formed from the dust of the

²² *Genesis* 1:1.

²³ *Id.* 1:1-25. Creation involves eight acts over six days: Alternation between day and night (Day 1), the dome / sky (Day 2), the separation between sea and land as well as plants (Day 3), heavenly bodies (Day 4), water animals and birds (Day 5), and land animals as well as humans (Day 6). Konrad Schmid, *Creation*, in 1 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 166, 168 (Samuel E. Balentine ed., 2015).

²⁴ *Genesis* 1:26.

²⁵ *Id.* 1:28.

²⁶ Peter Altmann, *Nature and Natural Resources*, in 2 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 123, 123-24 (Samuel E. Balentine ed., 2015); see ROBERT E. BABE, *CULTURE OF ECOLOGY: RECONCILING ECONOMICS AND ENVIRONMENT* (2006) (“God retains sovereignty over creation.”).

ground,” is part of that creation,²⁷ but is also set above through authority to “subdue” the earth and have “dominion” over all other living creatures.²⁸ These words might suggest that God has granted man “a license . . . to do as he pleases.”²⁹ Instead, this is a “creation mandate,” with the “special place” of humans in creation involving “the duty of a caretaker.”³⁰ One scholar opines that “dominion is not the same as domination or degradation. Dominion . . . is the English translation of a Hebrew word that means taking appropriate care or exercising appropriate rulership.”³¹

Being tasked with a duty makes humankind a steward charged with the responsibility of creation care.³² Consider the second book of Genesis: man was formed prior to the “herb of the field” springing up because “there was no one to till the ground.”³³ God therefore “took the man and put him in the garden of Eden to till it and keep it.”³⁴ Accordingly, God’s creation is sufficient to sustain humankind, but humankind must be both laborer and manager for it do so: “By placing Adam in the garden with the charge to ‘cultivate and keep it,’ both the duty of stewardship for man and the intrinsic value of nature to God as His creation were clearly established.”³⁵

The opening creation narrative continues through the ninth book of Genesis,³⁶ and the account of Noah and the flood reinforce the duty of humans as caretakers. God commanded Noah to take “seven pairs of all clean animals, the male and its mate; and a pair of the animals that are not clean, the male and its mate; and seven pairs of the birds of the air also, male and female, to keep their kind alive on the face of all the earth.”³⁷ Noah therefore had charge to preserve animals that would

²⁷ *Genesis* 2:7 (“[T]hen the Lord God formed man from the dust of the ground, and breathed into his nostrils the breath of life; and the man became a living being.”).

²⁸ Richard J. Clifford & Roland E. Murphy, *Genesis*, in *THE NEW JEROME BIBLICAL COMMENTARY* 8, 11 (Raymond E. Brown, Joseph A. Fitzmyer, & Roland E. Murphy eds., 1990) (“[H]umans are the pinnacle of the created world; the world is made for man and woman.”).

²⁹ Alan Marshall, *Shaping a Sustainable World*, 23 *NOTRE DAME J.L. ETHICS & PUB. POL’Y* 569, 572 (2009).

³⁰ *Id.* at 571-72; see Renee A. Pistone, *Environmental Advocacy Makes Strange Bedfellows: A Plea for Lawyers, Scientists, and Theologians to Caucus & Promote Environmental Sustainability*, 15 *PENN ST. ENVTL. L. REV.* 323, 329 (2007) (“In short, humans may not do whatever they want with the power of dominion.”); Rolston, *supra* note 10, at 126-27 (writing that “dominion requires stewardship and care” with humans as “prophets, priests, and kings—roles unavailable to nonhumans”).

³¹ Augustine, *supra* note 21, at 346 (citing Dernbach, *supra* note 21).

³² *BABE*, *supra* note 26, at 81 (“Nature in the Bible belongs to God, and humans are to hold nature in stewardship and do God’s will.”); Berryhill, *supra* note 21, at 12 (“A more appropriate reading, and one that corresponds to the dominant theme of stewardship found throughout Scripture, is that of man as caretaker for the Creator.”); see Nadia B. Ahmad, *Recognizing the Role of Religion in Environmental Legal Norms*, 32 *ST. THOMAS L. REV.* 24, 24 (2019) (writing that “sacred scriptures” impose “a divine mandate to improve nature and dispose of impurities as they find them,” which is “duty-based rather than rights-based”); Pistone, *supra* note 29, at 329 (writing that “nature’s hierarchy appears to be deliberate so that humanity would be accountable as it seems like God’s intention was for humanity to protect and preserve the earth”).

³³ *Genesis* 2:5-7.

³⁴ *Id.* 2:15.

³⁵ Berryhill, *supra* note 21, at 12; see *id.* at 11-12 (quoting Pat Stone, *Christian Ecology: Environmentalism and Spirituality*, Part II, *MOTHER EARTH NEWS*, Jan.-Feb. 1989, at 60) (“The ecological teaching of the Bible is inescapable. God made the world. He thinks the world is good. He loves it. It is his world. He has never relinquished title to it. And he has never revoked the conditions that oblige us to take excellent care of it.”); André LaCocque, *Eden*, in 1 *THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY* 246, 247 (Samuel E. Balentine ed., 2015) (claiming that Eden “represents the excellence of God’s creation, an excellence that, paradoxically, needs human collaboration in order to come to fruition, so that Eden is linked to human action and human history”).

³⁶ Schmid, *supra* note 23, at 169 (writing that the creation account in Genesis 1 is “open, even incomplete” and “points forward at least as far as Genesis 9”).

³⁷ *Genesis* 7:2-3.

later be bred for food as well as every other species, “regardless of its utility to man.”³⁸ After the flood, Noah’s family and the animals departed the ark, and Noah made a sacrifice of the clean animals. God then reaffirmed (and even expanded) the role of humankind as stewards over all of creation:

God blessed Noah and his sons, and said to them, “Be fruitful and multiply, and fill the earth. The fear and dread of you shall rest on every animal of the earth, and on every bird of the air, on everything that creeps on the ground, and on all the fish of the sea; into your hand they are delivered. Every moving thing that lives shall be food for you; and just as I gave you the green plants, I give you everything.”³⁹

Here again, these words do not grant humanity license to dominate the rest of creation but instead to act as stewards who must labor and manage. After all, “Noah, a man of the soil, was the first to plant a vineyard.”⁴⁰

The Biblical treatment of creation is found throughout the Bible. For example, several psalms reinforce the idea that the earth belongs to God and that man is its steward.⁴¹ Psalm 8 is “theologically quite similar to Genesis 1:26-28”⁴²:

When I look at your heavens, the work of your fingers,
the moon and the stars that you have established;
what are human beings that you are mindful of them,
mortals that you care for them?

Yet you have made them a little lower than God,
and crowned them with glory and honor.
You have given them dominion over the works of your hands;
you have put all things under their feet,
all sheep and oxen, and also the beasts of the field,
the birds of the air, and the fish of the sea,
whatever passes along the paths of the seas.⁴³

Another creation psalm is Psalm 104, which “conceive[s] of the world as a whole in terms of a divine ‘temple.’”⁴⁴ Two passages are noteworthy for the theme of this article. First, God’s creation is for man’s use:

You cause the grass to grow for the cattle,
and the plants for people to use,

³⁸ Marshall, *supra* note 29, at 573.

³⁹ Genesis 9:1-3; see John Copeland Nagle, *Playing Noah*, 82 MINN. L. REV. 1171, 1217-18 (1998) (arguing that the covenant between God and Noah was meant to protect all of creation); Clifford & Murphy, *supra* note 28, at 16-17 (writing that “the blessing given to Noah in 9:1 repeats the original blessing in 1:28 verbatim” but adds “the concession [that] humans may kill animals for food”).

⁴⁰ Genesis 9:20.

⁴¹ Berryhill, *supra* note 21, at 45.

⁴² Schmid, *supra* note 23, at 172.

⁴³ Psalms 8:3-8.

⁴⁴ Schmid, *supra* note 23, at 172.

to bring forth food from the earth,
and wine to gladden the human heart,
oil to make the face shine,
and bread to strengthen the human heart.⁴⁵

In addition, God's creation of day and night establishes an order for man's labor: "People go out to their work / and to their labor until the evening."⁴⁶ Turning to the New Testament, the theme of man-as-steward is reinforced in the synoptic gospels of Matthew, Mark, and Luke, which contain seven references to stewardship.⁴⁷ For example, in Luke, Jesus tells the parable of the man whose fig tree had produced no fruit, so he instructs the gardener to cut it down.⁴⁸ The gardener, as steward of the vineyard, suggests that the owner wait so that the gardener can "dig around" and "put manure on" the tree to see if it bears fruit the following year.⁴⁹

B. Sustainability and Justice: Sabbaths, Harvests, and Prophetic Warnings about Exploitation

In other books of the Old Testament, notions of sustainability and justice flow from God's creation and the role of humankind as steward-laborers. The Pentateuch and prophetic books like Isaiah and Micah articulate "a 'justice' principle that advocates a fair and equitable distribution of resources, such that no one hoards too much and persons can avoid destitution."⁵⁰

As discussed in the previous Subpart, the Old Testament commands humans to labor so that God's creation can sustain us. In Biblical times, Israelite society was patrilineal and patrilocal: household units had close kinship ties with a patriarch as the head, so "family identity and any inheritance usually passed from the father to his son(s)," and women through marriage became members of the husband's household.⁵¹ The economy revolved around agriculture and animal husbandry, so "agrarian households required at least a small plot of land in order to maintain their viability and 'house of the father' structure."⁵² Hard work was a necessity because of a challenging geography, unpredictable water supplies, and foreign occupation that co-opted labor.⁵³ In short, persons needed a strong work ethic, and those who were lazy or drunkards would not prosper.⁵⁴ Consider Proverbs 6:

⁴⁵ *Psalms* 104:14-15.

