MIND-INDEPENDENCE DISAMBIGUATED: SEPARATING THE MEAT FROM THE STRAW IN THE REALISM/ANTI-REALISM DEBATE

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Abstract
The notion of mind-independence plays a central role in the contemporary realism/anti-realism debate, but the notion is severely ambiguous and consequently the source of considerable misunderstanding. In this paper, four kinds of mind-independence are distinguished: ontological, causal, structural, and individuative independence. Appreciating these distinctions entails that one can reject the individuative independence of the natural world, and still maintain that the natural world is causally and structurally independent of us. This paper argues that so-called anti-realists, especially Rorty, Putnam, and Goodman, are not opposed to the causal and structural independence of the natural world, as is frequently alleged, but rather its individuative independence. An acceptance of these points will hopefully put an end to the prevalence of strawmen in the debate, and focus attention on meatier issues.

I. Introduction
The notion of mind-independence is a (if not the) central concept in the contemporary realism/anti-realism debate. Philosophers who maintain that much of the natural world is totally mind-independent are usually categorized as realists and taken to be defending common sense, while philosophers who maintain that all of the natural world is mind-dependent are typically labeled anti-realists and taken to be rejecting common sense. The blurb on the back cover of a recent anthology entitled Realism & Antirealism construes the debate in kindred fashion:

Throughout the past century, a debate has raged over the thesis of realism and its alternatives. Realism – the seemingly commonsensical view that all or most of what we encounter in the world exists and is what it is independent of human thought – has been vigorously denied by such prominent intellectuals as
Jacques Derrida, Michel Foucault, Richard Rorty, Thomas Kuhn, Hilary Putnam, and Nelson Goodman. The opponents of realism, among them historians and social scientists who support social constructionism, hold that all or most of reality depends on human conceptual schemes and beliefs.\(^1\)

This is a fairly representative construal of the contemporary realism/anti-realism debate. To put it comically, the anti-realists are the bad guys attacking common sense, while the realist has come to save the day (and in some rather immodest moments, the foundations of the Western Tradition, or something along those lines). This standard depiction is rather Quixotic – fighting windmills and all that – since a charitable reading of so-called anti-realists, like Putnam, Rorty, and Goodman, reveals that they are not opposed to the mundane ways in which reality is mind-independent. Finding the real monster, so to speak, requires recognizing that the crucial notion of mind-independence is extremely ambiguous. The purpose of this paper is to clear up this ambiguity by distinguishing four kinds of mind-independence. Making these distinctions goes a long way toward clarifying what the debate is actually about (or should be about).

II. Ontological, causal, and structural independence

The first kind of mind-independence worth distinguishing is ontological independence. Something is ontologically dependent on us if our ceasing to exist would immediately cause it to cease to exist. Things like money, national borders, tax laws, and speed limits – which are sometimes called social realities – are ontologically dependent on people, since if all people went out of existence, they would immediately follow. Their very being is generated and sustained by our collective agreement and social practices. This is not to say that the physical things that get counted as money and national borders, for instance, would go out of existence if all people did, but just that those physical things would no longer count as money or national borders. The physical realities would remain, while their social significance would not. According to common sense, brute physical realities,

such as mountains and rocks, are ontologically independent of us, since even if all human beings suddenly ceased to exist, brute physical realities would continue to exist.

Radical Idealism is an apt name for the thesis that all reality is ontologically dependent on us – that if all people ceased to exist, everything else would consequently cease to exist. Few if any academic philosophers, with the notable exception of Berkeley, defend or are alleged to defend something akin to this view. Rorty agrees, writing: ‘I think that nobody has ever doubted an independently existing reality, except perhaps the nineteenth-century absolute idealists who claimed that the nature of reality was spiritual.’ If Rorty, for instance, accepts the ontological independence of the natural world, what does he reject when he claims to ‘not believe in “mind-independent reality”’?

Though common sense has it that all physical realities are ontologically independent of us – since if we zapped out of existence, they would remain more or less unchanged – a subset of physical realities are dependent on us in another way. If people had never existed, then physical things like baseballs, skyscrapers, and lamps would never have existed, since we make these things. Such manufactured realities are causally dependent on us, since we caused them to exist. Had there been no people, there would have been no baseballs, skyscrapers, or lamps. But now that these physical things exist, were we to zap out of existence, they would remain – that is, though they are causally dependent on us, they are ontologically independent of us. There are, however, many physical realities that are independent of us in both senses. These are all the physical things we did not make, including stones, mountains, stars, and dinosaurs. They are causally independent of us, since they would have existed had we never existed, and they are ontologically independent of us, since our zapping out of existence would leave them untouched. It is presumably the case that all things that are causally independent of us are ontologically independent as well.

