3 | WHAT IS MARRIAGE FOR?

What is Marriage for? Should it be made available to: (a) same-sex couples, (b) multiple-party, (c) sibling, or other groupings? If so, why? If not, why not?

Catriona Furlong,[1] *University of Saint Andrews*

INTRODUCTION

Marriage is an institution that lies at the hearts of most societies, governs sexual and reproductive practice and organises family life. Perhaps the greatest common feature of marriage is the significance it holds for individuals, society and the state. These three parties each have interests in marriage; sometimes parallel, sometimes divergent. One challenge for a philosophical account of marriage is to bring together these three strands of meaning. In addition, studying marriage raises issues relating to the nature of the good and the role of the state in personal affairs (Brake, 2012; A). Considerations of extending marriage to new groups also bring with them concerns about equality. The complexity of any discussion of marriage not only results from the variety of perspectives and issues raised, but also from the fact that it is a deeply emotional practice that significantly impacts the lives of individuals, whether they do or don't marry. In light of this, an analysis of marriage must be mindful of the fact that some of its aspects might seem irrational. Section I will consider what marriage is for, which will inform discussion in section II about who marriage ought to be made available to. This will lead to the conclusion that marriage has different, but parallel purposes for individuals, society, and the state. Such purposes are good reasons to make marriage available to opposite-sex, same-sex, and sibling couples.

---

1 Catriona Furlong is a philosophy student at the *University of Saint Andrews*. She is also reading for International Relations, and will be graduating in 2014.

WHAT IS MARRIAGE FOR?

(a) What is Marriage for?

A discussion of the purpose of marriage requires an understanding of what marriage is. Marriage is a social institution that is present in all known societies and relates to the construction of families (Gallagher, 2002: 774). When two people get married, they enter into a committed and voluntary relationship of mutual love and support. The term itself can refer to a legal contract, a cultural practice or religious ceremony, and some argue that there is so much variation in marital practice that it has no essential structure and is merely a 'family resemblance concept' (Brake, 2012: A). This account of marriage will discuss the purpose of marriage in the present day, and will be based on a Western perspective of marriage. I will not give attention to 'metaphysical' accounts of marriage, as these assume there is a single correct purpose of marriage, an assumption which I reject. Defining marriage presents a challenge because it mustn't prohibit the inclusion of new cases or be circular. Attributing essential features to marriage can limit discussion, for instance by incorporating the necessity of an opposite-sex couple into the definition (Brake, 2012: A). Therefore, it seems that 'a definition of marriage must depend on, rather than precede, ethical and political enquiry', as suggested by Elizabeth Brake (2012: A). In addition, an account of marriage must reconcile internal and external views of the institution arising from the perspectives of the individual, society, and state. An implicit definition of marriage will emerge in discussion throughout the remainder of section I.

(b) For the Individual

For individuals who get married, marriage can have a variety of purposes. It can be both a means, for example to legal benefits, social recognition or a family, and it can be an end in itself. One purpose of marriage for individuals might be the legal benefits it provides, which can include custody rights, insurance benefits, inheritance and property rights, bereavement leave, and tax benefits (Mitchell, 1991: 540). Nowadays many couples feel that for them, marriage has reduced to these practicalities. For many American same-sex couples that cannot marry, for example, the legal benefits are a major advantage of access to the institution (Goldberg, 2012: 41). In addition, many same-sex couples seek marriage in order to gain social recognition of their relationship. Individuals may want to get married to make their relationship intelligible to others around them and to feel like they are part of a community of married people (Goldberg, 2012: 45). In the United Kingdom, same-sex couples are still seeking access to marriage despite being granted similar rights and benefits as married couples (British Humanist Association,

2012). This suggests that marriage is the lead to social acceptance and recognition of certain relationships.