⁴⁶ *Id.* 104:20-23. Psalm 19 is another creation psalm, one which combines the themes of creation and law, thus underscoring "the interplay and correlation between the heavenly and earthly orders." Schmid, *supra* note 23, at 172. The first six verses proclaim that the heavens and the firmament and that the day and the night attest to the "glory of God" and "his handiwork." *Psalms* 19:1-6. The remaining verses similarly proclaim how the "law," "decrees," "precepts," and "commandment" of the Lord is "perfect," "sure," "right," and "clear." *Id.* 19:7-14.

⁴⁷ Berryhill, *supra* note 21, at 11.

⁴⁸ *Luke* 13:6-7.

⁴⁹ *Id.* 13:8-9. Another example is the master who entrusted three of his servants with money (or talents). Two of the servants invested the money and doubled the amount, while the third buried his in a hole for safekeeping; the master praised the two servants who had invested their talents but punished the one who buried his. *Matthew* 25:14-30.

⁵⁰ Samuel L. Adams, *Wealth and Poverty*, in 2 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 412, 413 (Samuel E. Balentine ed., 2015).

⁵¹ *Id.*

⁵² *Id.* at 413, 415.

⁵³ John J. Pilch, *Labor*, in 2 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 21, 21 (Samuel E. Balentine ed., 2015). See Adams, *supra* note 46, at 413 ("The challenging terrain for farming and the incursion of foreign powers made it difficult for households to avoid poverty.").

⁵⁴ Adams, *supra* note 50, at 416.

Go to the ant, you lazybones;
consider its ways, and be wise.
Without having any chief
or officer or ruler,
it prepares its food in summer,
and gathers its sustenance in harvest.
How long will you lie there,
O lazybones?⁵⁵

The Bible does not make work-for-work's sake the ultimate goal of labor, however.⁵⁶ Instead, “[t]he true purpose of labor is the glory and service of God,” a purpose that is revealed in the sabbath.⁵⁷ After God created the heavens and earth and all their multitudes, “he rested on the seventh day from all the work that he had done,” so he “blessed the seventh day and hallowed it, because on it God rested from all the work that he had done in creation.”⁵⁸ Likewise, mankind is commanded to obey the sabbath by resting on the seventh day of each week:

Remember the sabbath day, and keep it holy. Six days you shall labor and do all your work. But the seventh day is a sabbath to the Lord your God; you shall not do any work. . . . For in six days the Lord made heaven and earth, the sea, and all that is in them, but rested the seventh day; therefore the Lord blessed the sabbath day and consecrated it.”⁵⁹

Labor is therefore a way “to continue the creative work of God and then enter into God’s own rest.”⁶⁰

In addition to a sabbath for labor is a sabbath for the land. The first statement is in Exodus: “For six years you shall sow your land and gather in its yield; but the seventh year you shall let it rest and lie fallow, so that the poor of your people may eat; and what they leave the wild animals may eat. You shall do the same with your vineyard, and with your olive orchard.”⁶¹ This mandate is expanded in Leviticus:

[T]he land shall observe a sabbath for the Lord. Six years you shall sow your field, and six years you shall prune your vineyard, and gather in their yield; but in the seventh year there shall be a sabbath for the Lord: you shall not sow your field or prune your vineyard. You shall not reap the aftergrowth of your harvest or gather the grapes of your unpruned vine: it shall be a year of complete rest for the land.”⁶²

⁵⁵ *Proverbs* 6:6-9. *See id.* 21:17 (“Whoever loves pleasure will suffer want; / whoever loves wine and oil will not be rich.”).

⁵⁶ Pilch, *supra* note 53, at 21 (“However, the command to rest on the sabbath reveals that labor is not the main purpose of human life.”).

⁵⁷ *Id.*

⁵⁸ *Genesis* 2:1-2.

⁵⁹ *Exodus* 20:8-11. *See id.* 22:12 (“Six days you shall do your work, but on the seventh day you shall rest, so that your ox and your donkey shall rest, and your homeborn slave and resident alien may be refreshed.”).

⁶⁰ Pilch, *supra* note 53, at 21.

⁶¹ *Exodus* 22:10-11.

⁶² *Leviticus* 25:2-5.

In combination, the encouragement to labor but also the requirement to observe a sabbath for people and for the land offer several takeaways for sustainable development. First, sabbaths are “a way of living a sustainable life” because they “limit[] use of resources.”⁶³ This approach has support in modern science with crop rotation. For example, tobacco is a nutrient-robbing plant, so in alternate years, a tobacco field should be planted with beans or other cover crops to restore the topsoil.⁶⁴ Planting tobacco year after year will deplete the soil of nutrients and thus lead to declining—and eventually disappearing—yields.⁶⁵

Second, the result of labor is not mere subsistence—which is only sufficient for the farmer’s household—but abundance.⁶⁶ During the exodus, God showed the divine responsibility for human flourishing by providing the Israelites with manna—but only enough for each day.⁶⁷ By contrast, the promised land was one capable of providing for more than their needs: “I have come down to deliver them from the Egyptians, and to bring them up out of that land to a good and broad land, a land flowing with milk and honey. . . .”⁶⁸ The natural resources of the promised land—including “water, grain, and long-term ownership of land” that allowed for cultivation—were a divine gift sufficient for “a satisfied life.”⁶⁹ This sufficiency hinged upon adherence to divine ordinances, however.⁷⁰ For example, the land was capable of yielding so much that regulations limited the amount that could be harvested: “When you reap the harvest of your land, you shall not reap to the very edges of your field, or gather the gleanings of your harvest. You shall not strip your vineyard bare, or gather the fallen grapes of your vineyard; you shall leave them for the poor and the alien: I am the Lord your God.”⁷¹

Third, abundance is tied to justice by providing for those who are the most powerless.⁷² Widows, orphans, and resident aliens “lacked the security of a functioning household,” so the laws singled these persons out for protection since they “were most susceptible to isolation and destitution.”⁷³ With their explicit mention of the poor and powerless, sabbath laws “linked the care of the poor with the care of the land and recognized the need to consider them together and to reexamine obligations to both.”⁷⁴ Laws went beyond leaving gleanings during harvest or a sabbath

⁶³ Ahmad, *supra* note 14, at 13; see Edward Z. Fox, *The Role of Law and Lawyers in a Sustainable Society*, 43 ARIZ. ST. L.J. 713, 714 (2011) (finding the outlines for sustainable development in the Book of Leviticus and its commands for the Israelites to leave the ground fallow every seventh year and to leave the edges of the field unharvested for the needy and strangers).

⁶⁴ Christopher P. Guzelian, *Silver: A Morally Good Money*, 15 PROCESOS DE MERCADO: REVISTA EUROPEA DE ECONOMIA POLITICA (MARKET PROCESSES: EUROPEAN REV. POLITICAL ECON.) 213, 223-24 (2018) (citing WENDELL BERRY, WHAT MATTERS? ECONOMICS FOR A RENEWED COMMONWEALTH 117-19 (2010)).

⁶⁵ *Id.*

⁶⁶ Interview with Rev. Chris Caddell, Episcopal Church of the Holy Spirit, May 9, 2021.

⁶⁷ Altmann, *supra* note 26, at 124-25. See *Exodus* 16.

⁶⁸ *Exodus* 3:8.

⁶⁹ Altmann, *supra* note 26, at 125. See *Deuteronomy* 8:7-10. The “divine provision for all in the Old Testament” is carried forward in the New Testament with God “provid[ng] sustenance for the whole world,” such as by sending rain and giving the necessities of life to nonhuman life. Altmann, *supra* note 26, at 127. See *Matthew* 5:45 (rain for the righteous and the unrighteous); *Luke* 12:6-7 (sparrows); *id.* 12:24 (ravens); *Matthew* 6:23-34 (grass).

⁷⁰ Altmann, *supra* note 26, at 125. See *Deuteronomy* 8:6, 11-20.

⁷¹ *Leviticus* 19:9-10.

⁷² See Altmann, *supra* note 26, at 125 (noting the “distinctive link between natural provision and riches, on the one hand, and justice, on the other”).

⁷³ Adams, *supra* note 50, at 413.

⁷⁴ Lucia A. Silecchia, *The “Preferential Option for the Poor”: An Opportunity and a Challenge for Environmental Decision-Making*, 5 U. ST. THOMAS L. REV. 87, 101-02 (2008); see *id.* (“The theory underlying these traditions was

year by mandating justice for the poor and aliens. Consider one command in Exodus: “You shall not pervert the justice due to your poor in their lawsuits.”⁷⁵ As another example, to limit “tak[ing] advantage of vulnerable persons for financial gain,” laws forbade charging interest on loans to the poor or requiring a garment as pledge from a widow.⁷⁶

Sustainable creation care and justice for the powerless were reinforced by the prophets. For example, the first chapter of Isaiah implores the nation to “seek justice, / rescue the oppressed, / defend the orphan, / plead for the widow.”⁷⁷ Wealthy landowners were supposed to tithe by donating one-tenth of their annual produce to support “priests, Levites, widows, and others who do not own property.”⁷⁸ During the times of prophets like Amos, Isaiah, and Micah, however, the rich and powerful caused “economic polarization” by usurping the land that belonged to small farmers (often by deceptive tactics) and then building fortresses and opulent houses for themselves.⁷⁹ For example, Isaiah laments: “Ah, you who join house to house, who add field to field, until there is room for no one but you, and you are left to live alone in the midst of the land.”⁸⁰ Micah is more direct in his condemnation: “[T]hose who devise wickedness and evil deeds . . . covet fields, and seize them; houses, and take them away; they oppress householder and house, people and their inheritance.”⁸¹ This practice threatened the very survival of subsistence farmers, who depended upon arable land to maintain their viability.⁸² Micah in particular defended the rights of small farmers and their households, warning that God will punish those who ignore “long-standing covenant stipulations” by “bilk[ing] land from those who depend upon it.”⁸³ His declaration that the Lord requires “but to do justice, and to love kindness, and to walk humbly with your God” can be read in context as requiring care for, and thus forbidding exploitation of, the poor.⁸⁴

II. SUSTAINABLE DEVELOPMENT IN THE NEW TESTAMENT

A. Love of God and Neighbor: A Call to Action for Sustainability and Justice

to provide a regular time at which to appraise whether the land itself or the poor on the land had suffered a wrong that needed to be corrected.”)