It is sometimes alleged that anti-realists, primarily Rorty, Goodman, and Putnam, maintain that all of reality is causally dependent on us, that we somehow create(d) all of reality. It is not hard to see why Goodman is so accused, especially con-


sidering his infamous claim, ‘when I say that worlds are made, I mean it literally.’

Call the position that all of the natural world is causally dependent on us Literal Worldmaking. Rorty and Putnam are clear about rejecting Literal Worldmaking and endorsing the causal independence of much of the natural world. Rorty claims ‘that causal independence is irrelevant to realism’, since everyone agrees that much of reality is causally independent of us. Rorty maintains that denying the existence of mind-independent reality is not equivalent to ‘deny[ing] that there were mountains before people had the idea of “mountain” in their minds or the word “mountain” in their language.’ As Rorty continues, ‘Nobody thinks there is a chain of causes that makes mountains an effect of thoughts or words.’

Rorty takes pains to ‘agree with common sense that there were dinosaurs and mountains long before anybody described them as dinosaurs and mountains, [and] that thinking doesn’t make it so’. Putnam does the same, insisting that ‘there are tables and chairs and ice cubes’, and that ‘human minds did not create the stars or the mountains’.

If anti-realists are not opposed to the causal independence of much of reality, then to what are they opposed? This is where things start getting complicated, in no small part because anti-realists are not entirely clear about their position. Rorty, for instance, claims that ‘everything, including giraffes and molecules, is socially constructed’. What could this mean? Is Rorty suggesting that although things like giraffes and molecules are causally independent of us – meaning that we did not bring their physical bulk into being – that our minds somehow transform or structure their amorphous mass into stable form? Goodman seems to support something like this, claiming ‘that there is no such thing as the structure of the world for anything to conform

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7 Rorty, ‘John Searle on Realism and Relativism’, p. 83 (n. 23).


10 Rorty, ‘John Searle on Realism and Relativism’, p. 83 (n. 23).
or fail to conform to’, but that the ‘features of the world derive from – are made and imposed by – versions’. \(^{11}\) Because of passages like these, it is not hard to see why anti-realists are accused of defending the view that all of reality is somehow structured by us, that the natural world is an amorphous (though perhaps causally independent) blob onto which we impose structure. This view is sometimes called Blob Realism and entails a third kind of mind-independence, which will be dubbed structural independence.

Something is structurally independent of us if it has structure independent of how we say it is structured. Mountains are structurally independent of us, since they would have many of the physical features and characteristics they do have even if we never existed. They have particular spatio-temporal locations and dimensions, and particular physical features and properties, regardless of what we think and say. Not only is what we call Mt. Everest causally independent of us, since we did not bring it into being, it is also structurally independent of us, since it is as big, steep, crumbly, icy and avalanche prone as it is irrespective of the wishes of climbers struggling on its slopes. Of course, we can and do alter the structure of mountains by carving paths on them, and excavating them, but the point is that there are properties and features that mountains have that are independent of us. If mountains had no independent structure, there would be nothing to carve, excavate, or climb.

Something would be structurally dependent on us if it were totally amorphous and we (somehow) imposed all structure onto it. A possible example of a thing that is structurally dependent on us is a cloud. Atmospheric clouds are relatively amorphous. Their shape shifts and changes, light passes through them, and birds can fly through them. What clouds are structured as is to some extent up to us, since they seem to have little if any structure on their own. Some clouds look like alligators, others like cotton balls, and others just look dark and foreboding. Another example of a natural reality that could conceivably be understood to be structurally dependent on us is the aurora borealis. The aurora borealis appears as a colossal undulating curtain of light in the northern sky. Its form and colours shift and twist erratically, and

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they can disappear just as unexpectedly as they appear. According to Blob Realism, reality is somehow just as amorphous as clouds and the aurora borealis, and whatever rigid structure we perceive to inhere in things like mountains is somehow imposed by us.

