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Throwing Tomato Soup at a Van Gogh: How Climate Activists Leveraged Legal Theory, Criminal Law, and Moral Outrage to Conduct a Radical Protest Campaign in the World's Most Famous Museums

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THROWING TOMATO SOUP AT A VAN GOGH: HOW CLIMATE ACTIVISTS LEVERAGED LEGAL THEORY, CRIMINAL LAW, AND MORAL OUTRAGE TO CONDUCT A RADICAL PROTEST CAMPAIGN IN THE WORLD’S MOST FAMOUS MUSEUMS

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ABSTRACT

During the latter half of 2022, a coordinated wave of non-violent protests unfolded in the world’s preeminent museums. Motivated largely by frustration over climate inaction, the brash campaign generated international media attention and moral outrage by purporting to destroy priceless works of art. This paper will analyze how these so-called acts of climate disobedience took advantage of critical legal theory in the arts and notable gaps in domestic law to bring attention to the climate crisis. In doing so, it will situate the campaign within the storied history of art vandalism to explain why museums were a natural landing place for this particular strain of activism and illuminate the significant role that these radical tactics have within the greater climate change movement. Finally, this paper will survey the various state responses that have taken place in the wake of the museum campaign and examine their alarming implications for future climate protests as well as the preservation of civil liberties and human rights.

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I. INTRODUCTION

Throughout the summer and fall of 2022, an audacious climate change protest unfolded in many of the world’s most famous museums. Unlike climate campaigns of the past, this radical effort was not designed to create mass traffic jams, halt the construction of a fossil fuel project, or capture public attention through large-scale marches. Rather, it aimed to shock and provoke through the apparent desecration of priceless art. Although this was largely an illusion — no works of art were seriously harmed in the process — the museum protests captured international media coverage and generated a range of inflammatory reactions. To some critics, the activists were

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relying on “sociopathic logic”⁴ and alienating potentially like-minded allies, while others simply deemed their actions “vile.”⁵

This paper seeks to examine the demonstrations from a less reactionary perspective and consider their potentially far-reaching implications. Accordingly, Part II presents an overview of the museum protests in 2022. Part III provides insight into why the public was so aggrieved by situating the campaign within the robust protest tradition of art vandalism and relevant legal theory. Part IV illuminates how the success of the climate change movement depends in part on the radical tactics embraced by the museum activists. Part V draws from deterrence theory to analyze how the protesters uniquely capitalized on gaps in criminal law. Part VI then considers how some countries have responded to close those gaps to the potential detriment of both the climate change movement and the enjoyment of established rights. Part VII offers concluding thoughts in light of recent legal developments.

II. AN OVERVIEW OF THE MUSEUM PROTESTS

In April 2022, the A22 Network — an international collection of activist organizations “engaged in a mad dash to try and save humanity”⁶ — released a declaration on its website that presaged the museum protests ahead.⁷ The online document announces a commitment to mass non-violent civil disobedience and alludes to a “plan”⁸ to “force governments to slash carbon emissions, nothing less.”⁹ That plan unfolded throughout the rest of 2022, as organizations in the A22 Network, as well as other independent activists and

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⁵. Benzine, supra note 3.
⁶. A22 Network, A22 Network, https://a22network.org/en/#projects [https://web.archive.org/web/20230621185406/https://a22network.org/en/#projects]. The activist groups in the A22 Network are: Återställ Våtmarker (Sweden), Declare Emergency (United States), Dernière Rénovation (France), Just Stop Oil (United Kingdom), Letzte Generation (Germany), Letzte Generation (Austria), Renovate Switzerland, Restore Passenger Rail (New Zealand), Stop Fossil Fuel Subsidies (Australia), Stopp Oljeletinga! (Norway), and Ultima Generazione (Italy). *Id.*
⁸. *Id.*
⁹. *Id.* Note that the museum protests are just one part of a larger climate action strategy. For more information on the A22 Network’s climate protests, see A22 Network, supra note 6.
protest groups, targeted renowned artworks in world-famous museums in Australia, Canada, and across Europe.\footnote{Benzine, supra note 3; George Petras & Jennifer Borresen, From Mona Lisa to The Scream: Climate protesters deface art in Europe – and now the US, USA TODAY, https://eu.usatoday.com/in-depth/graphics/2022/11/30/climate-activists-attack-paintings-mona-lisa-scream/10699588002/ (May 30, 2023, 8:42 AM). See the Appendix for a complete list of artworks targeted by the museum protesters.}

The events in the museum campaign generally followed a common playbook. Protesters would affix themselves with industrial-strength glue to a particular artwork’s frame or a surface nearby, then deliver an impassioned statement decrying climate inaction that would later be posted to social media.\footnote{Id.} Occasionally, participants would throw food or a liquid substance at the work, write a message in soluble paint, or unfurl a protest banner.\footnote{See Appendix.} For example, in one of the campaign’s most publicized incidents, two Just Stop Oil activists hurled a can of tomato soup at Vincent van Gogh’s Sunflowers, then declared:

What is worth more, art or life? Is it worth more than food? Worth more than justice? Are you more concerned about the protection of a painting or the protection of our planet and people? The cost-of-living crisis is part of the cost of oil crisis. Fuel is unaffordable to millions of cold, hungry families. They can’t even afford to heat a tin of soup.\footnote{The Guardian, Just Stop Oil Activists Throw Tomato Soup on Van Gogh’s Sunflowers Painting at National Gallery, YOUTUBE (Oct. 14, 2022), https://www.youtube.com/watch?v=LTdquzuB-Xg; see also Damien Gayle, Just Stop Oil Activists Throw Soup at Van Gogh’s Sunflowers, THE GUARDIAN (Oct. 14, 2022, 10:07 AM), www.theguardian.com/environment/2022/oct/14/just-stop-oil-activists-throw-soup-at-van-goghs-sunflowers.}

In another similar episode, two activists from Germany’s Letzte Generation threw mashed potatoes on Claude Monet’s Haystacks before stating:

[P]eople are starving, people are freezing, people are dying. We are in a climate catastrophe and all you are afraid of is tomato soup or mashed potatoes on a painting. You know what I’m afraid of? I’m afraid because science tells us that we won’t be able to feed our families in 2050. Does it take mashed potatoes on a painting to make you listen? This painting is not going to be worth anything if we have to fight over food.\footnote{Jo Lawson-Tancred, German Collector Hasso Plattner Has Temporarily Closed His Museum After Climate Activists Throw Mashed Potatoes at His $111 Million Monet, ARTNET (Oct. 24, 2022), https://news.artnet.com/art-world/mashed-potato-monet-protest-2197429.
As media coverage intensified, a heated discourse took place on the appropriateness of centering a climate change protest around priceless art. For instance, Robinson Meyer, who writes about climate change in The Atlantic, lambasted the campaign in an article titled The Climate Art Vandals Are Embarrassing. Other critics expressed solidarity with the museum protesters on climate change concerns but argued that targeting art was “misdirected activism.” On the other hand, activists Charles de Lacombe and Nicolas Haeringer pointed out that the perceived disconnect between the relevant artwork and the intended message was grounded in a Dadaist tradition meant to “destabiliz[e]” public opinion. Vox’s Aja Romano, furthermore, stressed the “huge difference” between a protest that actually destroys art and one that only appears to do so. According to Romano, the former treats works of art and their associated cultural value “as incidental in the fight to save the planet, ignoring that a civilization without art is an incredible loss,” while the latter act allows observers to confront the degree to which society collectively dismisses and downplays climate change. These perspectives are by no means exhaustive, but rather, represent the spectrum of critical reactions to the museum protests.