⁷⁵ *Exodus* 22:6; *see id.* 22:9 (“You shall not oppress a resident alien; you know the heart of an alien, for you were aliens in the land of Egypt.”).

⁷⁶ Adams, *supra* note 50, at 413-14 (citing J. DAVID PLEINS, *THE SOCIAL VISIONS OF THE HEBREW BIBLE* (2001)). *See Exodus* 22:25 (prohibiting the charging of interest on loans to the poor); *Deuteronomy* 24:17 (forbidding requiring a widow to leave a garment as pledge). The Holiness Code in Leviticus also required the forgiveness of loans (including interest) and restoration of lands every 50 years, thus “reflect[ing] the goals of debt forgiveness and minimizing poverty”—though biblical scholars doubt that this remission actually occurred. Adams, *supra* note 50, at 414.

⁷⁷ *Isaiah* 1:17.

⁷⁸ Adams, *supra* note 50, at 414. *See Deuteronomy* 14:22 (“Set apart a tithe of all the yield of your seed that is brought in yearly from the field.”).

⁷⁹ Adams, *supra* note 50, at 414-15.

⁸⁰ *Isaiah* 5:8.

⁸¹ *Micah* 2:1-2.

⁸² Adams, *supra* note 50, at 415.

⁸³ *Id.* (citing *Micah* 6).

⁸⁴ Adams, *supra* note 50, at 415. *See* BABE, *supra* note 26, at 82 (“In the Old Testament, there is a clear distinction between pursuing wealth, an activity that is condemned, and enjoying the wealth that ensures from following God’s commands.”).

The New Testament contains passages relevant to sustainable development, though it does so by emphasizing love rather than mandates about dominion and sabbaths. Some commentators tie love of neighbor (particularly words and acts of mercy toward the poor and powerless) to creation care, and Jesus physically opposes the exploitation of the poor in his cleansing the temple of money-changing and sales of sacrificial animals. The New Testament also addresses sustainability directly by advocating for empowering the poor to labor and for believers to use natural resources in a sustainable way.

The Introduction, *supra*, quoted the Gospel of St. Mark for the greatest commandment: to love God and neighbor. The second part of this command has roots in Leviticus 19:18—“You shall not take vengeance or bear a grudge against any of your people, but you shall love your neighbor as yourself”⁸⁵—and other passages of the New Testament expand on love of neighbor as a call to action.⁸⁶ For example, at the last supper, Jesus said, “I give you a new commandment, that you love one another. Just as I have loved you, you also should love one another. By this everyone will know that you are my disciples, if you have love for one another.”⁸⁷ Likewise, the First Letter of John reinforces the new commandments “that we should believe in the name of his Son Jesus Christ and love one another, just as he has commanded us.”⁸⁸ St. John prefaces the command by exhorting, “let us love, not in word or speech, but in truth and action.”⁸⁹ After all, “[h]ow does God’s love abide in anyone who has the world’s goods and sees a brother or sister in need and yet refuses help?”⁹⁰ These passages therefore call on people to imitate Christ, who not only spoke of love but engaged in numerous acts of “compassion, mercy, and forgiveness.”⁹¹

One commentator ties the twin commands to love God and neighbor to the Genesis creation narrative: “having ‘dominion’ over the Earth has an associated responsibility of loving the Earth’s resources because they are shared with one’s neighbors.”⁹² Likewise, another claims that “the pervasive sense of stewardship and love of neighbor” means “that these virtues must have priority.”⁹³ He continues:

Not only are the Scriptures replete with references to responsibility and stewardship, but the very words of Christ urge that we “feed his sheep.” These encouragements, together with the parables of the sheep and goats and that of Lazarus, sound stern warnings to those who through greed, indifference, or a misconstrued definition of ‘dominion’ would ignore the needs of other creatures. It becomes difficult to argue that the inequitable waste of the earth’s resources is an appropriate Christian viewpoint.⁹⁴

⁸⁵ *Leviticus* 19:18.

⁸⁶ See Berryhill, *supra* note 21, at 36 (“[T]he commandment opined by Christ is love of neighbor.”).

⁸⁷ *John* 13:34-35.

⁸⁸ *1 John* 3:23.

⁸⁹ *Id.* 3:18.

⁹⁰ *Id.* 3:17.

⁹¹ Francis J. Moloney, *Love*, in 2 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 59, 61 (Samuel E. Balentine ed., 2015).

⁹² Augustine, *supra* note 21, at 346 (citing Dernbach, *supra* note 21). See Marshall, *supra* note 29, at 582 (“Yet if we love the Creator, we will care for His creation.”).

⁹³ Berryhill, *supra* note 21, at 25.

⁹⁴ *Id.* at 36. See *Matthew* 25:32-46 (parable of sheep and goats); *Luke* 16:19-31 (the story of Lazarus).

Further, Pope Francis in his encyclical letter *Laudato Si'* discusses the concept of social love, a love not of words but of “small gestures of mutual care [that are] civic and political” and of “every action that seeks to build a better world.”⁹⁵ Based in both the sabbath and “personal love of God and love of neighbor,”⁹⁶ “social love moves us to devise larger strategies to halt environmental degradation and to encourage a ‘culture of care’ which permeates all of society.”⁹⁷

Jesus showed a particular love of those who are poor and powerless. His most famous expression is in the beatitudes:

“Blessed are you who are poor,
for yours is the kingdom of God;
Blessed are you who are hungry now,
for you will be filled.”⁹⁸

Jesus also engaged in acts of love to aid the poor and powerless, with perhaps the most dramatic being the cleansing of the temple, which is recounted in all four gospels.⁹⁹ The temple was the hub of Jewish worship; for example, it was a place for required animal sacrifice, and Jews were required to pay a temple tax.¹⁰⁰ The high priest Caiaphas had established a market on the temple mount for the sale of sacrificial animals.¹⁰¹ So that people could pay their tax, money changers operated on temple grounds to change Greek and Roman currency into the high-silver-content Tyrian Tetradrachm (shekel) or drachm (half-shekel), charging between 4 and 8 percent interest on the half-shekel, which was the tax for one man.¹⁰² On one visit to the temple, Jesus made “a whip of cords,” and “he drove all of them out of the temple, both the sheep and the cattle. He also poured out the coins of the money changers and overturned their tables.”¹⁰³ He also chastised those who sold doves, “‘Take these things out of here! Stop making my Father’s house a marketplace!’”¹⁰⁴ In the synoptic gospels, Jesus accuses the sellers and money changers of making the temple “a den of robbers.”¹⁰⁵

⁹⁵ POPE FRANCIS, THE ENCYCLICAL LETTER *LAUDATO SI'* OF THE HOLY FATHER FRANCIS ON CARE FOR OUR COMMON WORLD 166-67 (May 24, 2015), https://w2.vatican.va/content/dam/francesco/pdf/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si_en.pdf.

⁹⁶ Lucia A. Silecchia, “*Social Love*” as a *Vision for Environmental Law: Laudato Si' and the Rule of Law*, 10 LIBERTY U.L. REV. 371, 397 (2016).

⁹⁷ POPE FRANCIS, *supra* note 95, at 167. See BABE, *supra* note 26, at 85 (“To care for, rather than exploit, those weaker and poorer than oneself is indicative of a caring posture toward nature as well.”).

⁹⁸ *Luke* 6:20-21. The Gospel of St. Matthew also contains the beatitudes:

“Blessed are the poor in spirit, for theirs is the kingdom of heaven;
Blessed are the meek, for they will inherit the earth;
Blessed are those who hunger and thirst for righteousness, for they will be filled.”

(*Matthew* 5:3, 5-6).

⁹⁹ *Matthew* 21:12-13; *Mark* 11:15-17; *Luke* 19:45-46. The Gospel of John recounts the cleansing of the Temple, though it places the event early in the ministry of Jesus rather than shortly before the last supper and crucifixion. *John* 2:13-17.

¹⁰⁰ *Exodus* 30:11-16.

¹⁰¹ William Domeris, *The “Enigma of Jesus” Temple Intervention: Four Essential Keys*, 71 HTS THEOLOGICAL STUDS. 1, 4 (2015).

¹⁰² *Id.* at 3.

¹⁰³ *John* 2:15. The synoptic gospels are similar except that they do not mention the whip of cords.

¹⁰⁴ *John* 2:16.

¹⁰⁵ *Matthew* 21:13; *Mark* 11:17; *Luke* 19:45.