That said, clouds and the aurora borealis are not actually good examples of things that are structurally dependent on us, because they clearly have some independent structure. Clouds, for instance, are comprised of certain molecules and have properties independent of what we think and say about them. It is likely that there are no natural realities that are completely structurally dependent on us, perhaps because any natural reality has to have some independent structure in order for it to be considered a natural reality. However, if there were a totally amorphous thing onto which we imposed all structure, then this thing would be structurally dependent on us.

The debate between realists and anti-realists is often construed as follows. Anti-realists maintain that the entire natural world is somehow causally and/or structurally dependent on us, while the realist defends common sense by maintaining that we did not cause the natural world to exist and do not structure it through some mysterious cognitive faculty. Michael Devitt, for instance, claims that plenty of academics, most notably Goodman, defend the Literal Worldmaking thesis that different conceptual schemes literally make or construct different worlds and ‘that there would not have been dinosaurs or stars if there had not been people (or similar thinkers).’

In response to this madness, Devitt defends his own brand of Common-Sense Realism against Literal Worldmaking. Deborah Smith construes the debate similarly, but uses different labels: (1) ‘Modest Metaphysical Realism’, a central element of which is that ‘the world has some structure(s) that is(are) mind-independent’; (2) ‘Modest Metaphysical Antirealism’, a central element of which is that ‘the world is dependent on the existence and/or activities of minds for all of its structure.’ Smith suggests that the debate between (1) and (2) is a live one, because position (1) ‘does seem to have been rejected by a number of prominent thinkers’, notably Putnam.

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Searle claims that Rorty insinuates that ‘the “real world” is just our creation.’¹⁵ Searle interprets Rorty’s claim (1) that the things in the natural world are socially constructed, as the crazy claim (2) that things like giraffes, mountains, and molecules do not actually exist.¹⁶ Searle sees himself as defending common sense against anti-realist attack. He writes that ‘the rejection of realism . . . is an essential component of the attacks on epistemic objectivity, rationality, truth, and intelligence in contemporary intellectual life’, and that ‘the first step in combating irrationalism . . . is a refutation of the arguments against realism.’¹⁷

Devitt, Smith, and Searle misconstrue the debate, since they miss the kind of mind-independence to which anti-realists like Rorty, Putnam, and Goodman are actually opposed: individuative independence.

III. Individuative independence

To say that the natural world is individuatively independent of us is to say that it is divided up into individual things and kinds of things that are circumscribed by boundaries that are totally independent of where we draw the lines. An example of an individual thing that is presumably individuated independently of us is the moon. When the bright full moon is overhead in a cloudless night sky, it is a clearly distinct individual with boundaries that appear crisp and unambiguous. The same goes for many other things like apples, grizzly bears, and pearls. An example of a kind of thing that is presumably individuated independently of us is a polar bear. First, all mature polar bears look more or less alike. Second, the difference between polar bears and other kinds of animals, such as marmots, bald eagles, and grizzly bears, is prima facie clear and unambiguous. There is no confusing one with another. These things and kinds of things seem individuatively independent of us – that is, the boundaries around and between them seem to inhere in nature irrespective of anything about us.

Many things are, on the contrary, individuatively dependent on us. Constellations are a prime example of this. We individuate the night sky into constellations. We, or more specifically our ancestors, determined which stars comprise which constellations. We can come up with new constellations whenever we like simply by pointing out a few stars and giving the cluster a name. Furthermore, the boundary between a constellation and its surroundings is very much a function of where we draw the lines (or more aptly, how we connect the dots). Though it is _prima facie_ plausible that reality is individuated intrinsically into stars, reality is not individuated intrinsically into constellations, since it is people who divide the night sky into constellations. Another example of something that is quite obviously individuated by us is a rainbow. Though it may appear that there is a finite number of colour stripes in a rainbow, in reality a rainbow is a smooth spectrum that can be divided up into as many stripes as we like. Though things like constellations and rainbows are causally and structurally independent of us, they are individuatively dependent on us. To elucidate further the difference between these kinds of mind-independence, if it turns out that reality is at base a fluid, undifferentiated continuum, then it would be structurally independent of us, yet individuatively dependent on us, for any individuation that we recognize in such a world would be imposed by us.