Other conversations turned to the role of museums as important loci for debate. Art scholars Anne and Juliette Bessette, for instance, wondered if museums should embrace the opportunity to reflect “on constructive ways to welcome these symbolic acts of peaceful appropriation, which place their collections at the center of urgently needed public discussion and consciousness raising[].” In November 2022, ninety-two museum directors released a joint

19. Id.
20. Id.
statement in which they acknowledged being “deeply shaken” by the protests, but pledged to keep museums as “free space[s] for social understanding.” Days later, the International Council of Museums released its own statement reflecting the concerns of the museum directors, while also expressing a desire “for museums to be seen as allies in facing the common threat of climate change.” Although it is uncertain what shape — if any — that alliance might take in the future, the next section illustrates how museums and the artwork they safeguard have long attracted radical forms of sociopolitical protest.

III. The Museum Protests as Acts of Art Vandalism

The purposeful desecration of art is as old as civilization itself, with evidence of such acts documented in ancient Egyptian, Greek, and Roman societies. During the French Revolution, burning portraits of nobles “became a weapon in the arsenal of the revolutionary” that exploited art’s symbolic value as well as the value of its public destruction. The French bishop Grégoire de Blois referred to this trend as *vandalisme* in 1794, after the Vandals who looted Rome in 455 and “became forever associated with the wilful defacement of art.” In this regard, the term “art vandalism” is somewhat redundant, but the phrase nevertheless reflects art’s enduring power to function as a symbol of meaning as well as a lightning rod for dissent.

This section will situate the 2022 museum protests within two recognized types of art vandalism to provide insight into the

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23. Id.
28. Art attack: Famous works vandalised, BBC (Oct. 8, 2012), www.bbc.co.uk/news/entertainment-arts-19869154. The Vandals were a Germanic tribe that fought against the Romans throughout the fifth century. In 533, the Romans defeated the Vandals in Carthage and took their last king back to Constantinople, thereby ending their reign. George C. Kohn, *Dictionary of Wars* 571 (George C. Kohn ed., 3d ed. 2007).
campaign and the polarizing reactions it evoked. These categories were first examined in a law journal article by legal practitioner M.J. Williams and include “expressive” attacks that are “motivated by what an artwork depicts” or its “high social value and cultural status,” and “tactical” art vandalism “that seek[s] to bring attention to a political cause.” As the museum protests straddle the distinctions, both forms are worthy of analysis.

A. Expressive Art Vandalism

One of the most well-known examples of expressive art vandalism is the 1975 attack on Rembrandt Harmenszoon van Rijn’s *The Night Watch*. That incident was carried out by an unemployed school teacher named Wilhelmus de Rijk, who claimed that he was “sent by the Lord” to attack the painting because “the world was going to have to be redone . . . .” Moreover, de Rijk revealed that he chose the work, which also endured a knifing in 1911 and an acid attack in 1990, because “it embodies the forces of both light and dark.”

This statement bears a marked similarity to the dire declaration within the third paragraph of the *A22 Network Declaration on the Crisis* referenced in Part II:

> We are the Last Generation of the old world. We are here today to say we will create a new world — where humanity embraces itself, forgives itself, loves itself and commits to continue our great adventure . . . .

> The old world is dying. We are in the last hour, the darkest hour. This world is being decimated before our eyes. We are in between moments. What we do now decides the fate of both this world and the next.

Both proclamations could be read as cryptic, bewildering, or ominous. However, sociology professor Gary Alan Fine and health researcher Deborah Shatin contend that even when such peculiar justifications

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30. Id. at 597–98.
31. Id. at 597.
32. Fine & Shatin, supra note 26, at 143.
34. Fine & Shatin, supra note 26, at 143.
35. A22 Network Declaration on the Crisis, supra note 7.
for art vandalism “inhabit lonely universes of discourse,” the actors’ behavior often reflects a yearning to restructure the social order through attacks on central symbols.

Just as de Rijk described his rationale for attacking The Night Watch, the museum protesters offered an explanation between the symbols they targeted and their connection to climate change. For instance, during a thwarted attempt to glue themselves to Edvard Munch’s The Scream, protesters from Norway’s Stopp Oljeletinga! shouted, “I scream for people dying” and “I scream when lawmakers ignore science.” After two protesters from Italy’s Ultima Generazione glued themselves to Sandro Botticelli’s Primavera at the Uffizi Gallery in Florence, the organization referenced the painting’s famous pastoral scene in a statement: “Is it possible to see a spring as beautiful as this today? . . . Fires, food crises and drought make it increasingly difficult. We decided to use art to sound an alarm call: we are heading towards social and eco-climate collapse.”

Critics of the museum protesters have questioned the logical connection between the targeted works and the protesters’ aims. In October 2022, a law and philosophy professor from Yale University sardonically tweeted, “Embarassing confession: Did not know that climate change was caused by French impressionists.” Relatedly, the advocacy manager of an environmental non-profit organization argued that the link between climate change and a Van Gogh painting seems like “a stretch.” However, the rationale of the protesters seems less relevant when one considers that expressive art vandals often have multiple motives for their actions, such as “impugn[ing] the cultural meaning of prominent artworks” while, at the same time, “seek[ing] recognition for their destructive acts as performative works of art themselves.” The performative nature of expressive art vandalism is perhaps best exemplified by Tony Shafrazi’s 1974 decision to spray-paint “Kill Lies All” in red capital letters on Pablo

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37. See id. at 138, 142-44.
41. Id.
42. Id.
43. Id.
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Picasso’s anti-war masterpiece *Guernica*. The well-publicized defacement functioned both as a protest against the release of a lieutenant involved in the My Lai massacre as well as a conceptual expression. As Shafrazi was escorted away, he declared, “Call the curator, I’m an artist.” The museum’s chief conservator quickly removed the paint with no damage to *Guernica*, while Shafrazi leveraged the publicity to establish himself in New York’s art world and would later become an early dealer of works by Jean-Michel Basquiat, Keith Haring, and Kenny Scharf.