Biblical commentators offer several interpretations of the cleansing of the temple, including one that is relevant for this article: Jesus was protesting how the priestly class used religious obligation to exploit the poor.¹⁰⁶ For example, the requirement for the temple tax had originally been once in a lifetime, but by the time of Jesus, it had become annual.¹⁰⁷ Further, the tax rate was the same for all so that it was a greater burden for the poor than for the rich—and rich priests did not have to pay the tax.¹⁰⁸ Animal sales in the temple were established by the high priest Caiaphas to compete with markets on the Mount of Olives and thus for his personal gain.¹⁰⁹ The focus of Jesus on the sellers of doves is significant because these animals were sacrificed not by the rich but by the poor, women, and lepers.¹¹⁰ The cleansing of the temple is therefore not so much a condemnation of providing animals for worship or of changing money for the tax (both of which were necessary),¹¹¹ but of religious leaders perverting worship into exploitive commerce: “Like the prophets of old, Jesus sought to drive a wedge between the essential symbolism of the temple as the House of God and those who used the temple to further their own commercial interests, to the detriment of the ordinary peasants.”¹¹²

Rather than exploit the poor and powerless, people are called to show mercy and compassion, not only in “emotion or a disposition” but also through “concrete acts of mercy such as almsgiving.”¹¹³ Christ identified with those in poverty and need, so acts of mercy “express communion with God in Christ through participation in a circle of giving and receiving.”¹¹⁴ Mercy goes beyond providing handouts to the poor to include supporting the ability of others to work. The New Testament treatment of labor reiterates the Old Testament view that labor is not for the

¹⁰⁶ Scholars have “varied” interpretations of this event, which can be categorized into religious, messianic, prophetic and political. Domeris, *supra* note 101, at 1-2 (citing W.R. Herzog, *Temple Cleansing*, in *DICTIONARY OF JESUS AND THE GOSPELS* 817 (J.B. Green & S. McKnight eds., 1992)). The political interpretation is that Jesus sought to “disrupt” Temple activities because “they had become oppressive and exploitative.” *Id.* (quoting Herzog, *supra*, at 820).

¹⁰⁷ P.M. Casey, *Culture and Historicity: The Cleansing of the Temple*, 59 *CATHOLIC BIBLICAL QUARTERLY* 306, 314 (1997); Domeris, *supra* note 101, at 5.

¹⁰⁸ Casey, *supra* note 107, at 313-14.

¹⁰⁹ Domeris, *supra* note 101, at 4.

¹¹⁰ Casey, *supra* note 107, at 314; Daniel J Harrington, *The Gospel According to Mark*, in *THE NEW JEROME BIBLICAL COMMENTARY* 596, 620 (Raymond E. Brown, Joseph A. Fitzmyer, & Roland E. Murphy eds., 1990).

¹¹¹ Hans Dieter Betz, *Jesus and the Purity of the Temple (Mark 11:15-18): A Comparative Religion Approach*, 116 *J. BIBLICAL LITER.* 455, 461 (1997) (claiming that animal sales in the Temple were needed to accommodate the large number of doves that were sacrificed and that Roman and Greek coinage needed to be converted into “acceptable coinage”); Domeris, *supra* note 101, at 3 (“Neither the surcharge nor the exchange appears to be problematic. . .”).

¹¹² Domeris, *supra* note 101, at 7. *See id.* at 3 (quoting R.A. HORSLEY, *JESUS AND THE SPIRAL OF VIOLENCE: POPULAR JEWISH RESISTANCE IN ROMAN PALESTINE* 300 (1987)) (writing that “these activities that were operated and controlled by the aristocratic priestly families must have been points at which the domination and exploitation of the people was most obvious.”); *id.* (quoting Herzog, *supra* note 106, at 820) (discussing the “exploitative and oppressive domination of the people through taxation and tribute” which ‘represent the real social-banditry of the time, even though it was marked as piety and religious obligation’); Casey, *supra* note 107, at 316 (writing that the poor “should be able to obtain sacrificial animals and should not be oppressed by excessive demands for money”). *See also Isaiah* 56:7 (“for my house shall be called a house of prayer / for all peoples”); *Jeremiah* 7:11 (“Has this house, which is called by my name, become a den of robbers in your sight?”).

¹¹³ Susan Eastman, *Mercy and Compassion*, in 2 *THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY* 95, 97 (Samuel E. Balentine ed., 2015).

¹¹⁴ *Id.*; *see* Silecchia, *supra* note 74, at 102-03 (“The New Testament roots of the doctrine [of the preferential option for the poor] . . . arise from the many examples of Christ’s identification with the poor and outcast, and his reminders that whatever is done to and for the “least” is done to and for God himself.”).

service of man but of God.¹¹⁵ For example, the letter of James promotes work as a practical activity that demonstrates faith and guards against materialism.¹¹⁶ James even warns wealthy landowners who hold back wages that God hears the cries of the laborers.¹¹⁷ In the Second Letter to the Thessalonians, Paul exhorts believers “to labor diligently and avoid idleness”.¹¹⁸

For even when we were with you, we gave you this command: Anyone unwilling to work should not eat. For we hear that some of you are living in idleness, mere busybodies, not doing any work. Now such persons we command and exhort in the Lord Jesus Christ to do their work quietly and to earn their own living. Brothers and sisters, do not be weary in doing what is right.¹¹⁹

The command to work was not divorced from charity, however. The burgeoning Christian community supported unemployed fellow believers in learning a new craft, by providing capital to those learning a new trade, or by supplementing income.¹²⁰ Paul also encouraged believers not to hoard more than they need to live but instead to share abundance with those in need.¹²¹ “I do not mean that there should be relief for others and pressure on you, but it is a question of fair balance between your present abundance and their need, so that their abundance may be for your need, in order that there may be a fair balance.”¹²²

One final example found only in the Gospel of St. Matthew weaves together the sustainability of natural resources, the value of labor, the importance of worship, and protection of the poor. In Capernaum, the collectors of the temple tax approached Peter and demanded the annual tax from him and Jesus.¹²³ Neither Jesus nor Peter had money, since Peter had abandoned fishing to follow Jesus.¹²⁴ Even though Jesus did not feel that he and his followers were bound to pay it, he nevertheless instructed Peter, “‘But that we may not offend [the authorities], go to the sea, drop in a hook, and take the first fish that comes up. Open its mouth and you will find a coin worth twice the temple tax. Give that to them for me and for you.’”¹²⁵ Rather than excuse Peter from the tax, Jesus directed him to labor by extracting resources from the sea—but only to the extent necessary to cover the temple debt of Peter and of Jesus.¹²⁶ The miracle of the coin in the fish’s mouth demonstrates the ecological relationship of man and environment.¹²⁷ God’s creation combined with modest toil provides enough for all.

¹¹⁵ Pilch, *supra* note 53, at 21-22. See 2 Thessalonians 3:6 (“Now we command you, beloved, in the name of our Lord Jesus Christ, to keep away from believers who are living in idleness and not according to the tradition that they received from us.”).

¹¹⁶ Pilch, *supra* note 53, at 22 (citing James 2:18-26, 4:13-5:6).

¹¹⁷ James 5:4.

¹¹⁸ Pilch, *supra* note 53, at 22.

¹¹⁹ 2 Thessalonians 3:10-13.

¹²⁰ Pilch, *supra* note 53, at 22.

¹²¹ Adams, *supra* note 50, at 417.

¹²² 2 Corinthians 8:13-14.

¹²³ Matthew 17:24

¹²⁴ See Matthew 4:18-20 (describing how Jesus, when walking by the Sea of Galilee, saw Simon (later called Peter) and his brother Andrew fishing and said to them, “‘Follow me, and I will make you fish for people,’” and how “they left their nets and followed him”).

¹²⁵ Matthew 17:25-27 (New American Bible).

¹²⁶ Guzelian & Todd, *supra* note 13, at 455-56.

¹²⁷ Andries G. van Aarde, *A Silver Coin in the Mouth of a Fish (Matthew 17: 24-27)—A Miracle of Nature, Ecology, Economy and the Politics of Holiness*, 27 NEOTESTAMENTICA 1, 21-22 (1993) (discussing the miracle of the coin in the fish’s mouth as showing, *inter alia*, the “exploitation” that accompanies money changing, “the evil of the socio-

B. The Book of Revelation as a Message of Hope

The term “apocalypse” typically conjures large-scale catastrophe at the end of times,¹²⁸ but its Greek origin is a lifting of the veil, or in New Testament use, an awakening or revelation.¹²⁹ Though it may seem contradictory, the Book of Revelation has hopeful messages about justice and creation,¹³⁰ including an exhortation to act now for the coming of the kingdom of God to earth.

The Book of Revelation mixes destruction and creation. In Chapter 21, “the holy city of Jerusalem” comes down from heaven:

“See, the home of God is among mortals.
He will dwell with them;
they will be his peoples,
and God himself will be with them. . . .”¹³¹

As God’s city, New Jerusalem “has the glory of God and a radiance like a very rare jewel, like jasper, clear as crystal.”¹³² The city is rich and lush, both in its construction of gold and precious stones¹³³ and in its natural resources: “the river of the water of life . . . flow[s] from the throne of God and of the Lamb through the middle of the street of the city,” and “[o]n either side of the river is the tree of life with its twelve kinds of fruit.”¹³⁴ Because “[t]he kingdom of the world has become the kingdom of our Lord and of his Messiah,” God’s “wrath has come, and the time . . . for destroying those who destroy the earth.”¹³⁵

One commentator writes that Revelation invites believers to “embrace environmental justice.”¹³⁶ One sense of justice is the punishment of those who dominate the powerless and exploit Earth’s resources.¹³⁷ Consider that among those who mourned the destruction of Babylon were the

political ostracism of the peripheral groups of people,” and the importance of the ecological relationship between man and his environment).

¹²⁸ See, e.g., Burger, *supra* note 4, at 10,356 (contrasting the “pastoral utopia” of sustainability with the “environmental apocalypse” of climate change, which focuses on “crisis and catastrophe”).