For many individuals, marriage is a compact that promises mutual commitment in a shared life. Therefore, the purpose of marriage can simply be to affirm the nature of the relationship, often as a basis for a family or shared household. For some individuals, this compact also makes a sexual relationship morally legitimate. Married life and family life have always been inextricably linked. Even today, there are strong ties between marriage and the foundation of families (Haldane, 2009: 179). Many couples enter marriage with the intention of starting a family, and often wait until they are married to do so. This suggests that marriage is an important stage for individuals in the family-building process. Studies in Massachusetts, for example, found that 'some participants' motivation to marry rested, in part, on their belief that getting married would help to protect their relationships with existing or future children' (Goldberg, 2012: 36). For some individuals, marriage may primarily be a declaration of commitment for creating a stable foundation for a family.

The purposes of marriage listed above portray marriage as a means to legal benefits, social recognition, and family life. It can, however, be argued that marriage is not merely a means but also an end in itself. It is believed that marriage is a special kind of relationship that constitutes human flourishing and is, thus, intrinsically good. Aristotle created an account of flourishing in his search for the highest good. He concluded that the highest end of human life is *eudaimonia*, which can be understood as human flourishing or a 'good human life'. Aristotle thought that humans would flourish if they properly fulfilled the function of their human nature (Kraut, 2010). It can be argued that entering into the mutually supportive and caring relationship of marriage and forming a family is a distinctive aspect of human nature, and therefore, constitutes human flourishing. John Finnis, for example, holds that 'the good of marriage is one of the basic human goods to which human choice and action are directed by the first principles of practical reason' (1998: 97). Scruton too adopts a view that seems to place inherent value on marriage by presenting it as sacred (2006). For individuals, marriage may hold inherent value and be an important goal in their lives.

The particular source of the value of marriage, however, must be scrutinised. Does the intrinsic value of marriage lie in the 'marriage relationship' or in the 'officiation' of this relationship? Some might argue that the two cannot be separated. However, we can imagine a legal marriage that has none of the characteristics of a 'marriage relationship', we just have to look at some 'Las Vegas' marriages that last less than a few weeks, for example the marriage between Britney Spears and Ja-

son Alexander which lasted only two days (Marie Claire, 2011). Can we also imagine a perfect 'marriage relationship' consisting of mutual love and support in a shared life, without a legal marriage? It seems logically possible that individuals can have a life-long, loving, caring and supportive relationship that is the basis of a family without being legally married. It is intuitive to think that the 'marriage relationship' precedes and can be independent of the legal status. For evidence we need only to look to those who cannot legally marry. In a study conducted in the US, a number of children with LGB parents exhibited resistance to the notion that marriage is necessary for an enduring family relationship because they themselves had grown up with parents who 'maintained long-term, committed relationships in the absence of civil marriage' (Goldberg, 2012: 41). It is, therefore, reasonable to drive a wedge between the civil union and the marriage relationship itself. In this sense, we can understand marriage as both a certain kind of relationship (hereafter 'deep marriage'), and as an official status ('shallow marriage'). The key aspect of deep marriage is the kind of enduring love that leads people to want to share a life and commit to each other in a public ceremony witnessed by their close friends and family. Deep marriage seems, therefore, to be the source of the good in marriage. Shallow marriage, on the other hand, can be seen as instrumentally good in supporting deep marriage. The officiation of the relationship remains important as a means to legal benefits, social recognition and stable family life as described above. In addition, the act of officially committing may affirm and stabilise the deep marriage relationship.

(c) For Society

It has been argued that 'society has a profound interest in marriage' (Scruton, 2006). One purpose of marriage for society is organisational. It allows people to categorise relationships and serves the purpose of structuring society. When two people get married, their union is celebrated and their relationship is given a label that allows the rest of society to understand and approve of it. The importance of this becomes clear when society has a negative view of relationship structures such as polygamy, which they do not know how to make sense of (Turley, 2011). By getting married, a couple communicates the nature of their relationship: a committed, supportive relationship based on mutual love. The role of marriage for society is partly, thus, to categorise relationships. Closely tied with this is the importance of marriage for creating a beneficial social structure.