Evidence of the museum protesters embodying a similar strategy can be found in the lengths they took to ensure their actions would only present the illusion of destruction. For instance, the paintings targeted were all ensconced behind protective glass. The activists also conducted deliberate trials and consultations in anticipation of their protests. Members of *Ultima Generazione*, for example, spoke with an art restoration expert to learn how to glue themselves to Primavera’s glass without causing any harm. Likewise, Just Stop Oil activists “took efforts to minimise the damage they would cause” to the frame of a copy of Leonardo da Vinci’s *The Last Supper* by “gluing themselves to different types of wood beforehand . . . .” Even the soluble spray paint used to write climate-themed messages — such as “No New Oil” — on museum walls harkens back to Shafrazi’s attack on *Guernica* and his utilization of easily removable red paint. As the rest of this section will reveal, these performative elements did not stand alone, but rather, embraced and incorporated aspects of a confrontational approach with distinctly militant antecedents.

B. Tactical Art Vandalism

Tactical art vandalism frequently focuses on highly regarded works of art with the goal of provoking fear and anger in the public.

45. Id.
47. See Freeman, *supra* note 44.
51. Id.
52. Id.
53. Freeman, *supra* note 44.
consciousness. An early twentieth-century example of this type of vandalism can be found in the coordinated attacks of the British suffragettes, who targeted eleven works of art in 1914 as part of a demonstrative campaign to secure for women the right to vote. One particularly notable incident involved Mary Richardson’s repeated slashing of Diego Velázquez’s *Rokeby Venus* with a meat cleaver. Richardson subsequently explained that her action was a political response to the arrest of her compatriot Sylvia Pankhurst: “I have tried to destroy the picture of the most beautiful women in mythological history ... as a protest against the government destroying Mrs. Pankhurst, who is the most beautiful character in modern history.” In a similar attack involving the slashing of John Singer Sargent’s portrait of Henry James, the assailant, Mary Wood, confessed that she “wish[ed] to show the public that they have no security for their property nor for their art treasures until women are given the political freedom.”

Another tactical, albeit more extreme case is the Breton Liberation Front’s 1978 bombing of the Palace of Versailles. This attack caused extensive damage to three rooms in the building as well as a number of paintings, such as Jean-Baptiste Debret’s *The First Bestowal of the Legions of Honor to War Invalids* and Pierre-Narcisse Guérin’s *General Bonaparte Pardoning Insurgents in Cairo*. Much like Richardson and Wood before him, Patrick Montauzier, one of two individuals arrested for the bombing, explicitly drew a connection between art and political resistance — separatism in this case — before the French Court of State Security:

[The bombing of Versailles] allowed us to question the artistic value of these spoiled canvases ... This class art reflects the political dictatorship of Louis XIV, who worked toward the destruction of the cultures of other people and especially towards the destruction of the Breton people.

Just as activists conducted these instances of tactical art vandalism to show that a work of art is worthless in a society that does not promote equality and liberty, the museum protesters repeatedly

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54. Williams, supra note 29, at 597.
55. Fine & Shatin, supra note 26, at 141.
57. Fine & Shatin, supra note 26, at 141-42.
58. Bonett, supra note 56.
59. Fine & Shatin, supra note 26, at 141.
60. Id. at 142.
stressed the absurdity of venerating art in a world that is becoming increasingly unliveable due to climate change. For example, after three *Ultima Generazione* activists threw pea soup at Van Gogh’s *The Sower* in Rome’s Palazzo Bonaparte, one of them declared, “We shouldn’t get angry about a painting that is protected by glass and will be clean tomorrow.” Similarly, when a Just Stop Oil protester glued his head to Johannes Vermeer’s *Girl with a Pearl Earring* at the Mauritshuis, a second activist asked an enraged crowd of onlookers:

How do you feel when you see something beautiful and priceless being apparently destroyed before your eyes? 

Do you feel outraged? Good. Where is that feeling when you see the planet being destroyed before our very eyes? 

This painting is protected by glass, it’s just fine. 

Vulnerable people in the Global South, they are not protected, the future of our children is not protected.

As the museum protesters did not actually destroy the works they targeted, it can be difficult to place their actions neatly into either the tactical or expressive art vandalism categories. In general, such distinctions can be helpful in terms of better understanding the actors’ motivations and goals, or perhaps even predicting future protests. Ultimately, it is important to stress that when either form of art vandalism occurs, the public usually views the act as more than mere damage to a valuable item. As Anne Bessette maintains, this is because “art is sacred and holds a symbolic power” in society. International law reflects this sentiment, most notably Article 27 of the Universal Declaration of Human Rights, which affirms the right to “enjoy the arts,” and Article 15(1) of the International Covenant on Economic, Social and Cultural Rights, which protects the right to “take part in cultural life.” Furthermore, numerous


scholars, such as Joseph Sax and Tania Cheng-Davies, have made
the case that great works of art are part of a common cultural heri-
tage that deserves special protection, such as stewardship under a
public trust model.\textsuperscript{67}

In light of this recognition by international law, scholars, and
society at large, museums function as critical spaces to safely house
and exhibit art. Thus, when vandalism occurs in these protected
sites, it seems “inherently blasphemous;”\textsuperscript{68}

It is a profanation in the sense that there is a distance, a
limit that is sacrilege to pass through. People who degrade
or destroy works of art exhibited in museums are aware of
the “sacred” status of art. They realize that the object they
attack is a cultural object, and it is precisely because the
work is considered sacrosanct due to its museum admission
that the act of vandalism generates so much coverage and
shock.\textsuperscript{69}

This “special form of violence”\textsuperscript{70} is arguably an affront on funda-
mental social values, such as civility and egalitarianism, that facilitate
public access to art.\textsuperscript{71} By repeatedly targeting world-famous works
of art, the museum protesters directly engaged with these “sacral
objects”\textsuperscript{72} to bring attention to the climate crisis. As the next section
will explain, such extreme tactics may be necessary to propel the
climate change movement forward.

\section*{IV. The Museum Protests as Acts of Climate Disobedience}

This paper has thus far asserted that the museum protests can
be seen as a reflection of the public’s frustration with government
responses to climate change. Of course, climate change activism has
not been limited to museums and, in recent years, there have been
stunning scenes of dissent in disparate sites such as coal mines,\textsuperscript{73} oil

\begin{thebibliography}{99}
\bibitem{68} Bessette, \textit{supra} note 64, at 20.
\bibitem{69} \textit{Id.}
\bibitem{70} Christopher Cordess & Maja Turgan, \textit{Art Vandalism}, 33 \textit{Brit. J. Criminology} 95, 95 (1993).
\bibitem{71} See \textit{id.}
\bibitem{72} Bessette, \textit{supra} note 64, at 20.
\bibitem{73} de Lacombe & Haeringer, \textit{supra} note 17.
\end{thebibliography}
pipelines, airports, motorways, schools, supermarkets, and sporting events. Law professor Maxine Burkett refers to these protests as acts of “climate disobedience” and, despite their growing frequency, scale, and sophistication, she argues that they are “under-analyzed and undertheorized” in legal scholarship. This is likely because jurists remain skeptical that this form of climate advocacy is an effective way to change public policy or behavior. The following analysis thereby attempts to address this gap. While Part III demonstrated why the protests generated such fierce moral outrage, this section explains how radical activism can advance the climate change movement before suggesting ways for future legal scholars to effectively measure the museum campaign’s tangible impact.