¹²⁹ David L. Barr, *The Apocalypse of John*, in BLACKWELL COMPANION TO THE NEW TESTAMENT 632, 643 (David E. Aune ed., 2012) (“Literally, the word means to remove the veil.”); George Wolfe, *Apocalypse Does Not Mean War*, THE OLIVE BRANCH 1, 1 (Jan. 26, 2012) (explaining that “the linguistic derivation of the term apocalypse does not denote calamity or human-inflicted mass destruction; rather, ‘apocalypse’ comes from the Greek word *apokalyptein* which means, “to uncover,” as if one were removing a veil”); *id.* (claiming that the Biblical usage is more akin to an awakening or paradigm shift); see, e.g., *Isaiah* 25:7 (“And the Lord will destroy on this mountain the covering that is cast over all peoples, the veil that is spread over all nations.”); *2 Corinthians* 3:14-15 (describing the “veil” that lies over the minds of those who are bound by the Law of Moses).

¹³⁰ See Raymond E. Brown et al., *Aspects of New Testament Thought: Eschatology and Apocalypticism*, in THE NEW JEROME BIBLICAL COMMENTARY 1354, 1360 (Raymond E. Brown, Joseph A. Fitzmyer, & Roland E. Murphy eds., 1990) (“Apocalyptic eschatology consists of the interpretation of past and present and especially the hopes for the future found in these works.”).

¹³¹ *Revelation* 21:3.

¹³² *Id.* 21:11.

¹³³ *Id.* 21:15-21.

¹³⁴ *Id.* 22:1-2.

¹³⁵ *Id.* 11:15-18.

¹³⁶ Augustine, *supra* note 21, at 339 (“John’s Revelation narrative invites [believers] to reject environmental injustice and embrace environmental justice.”)

¹³⁷ *Id.* at 337 (“God will not destroy the Earth. Instead, in the interest of justice, God will only destroy those that seek to marginalize and objectify others. . . .”); see Klaus B. Haacker, *Justice: New Testament*, in 1 THE OXFORD

“merchants of the earth” who had gained wealth by selling their “dainties” and “splendors” because their wealth will be “laid waste.”¹³⁸ “Imagining a divine intervention by which the roles of oppressor and oppressed would be reversed, apocalyptic eschatology . . . offered hope and strength to the disconsolate and the weak.”¹³⁹

Such “hope and strength” comes from understanding the coming of God not only as an event in the future but also as an exhortation of how to live right now.¹⁴⁰ “Let the evildoer still do evil, and the filthy still be filthy, and the righteous still do right, and the holy still be holy.”¹⁴¹ Those who follow God’s commands “will have the right to the tree of life and may enter the city by the gates.”¹⁴² Accordingly, Revelation “encourages humans to be wise stewards of the Earth because it provides that God will descend to live with humans, as opposed to humans ascending to live with God in heaven.”¹⁴³ The Bible therefore closes with a “clarion call” to be “protective stewards” of God’s creation.¹⁴⁴

III. A MORAL AND ETHICAL FOUNDATION FOR SUSTAINABLE DEVELOPMENT LAW AND POLICY FROM BIBLICAL TEACHING

The Bible opens and closes with a command for humans to be stewards of God’s creation, a creation that includes the earth, both land and water, as well as its flora and fauna. Not to be forgotten is that the Bible recounts how humans are also God’s creation—indeed, God’s greatest creation, made in the image of God Himself. Humans therefore have a responsibility for—or more to the point, a command to love—one another so that all can benefit. Labor is encouraged, but overuse of natural resources and exploitation of people (particularly the poor and powerless) are forbidden. Rather, the Bible contains a message of empowerment for all people and restraint toward God’s gifts, which managed wisely provide enough for all. Given that Western laws have a Judeo-Christian heritage,¹⁴⁵ and that many people identify as religious,¹⁴⁶ Biblical teachings can help inform and strengthen legal norms for sustainable development.¹⁴⁷ More to the point for this

ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 581, 582 (Samuel E. Balentine ed., 2015) (writing that “the relevance of ‘justice’ is heightened in the New Testament, where the expectation of a universal judgment at the end of times is of basic importance”); Ahmad, *supra* note 14, at 7 (“Religious scholar Gretel Van Wieren notes that Christian approaches to environmental ethics are not monolithic, fully agreed-upon principles, but recognize that individuals ‘should be *against* the unjustified destruction of nature and *for* the care of God’s Earth.”).

¹³⁸ *Revelation* 18:11-17.

¹³⁹ Calvin J. Roetzel, *Eschatology*, in 1 THE OXFORD ENCYCLOPEDIA OF THE BIBLE AND THEOLOGY 262, 262 (Samuel E. Balentine ed., 2015).

¹⁴⁰ Brown et al., *supra* note 130, at 1364 (writing that eschatology addresses “the flawed character of the universe, human responsibility, and the unfinished work of creation”).

¹⁴¹ *Revelation* 22:11.

¹⁴² *Id.* 22:12-14.

¹⁴³ Augustine, *supra* note 21, at 336.

¹⁴⁴ *Id.* at 331-32.

¹⁴⁵ See Fisher-Ogden & Saxer, *supra* note 14, at 68 (“The environmental laws in the United States were created from a cultural milieu of its Judeo-Christian heritage.”). See also Chad G. Marzen, *The Gospels and American Jurisprudence*, 53 UNIV. MEMPHIS L. REV. (forthcoming 2023) (manuscript at 4) (surveying American cases to conclude that “the Gospels retain a prominent historical and current role in American jurisprudence”).

¹⁴⁶ See Rolston, *supra* note 14, at 129 (writing that eighty percent of Americans claim to be religious).

¹⁴⁷ Ahmad, *supra* note 14, at 21 (“Legal norms for environmental protection nationally, subnationally, and internationally would be strengthened by the use of faith-based approaches to environmental protection.”); see Adams, *supra* note 50, at 418. (“[T]here are still many similarities between the biblical world and ours when it comes to wealth and poverty, primarily as the result of stark inequality and the timelessness of human behavior. The daily challenges

article, the Bible can help us rectify the vagueness and ambiguity of sustainable development by providing a moral and ethical foundation for it.

A. Prioritizing Humanity Rather than Seeking to Balance the Triple Bottom Line

The Bible and sustainable development both recognize the connections between commercial activity, environmental protection, and social concerns like employment and care for the poor and powerless. Sustainable development goes beyond recognition to require balance, such as the metaphorical expressions of three co-equal pillars or the triple bottom line. It is therefore surprising that one of the discursive issues with sustainable development is the lack of balance. The very term “sustainable development” privileges commerce because “development” is a noun and “sustainable” an adjective, and one common understanding is that economic development is the key to sustainable development.¹⁴⁸ This is particularly problematic when the emphasis on development and growth is “not presented openly or is camouflaged with secondary environmental objectives.”¹⁴⁹ Even when environmental concerns are given more attention, the social dimension often goes unaddressed.¹⁵⁰

Further, attempts to balance the triple bottom line can be problematic if words signaling a common identity veil serious harms to persons or the environment.¹⁵¹ After all, laws, programs, and projects can achieve balance if negative consequences are sufficiently countered by beneficial ones—even if the detriments have an outsized harmful impact on the most vulnerable people. For example, efforts to tackle global challenges like climate change might lead to carbon-friendly but “troublesome” facilities like “uranium mining in Indian country” or to carbon trading schemes that do nothing to rectify localized pollution.¹⁵² Plus, good intentions can have adverse consequences, as when Northern-tier nations’ food aid to Southern-tier nations harms those nations’ small-scale farmers by making them less competitive,¹⁵³ or when programs to modernize agriculture in the developing world lead to the reduction of the growth of biodiverse crops and the displacement of small-scale farmers from their land.¹⁵⁴

for many persons, especially in the Third World, resemble quite closely the situation of poverty for many of the characters in the Bible.”)

¹⁴⁸ Guzelian & Todd, *supra* note 13, at 467; Todd, *supra* note 7 (manuscript at 26); see Rio Declaration, *supra* note 7, Principle 12 (“States should cooperate to promote a supportive and open international economic system that would lead to economic growth and sustainable development in all countries, to better address the problems of environmental degradation.”).

¹⁴⁹ Viñuales, *supra* note 8, at 6.

¹⁵⁰ See, e.g., Jacobs & Finney, *supra* note 2, at 95-97 (describing how private sustainability metrics often measure only one of multiple dimensions, such as Newsweek’s annual Green Rankings, which consider only environmental indicators); Barbara Stark, *Sustainable Development and Postmodern International Law: Greener Globalization?*, 27 WM. & MARY ENVTL. L. & POL’Y REV. 137, 151-52 (2002) (adopting a postmodern perspective of view sustainable development as the merger of two meta-narratives, environmentalism and economic development).

¹⁵¹ See Burger, *supra* note 4, at 10,356 (describing one possible way that sustainability fits into contemporary environmental discourse as a “deceptive story that perpetuates existing power dynamics” because it “brackets big-ticket items like capitalism and consumerism, reifies existing actors and hierarchies, and affirms basic patterns of social organization, production, and consumption”).

¹⁵² Eileen Guana, *Environmental Law, Civil Rights and Sustainability: Three Frameworks for Environmental Justice*, 19 J. ENVTL. & SUSTAINABILITY L. 34, 56-58 (2012).

¹⁵³ Alkon, *supra* note 12, at 185-92 (arguing for direct monetary aid from the government to small farmers rather than aid in food since food aid can hurt the ability of small farmers to be competitive).

¹⁵⁴ Susan H. Bragdon, *Global Legal Constraints: How the International System Fails Small-Scale Farmers and Agricultural Biodiversity, Harming Human and Planetary Health, and What to Do About It*, 36 AM. U. INT’L L. REV.

