

ANIMAL RIGHTS-COMPASSION FOR LIVING CREATURES

Written by Anshika Vats

Research Scholar, Savitribai Phule Pune University, Pune, India

ABSTRACT

In India, the rights of animals and human beings are protected under various laws. As time evolves, the laws are becoming more stringent with penal provisions, though animals are unaware of their rights. That makes human beings to be more vigilant about animal rights along with human rights.

In earlier days animals were slaughtered widely and many of them became extinct due to selfishness of men. Every animal is a necessary part of our ecosystem to maintain equilibrium. Still, animals are facing so many threats to their natural habitat. The main enemy of animals is their law donors themselves, human beings. Both wild animals and domestic animals face threats due to modernization and commercialization. So many animal lovers and activists joined together for the protection of animals. Thus, in every country including India, so many laws were originated as the rights of animals. In different times legal luminaries and legislature have amended and incorporated these rights via law-making and precedents.

The present study speaks out for animals, for all kinds of animals and their rights. This calls for debates on the subject and reformulation weak penal provisions. The people too have an important role to understand the significance of ecology and all living beings. The basic freedoms of animals must be granted to them

Keywords: Animal Rights, Animal welfare, Legislation on Animals, Right against harassment to animals

INTRODUCTION

Animals are sentient and can suffer. “Animals deserve rights, regardless of how they taste or how convenient it is to experiment on them. Like humans, animals are capable of suffering and have an interest in leading their own lives.”ⁱ When it comes to cruelty to animals the first thing which may turn up in our mind is slaughtering. But in fact, slaughtering in accordance with the due procedure and lawsⁱⁱ is legal and the pile of animal cruelty or abuse lies with the other plethora of cruel and inhumane acts toward them. There may not be a recognized or a definite definition of cruelty to animals but after the general reading of the Prevention of Cruelty to Animals Act, 1960 (herein after referred to as the ‘PCA Act’) one may interpret it as any act or neglect which may cause infliction of unnecessary pain or suffering to an animal (who is any living creature other than a human beingⁱⁱⁱ). Some of the many acts of neglect may include the failure to provide the necessary medical attention or food, water or the failure to take any necessary measure which may put the animal through unnecessary pain or suffering. It is also important to remember that animal cruelty is not restricted to cases involving physical harm, causing an animal psychological harm in the form of distress, torment or terror may also constitute animal cruelty.^{iv} Animal cruelty can be either deliberate abuse or simply the failure to take care of an animal. It may be called any human activity which infers on any non-human animal suffering, pain or harm for the object or motive being other than that of own self-protection or survival. From the minimal to the atrocious crimes (such as killing and thereafter cooking of a pet^v, maiming of animals, to rape of animals resulting in their death) all have had and are having their presence in our country. There is no data available on the national level because of the unawareness between the people as well as the officials which results in non-reporting of most of the cases, the unawareness being also the major reason of the non-implementation of these laws.^{vi}

LEGAL STATUS OF ANIMALS

In modern law, animals are not recognised as persons by any legal system. Therefore, they are not having legal rights and duties. However, in the ancient Greek law animals and trees were

tried in the court for their wrongful acts. Under the ancient Jewish Code ‘if an ox gore a man or women resulting in his or her death, then the ox was to stoned and its flesh was not to be eaten. In Hebrew Code, there is reference of trial of cocks, bulls, dogs and trees. In middle age, in Germany a cock accused of contumacious crowing was solemnly placed in prisoner’s box. In 1688, *Gaspard Bailly of Chamberg* in Savoy published a volume including forms of indictment and pleading in animal trial. In all these cases, the animal is considered to be capable of sustaining duties and is therefore to this extend a legal person.