A. The Power of Climate Disobedience

Proponents of civil disobedience contend that an individual has the right to disobey a law to prompt a necessary change in government policy. This notion has its roots in the philosophy of Socrates and, in recent decades, has been invoked to contest a range of sociopolitical and environmental issues across the globe, including apartheid in South Africa, racial segregation and discrimination in the United States, Soviet control of Eastern Europe, the destruction of the Amazon rainforest, atomic weapons testing in New Zealand, and the use...
of coal-fired power in the United Kingdom.\textsuperscript{85} From this perspective, when the A22 Network declared in its climate crisis declaration that it has an “inalienable right”\textsuperscript{86} to “do whatever it takes to protect our generation and all future generations,”\textsuperscript{87} its language can similarly be interpreted as an effort to justify the climate disobedience it carried out through the museum protests by casting it amongst other non-violent campaigns.

Although there is no one-size-fits-all protest model, numerous scholars have identified the strain of radical activism in the museum protests as an important means of influencing policymaking. Professors Susan Olzak and Emily Ryo, for instance, point out that moderate activities, such as lobbying and advocacy efforts, conducted alongside a diversity in radical protest action increase the likelihood that a movement will achieve its desired policy changes.\textsuperscript{88} A recent scientific study expands on this argument by positing that the presence of a radical flank — an activist group that embraces tactics or beliefs that are perceived as more extreme than other organizations in the same movement\textsuperscript{89} — can benefit a cause by channelling support to a comparatively moderate group.\textsuperscript{90} This symbiotic relationship thereby “point[s] to a hidden way in which movement factions are complementary, despite pursuing divergent approaches to social change.”\textsuperscript{91}

Scholars have also highlighted the usefulness of varied protest actions by examining the unambitious legal policies that took shape in the absence of a radical flank. This dynamic is particularly apparent in the environmental sector, which traditionally requires “high levels of both protest and institutional activity” to create legislative progress.\textsuperscript{92} Mark Dowie argues in Losing Ground that established American organizations in the 1980s and 1990s failed to capitalize on the landmark victories of the United States environmental movement — such as the passage of the Clean Air Act, the Clean Water Act, and the National Environmental Policy Act — due to their unwillingness to jeopardize their insider-status in the

\textsuperscript{85} Id. at 8–9.
\textsuperscript{86} A22 Network Declaration on the Crisis, supra note 7.
\textsuperscript{87} Id.
\textsuperscript{88} See Susan Olzak & Emily Ryo, Organizational Diversity, Vitality and Outcomes in the Civil Rights Movement, 85 SOC. FORCES 1561, 1579 (2007).
\textsuperscript{89} Brent Simpson, Rob Willer, & Matthew Feinberg, Radical Flanks of Social Movements Can Increase Support for Moderate Factions, 1 PNAS Nexus 1, 1 (2022).
\textsuperscript{90} Id.
\textsuperscript{91} Id.
\textsuperscript{92} Erik W. Johnson, Jon Agnone, & John D. McCarthy, Movement Organizations, Synergistic Tactics and Environmental Public Policy, 88 SOC. FORCES 2267, 2267 (2010).
nation’s capital. With respect to climate change laws, journalists Petra Bartosiewicz and Marissa Miley posit that the inability of the Barack Obama administration to pass federal legislation in his first term was greatly influenced by the decision of major environmental organizations to partner with industry stakeholders seeking a “modest and incremental” victory rather than collaborate with grassroots organizations focused on more sweeping change. They conclude that this tepid form of environmental advocacy is “perhaps the most definitive evidence to date that climate change will not be resolved through politesse.”

Given that legal scholarship on the ability of protests to specifically address climate change is limited, it is helpful to turn to sociological research projects, which have investigated this topic with greater regularity. One particularly relevant study in Ecological Economics focuses on how social movements have helped curb carbon emissions through a qualitative meta-analysis of fifty-seven empirical case studies in twenty-nine countries. The authors examine how different movement strategies promote staying within the global carbon budget through various actions, from cancelling or postponing hydrocarbon projects to encouraging just transitions and energy democracy. When social movements made progress in these areas, the actors relied at least partly on civil disobedience — defined in the study as “[s]it-ins, blockades and similar actions that may involve some degree of violation of the law” — in a large number of instances. Although no peer-reviewed study thus far

94. These stakeholders included some of the country’s biggest oil refiners, carmakers, and chemical companies. Petra Bartosiewicz & Marissa Miley, The Too Polite Revolution: Why the Recent Campaign to Pass Comprehensive Climate Legislation in the United States Failed, 6, 9 (2013).
95. Id. at 89.
98. The complete list of categories are: raising awareness of risks; canceling or postponing hydrocarbon projects; creating policy changes and new laws and regulations; promoting divestment from fossil fuel corporations; encouraging just transitions and energy democracy; enhancing corporate social responsibility; and providing alternative market solutions. Id.
99. Id. at 6-7. The percentage breakdown by category is as follows: raising awareness of risks (53%); postponing hydrocarbon projects (62%); canceling
has examined the impact of the museum protests from a similar perspective, the above research suggests that the radical nature of the campaign has an important role to play in the climate change movement.¹⁰⁰

B. Quantifying the Impact of the Museum Protests

The previous subsection presented scholarly arguments that advocate for the place of radical activism within a larger social movement. These perspectives are particularly encouraging when one considers how climate disobedience could lead to more effective climate policy. It therefore seems reasonable to contend that if a radical flank can bolster the climate change movement by drawing support to more moderate factions, then any analytical framework that does not consider this indirect effect is of limited use. Nonetheless, certain challenges exist with respect to quantifying the specific impact of the museum protests, given an apparent lack of relevant data at this time.¹⁰¹ As such, this subsection considers several efforts that explore analogous radical flanks within the climate change movement with an eye towards informing future scholarship on the museum campaign.

One of the most noteworthy recent analyses of radical climate flanks is Charles DiSalvo’s examination of an April 2019 Extinction Rebellion (XR) campaign.¹⁰² The 2019 XR campaign saw members obstruct numerous public spaces across London as well as Shell’s offices and the house of British Labour party leader Jeremy Corbyn.¹⁰³ DiSalvo’s effort is laudable in that it attempts to evaluate the effectiveness of XR’s campaign within the climate change movement and thereby meets a pressing legal scholarship need. However, his analytical framework places an especially strong emphasis on the importance of goal specificity but does not consider the indirect effects of a radical protest.¹⁰⁴ He accordingly links XR’s failure to achieve substantive change with the organization’s

hydrocarbon projects (63%); creating policy changes (50%); creating new laws and regulations (50%); divesting fossil fuel corporations (44%); promoting just transitions (77%); promoting energy democracy (63%); enhancing corporate social responsibility (64%); and providing alternative market solutions (67%).

¹⁰⁰. See Donna Lu, Throwing Soup at the Problem: Are Radical Climate Protests Helping or Hurting the Cause?, GUARDIAN (Nov. 12, 2022), www.theguardian.com/world/2022/nov/13/throwing-soup-at-the-problem-are-radical-climate-protests-helping-or-hurting-the-cause.