Rather than balance, a more appropriate approach to sustainable development is to focus on “sites at which tensions between bodies of law and ways of knowing are felt most acutely.”¹⁵⁵ The lens for such focus is found in a Biblical approach, which prioritizes people, who are integral to creation care and managing its use for development. After all, humans are made in the image of God and so set above the rest of creation, with natural resources a divine gift to them.¹⁵⁶ Further, separating environmental and social issues is conceptually flawed because humanity is part of God’s creation and thus part of the environment.¹⁵⁷ Nor should economics be given equal status to humanity.¹⁵⁸ Consider that regulations from the Pentateuch limit the use of land and prohibit charging interest on loans to the poor, and several passages from both the Old and New Testament proscribe hoarding and exploitation: the prophetic warnings about the powerful seizing and combining land, Jesus’s cleansing of the temple because the ruling classes had made it a marketplace, Paul’s exhortation to the Christian community not to hoard resources, and the punishment for merchants in the Book of Revelation.¹⁵⁹ Even individual labor is limited, such as by the weekly sabbath and Jesus’ directive to Peter to fish only to the extent necessary to fulfill their tax obligations.¹⁶⁰

These limitations mean that prioritizing humanity is not the same as granting people an unlimited license over natural resources. Instead, giving humanity priority means seeking ways to empower all people to act as stewards and thereby assume the responsibility that is our charge.¹⁶¹ Because humanity is made in God’s image, each human is a “royal representative” on earth so that “care for nature becomes part of the royal task.”¹⁶² All persons are called to be “noble stewards,”¹⁶³ managers who “labor to protect God’s creation.”¹⁶⁴ The command to love reinforces and expands this calling. After all, “if we love the Creator, we will care for His creation.”¹⁶⁵ And love of

1, 45–48 (2020) (“review of PPPs’ successes, as measured by their contribution to achieving development goals, conserving biodiversity, protecting SSF livelihoods, and increasing the supply of affordable and nutrient-dense food, found them to be more harmful than helpful.”); Susan H. Bragdon & Carly Hayes, *Reconceiving Public-Private Partnerships to Eradicate Hunger: Recognizing Small-Scale Farmers and Agricultural Biological Diversity as the Foundation of Global Food Security*, 49 GEO. J. INT’L L. 1271, 11298-1300 (2018) (writing that the grant of land to Northern-tier agribusiness entities leaves less land for Southern-tier SSFs, some of whom are displaced altogether because they have uncertain legal title to their farm land).

¹⁵⁵ Ellis, *supra* note 2, at 72.

¹⁵⁶ Clifford & Murphy, *supra* note 28, at 11 (“[H]umans are the pinnacle of the created world; the world is made for man and woman.”)

¹⁵⁷ Berryhill, *supra* note 21, at 41:

To identify the environment as if it were something outside of man does grave injustice. An identity based on separation moves it away from mankind. This distance distorts and even ignores intrinsic values, creating a succession of false positives, as well as false negatives. Its greatest injustice, however, is that it misstates the problem, posturing created against Creator.

¹⁵⁸ Rolston, *supra* note 14, at 128-29 (“The fundamental flaw in ‘sustainable development’ is not to see the Earth as a resource but to see it as resource only. This leads to an attitude of exploitation and bad stewardship.”).

¹⁵⁹ See Parts I(B), II, *supra*.

¹⁶⁰ See *Exodus* 20:8-11, 22:10-12; *Leviticus* 25:2-5; *Matthew* 17:24-27.

¹⁶¹ Augustine, *supra* note 21, at 348 (claiming that those who identify with Judeo-Christian faith traditions have a responsibility toward environmental stewardship).

¹⁶² Altmann, *supra* note 26, at 129.

¹⁶³ Berryhill, *supra* note 21, at 32.

¹⁶⁴ David P. Gushee, *Evangelicals and Politics: A Rethinking*, 23 J.L. & RELIGION 1, 12-13 (2007-08) (“We labor to protect God’s creation.”).

¹⁶⁵ Marshall, *supra* note 29, at 582; see John Copeland Nagle, *Humility and Environmental Law*, 10 LIBERTY U.L. REV. 335, 336 (2016) (“Humility toward the environment emphasizes the need for restraint and for care in light of our lack of knowledge about the environmental impacts of our actions.”).

neighbor means preserving natural resources for all—both the present generation and our “neighbors in time”¹⁶⁶—and to engage in acts that enable all people to fulfill the call to stewardship.

B. Environmental Justice as Part of Sustainable Development, with the Social Dimension a Call to Individual and Community Empowerment

Additional support for prioritizing humanity is found in the recurrence of justice, whether for the poor and powerless, or as linked to the use (and abuse) of natural resources, or when combined—as when the poor are dispossessed of their land or field laborers have their wages withheld. Indeed, some commentators call justice an integral part of sustainable development as informed by religious principles,¹⁶⁷ a finding that aligns with those scholars who treat environmental justice as part of sustainable development.¹⁶⁸ Both creation care and love of God and neighbor are reflected in the distributive, procedural, corrective, and social dimensions of environmental justice.¹⁶⁹ For example, while distributive justice often deals with the inequitable concentration of environmental harms like waste facilities and smelters in poor and minority communities,¹⁷⁰ the flip side of distributive justice is the call for a more equitable distribution of environmental benefits.¹⁷¹ This positive sense finds support throughout the Bible, such as limits on harvests and the sabbath year, both of which make food available for the poor and resident aliens.¹⁷² Plus, prophets like Micah attacked the concentration of land by the wealthy because it

¹⁶⁶ Berryhill, *supra* note 21, at 8; *see id.* at 5 (arguing that “the allocation of natural resources must be dictated by a respect for creation and a love of neighbor”).

¹⁶⁷ Ahmad, *supra* note 14, at 4 (“Religion offers a sense of environmental justice, creating a sense of duty to the environment and to others, because religious rhetoric carries a powerful moral authority.”); Lakshman Guruswamy, *Global Energy Poverty: The Relevance of Faith and Reason*, 7 BELMONT L. REV. 199, 228 (2020) (“Sustainable development is predicated on these unarticulated general principles of law and justice. . . .”); Dieter T. Hessel, *Religion and Ethics Focused on Sustainability*, 39 ENVTL. L. REP. 10,291, 10,291 (2009) (“Because sustainability links environmental health with socioeconomic well-being, sustainability ethics encompass concerns for both ecology and justice.”).

¹⁶⁸ *E.g.*, JULIAN AGYEMAN, *INTRODUCING JUST SUSTAINABILITIES: POLICY, PLANNING, & PRACTICE* (2013); Julian Agyeman, Robert D. Bullard, & Bob Evans, *Joined-up Thinking: Bringing Together Sustainability, Environmental Justice and Equity*, in *JUST SUSTAINABILITIES: DEVELOPMENT IN AN UNEQUAL WORLD 1* (Robert D. Bullard et al. eds., 2012); *see* Alyson C. Fluornoy, *In Search of an Environmental Ethic*, 28 COLUM. J. ENVTL. L. 63, 87-88 (2003). (calling the Environmental Justice Impulse “consistent with, but more narrowly focused than, the Sustainability Impulse”); Joshua C. Gellers & Trevor J. Cheatham, *Sustainable Development Goals and Environmental Justice: Realization Through Disaggregation?*, 36 WIS. INT’L L.J. 276, 278 (2019) (writing that environmental justice “rest[s] at the intersection” of the social equity and environmental protection “sectors” of sustainable development); Guana, *supra* note 152, at 36 (claiming that “a framework oriented towards sustainability, if coupled with sensitivity towards environmental justice concerns, might help bridge the chasm in the current discourse about environmental justice, and provide the space, in a manner of speaking, where more common ground can be meaningfully explored”).

¹⁶⁹ *See* Carmen G. Gonzalez, *Climate Justice and Climate Displacement: Evaluating the Emerging Legal and Policy Responses*, 36 WIS. INT’L L.J. 366, 370-71 (2019).

¹⁷⁰ *See* Colin Crawford, *Access to Justice for Four Billion: Urban and Environmental Options and Challenges*, 26 N.Y.U. ENVTL. L.J. 340, 382 (2018) (“The basic demand of the environmental justice movement . . . is to more fairly distribute—or, preferably, reduce in an equitable manner—the harms of industrial and military activities.”).

¹⁷¹ Colin Crawford, *Environmental Benefits and the Notion of Positive Environmental Justice*, 32 U. PA. J. INT’L L. 911, 914 (2011); *see* Clifford Rechtschaffen, *Advancing Environmental Justice Norms*, 37 U.C. DAVIS L. REV. 95, 96 (2003) (“Broadly speaking, environmental justice refers to a political and social movement to address the disparate distribution of environment harms *and benefits* in our society”).

¹⁷² *See* text accompanying footnotes 56-76, *supra*.

deprived families of their own plots for agriculture.¹⁷³ The most common meaning of procedural justice is the right to a meaningful voice in the formation of laws and policies.¹⁷⁴ This is not addressed in the Bible since laws and regulations come directly from God while the new commandments are from Jesus. The First Letter of John nevertheless hints at such participation in its exhortation to engage in acts of love.¹⁷⁵ For example, faith-based organizations lobby for the expansion of existing laws or the creation of new ones that embody stewardship and preservation of natural resources.¹⁷⁶ The Bible also addresses corrective justice, perhaps most directly in the Book of Revelation when those who exploit the earth's resources will be punished while those who abide by God's commands will be rewarded with a New Jerusalem.¹⁷⁷

The social justice dimension of environmental justice has been characterized as too “nebulous,”¹⁷⁸ but the Bible provides a means to reconceive it as empowering individuals and communities to fulfill the calling to act as stewards. Returning to the theme of vagueness and ambiguity, programs that ostensibly promote development and target poverty can result in social injustice. For example, one commentator criticizes how such programs are actually “programs of dependence.”¹⁷⁹ Not only do international programs often necessitate the sacrifice of natural resource conservation and pollution control, but they are financed by international loans, the repayment of which requires export-oriented commerce and the suppression of wages.¹⁸⁰ These programs create a “cycle of perpetual servitude, exploitation, and dependency of the working poor and oppressed,” which is nothing short of “theft of the only asset the non-landed peoples of the Third World possess—their labor.”¹⁸¹ The alternative is that “proposed programs must cultivate ecologically sensible progress without the theft of the assets of labor and natural resources.”¹⁸² Laws and programs must therefore empower all people to engage in “good husbandry of the land”

¹⁷³ See Berryhill, *supra* note 21, at 5 (arguing that “the allocation of natural resources must be dictated by a respect for creation and a love of neighbor”).