It will be useful to have a name for the position that some things and/or kinds of things in the natural world are individuated independently of us – call it Individuative Realism. Individuative Realism is the thesis that the individuation in nature is (metaphysically) real, or in other words, that some things and/or kinds of things in the natural world are not just causally and structurally independent of us, but individuatively independent as well. Just as a turkey is divided up naturally into various joints that are there for the carving, reality itself is divided up naturally into various objects and kinds of objects.

So characterized, Individuative Realism is equivalent to how Metaphysical Realism is sometimes defined. Putnam defines Metaphysical Realism as the view that ‘the world divides itself up into objects and properties in one definite unique way.’18 Mary Kate McGowan defines Metaphysical Realism as ‘the thesis that

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there is a single objective way that the world is’, that ‘the world is objectively individuated into things and kinds of things.’\textsuperscript{19} Gabor Forrai characterizes Metaphysical Realism by saying that ‘the principles of individuation and classification are intrinsic features of reality’, that ‘reality comes in natural units’, and that ‘the beast of reality . . . [has] joints, and they are where they are independently of the human mind.’\textsuperscript{20} It is the core idea expressed in these passages, that reality is individuated independently of how we divide it up, that is the essence of Individuative Realism.\textsuperscript{21}

As another example to put a bit more flesh on the turkey’s skeleton, so to speak, consider a room filled with the following entities: three grizzly bears, four apples, and five stones. According to Individuative Realism, there are presumably twelve individual things and three kinds of things in the room. It is crystal clear where the boundaries between an apple and a stone lie, and where one grizzly bear ends and the other begins. It does not seem plausible, as it is in the case of a rainbow, that we are imposing divisions on what is in reality an undifferentiated continuum. The border between an apple and a stone, even when juxtaposed, is not blurry and arbitrary, but crisp and undeniable. Additionally, there is no confusing grizzly bears with apples, for instance, since they are distinct kinds of things – each belongs to a different class, and these classes inhere in nature. We can of course come up with our own whimsical classifications, like ‘grizzly-apples’. A member of the class grizzly-apple is comprised of what we normally consider to be two distinct things: a grizzly bear and an apple. According to this bizarre classification there are two kinds of things in the room, stones and grizzly-apples, and consequently only eight individual things, three grizzly-apples and five stones (and a piece of a grizzly-apple, which happens to be what we would normally call a single apple, perhaps yielding nine things). But according to the Individuative Realist, the classification grizzly-apple is not a real one, since nature does not come pre-individuated into these bizarre kinds of things. Nature does, however, come pre-classified into grizzly bears and apples (forgetting about stones for the moment), and the particular

\textsuperscript{19} Mary Kate McGowan, ‘Realism, Reference, and Grue (Why Metaphysical Realism Cannot Solve the Grue Paradox)’, \textit{American Philosophical Quarterly}, vol. 40, no. 1 (January 2003), p. 47.


\textsuperscript{21} The label ‘Metaphysical Realism’ is worth avoiding since it is also ambiguous.
members of these classes are unambiguously distinct from one another within (the boundary between one grizzly bear and another is sharp) and between (the boundary between a grizzly bear and an apple is sharp) classes. According to Individuative Realism, the same goes for much if not all of the natural world – that is, the lines between objects and/or kinds of objects are clear, unambiguous, and inhere in nature wholly independent of our gerrymandering.

IV. Anti-Realism as Anti-Individuative realism

Rorty, Putnam, and Goodman are opposed to Individuative Realism. Just to give their position a name, call it Anti-Individuative Realism. Anti-Individuative Realism is the thesis that although much of the natural world is causally and structurally independent of us, none of it is individuatively independent of us – we do the individuating. The natural world is akin to a rainbow, in that it can be divided up in a variety of ways, none closer to the way it is individuated intrinsically. Consider a giraffe as an example. It is not obviously true that a giraffe is one of the things into which reality is individuated intrinsically, since a giraffe itself can be divided up in many ways. For instance, a giraffe can be divided up into its anatomical constituents, or into constituent molecules, or atoms, or quantum fields. Which way of individuating a giraffe gets reality right? According to the Anti-Individuative Realist, none, since there is no way reality is individuated intrinsically.