Modern law does not confer any rights and duties on the animals. Their interest are not recognised by the law. If an animal is hurt, it is not a wrong against that animal but against the owner of the animal or against the society. The master is held liable for the wrong done by the animals, which is strict ability. If it would be vicarious liability, the animal could be said to have a legal personality.^{vii} Animals are considered only a kind of property and can’t hold property even through a human trustee. However, there are two cases in which animals may be said to possess legal rights:

1. Cruelty to animals is a criminal offence.
2. A trust for the benefit of particular classes of animals, as opposed to one for individual animals, is valid and enforceable as public and charitable trust.

CONSTITUTIONAL PROVISIONS FOR ANIMALS

The fundamental duty incorporated under Article 51A(g) reads, “It shall be the duty of every citizen of India to protect and improve the natural environment including forests, lakes, rivers and wildlife, and to have compassion for living creatures.” The compassion for living creatures means the concern for suffering, kindness, sympathy etc. This duty of citizen gives rights to animals,

(i) to live in a natural environment including forests, lakes, rivers etc. without intrusion unless and otherwise provided by law;

(ii) to be treated with compassion;

(iii) Wildlife has the right to live without the forcible entry of external groups. That means they gave the right to get the protection of their natural habitat, food chain etc.^{viii}

In *Animal Welfare Board of India (AWBI) v. A. Nagaraja and Ors.*^{ix}, it was held by the Hon^{ble} Supreme Court of India that animal welfare laws have to be interpreted keeping in mind the welfare of animals and species best interest subject to exceptions out of human necessity. Lordships have also held that every species has an inherent right to live and shall be protected by law, subject to the exception provided out of necessity. Lordships have further held that so far animals are concerned, “life” means something more than mere survival or existence or instrumental value for human beings, but to lead a life with some intrinsic worth, honour and dignity. Animal has also honour and dignity which cannot be arbitrarily deprived of. Lordships held that Article 51 (g) and (h) are Magna Carta for protecting the life of animals.

In Seventh Schedule under List-II (State List) State has the power and authority to Preserve, protect and improve stock and prevent animal diseases, and enforce veterinary training and practice. It is given as entry 15. Entry 21 provides authority over fisheries. List III (Concurrent List), gives power to both the Centre and the State for preventing cruelty to animals (Entry 17), protecting forests (Entry 17 A) & protecting wild animals and birds. (Entry 17 B) Under the Eleventh Schedule (Article 243 G), duty and authority of the Panchayati Raj institutions in the case of animal husbandry, dairying and poultry (Entry 4) & fisheries (Entry 5) are included.

In, *State of Gujarat v. Mirzapur Moti Kureshi Kassab Jamat and Ors.*^x, the Supreme Court held that by enacting Article 51A (g) and giving it the status of a fundamental duty, one of the objects sought to be achieved by Parliament is to ensure that the spirit and message of Articles 48 and 48A are honoured as a fundamental duty of every citizen.

Article 48A specifies a duty on the State and Article 51A (g) imposes a fundamental duty on every citizen. The social and economic justice shall be observed by the State as the citizen while implementing the said provisions.

Thus Articles 48 and 48 A give rise to other indirect rights to animals. Though both Articles are directive principles, the Central government and State governments have adopted different measures to protect animals by invoking different laws.

Article 48 reads as follows, “The State shall endeavour to organise agriculture and animal husbandry on modern and scientific lines and shall, in particular, take steps for preserving and improving the breeds, and prohibiting the slaughter of cows and calves and other milch and draught cattle.”

Further Article 48A states, “Protection and improvement of environment and safeguarding of forests and wildlife. The State shall endeavour to protect and improve the environment and to safeguard the forests and wildlife of the country.”

Deepak Kumar's case judgment^{xi} directed State Governments in India to frame Rules to protect environment invoking the provision of Article 48.

In *Nature Lovers Movement v. State of Kerala and Ors.*^{xii} Kerala HC ruled that Article 48 contained in the Directive Principles of State policy mandates that the State shall endeavour to organise agriculture and animal husbandry on modern and scientific lines. So it directs states to adopt modern and scientific measures on animal husbandry, preserving and breeding of animals and high-level cow protection; hence aims to lessen the cruelties against animals

Thus Article 48 gives right against harassment to animals.