¹⁷⁴ Jeff Todd, *A “Sense of Equity” in Environmental Justice Litigation*, 44 HARV. ENVTL. L. REV. 169, 177 n.45 (2020) (writing that procedural justice “is typically defined as the right for citizens to equal participation in political processes”); see Robert R. Kuehn, *A Taxonomy of Environmental Justice*, 30 ENVTL. L. REPORTER 10681, 10688 (2000) (claiming that procedural justice deals with the right “to equal concern and respect for the political decisions about how . . . goods and opportunities are to be distributed”).

¹⁷⁵ *1 John* 3:17-19, 23.

¹⁷⁶ Berryhill, *supra* note 21, at 49; see Ahmad, *supra* note 14, at 9 (“The public trust doctrine is a way for citizens to stand as beneficiaries holding clear public property interests in natural resources, rather than as weakened political constituents making increasingly desperate environmental appeals to their public officials.”).

¹⁷⁷ See Kuehn, *supra* note 174, at 10683-84 (2000) (writing that corrective justice covers both the punishment of those who violate environmental laws and remediation of injuries caused by harmful acts).

¹⁷⁸ *Id.* at 10698.

¹⁷⁹ Berryhill, *supra* note 21, at 41-42.

¹⁸⁰ *Id.* See Guzelian & Todd, *supra* note 13, at 470 (“Heavily subsidized U.S.-grown crops can be sold in countries like Mexico tariff-free, while nations of the global South borrow from the International Monetary Fund and World Bank, which condition loans on structural adjustments like reducing import restrictions and eliminating price controls, low-interest loans to SSFs, and subsidized seed and fertilizer.”).

¹⁸¹ Berryhill, *supra* note 21, at 41-42. See Gonzalez, *supra* note 11, at 422 (“Policies that depress agricultural prices . . . exacerbate hunger by rendering small farmers destitute, thereby depriving them of the income with which to purchase agricultural inputs, pay taxes, and purchase consumer goods and food not produced on the farm.”); Ehrenreich & Lyon, *supra* note 11, at 17 (writing that the “corporatization of subsistence crops . . . forcefully converts subsistence farmers, who must now buy their food with currency, into wage and migrant laborers to be exploited by corporate agriculture in their countries and abroad”).

¹⁸² Berryhill, *supra* note 21, at 44.

so that “the land flows with milk and honey.”¹⁸³ Phrased differently, laws and programs can promote social justice by empowering all to participate in creation care, whether individual (as with Peter practicing his trade of fishing to satisfy his temple debt), familial (as with the patrilocal agriculture of ancient Israelites), or community (as with early church members supporting each other to learn a new trade).¹⁸⁴

This participatory vision of justice might seem aspirational, or worse, as deepening the ambiguity of sustainable development by adding a vague goal of empowerment; however, empowerment has already been proposed by scholars and enacted in practice. For example, the “words and deeds of churches and religious organizations can activate both the stewardship and social justice norms”¹⁸⁵ and thereby “play a key role by illuminating a more sustainable path.”¹⁸⁶ One commentator suggests that governments “should explore partnerships, grant programs, and other ways to take advantage of the expertise that churches and religious organizations have in activating personal norms and influencing individuals to change their behavior.”¹⁸⁷ Religious entities can therefore facilitate the enactment of law and policy by encouraging believers to live more sustainable lives.

Perhaps more importantly, individual empowerment fits with the grassroots ethos of environmental justice, which emerged as an extension of the civil rights movement through community activism (often with support from churches) in drawing attention to injustice and pushing for change.¹⁸⁸ Communities “sought a greater voice in how . . . development should occur, such as through community monitoring of hazardous activities and the creation of jobs for community residents.”¹⁸⁹ Contemporary scholarship calls for community-based sustainable

¹⁸³ Rolston, *supra* note 14, at 132 (“If there is to be a sustainable society, one in which the land flows with milk and honey, good husbandry of the land has to be coupled with divine law. . . . [L]ands do not flow with milk and honey for all unless and until ‘justice rolls down like waters.’”).

¹⁸⁴ See Michael Zielinski, *An Ecology of Liberation: The Shifting Landscape of Environmental Law in an Era of Change in Environmental Values*, 10/25/2016 GEO. ENVTL. L. REV. ONLINE 1 (discussing, in the context of a “liberationist approach to environmental law,” the integration “of social and environmental justice, as well as a vision of collaborative engagement among community members on the local, regional, national, and global levels”).

¹⁸⁵ Stephen M. Johnson, *Is Religion the Environment’s Last Best Hope? Targeting Climate Change in Individual Behavior Through Personal Norm Activation*, 24 J. ENVTL. L. & LITIG. 119, 150 (2009).

¹⁸⁶ Hessel, *supra* note 167, at 10,293; see *id.* at 10,293-94 (“Religious environmental activists underscore contemporary humanity’s ethical responsibility to respect and conserve Earth’s ecological integrity and biodiversity while acting to achieve social and economic justice.”).

¹⁸⁷ Johnson, *supra* note 185, at 164.

¹⁸⁸ LUKE W. COLE & SHEILA R. FOSTER, FROM THE GROUND UP: ENVIRONMENTAL RACISM AND THE RISE OF THE ENVIRONMENTAL JUSTICE MOVEMENT 10-18 (2001) (describing how communities eschewed the top-down structure of mainstream environmentalism to engage in grassroots activism to protect the places where they “live, work, play, and go to school”); Augustine, *supra* note 21, at 329-30 (claiming that, “while the legal basis of environmental justice began with religious and social activists during the post-Civil Rights Movement . . . era of American history, the theological basis of environmental justice originated with the canonical compilation comprising the Holy Bible’s epistles and narratives, with an eschatological focus, all written well before antiquity”); Johnson, *supra* note 185, at 147-48 (noting how “churches and religious organizations played a pivotal role in mobilizing change in the civil rights movement and the environmental justice movement.”).

¹⁸⁹ Todd, *supra* note 7 (manuscript at 42-43) (citing Luke W. Cole, *Civil Rights, Environmental Justice and the EPA: The Brief History of Administrative Complaints Under Title VI of the Civil Rights Act of 1964*, 9 J. ENVTL. L. & LITIG. 309 (1994) (arguing that the main goal of environmental justice campaigns is community empowerment); Gregg P. Macey & Lawrence E. Susskind, *The Secondary Effects of Environmental Justice Litigation: The Case of West Dallas Coalition for Environmental Justice v. EPA*, 20 VA. ENVTL. L.J. 431, 466 (2001) (describing actions of the West Dallas Coalition for Environmental Justice in negotiating a settlement with a hazardous waste facility reduce its processing, incorporate clean-up and disposal services, and hire workers from the neighborhood)).

development,¹⁹⁰ where individuals and communities have the right to “self-determination.”¹⁹¹ Examples of self-determination in action include community-based participatory research programs that have been successful in effecting policy change, good neighbor agreements where developers specify emissions standards and establish a monitoring role for community groups, and remediation efforts that included community members.¹⁹² From a social justice standpoint, prioritizing individuals suggests that the most ethical approach to legal change and the remediation of environmental harm may not be top-down, so those in power should embrace the bottom-up efforts of community- and religious-led organizations.¹⁹³

CONCLUSION AND ADDITIONAL STUDY

This survey of Biblical passages is an important step toward overcoming the vagueness and ambiguity of sustainable development. It offers faith-based, moral and ethical support to viewing environmental justice as an aspect of sustainable development and to steering away from deceptive attempts at balance and toward prioritizing the empowerment of all people to participate as stewards of creation. An additional value of this survey is that it offers a framework for deeper exploration, such as a focus on particular books of the Bible or on specific topics like agriculture, land use, labor and employment, or money and taxation. Another approach might be to consider different translations of the Bible. This article used the New Revised Standard Version because it is in contemporary English and was commissioned by the National Council of Churches so has

¹⁹⁰ E.g., Matthew N. Currie, *Social Ecology and Lawyering in the Anthropocene*, 45 U. DAYTON L. REV. 401 (2020) (promoting community action to address broad climate and environmental ills); Kermit Lind, *Moving Toward Sustainable Residential Integration with Racial Justice and Social Equity*, 70 CASE W. RES. L. REV. 759, 775 (2020) (“The way forward, therefore, requires a new approach, one that values just and equitable communities and their sustainability ahead of interests that sustain deep, destabilizing divisions.”).

¹⁹¹ See Alexandra McGee & Shalini Swaroop, *The Power of Power: Democratizing California’s Energy Economy to Align with Environmental Justice Principles through Community Choice Aggregation*, 46 ECOLOGY L.Q. 985 (2019) (quoting EJNET, *Principles of Environmental Justice* (Apr. 6, 1996), <https://www.ejnet.org/ej/principles.html>) (discussing the seventeen principles of environmental justice that were established in 1991 at the First National People of Color Environmental Leadership Summit, including Principle 5, which states that “[e]nvironmental justice affirms the fundamental right to political, economic, cultural and environmental self-determination of all peoples”).

¹⁹² E.g., George K. Foster, *Community Participation in Development*, 51 VAND. J. TRANSNAT’L L. 39, 84 (2018) (discussing good neighbor agreements between communities and developers); Todd, *supra* note 174, at 196-97 (describing settlements that allowed each community to have “more say in fashioning its own remedy”); Rama Mohana R. Turaga, Douglas Noonan, & Ann Bostrom, *Hot Spots Regulation and Environmental Justice*, 70 ECOLOGICAL ECON. 1395, 1396 (2011) (discussing success of community-based participatory research programs).