¹⁰¹. See id.


¹⁰³. Id. at 314.

¹⁰⁴. Id. at 288.
“fail[ure] to announce — and stick with — a carefully defined set of goals.”

This is not to say that goal specificity has no place in evaluating climate disobedience from a legal scholarship perspective. Rather, any evaluation of a radical flank’s tactics should take a more holistic analytical approach, such as including how a particular campaign also impacts voting behavior, or the public’s perception of climate change or desire to engage in the climate change movement.

On the other hand, a recent report from social movement researchers James Ozden and Sam Glover embraces the type of methodology that could help legal scholars analyze the museum protests in the future. Ozden and Glover carried out a public opinion poll before and after a Just Stop Oil campaign in which its members blockaded oil terminals across England during April 2022. Despite the ensuing disruption in fuel deliveries, the report reveals that there was “no loss of support for climate policies” and even a “marginally statistically significant” positive impact on people’s willingness to participate in climate activism. Ozden and Glover’s data is notable because it provides “some evidence against the notion that disruptive protests tend to cause a negative public reaction.” This “before-and-after” approach could thereby provide more accurate insight into the broader impact the museum protests may have had on public opinion or voting patterns. At the time of this writing, it is unclear when or if scholars might pursue this approach. Should the relevant data manifest in the near term, however, those interested in examining the full scope of the museum protests would strengthen their research by incorporating such figures into their analyses.

105. Id. at 317. DiSalvo notes that XR framed the campaign’s goals in multiple ways before settling on the following objectives: 1) Government must tell the truth by declaring a climate and ecological emergency, working with other institutions to communicate the urgency for change; 2) Government must act now to halt biodiversity loss and reduce greenhouse gas emissions to net zero by 2025; and 3) Government must create and be led by the decisions of a Citizens’ Assembly on climate and ecological justice. Id.

106. Id. at 291.


108. Damien Gayle, Just Stop Oil Protesters Vow to Continue Until “All are Jailed”, GUARDIAN (Apr. 12, 2022), www.theguardian.com/environment/2022/apr/12/just-stop-oil-protesters-vow-to-continue-until-all-are-jailed.

109. Ozden & Glover, supra note 107, at 1.

110. Id.

111. Id.
V. THE MUSEUM PROTESTS CONSIDERED UNDER A DETERRENCE THEORY FRAMEWORK

Although relevant public opinion data on the museum protests currently appears to be unavailable, this section presents another way to consider the scope of the campaign. Before doing so, it is important to note that one of the inherent difficulties of climate protests is the limited number of opportunities for direct civil disobedience. As DiSalvo states, direct civil disobedience provides “a very close connection — and often an identity — between the act the disobedient performs and the right the disobedient seeks to assert,”\(^\text{112}\) such as Black college students carrying out a sit-in campaign in restaurants to protest segregation laws during the United States Civil Rights Movement.\(^\text{113}\) By easily identifying this link, the public is better able to comprehend the injustice.\(^\text{114}\) Although climate activists can center direct civil disobedience actions around the construction of fossil fuel initiatives, confronting unambitious climate policies is more challenging in that it requires an indirect form of protest.\(^\text{115}\) In the case of the museum campaign, activists purposefully confronted legislation they conceivably had no issue with — most notably criminal property damage statutes — to bring attention to climate inaction.\(^\text{116}\) It thereby seems relevant to consider the extent to which the museum protesters leveraged gaps in the law to limit their exposure to criminal liability.

To be clear, the purpose of this exercise is not to condone or advocate for illegal behavior. The reality of engaging in climate disobedience, however, is that it subjects its adherents to jail time, court costs, fines, and restitution — all of which represent factors that could act as significant barriers to participation.\(^\text{117}\) Thus, if climate disobedience is a key driver of ambitious climate policies — as explained in Part III — then it seems pertinent to contemplate the ways in which radical flanks interpret and balance those legal risks. To that end, a particularly compelling aspect of the museum protests is that, for all the media publicity and vitriol they generated, the participants have largely evaded serious legal consequences for their actions.\(^\text{118}\) One way to explain why this has been the case is through

\(^{112}\) DiSalvo, supra note 102, at 309.
\(^{113}\) Id.
\(^{114}\) Id.
\(^{115}\) Id.
\(^{116}\) Id.
\(^{117}\) See analysis infra notes 124–91.
\(^{118}\) See Appendix.
an analysis under a deterrence theory framework.\textsuperscript{119} Although this is not the only framework from which to consider the campaign,\textsuperscript{120} its longevity and practical utility lend itself to this examination.\textsuperscript{121}

Deterrence theory originates from the writings of Thomas Hobbes, Cesare Beccaria, and Jeremy Bentham.\textsuperscript{122} These philosopher-jurists posited that “if punishment is severe, certain and swift, a rational individual will weigh potential gains and losses before engaging in illegal activity and will be discouraged from breaking the law if the loss is greater than the gain.”\textsuperscript{123} This section examines the museum protests under each of those factors to demonstrate how the relevant conditions that existed at the time were ripe for exploitation. Although the analysis employs a simplified framework due to space considerations, it nevertheless provides important insight into the nuances of the campaign.

A. Severity and Certainty

Severity relates to the average length of sentences that offenders receive\textsuperscript{124} or the potential severity of the punishment.\textsuperscript{125} This factor is often analyzed together with certainty, which refers to the degree of likelihood that a perpetrator will face criminal punishment.\textsuperscript{126} The following subsection accordingly considers the museum protests within the context of both factors.

With respect to certainty, the museum protesters increased their likelihood of arrest and an ensuing conviction by purposely gluing themselves to art frames and nearby walls, while also recording their actions. As mentioned earlier, this visual component was

\begin{itemize}
  \item \textsuperscript{119} Kelli D. Tomlinson, \textit{An Examination of Deterrence Theory: Where Do We Stand}, 80 Fed. Probation 33 (2016).
  \item \textsuperscript{120} Other potentially useful frameworks include the life course theory or Robert Agnew’s general theory of crime. \textit{Id.} at 33.
  \item \textsuperscript{123} Abramovaite et al., \textit{supra} note 123.
  \item \textsuperscript{124} \textit{Id.} at 6.
  \item \textsuperscript{126} Abramovaite et al., \textit{supra} note 123, at 2.
\end{itemize}
an essential part of the campaign’s shock factor. The museum protesters may have taken this calculated risk because art vandals have historically avoided criminal punishment. Despite limited data in this area of law, a 2006–07 survey of 250 British museums reveals that institutions have largely declined to press charges in instances of art vandalism. Notably, only two museums chose to pursue legal action in the relevant time frame (1997–2006) after a perpetrator had been identified. The survey offers several “credible explanations” for this behavior: 1) institutions may hope to avoid negative publicity from high-profile legal proceedings; 2) potentially drawn-out court cases may not be worth the financial cost of addressing minor or isolated crimes; 3) the leniency of punishments for art vandalism, as explored later in this section; and 4) a feeling of being “under-supported” by police.