Many philosophers, both historical and contemporary, see marriage as a procreative union that constitutes the foundation of society (Brake, 2012: A). Aristotle, for example, defended the view that the marital family is the building block of the state and that the proper functioning of

the state depends on the working of the household (*Politics*, book I: part III). This point is still relevant today, as individual families held together by marriage compose most communities (Wright, 1994: 57). There is a strong link between marriage and the family: those who get married often do so with the intention of starting a family, and it has been argued that families benefit from marriage, as this can provide the stability, care and love they need (Haldane, 2009: 170). Most importantly, 'deep marriage' as described in part (a) is arguably the strongest foundation for a family. When we say that marriage is good for families, we don't mean purely 'shallow marriage'; bestowing a legal marriage status on two strangers doesn't make them a good family. Deep marriage, an enduring mutual bond based on love, is conducive to creating strong families. The official status can help cement this bond, but I doubt it can create it. Furthermore, it can be argued that the proper functioning of society depends on the family. In fact, 'in every human culture on the anthropological record, marriage is the norm, (whether monogamous or polygamous, permanent or temporary), and the family is the atom of social organisation' (Wright, 1994: 57). This includes cultures that have developed in isolation for the last 100,000 years, like the indigenous culture of the Trobriand Islands (Wright, 1994: 44). Families are essential because they support the most vulnerable in society: the young, and the elderly (Haldane, 2009: 164). A society built from strong families is one in which children grow up in a stable, supportive and healthy environment and the elderly are protected and looked after by family members. It can, therefore, be argued that marriage is an important aspect of a healthy and well-structured society. Since marriage is conducive to creating strong families and these contribute to a well-structured and healthy society, marriage is important for society. An optimistic perspective that appreciates the value of marriage in families ought to be sympathetic with this argument. Looking back to the importance of marriage in categorising relationships, it becomes clear that social approval and celebration of marriage is linked with its importance for the family and society.

(d) For the State

The purpose of marriage for the state must explain why the government goes to the effort of providing legal benefits and presiding over the institution. State involvement in marriage at the present moment can be understood in two ways: encouragement and endorsement. The state can use legal benefits to encourage an institution which it views as beneficial in practice, and to recognise the moral value of a certain kind of relationship. This division parallels the means/end separation in segment (a).

For the state, the role of marriage may be to encourage an environment that is conducive to the creation and raising of well-looked after children, and to reward with benefits those who provide this environment (Mitchell, 1991: 545). That is neither to say that single parents cannot provide a good environment for children, nor that they shouldn't receive benefits; rather, that the government has a stake in supporting those relationships that are most likely to produce children that have been given a good start in life. Much research has corroborated the view that children who grow up with parents that are in a strong, stable marriage are better off (Haldane, 2009: 171); (Gallagher, 2002: 780); (Scruton, 2006). It may very well be that this is not because of the marriage status itself, but because the kinds of parents who want to get married are those kind whose relationship is stable and strong already (a deep marriage). However, it is within the state's interest to encourage people to form such relationships and to reward those who do. In addition, as discussed above, marriages can act as glue for families, and the state has an interest in having strong and supportive families. Whether the state is justified in acting on its interest in marriage will be discussed in the next section.
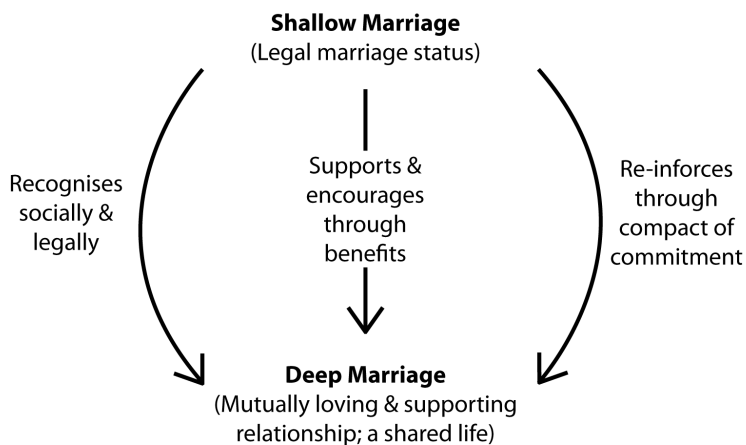
It has been argued that the state ought not make moral claims about the superiority of different ways of life. In the case of marriage, however, this sort of moral claim by the state has a very important purpose. When two people get a civil marriage, they are essentially communicating to the state the nature of their relationship. They are telling the state that they are in a consensual and committed romantic relationship based on mutual love. In response, the state is able to give the couple relevant treatment, for example by allowing hospital visitation and inheritance rights (Mitchell, 1991: 540). As discussed above, the 'marriage relationship' is a very valuable and significant aspect of many people's lives. A shared life with someone you love is intrinsically good and an end that many people strive towards. By allowing couples to marry, the state recognises the moral importance of the profound connection between the couple, and is able to tailor the law to recognise the significance of the relationship. In this sense, shallow marriage serves the purpose of recognising deep marriage. When people are legally married, they are seen as a unit that gains special rights and status, for example the right to make proxy medical decisions if the other spouse is unable to (Human Rights Campaign, 2012). Without legal marriage, the state could not differentiate between relationships to provide this sort of special treatment. Looking back to section (a) and the legal benefits of marriage for individuals, we can now appreciate the difference of the state perspective on the same issue. Looking at the different goods and purposes of marriage