¹⁹³ Todd, *supra* note 7 (manuscript at 42-44). See Krista Harper & S. Ravi Rajan, *International Environmental Justice: Building the Natural Assets of the World’s Poor*, in RECLAIMING NATURE: ENVIRONMENTAL JUSTICE AND ECOLOGICAL RESTORATION 327, 342-43 (James K. Boyce et al. eds., 2007) (discussing the Indian Joint Forest Management program, which is a partnership between local communities and government agencies); D. Kapua’ala Sproat, *An Indigenous People’s Right to Environmental Self-Determination: Native Hawaiians and the Struggle Against Climate Change Devastation*, 35 STAN. ENVTL. L.J. 157, 162 (2016) (describing the advocacy of Native Hawaiians in lobbying the state to change laws to help preserve traditional cultivation practices). Grassroots activism as an approach toward legal change has also been proposed by scholars applying secular frameworks. See Martin McCrory et al., *Watered Down Voices, Watered Down Justice: A Demand for Polycentrism, Demosprudence, and Praxis in WOTUS Regulatory Reform*, 34 GEO. ENVTL. L. REV. (forthcoming 2022) (manuscript at 31) (promoting “demosprudence” as a citizen-led approach to “shape environmental regulatory reform” and to promote environmental justice).

ecumenical appeal.¹⁹⁴ Other translations might challenge us to consider not only questions of style but also of substance. Taking the miracle of the coin in the fish’s mouth as an example, the New American Bible (which is the translation used by the Roman Catholic Church in the U.S.) makes explicit that the coin Peter will find is worth twice the temple tax while the New Revised Standard Version does not.¹⁹⁵

Still another avenue of study is how Biblical passages align with the tenets of particular Christian denominations as well as non-Christian faiths.¹⁹⁶ For example, legal articles have already explicated *Laudato Si’* by Pope Francis,¹⁹⁷ which was addressed in Part II(A), *supra*, and which has particular relevance because it addresses law and legal institutions.¹⁹⁸ Others have looked at evangelical statements, such as the Evangelical Declaration on the Care of Creation, which proclaims that “one consequence of our misuse of the earth is an unjust denial of God’s created bounty to other human beings, both now and in the future.”¹⁹⁹ Instead, persons of faith should “labor to protect God’s creation,” as recognized in the seventh statement of *For the Health of the Nation* from the National Association of Evangelicals.²⁰⁰ The seventh statement therefore “embraces the principles of dominion, stewardship, and sustainability.”²⁰¹ New research might explore the key texts of other Christian faiths, such as the Episcopal Church’s Book of Common Prayer, which has numerous references to creation and justice, including this powerful statement from Eucharistic Prayer D: “You formed us in your own image, giving the whole world into our care, so that, in obedience to you, our Creator, we might rule and serve all your creatures.”²⁰² Or it might look beyond specific texts to consider the traditions and practices of different denominations, such as Lutheran traditions that “call on their members to challenge the practices where God’s creation is made into commodities in an unjust way, which negatively impacts the poor.”²⁰³ Additional study can not only isolate the tenets of particular faiths but also reveal what they share, a point reinforced by the joint statement of Pope Francis, Ecumenical Patriarch

¹⁹⁴ *About the National Council of Churches*, NAT’L COUNCIL OF CHURCHES, <https://nationalcouncilofchurches.us/about/> (last visited July 7, 2022).

¹⁹⁵ *Compare* Matt. 17:27 (New American Bible) (“Open it mouth and you will find a coin worth twice the temple tax.”), *with* Matt. 17:27 (New Revised Standard Version) (“ . . . and when you open its mouth, you will find a coin”); *see* THE EPISCOPAL HANDBOOK 145 (rev. ed. 2015) (calling the New American Bible the translation for the Roman Catholic Church in the U.S.).

¹⁹⁶ Fisher-Ogden & Saxer, *supra* note 14, at 68 (writing that “religious values from diverse world religions can inform policy choices in domestic and international regulatory schemes protecting air, water, and land resources”).

¹⁹⁷ *See, e.g.*, Albert C. Lin, *Pope Francis’ Encyclical on the Environment as Private Environmental Governance*, 9 GEO. WASH. J. ENERGY & ENVTL. L. 33 (2018); John Copeland Nagle, *Pope Francis, Environmental Anthropologist*, 28 REGENT U.L. REV. 7 (2016); Porras, *supra* note 4, *passim*.

¹⁹⁸ Silecchia, *supra* note 96, *passim*.

¹⁹⁹ Marshall, *supra* note 29, at 573 (quoting Evangelical Env’tl. Network, *An Evangelical Declaration on the Care of Creation* (1994), available at <http://www.creationcare.org/resources/declaration>).

²⁰⁰ Gushee, *supra* note 164, at 12 (quoting NATL. ASSOC. OF EVANGELICALS, *FOR THE HEALTH OF THE NATION: AN EVANGELICAL CALL TO CIVIC RESPONSIBILITY* 11 (available at http://www.nae.net/images/civic_responsibility.pdf)).

²⁰¹ *Id.* at 12-13. *See* Johnson, *supra* note 185, at 153 (“Evangelical Christians have become a strong voice in the environmental movement. . .”).

²⁰² BOOK OF COMMON PRAYER 373 (1979). Additional passages about creation care and justice used in the weekly mass include the Prayers for the People, such as Form IV: “Guide the people of this land, and of all the nations, in the ways of justice and peace; that we may honor one another and serve the common good,” and “Give us all a reverence for the earth as your own creation, that we may use its resources rightly in the service of others and to your honor and glory.” *See id.* at 388. Several prayers address the social order (including social justice, agriculture, the poor and neglected, and the oppressed) as well as the natural order (including knowledge of God’s creation and the conservation of natural resources). *See id.* at 810-835.

²⁰³ Ahmad, *supra* note 14, at 7.

Bartholomew, and Archbishop of Canterbury Justin Welby on climate change and sustainability.²⁰⁴

Religious studies that compare Christianity with non-Christian faiths can also inform sustainable development. This survey was Judeo-Christian because it included both the Old and New Testaments, so a more focused analysis of Judaism could add considerable insight. After all, “[t]hose of the Jewish faith have a similar view of humanity as stewards of creation, part of nature and yet separate from it.”²⁰⁵ Further, Jewish organizations have issued environmental documents, like *A Jewish Response to the Environmental Crisis*, “which also focused on the tie between individual actions and stewardship and stressed the need for individual action to protect the environment.”²⁰⁶ As the other major monotheistic religion, Islam could bolster sustainable development as a mandate for individual action because it imposes a duty on Muslims to care for the environment since the Earth is Allah’s creation.²⁰⁷ Scholars have already laid a foundation for broader comparative religious study in sustainable development by considering environmental concepts in religions like Hinduism, Buddhism and Confucianism.²⁰⁸ Finally, given how environmental justice specifically embraces indigenous peoples and their cultures, a truly inclusive concept of sustainable development would incorporate traditional beliefs.²⁰⁹

“The duty to fulfill our roles as stewards culminates in transcultural, global tenets respecting the environment that are found in the teachings of all religions.”²¹⁰ Accordingly, building upon the Biblical foundation laid in this article by reconsidering sustainable development in light of Christian and non-Christian faiths can strengthen its moral and ethical underpinnings so that it can fulfill its laudable goals.

²⁰⁴ Pope Francis, *Ecumenical Patriarch Bartholomew and the Archbishop of Canterbury Join Together for the First Time in Urgent Appeal for the Future of the Planet*, EPISCOPAL CHURCH (Sept. 7, 2021), https://www.episcopalchurch.org/publicaffairs/joint-statement-on-climate-change-by-the-archbishop-of-canterbury-pope-francis-and-ecumenical-patriarch/?mc_cid=07170c05ef&mc_eid=948ae73e14.

²⁰⁵ Fisher-Ogden & Saxer, *supra* note 14, at 100.

²⁰⁶ Johnson, *supra* note 185, at 154 (citing COALITION ON THE ENVIRONMENT AND JEWISH LIFE, *A JEWISH RESPONSE TO THE ENVIRONMENTAL CRISIS*, <http://www.coejl.org/about/founding.php> (last visited May 5, 2009)).

²⁰⁷ Ahmad, *supra* note 14, at 10 (“The Quran emphasizes the duty of the individual Muslim to care for the environment instead of a rights-based approach. This duty is rooted in the belief that the Earth in its totality is a creation of God, and that both the individual and the State are enjoined to take responsibility for God’s creation as part of their religious duties.”); *id.* at 11 (“Under Islamic teachings, humans have a divine mandate to improve nature and dispose of impurities as they find them.”).

²⁰⁸ *Id.* at 2 (surveying “Judaism, Christianity, Islam, Hinduism, Buddhism, Jainism, Zoroastrianism, Daoism, Shintoism, Sikhism, and others” to argue that the “emphasis on righteousness lays the foundation for the religious command to protect the environment”); Guruswamy, *supra* note 167, at 240-43 (discussing Buddhism and Confucianism).

²⁰⁹ See Ehrenreich & Lyon, *supra* note 11, at 15-16 (discussing the agricultural practices of the Inca that centered around the cultivation of quinoa); Paulette L. Stenzel, *The Pursuit of Equilibrium as the Eagle Meets the Condor: Supporting Sustainable Development Through Fair Trade*, 49 AM. BUS. L.J. 557, 590 (2012) (explaining how the intergenerational equity dimension of sustainability “is a long-standing one among indigenous people of the Western Hemisphere,” including the Great Law of the Iroquois).

²¹⁰ Berryhill, *supra* note 21, at 13.