The following passage from Rorty makes it fairly clear that he rejects Individuative Realism:

No sense can be made, we pragmatists argue, of the claim that some . . . descriptions pick out ‘natural kinds’ – that they cut nature at the joints. The line between a giraffe and the surrounding air is clear enough if you are a human being interested in hunting for meat. If you are a language-using ant or amoeba, or a space voyager observing us from far above, that line is not so clear, and it is not clear that you would need or have a word for ‘giraffe’ in your language. More generally, it is not clear that any of the millions of ways of describing the piece of space time occupied by what we call a giraffe is any closer to the way things are in themselves than any of the others.²²

Elsewhere Rorty writes:

[E]verything, including giraffes and molecules, is socially constructed, for no vocabulary (e.g., that of zoology or physics) cuts reality at the joints. Reality has no joints. It just has descriptions – some more socially useful than others.\(^{23}\)

In passages like these, it is plausible to interpret Rorty’s rejection of the mind-independence of reality not as the rejection of its causal or structural independence, but of its individuative independence. When Rorty says that all reality is socially constructed, he does not mean that we somehow structure – actually physically structure through some mysterious cognitive faculty – the natural world, but that we individuate the natural world, that we divide it up into things and kinds of things, and that without us there would be no individuation in nature.

Making the appropriate distinctions between kinds of mind-independence, and reading charitably, suggests that even Goodman is not opposed to the causal or structural independence of the natural world, but merely its individuative independence. Goodman writes:

We make a star as we make a constellation, by putting its parts together and marking off its boundaries. In short, we do not make stars as we make bricks; not all making is a matter of molding mud. The worldmaking mainly in question here is making not with hands but with minds, or rather with languages or other symbol systems.\(^{24}\)

Elsewhere Goodman writes:

Now as we thus make constellations by picking out and putting together certain stars rather than others, so we make stars by drawing certain boundaries rather than others. Nothing dictates whether the skies shall be marked off into constellations or other objects. We have to make what we find, be it the Great Dipper, Sirius, food, [etc.].\(^{25}\)

Goodman uses the term ‘make’ in misleading fashion. Though we ‘make’ constellations by picking out a few stars and giving the group a name, we of course do not physically create the stars out

\(^{23}\) Rorty, ‘John Searle on Realism and Relativism’, p. 83 (n. 23).
of which constellations are comprised or drag the stars into place. The crucial difference here is between (1) making in the sense of individuating and (2) making in the sense of physically forming, be it causally and/or structurally. As another example, though we did not make the moon by bringing it into being causally and/or structurally, Goodman would say that we made it by recognizing certain boundaries rather than others. We could have individuated the hunk of reality we call the moon (and thereby ‘made’ the world) differently. Instead of referring to what we call the moon as a single entity, we could have conceptually divided it into two halves, calling one ‘moonhalf1’ and the other ‘moonhalf2’ (and thereby in Goodman’s lingo ‘making’ moonhalf1 and moonhalf2). We make moons and moonhalves and everything else for that matter by conceptually carving up reality and assigning names to the chunks. We do not make them in the sense of actually creating or structuring them. Though many realities, including moons and moonhalves, are causally and structurally independent of us, all realities, according to Goodman, are individuatively dependent on us.

It should be said that whether the Anti-Individuative Realists are right that all of reality is individuatively dependent on us – that reality is not individuated intrinsically – is a separate matter entirely.

V. Anti-realism misconstrued

A point which is well-worth emphasizing, since it is commonly confused in the literature, is that individuative dependence does not entail structural dependence. In other words, if something is individuatively dependent on us, it does not follow that it is structurally dependent on us as well. Mountain peaks, for example, are individuatively dependent on us, since the number of peaks in a given mountain range depends on how ‘peak’ is defined. For instance, some hikers insist that in order for a peak in New Hampshire’s White Mountains to be a legitimate peak, its summit has to be two hundred feet higher than any saddle connecting it with another legitimate peak. If two peaks are connected by a saddle that is only one hundred feet lower than one of the peaks, then only the higher of the two peaks is legitimate. How peaks in the White Mountains are individuated is a function of our conventions of individuation – the peaks are individuatively dependent.
on us. Of course, it would be absurd to think that the peaks are also structurally dependent on us, that we somehow structure the peaks through some mysterious cognitive faculty. But this is unfortunately how the anti-realist position is routinely construed.