from an individual, social, and state perspective, allows us to construct a richer and deeper account of the purpose of marriage.

WHO SHOULD BE ALLOWED TO MARRY?

(a) Is Marriage Justified at All?

In order to examine whom marriage should be made available to, it is necessary to ask whether marriage, as it exists today, is justified at all. As an institution used by the state to discriminate between people (married an unmarried), and provide significant benefits on the basis of that discrimination, the institution of marriage needs justification for its existence (Brake, 2012: A). As discussed above, the main purposes of marriage for society and the state are to cement family structures, encourage an environment conducive to the raising of healthy children, and recognise, both by society and in law, the significance of the 'marriage relationship' existing between people. Each of these purposes is founded upon the deep marriage relationship: it strengthens families, provides a good environment for raising children and is valuable in a way that deserves recognition. As shown below, shallow marriage (the legal status) ought to support, recognise and reinforce deep marriage.

Shallow Marriage
(Legal marriage status)

Recognises socially & legally

Supports & encourages through benefits

Re-inforces through compact of commitment

Deep Marriage
(Mutually loving & supporting relationship; a shared life)

Therefore, insofar as the state ought to support society, protect the interests of children and recognise significant human relationships before

the law, marriage is justified in so far as it is made available to those who may have a deep marriage. In the following sections (b, c, and d), I will elaborate on this point by considering whether opposite, same-sex, multiple party, and sibling couples can display the characteristics of deep marriage, and thus, whether marriage ought to be made available to them. I will focus on the first two, as these are the most common groups seeking marriage in our society.

(b) Opposite and Same-sex Couples

The only significant difference between opposite and same-sex couples is that same-sex couples can, at the present time, not have children without a third party, while only some opposite-sex couples cannot reproduce without a third party (Wardle, 2000: 797). It is without doubt that the interests of opposite as well as same-sex couples would be served by marriage (Wedgwood, 1999: 1). This is evidenced by the fact that many same and opposite-sex couples desire to get married. Both kinds of couples can be in life-long supportive and caring relationships that are based on profound love. In other words, both kinds of couples can have a deep marriage relationship. Opposite and same-sex couples can, thus, fulfill the purposes of marriage for society and the state. They can build strong families and raise healthy and well-adjusted children and have the kind of significant relationships recognised by the law. Although it is sometimes disputed, 'same-sex couples can provide the necessary shelter and care as well as create a satisfactory psychological environment' for children (Mitchell, 1991: 545). In addition, children of same-sex parents may be better off if their parents are permitted to marry because this may lessen the social stigma some of them may be subject to (Goldberg, 2012: 35). Furthermore, if the interests of the state lie in creating strong families with healthy children, and marriage is a means to this end, then, the state ought to extend marriage to more groups who can and do fulfill this interest. As put by Mitchell, 'ironically, the state's interest in promoting family stability is actually undermined by depriving same-sex couples of marital rights' (Mitchell, 1991: 545).