As to the severity factor, scholars have categorized judicial responses to high-profile art vandalism as “puzzling.” According to Gary Alan Fine and Deborah Shatin, “[o]ne might naively assume that when objects as valued and as sacred as art works are destroyed, a heavy price would be paid by the attacker.” That was not the case in the analogous instances described in Part III, however. For example, the attacker of Rembrandt’s The Night Watch avoided jail time and was instead sent to a psychiatric hospital. Mary Richardson received a six-month prison sentence, which was later cut in half due to an effective hunger strike, for slashing the Rokeby Venus. Other British suffragettes, like Mary Wood, served less than a week in prison for their respective acts of art vandalism. Although members of the Breton Liberation Front received fifteen-year sentences for the Versailles bombing, this crime can be distinguished from the previous incidents — as well as the museum protests — in that it was a state security offense that endangered human life, rather than an instance of property damage.

One explanation behind the perceived leniency of responses to art vandalism is that contemporary legal codes generally do not

127. See Part II, supra notes 6-24.
129. Id.
130. Id.
131. Id.
132. Fine & Shatin, supra note 26, at 146.
133. Id.
134. Id.
135. Id.
136. Id.
137. Fine & Shatin, supra note 26, at 147.
consider a work of art’s symbolic value to the community. Thus, there is often no significant difference, at least in terms of legal liability, between “slashing a masterpiece” and “breaking a window.” This lack of nuance is one probable reason why the museum protesters were undeterred from carrying out the campaign. It is, however, also important to stress that the protesters consciously limited the potential severity of their punishments by utilizing methods — as described in Part III — that only gave the appearance of severe property damage. As a result, their legal consequences, particularly in the United Kingdom, have been relatively benign. In a case concerning £2,000 in damages to the frame of Van Gogh’s *Peach Trees In Blossom*, one protester was jailed for three weeks, while another was given a suspended sentence. In a dispute involving a copy of da Vinci’s *The Last Supper*, five protesters were fined £486 each for causing £180 worth of damage. Finally, the two protesters who caused £1,081 of damages to John Constable’s *The Hay Wain* were given a conditional discharge of eighteen months and ordered to pay the National Gallery £540.74 each.

Museum protesters have faced more severe legal consequences in other European countries. For instance, a Berlin district court sentenced a *Letzte Generation* protester who glued herself to the frame of Lucas Cranach the Elder’s *Rest on the Flight into Egypt* to four months in prison. Likewise, a Dutch court sentenced two Just Stop Oil protesters who targeted Johannes Vermeer’s *Girl with a Pearl Earring* to two months in prison, with one month suspended. In Italy, a Vatican court considered the glue damage that two *Ultima Generazione* protesters caused to the base of the famous *Laocoön and His Sons* statue and issued nine-month suspended sentences, fines of €1,620 each, and an order to pay roughly €28,000 in restitution.

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138. Id.
139. See Williams, supra note 29, at 583, 586 n.25.
141. Parnaby, supra note 50.
costs. At the time of this writing, there is also an ongoing trial in a Munich district court over the glue damage that two Letzte Generation protesters caused to the frame of Peter Paul Rubens’s Massacre of the Innocents, with estimates ranging from €11,000 to €50,000.

The financial figures listed above are undoubtedly substantial and may be considered a deterrent for future protesters. The same may ring true for the sentences handed out by the British and German courts. A lack of publicly available information concerning criminal proceedings indicates, however, that at least some museum protesters will not face trial, perhaps due to prosecutorial discretion or the decision of the relevant institutions to not pursue charges.

Of the twenty-seven incidents in the 2022 museum campaign, only eight have gone to trial or have a pending court date at the time of this writing. These statistics support historical trends on art vandalism (at least in the United Kingdom), which indicate that the prospect of no legal consequences at all was a very real potential outcome for the museum protesters. Moreover, in most of the above court cases, the presiding judges could have either handed down longer sentences, or issued jail sentences instead of fines but chose not to do so. In fact, the judge in the Girl with a Pearl Earring trial could have doubled the defendant’s prison time but stated that she did not want to discourage others from protesting climate change. These outcomes pale in comparison to the severe punishments dispensed for other disruptive but non-violent forms of climate disobedience, such as the three-year jail sentence one protester received for climbing the Queen Elizabeth II suspension bridge in England, or the twelve-month prison term given to an Australian activist for blocking coal trains in New South Wales.


147. See Scott, supra note 129, at 17.

148. See Appendix.

149. Scott, supra note 129, at 17.

150. Girl with a Pearl Earring, supra note 144; Winfield, supra note 145. See also Criminal Damage Act 1971, c. 48, § 4(2) (UK).

151. Girl with a Pearl Earring, supra note 144.


153. Mostafa Rachwani, Climate Activist Sentenced to 12 months in Jail Over Coal
B. Swiftness

Swiftness, or celerity, refers to the length of time between the relevant offense and corresponding punishment, ranging from arrest to the completion of criminal proceedings.\(^\text{154}\) Evidence of swiftness as a crime deterrent, however, is limited,\(^\text{155}\) with available research indicating that the impact of punishment diminishes after a particular, albeit uncertain period of time, which could be as quick as a matter of seconds\(^\text{156}\) to thirty or more days.\(^\text{157}\) Despite these ambiguities, the following subsection will attempt to consider the role of swiftness in the museum protests.

If one considers arrest as a punishment, then the fact that the museum protesters were quickly taken into custody — first via museum security, then with the proper police authorities — points to a deterrence effect.\(^\text{158}\) However, as the entire objective of the museum protests was to bring public attention to climate change, any perceived deterrence may be negated by this anticipated and desired outcome. Alternatively, if one views punishment not as arrest, but as the conclusion of judicial proceedings, then the analysis becomes even less clear. As criminal justice systems are not constructed to accommodate celerity, scholars argue that the courts are fundamentally incapable of deterring potential perpetrators in terms of swiftness.\(^\text{159}\) This perspective is supported by the fact that only one case — the *Girl with a Pearl Earring* incident — appears to have been fast-tracked by the judicial systems handling the museum protests.\(^\text{160}\)

On the other hand, Malcolm Feeley famously argued that defendants can perceive lengthy pre-trial procedures in lower courts, including posting bail, missing work to attend hearings, and retaining a defense attorney, as outweighing the relatively small stakes of the trial.\(^\text{161}\) This rationale seems relevant in the context of the museum protests, as data indicates that climate activists differ

\(^\text{154.}\) Abramovaite et al., *supra* note 123, at 9.
\(^\text{155.}\) *Id.* at 5.
\(^\text{158.}\) Benzine, *supra* note 3.
\(^\text{159.}\) Pratt & Turanovic, *supra* note 156, at 10.
\(^\text{160.}\) *Girl with a Pearl Earring, supra* note 144.
demographically from property damage offenders but are nevertheless exposed to criminal liability due to the indirect nature of climate disobedience. Thus, the museum protesters may be particularly inclined to hope for a swift resolution to their legal disputes, perhaps out of a desire to restore a sense of normalcy to their lives. Accordingly, the fact that many of the trials took nearly a year to resolve and, in at least one case, are still pending at the time of this writing may ultimately have a deterrence effect, albeit one that subverts criminologists’ theories of celerity.