In *Mohd. Hanif Quareshi and Others v. State of Bihar*^{xiii}, the apex Court decided that a state law which prohibits the slaughter of cows and calves and other cattle capable of work has been upheld because it was meant to give effect to Article 48 of Indian Constitution. In this 1958 case, the main allegation was the cattle slaughter laws of Bihar, Uttar Pradesh, and Madhya Pradesh infringed on the fundamental rights of the petitioners ensured under Articles 25, 14

&19(1) (g) of Constitution. The petitioners were Muslims doing the butcher's trade. But Court upheld the validity of the Act by upholding State's responsibility under Article 48. Also, the sacrifice of a cow isn't obligatory part of the Islamic rites. Therefore, it doesn't violate Article 25. The Court found that the State law was not infringing the right to trade and business under Article 19(1) (g). The restriction is only reasonable and in the interest of the general public. The Court further ruled that the directive principle has to 'conform to and run as subsidiary to the fundamental rights' in Indian Constitution.^{xiv}

However, the apex Court held that a total ban on the slaughter of bulls, bullocks and she-buffaloes after they had ceased to be useful was invalid under the Constitution.^{xv} So the right against slaughtering is not universal for every animal in India. It is limited to some animals, as each State can frame their laws and that is not mandatory as long as it is a directive principle.

After Mohd. Hanif Qureshi's case, Supreme a reiterated and modified the right of certain animals regarding slaughtering in Abdul Hakim Quraishi and Others v. The State Of Bihar^{xvi}, Haji Usmanbhai Hasanbhai Qureshi & Ors. v. State of Gujarat^{xvii} and upheld the validity of state laws to protect some animals from slaughter.

But in the State of Gujarat v. Mirzapur Moti Kureshi Kassab,^{xviii} constitutional bench overturned the precedent Mohd. Hanif Qureshi judgment. The Court upheld an amendment to the Bombay Animal Preservation Act, 1954, the effect of which was to impose a total ban on the slaughter of bulls and bullocks of any age. The Court found that environmental principles and duties in Articles 48A and 51A (g) of the Constitution were introduced in 1976. So, the said Articles were not available to the bench in Mohd. Hanif Qureshi case. The Court held that the use of terms 'Milch and draught cattle' in Article 48 had employed to distinguish the cattle. The classification was not dependent on the cattle being able to perform a specific function that means a cow does not lose its protection if it ceases to perform its particular function or reaches a certain age. Thus, Court overruled its previous ruling that a total ban on the slaughter of bulls and bullocks was an unreasonable restriction and not in the public interest as per the test provided in article 19(6) of the Constitution.

In a 2008 judgment *Hinsa Virodhak Sangh v. Mirzapur Moti Kuresh Jamat & Ors*^{xxix}, the Apex Court upheld a temporary nine-day closure of municipal slaughterhouses for Paryushan festival celebrated by Jain community.

But in 2017, the Ministry of Environment imposed a ban on the purchase and sale of cattle for slaughtering at animal markets across the territory of India in Prevention of Cruelty to Animals (Regulation of Livestock Markets) Rules, 2017 under the Prevention of Cruelty to Animals Act. But Indian Supreme Court suspended the ban on the sale of cattle by a very important judgement.^{xx} Also, the Court gave relief to beef and leather industries.^{xxi}

As stated in Article 48A, for the protection and improvement of environment and safeguarding of forests and wildlife, the state and central governments have enacted different laws these days. The Kerala High Court in a 2000 judgment, *Jumbo Circus v. Union of India*,^{xxii} pronounced that a law which denies rights to animals is an anachronism, which must necessarily change.

In *N.R. Nair and Ors. v. Union of India and Ors*^{xxiii}, in this case Kerala High Court has held that banning the training and exhibition of animals was not violative of Article 19(1)(g) of the Constitution.