It is sometimes argued that same-sex couples shouldn't be able to get married because they cannot naturally conceive children; they need a third party (either through adoption, artificial insemination or surrogacy). However, many opposite-sex couples also choose to have children through these means. Based on the purposes described in section I, the way a child comes into a family is not relevant for marriage. A recent study by Susan Golombok at the Centre for Family Research at the University of Cambridge has found that families who had children through In Vitro Fertilisation, egg donation, donor insemination and surrogacy were just as well-functioning as 'ordinary' families, and

where there were differences, the unconventional families fared better (Guardian, 2012). Although family life is an important part of marriage, 'family structure is much less important for children's well-being than the quality of family relationships' (Golombok, 2012). Procreation can be an important aspect of marriage for individuals. However, what means they use to reproduce is irrelevant; important for the child is that the *same love* is the foundation of their parents' union. In addition, if marriage is a form of life that is inherently good and constitutes human flourishing, then the state not only has an interest in expanding access to it, but it may have a *duty* to do so. The state must allow equal access to those institutions which allow for the expression of the important aspects of human nature. Shallow marriage can be important for some people to strengthen deep marriage. Restricting marriage to same-sex couples is an unjustifiable 'denial of equality' (Wedgwood, 1999: 1). In this sense, it isn't only good for the state to allow same and opposite-sex couples to get married, it is *bad* if it doesn't.

(c) Multi-party

Relationships between multiple partners, or 'polygamous' relationships, are somewhat uncommon in the Western world, but '[remain] widespread in the world as a whole' (Chambers, 1997: 61). In the West, polygamy is most often associated with the practices of the Mormon Church (Chambers, 1997: 62). It has often been suggested that a polygamous family structure is harmful for women and children, even that polygamous wives experience higher rates of abuse and children in polygamous families are more likely to be neglected and abused (Bauman in Austen, 2011). However, these are contingent factors that can be dealt with on a case-by-case basis. Abusive relationships can exist between other kinds of couples and are not a reason to place a blanket ban on marriage. There is no doubt that some people who are in polygamous relationships certainly feel their relationships are harmonious and sincere (Chambers, 1997: 67). However, it is difficult to imagine how a relationship can logically exist between more than two people. We can conceive of a group of 5 people who each have a good relationship with each other member, but a *single* deep marriage relationship between 5 people is inconceivable as each one will have slightly differing feelings for each other person. A profound relationship that would justify a marriage between multiple people is, therefore, impossible. This is not a denial of equality, because such individuals do have access to marriage as an institution that recognises profound relationships.

(d) Siblings

Most people are disgusted if they imagine having a sexual relationship with their siblings. This is no accident; close proximity in childhood creates a natural aversion to siblings (Westermarck, BBC: 2007).

However, there have been a few unusual cases in which siblings who did not grow up together meet later in life and fall in love (ABC News: 2007). These couples have described themselves as having a normal, committed and loving relationship (BBC: 2007). The sincerity of their bond is not in doubt, and in many respects, these sorts of unusual relationships can create a similarly valuable family structure. The main difference between sibling and other couples is that they have a higher risk of giving birth to children with disabilities, although this is still debated (BBC: 2007). However, there are 'ordinary' couples that face a higher risk of having children with disabilities (for example those with genetic diseases) and these couples are permitted to marry. In addition, it is unfair to assume that disabilities render a life so worthless that those who may bring such children into the world ought to be strongly discouraged and even punished by the state (as in the case of a French man who was not allowed paternity of his child of an incestuous relationship (BBC: 2007)). Furthermore, sibling couples may choose not to reproduce, or do so via an alternative method. It is reasonable to assume that the strong stigma against sibling couples is due to the aversion we feel when we imagine a relationship with our siblings. By looking at the situation empathetically, we may be able to appreciate that sibling couples can and do in rare cases have relationships that are just as meaningful as those we experience in our own life. By extending marriage to siblings, the state would affirm the value of the love between two such people, and by ceasing to marginalise these groups, may be more able to inform them about the risks of natural procreation.