VI. GOVERNMENT RESPONSES TO CLIMATE DISOBEDIENCE AND THEIR POTENTIAL IMPACT

In the wake of the museum campaign, several countries passed legislation designed to deter climate disobedience or are responding more forcefully based on existing law. Given the scope and intensity of recent climate disobedience, these actions cannot be interpreted solely as a reaction to the museum protests. It seems likely, however, that the disruptive, well-publicized campaign had at least some influence over the relevant policy- and decision-making processes. As such, this section examines these domestic developments and considers how they might impact not only future instances


163. DiSalvo, supra note 102, at 310.

164. The trial for the Sunflowers incident is not scheduled until July 2024. Miranda Norris, Just Stop Oil Activist Phoebe Plummer Speaks at Oxford University, OXFORD MAIL (May 20, 2023), www.oxfordmail.co.uk/news/23536255.just-stop-oil-activist-phoebe-plummer-speaks-oxford-university/.

165. The virtual cessation of climate disobedience in museums in 2023 lends credence to this theory. At the time of this writing, only two such instances of climate disobedience have occurred in 2023. Petras & Borresen, supra note 10.


of climate disobedience, but in some cases limit the enjoyment of established rights.

A few countries affected by the museum protests have taken steps to protect works of art within their borders or have considered such actions. In April 2023, Italy’s Council of Ministers approved a plan to impose fines between €10,000 to €60,000 for damage caused to cultural sites or monuments. Gennaro Sangiuliano, the minister of culture, defended the legislation as a form of deterrence, noting, “[a]nyone who damages our cultural heritage cannot get away with it and must be severely punished.” Relatedly, in Spain, opposition parties stated that they would propose stricter reforms following protests in the Prado Museum in Madrid and the Egyptian Museum of Barcelona.

By contrast, Germany has not changed its laws, but has instead taken a more authoritarian stance towards radical climate protesters. Most notably, police officers carried out nationwide raids targeting members of Letzte Generation at fifteen properties across seven states in May 2023. The prosecutor general’s office said that the searches were conducted as part of an investigation into seven activists — including those involved in a protest centered around the Sistine Madonna — on “the charge of forming or supporting a criminal organization.” Although information on the ongoing investigation is limited, the suspects are accused of “organising a donations campaign to finance further criminal acts.” No arrests have been made, but the police temporarily shut down the Letzte Generation website, seized assets, froze two bank accounts, and gath-

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172. *See Appendix.*


The raid, moreover, comes on the heels of reports that Bavarian police have pre-emptively detained numerous climate protesters under the Bavarian Police Tasks Act, which allows the detention of suspected criminals up to sixty days without a trial. Perhaps uncoincidentally, the state of Berlin has seen an uptick in climate protests, which has prompted the head of the Deutsche Polizeigewerkschaft police trade union to call for national pre-emptive detention reforms in line with the “Bavarian model.”

Finally, the United Kingdom’s controversial Public Order Act 2023 went into effect on May 3, 2023, after months of protest, debate, and criticism. The Act criminalizes the popular climate protest tactic of “locking on” to another person, object, building, or land, as well as obstructing transportation infrastructure that causes “serious disruption” — defined as “more than a minor degree” of interference with day-to-day activities. Perpetrators of these offenses risk up to fifty-one weeks in jail and/or an unlimited fine. The Act also expands police powers, including the ability “to stop and search individuals without suspicion” in certain patrol areas for up to twenty-four hours, and gives courts the ability to ban people from protests based on past conduct.

The aforementioned actions represent an emboldened response by state governments to curb recent climate protests.

179. Public Order Act 2023 c. 15, § 1 (UK).
180. Id. § 3(1).
181. Id. § 1(6).
182. Id. §§ 1(3)-(4), 6(3)-(4).
183. Id. at sec. 11.
from radical flanks. Considered under a deterrence theory framework, their potential for longer jail sentences, increased fines, and more sweeping pre-emptive measures will undoubtedly force future climate activists to reconsider the benefits of protest against the heightened severity, certainty, and swiftness of possible punishment. This is notable because, as described earlier, climate disobedience is an important component of the passage of ambitious climate legislation. Thus, these new measures, while presented as a way for governments to minimize everyday disruptions, create another obstacle for the climate change movement at large.

Moreover, the trends unfolding in Germany and the United Kingdom also point to alarming threats to human rights and civil liberties. Munich lawyer Jochen Ringler, for instance, argued that the pre-emptive detention powers of the Bavarian Police Tasks Act were “designed to prevent terrorist attacks and serious crime, not protests.”185 However, a Bavarian court recently dismissed a claim challenging the law’s constitutionality due to a lack of sufficient evidence of a fundamental rights violation.186 Likewise, numerous legal experts and civil society organizations expressed anxiety and frustration over the far-reaching implications of the “draconian” Public Order Act.187 For example, an Amnesty International UK director called the expansion of police powers “deeply irresponsible” and argued that the law “will almost certainly have a chilling effect by seriously discouraging people from joining protests in the first place.”188 These concerns even reached the international level in April 2023, when the United Nations High Commissioner for Human Rights drew attention to “the grave risk”189 created by the

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Act’s ability to “pre-emptively limit someone’s future legitimate exercise of their rights.”

[T]he law appears to target peaceful actions used by those protesting about human rights and environmental issues. As the world faces the triple planetary crises of climate change, loss of biodiversity and pollution, governments should be protecting and facilitating peaceful protests on such existential topics, not hindering and blocking them.

These state responses to climate disobedience highlight the stakes of the climate change movement for both individual citizens and planetary health. Accordingly, it remains unclear how radical protest groups will proceed, where their campaigns will take place, and to what extent they will act as disruptive forces in daily life. This uncertainty, as well as the absence of protest that may follow, should be viewed with caution rather than celebrated as a return to order and normalcy.

VII. Conclusion

This paper has explored the 2022 museum protests carried out by climate activists in depth. It not only explained the legal theory underlying the polarized public discourse but also how radical campaigns that seek to evoke those reactions have a legitimate place within the climate change movement. Additionally, this paper highlighted the gaps in criminal law that created the conditions for the museum protests to unfold, and the troubling state responses that looked to close those gaps. As these dynamics remain very much in flux, the potential impacts of the museum protests on climate policy, public opinion, human rights, and civil liberties will likely have a ripple effect beyond the near term and well into the future.