In a recent article, Damian Cox recognizes that Putnam rejects the thesis that reality is individuatively independent of us. However, Cox conflates individuative independence with causal and/or structural independence. Consequently, he maintains that arguing that the natural world is not individuatively independent of us, as Putnam does, entails that the natural world is not causally and/or structurally independent of us either. For Cox, either some portions of the natural world are individuatively, structurally, and causally independent of us, or all of nature is individuatively, structurally, and causally dependent on us. Cox thinks there is a strict logical dichotomy between the two positions with no third alternative. Cox has missed Putnam’s alternative, Anti-Individuative Realism, which is simply the thesis that though much of the natural world is causally and structurally independent of us, none of it is individuatively independent of us. Cox is not alone in construing the debate as the false dichotomy above. Consider the following dilemma posed by Susan Haack. ‘The question, “is there or isn’t there a fixed totality of mind-independent objects?” traps you in a metaphysical corner. Answer “yes,” and you seem to be committed to something like a Logical Atomist picture, with its mysterious logically ultimate objects; answer “no,” and you seem to be committed to the idea that our conceptual goings-on bring new objects into existence.’ Unlike Cox, Haack is dissatisfied with both positions, and recommends rejecting both. But like Cox, Haack does not acknowledge the alternative position, presumably because she also does not adequately distinguish individuative independence from causal and/or structural independence.

Some philosophers are more explicit about conflating kinds of mind-independence. Crawford Elder, in his recent book, argues that Conventionalism, which he defines as the thesis that all of reality is individuatively dependent on us, leads to paradox. He

thinks it leads to paradox, because he wrongly assumes that individuative dependence entails structural dependence. Elder defines Conventionalism (which is akin to Anti-Individuative Realism) as follows. ‘[T]hat the existences of the world’s objects begin where they do, and end where they do, will not be independent of us and our conventions. Beginnings and endings of existence, for the world’s objects, will obtain only relative to us.’ Elder then asks precipitously: ‘Should this result be articulated in antirealist fashion, as the claim that we by our conventions [of individuation] actually construct the existences of the world’s objects?’ Elder claims that according to most versions of Conventionalism, ‘it is in a sense true that we (by our conventions [of individuation and classification]) construct, shape, the existence of the world’s objects.’ Elder acknowledges that this sense of construction ‘does not require the use of hammers and saws, and we do not do it in the sweat of our brows. We do it merely by thinking and talking as we do.’ But he then obfuscates Conventionalism by saying that it involves construction in a ‘mysterious’ sense, according to which the constructed objects ‘are as insubstantial as our own constructing activities. They have only a shadow reality of a mental (or a linguistic) projection.’ He then attributes this view to Putnam and proceeds to render it even fruitier and more frivolous. Elder then rightly argues that Conventionalism so construed breeds paradox. But the sleight of hand in the conjuring trick has already occurred. The sleight of hand involved associating individuation with construction in the construal of Conventionalism, or more specifically, claiming that individuative dependence entails structural dependence. But, as I have argued, individuative dependence does not entail structural dependence, and Conventionalists read charitably do not maintain that it does either. Consequently, Elder’s attempt to catch the Conventionalist in a paradox, and thus undermine Conventionalism, fails. Whether the failure of Conventionalism is crucial to the thesis Elder defends in the remainder of his book is unclear. What is clear is that Elder’s claim that individuative dependence entails structural dependence is part of a larger problem of not properly distinguishing any senses of mind-independence – a problem

30 Elder, Real Natures and Familiar Objects, p. 11.
31 Elder, Real Natures and Familiar Objects, p. 13.
revealed in the first chapter’s conclusion: ‘Conventionalism, I contend, ultimately founders on its refusal to allow that any objects in the world possess mind-independent existences.’

VI. Conclusion

The reader should not be left with the impression that anti-realists are crystal clear about which kinds of mind-independence they accept, and which they reject. They are not. Though once the distinctions between ontological, causal, structural, and individuative independence are made, and the anti-realists are read charitably, then it becomes clearer what is and is not in dispute. Anti-realists, by and large, accept the ontological, causal, and structural independence of the natural world, while rejecting its individuative independence. Philosophers who wish to distinguish themselves from anti-realists on matters of substance can do so by defending the thesis that the natural world is individuated independently of our conventions of individuation, or by showing that the anti-realists are unwarranted in concluding that reality is not individuated intrinsically.

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32 Elder, *Real Natures and Familiar Objects*, p. 20.
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