CONCLUSION

In conclusion, this account of marriage presents the institution as both a legal status and a kind of profound relationship. Marriage can, therefore, be seen as both a means and an end in itself. It cannot have a unitary purpose, as this would fail to recognise the multiple parties that have differing perspectives on the institution. However, the different roles of marriage are branches that all stem from the inherent value of the profound and lasting connection between two individuals. Thus, marriage ought to be made available to all those kinds of couples who can claim to have such a connection: opposite-sex, same-sex, and siblings.

BIBLIOGRAPHY

[1] Aristotle. 2009. 'Politics'. N.p.: n.p., n.d. *Internet Classics Archive*. Available on the World Wide Web at: <`http://classics.mit.edu/Aristotle/politics.1.one.html`>. [Accessed 27th October 2012].

[2] Austen, Ian. 2011. 'Canadian Court Rules That Polygamy Ban Is Constitutional'. *The New York Times*. Available on the World Wide Web at: <`http://www.nytimes.com/2011/11/24/world/americas/british-columbia-court-upholds-canadas-polygamy-ban.html?ref=polygamy`>. [Accessed 27th October 2012].

[3] BBC News. 2007. 'Incest: An Age-old Taboo'. *BBC News*. Available on the World Wide Web at: <`http://news.bbc.co.uk/1/hi/6424337.stm`>. [Accessed 27th October 2012].

[4] Brake, Elizabeth. 2012: A. 'Marriage and Domestic Partnership'. *Stanford Encyclopedia of Philosophy*. Stanford University. Available on the World Wide Web at: <`http://plato.stanford.edu/entries/marriage/`>. [Accessed 27th October 2012].

[5] Brake, Elizabeth. 2012: B. 'Minimizing Marriage: Marriage, Morality, and the Law'. *Oxford Scholarship Online*. Oxford University Press. Available on the World Wide Web at: <`http://www.oxfordscholarship.com/view/10.1093/acprof:oso/9780199774142.001.0001/acprof-9780199774142`>. [Accessed 29th September 2012].

[6] British Humanist Association. 2012. 'Same Sex Marriage'. *British Humanist Association*. Available on the World Wide Web at: <`http://www.humanism.org.uk/campaigns/marriage-laws/same-sex-marriage`>. [Accessed 22nd October 2012].

[7] Burbank, Maggie. 2007. 'Brother and Sister, and Lovers'. *ABC News Network*. Available on the World Wide Web at: <`http://abcnews.go.com/Primetime/story?id=2886819`>. [Accessed 27th October 2012].

[8] Chambers, David L. 1997. 'Polygamy and Same-sex Marriage'. *Hofstra Law Review*. Vol. 26. Pg: 53—83. HeinOnline: William S. Hein Co. Available on the World Wide Web at: <`http://heinonline.org/HOL/LandingPage?collection=journals&handle=hein.journals/hoflr26&div=10&id=&page=`>. [Accessed 21st October 2012].

[9] Claire, Marie. 2011. 'Hollywood's 15 Shortest Marriages Ever'. *Marie Claire Online*. Available on the World Wide Web at: <`http://www.marieclaire.com/celebrity-lifestyle/celebrities/hollywoods-shortest-marriages`>. [Accessed 29th October 2012].

[10] Finnis, John. 1998. 'The Good of Marriage and the Morality of Sexual Relations: Some Philosophical and Historical Observations'. *American Journal of Jurisprudence*. Vol. 42. Pg: 97—134. Princeton University. Available on the World Wide Web at: <http://www.princeton.edu/~anscombe/articles/finnismarriage.pdf>. [Accessed 20th October 2012].