190. Id.
191. Id. Just days after the Public Order Act went into effect, Metropolitan Police arrested sixty-four people during the coronation of King Charles III, including a group of activists who had been given high-level approval for their protest as well as two women’s safety volunteers. The mayor of London subsequently ordered a review of the arrests, which is pending at the time of this writing. Daniel Boffey, Met Says it Will Make Public Key Findings of Coronation Arrests Review, GUARDIAN (June 7, 2023), https://www.theguardian.com/uk-news/2023/jun/07/met-police-make-public-key-findings-king-charles-coronation-arrests-review.
## APPENDIX

### CLIMATE CHANGE MUSEUM PROTESTS IN 2022

<table>
<thead>
<tr>
<th>Date</th>
<th>Artwork</th>
<th>Artist</th>
<th>Museum</th>
<th>Activist Group</th>
<th>Items involved in attack</th>
<th>Legal Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 29</td>
<td>Mona Lisa</td>
<td>Leonardo da Vinci</td>
<td>Louvre (France)</td>
<td>Independent</td>
<td>Cake</td>
<td>Undetermined</td>
</tr>
<tr>
<td>June 29</td>
<td>My Heart’s in the Highland</td>
<td>Horatio McCulloch</td>
<td>Kelvingrove Museum (UK)</td>
<td>Just Stop Oil</td>
<td>Glue</td>
<td>Undetermined</td>
</tr>
<tr>
<td>June 30</td>
<td>Peach Trees in Blossom</td>
<td>Vincent van Gogh</td>
<td>Courtauld Gallery (UK)</td>
<td>Just Stop Oil</td>
<td>Glue</td>
<td>Jail (three weeks)</td>
</tr>
<tr>
<td>July 1</td>
<td>Thomson’s Aeolian Harp</td>
<td>JMW Turner</td>
<td>Manchester Art Gallery (UK)</td>
<td>Just Stop Oil</td>
<td>Glue</td>
<td>Undetermined</td>
</tr>
<tr>
<td>July 4</td>
<td>The Hay Wain</td>
<td>John Constable</td>
<td>National Gallery (UK)</td>
<td>Just Stop Oil</td>
<td>Glue, dystopian poster</td>
<td>Restitution</td>
</tr>
<tr>
<td>July 5</td>
<td>Copy of The Last Supper</td>
<td>Giampietri-no</td>
<td>Royal Academy (UK)</td>
<td>Just Stop Oil</td>
<td>Glue, soluble spray paint</td>
<td>Fines</td>
</tr>
<tr>
<td>July 22</td>
<td>Primavera</td>
<td>Sandro Botticelli</td>
<td>Uffizi Gallery (Italy)</td>
<td></td>
<td>Glue</td>
<td>Undetermined</td>
</tr>
<tr>
<td>July 30</td>
<td>Unique Forms of Continuity in Space</td>
<td>Umberto Boccioni</td>
<td>Museo del Novecento (Italy)</td>
<td></td>
<td>Glue</td>
<td>Undetermined</td>
</tr>
<tr>
<td>Aug 18</td>
<td>Laocoön and His Sons</td>
<td>Unknown</td>
<td>Vatican Museum (Italy)</td>
<td></td>
<td>Glue</td>
<td>Fines, suspended sentences, restitution</td>
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<td>Aug 23</td>
<td>The Sistine Madonna</td>
<td>Raphael</td>
<td>Old Masters Picture Gallery (Germany)</td>
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<td>Glue</td>
<td>Complaints filed</td>
</tr>
<tr>
<td>Aug 24</td>
<td>Thunderstorm with Pyramus and Thisbe</td>
<td>Nicolas Poussin</td>
<td>Stadel Museum (Germany)</td>
<td></td>
<td>Glue</td>
<td>Undetermined</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td>Artist</td>
<td>Location</td>
<td>Medium/Description</td>
<td>Collaboration Status</td>
<td></td>
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<tr>
<td>Aug 25</td>
<td>Massacre of the Innocents</td>
<td>Peter Paul Rubens</td>
<td>Alte Pinakothek Museum</td>
<td>Glue</td>
<td>Ongoing trial</td>
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<tr>
<td>Aug 26</td>
<td>Rest on the Flight into Egypt</td>
<td>Lucas Cranach the Elder</td>
<td>Gemaldegalerie</td>
<td>Letzte Generation (Germany)</td>
<td>Glue, Jail (four months)</td>
<td></td>
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<tr>
<td>Oct 8</td>
<td>Massacre in Korea</td>
<td>Pablo Picasso</td>
<td>National Gallery of Victoria</td>
<td>Extinction Rebellion</td>
<td>Glue, protest banner</td>
<td></td>
</tr>
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<td>Oct 14</td>
<td>Sunflowers</td>
<td>Vincent van Gogh</td>
<td>National Gallery (UK)</td>
<td>Just Stop Oil</td>
<td>Glue, Tomato soup</td>
<td></td>
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<tr>
<td>Oct 23</td>
<td>Grainstacks</td>
<td>Claude Monet</td>
<td>Museum Barberini (Germany)</td>
<td>Glue</td>
<td>Undetermined</td>
<td></td>
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<tr>
<td>Oct 27</td>
<td>Girl with a Pearl Earring</td>
<td>Johannes Vermeer</td>
<td>Mauritshuis (Netherlands)</td>
<td>Just Stop Oil</td>
<td>Jail (two months; one-month suspended sentence)</td>
<td></td>
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<tr>
<td>Oct 30</td>
<td>The Sower</td>
<td>Vincent van Gogh</td>
<td>Palazzo Bonaparte (Italy)</td>
<td>Ultima Generazione</td>
<td>Pea soup</td>
<td></td>
</tr>
<tr>
<td>Oct 30</td>
<td>Clown</td>
<td>Henri Toulouse-Lautrec</td>
<td>Alte Nationalgalerie</td>
<td>Independent</td>
<td>Glue, fake blood</td>
<td></td>
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<tr>
<td>Nov 4</td>
<td>Screen prints of Campbell’s soup cans</td>
<td>Andy Warhol</td>
<td>National Gallery of Australia</td>
<td>Stop Fossil Fuel Subsidies (Australia)</td>
<td>Glue, blue ink (on glass)</td>
<td></td>
</tr>
<tr>
<td>Nov 5</td>
<td>The Scream</td>
<td>Edvard Munch</td>
<td>National Museum of Norway</td>
<td>Stopp Oljeletinga!</td>
<td>Glue</td>
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| Nov 5 | The Naked Maja and The Clothed Maja | Francisco Goya (Spain) | Futuro Vegetal | Glue | Undetermined |
| Nov 12 | Stumps and Sky | Emily Carr | Vancouver Art Gallery (Canada) | Stop Fracking Around | Glue, maple syrup | Undetermined |
| Nov 13 | Replica mummy | Not applicable | Museu Egipci de Barcelona (Spain) | Futuro Vegetal | Red and brown slime | Undetermined |
| Nov 15 | Death and Life | Gustav Klimt | Leopold Museum (Austria) | Letzte Generation (Austria) | Glue, black liquid | Undetermined |
| Nov 18 | BMW art car | Andy Warhol | Fabbrica del Vapore (Italy) | Ultima Generazione | White flour | Undetermined |
| Nov 18 | Horse and Rider | Charles Ray | Bourse de Commerce – Pinault Collection (France) | Dernière Rénovation | Orange paint | Undetermined |