[11] Gallagher, Maggie. 2002. 'What Is Marriage For? the Public Purposes of Marriage Law'. *Louisiana Law Review*. Vol. 62. Pg: 774—91. HeinOnline: William S. Hein Co. Available on the World Wide Web at: <http://heinonline.org/HOL/LandingPage?collection=journals&handle=hein.journals/louilr62&div=34&id=&page=>. [Accessed 14th October 2012].

[12] Goldberg, Abbie E., and Katherine A. Kuvalanka. 2012. 'Marriage (In)equality: The Perspectives of Adolescents and Emerging Adults With Lesbian, Gay, and Bisexual Parents'. *Journal of Marriage and Family*. Vol. 74.1. Pg: 34—52. Wiley Online Library. Wiley. Available on the World Wide Web at: <http://onlinelibrary.wiley.com/doi/10.1111/j.1741-3737.2011.00876.x/full>. [Accessed 17th October 2012].

[13] Golombok, Susan. 2012. 'Three-parent Families Can Be as Good as Two'. *The Observer*. Available on the World Wide Web at: <http://www.guardian.co.uk/science/2012/oct/07/three-parent-families-susan-golombok>. [Accessed 25th October 2012].

[14] Haldane, John. 2009. 'Families and Why They Matter'. *Practical Philosophy Ethics, Society and Culture*. Imprint Academic Press. Exeter, United Kingdom. Pg: 164—85.

[15] Human Rights Campaign. 2012. 'Protecting Your Visitation and Decision-making Rights'. *Human Rights Campaign*. Available on the World Wide Web at: <http://www.hrc.org/resources/entry/protecting-your-visitation-decision-making-rights>. [Accessed 29th October 2012].

[16] Kraut, Richard. 2010. 'Aristotle's Ethics'. *Stanford Encyclopedia of Philosophy*. Stanford University. Available on the World Wide Web at: <http://plato.stanford.edu/entries/aristotle-ethics/>. [Accessed 27th October 2012].

[17] Scruton, Roger. 2006. 'Sacrilege and Sacrament'. *The Meaning of Marriage: Family, State, Market, and Morals*. Catholic Education Online. Pg: 3—28. Available on the World Wide Web at: <http://catholiceducation.org/articles/marriage/mf0081.htm>. [Accessed 19th October 2012].

[18] Turley, Jonathan. 2011. 'One Big, Happy Polygamous Family'. *The New York Times*. Available on the World Wide Web at: <http://www.nytimes.com/2011/07/21/opinion/21turley.html?ref=polygamy>. [Accessed 29th October 2012].

[19] Wardle, Lynn D. 2000. 'Multiply and Replenish: Considering Same-sex Marriage in Light of State Interests in Marital Procreation'. *Harvard Journal of Law and Public Policy*. Vol. 24. Pg: 772—87. HeinOnline: William S. Hein and Co. Available on the World Wide Web at: <http://heinonline.org/HOL/LandingPage?collection=journals&handle=hein.journals/hjlpp24&div=46&id=&page=>. [Accessed 17th October 2012].

[20] Wedgwood, Ralph. 1999. 'The Fundamental Argument for Same-sex Marriage'. *Journal of Political Philosophy*. Vol. 7.3. Pg: 225—42. Available on the World Wide Web at: <http://onlinelibrary.wiley.com/doi/10.1111/1467-9760.00075/abstract>. [Accessed: 14th October 2012].

[21] Wilson, Adrienne K. 1991. 'Same-sex Marriage: A Review'. *William Mitchell Law Review*. Pg: 539—61. HeinOnline: William S. Hein and Co. Available on the World Wide Web at: <http://heinonline.org/HOL/LandingPage?collection=journals&handle=hein.journals/wmitch17&div=39&id=&page=>. [Accessed: 17th October 2012].

[22] Wright, Robert. 1995. *The Moral Animal: Evolutionary Psychology and Everyday Life*. Vintage Press. New York, USA.