LEGISLATION FOR PROTECTION OF ANIMALS

1. Laws relating to Street Animals

- Killing, maiming, poisoning or rendering useless of any animal is punishable by imprisonment for up to two years or with fine or with both, under Section 428 of the Indian Penal Code, 1860. Under Section 429 of the Code, the term is 5 years and is applicable when the cost of the animal is above 50 Rs.
- Section 11 of the Prevention of Cruelty to Animals Act provides that if any person allows, or himself beats, kicks or tortures, in any way, any animal subjecting it to unnecessary pain and suffering will be liable to pay a fine of upto 50 Rs. In case of

repetition of the offence, the fine will increase or an imprisonment for 3 months will be granted.

- The Animal Protection (Dogs) Rules, 2001 provide for rules relating to pet and street dogs.^{xxiv}

2. Laws relating to work Animals/Cattle

Chapter III of the Prevention of Cruelty to Animals Act deals with “Cruelty to animals generally” According to Section 11, the following acts are punishable by fine upto Rs. 25-100 and a maximum of three months of imprisonment on repetition of the said acts.

- anybody who employs any unfit animal, suffering from wound, infirmity, sores or an animal of an old age, to work. -Section 11 (b)
- anybody who carries any animal subjecting it to pain or suffering. – Section 11 (d)
- keeps an animal in a cage or any other such confinement which is not sufficiently big enough as to let the animal move freely. -Section 11 (e)
- any owner of an animal who allows his animal, affected with a contagious or infectious disease to die in any street. -Section 11 (j)
- any person who offers for sale an animal that is suffering from pain due to mutilation, starvation, thirst, overcrowding or ill-treatment. -Section 11 (k)
- In October 2014, non-binding guidelines called National Code of Practices for Management of Dairy Animals in India were released by the government in consultation with an NGO named World Animal Protection.

In *Gauri Maulekhi V. Union of India and Ors*, the Supreme Court of India passed an interim order directing the Union of India to prevent the illegal movement of animals across the border from India to Nepal, to be sacrificed at the Gadhimai Festival, scheduled to be held on 28-29 November. It found that the animal movements were in violation of the Export-Import Policy of India and the Foreign Trade Act (Development and Regulation) Act 1992, which categorically places live cattle and buffalo in the restricted export category, requiring a license to legally export them.^{xxv}

3. *Laws relating to Wild Animals*

The chief laws relating to wildlife in India are found in the Wildlife Protection Act, 1972. The Act prohibits the killing, poaching, trapping, poisoning, or harming in any other way, of any wild animal or bird. It also provides for establishment of Wildlife Advisory Boards in every State.

- According to Section 2 (37) of the act, wildlife includes any animal, aquatic or land vegetation which forms part of any habitat, thus making the definition a wide and inclusive one.
- Section 9 of the Act prohibits the hunting of any wild animal (animals specified in Schedule 1, 2, 3 and 4) and punishes the offense with imprisonment for a term which may extend to 3 years or with fine which may extend to Rs. 25,000/- or with both.
- The Act allows the Central and State Government to declare any area 'restricted' as a wildlife sanctuary, national park etc. Carrying out any industrial activity in these areas is prohibited under the Act.
- Section 48A of the Act prohibits transportation of any wild animal, bird or plants except with the permission of the Chief Wildlife Warden or any other official authorised by the State Government.
- Section 49 prohibits the purchase without license of wild animals from dealers.

In *Wildlife Rescue & Rehabilitation Centre v. Union of India*^{xxvi}, the Supreme Court directed the Chief Wildlife Warden to keep a count of all captive elephants in the State of Kerala and ensure that the requisite declarations and certificates under Sections 40 and 42 of the Wildlife (Protection) Act, 1972 are duly obtained by the owners. The Court also imposed an obligation upon the State of Kerala to ensure that the various temples in the State are registered with the District Committee as per the requirements under Kerala Captive Elephants (Management and Maintenance) Rules, 2012. It observed that the State, the District Committee, Management of the Devaswom or the temple and the owners of the elephants are duty bound to see that no elephant is meted with any kind of cruelty and will face severe consequences if cruelty is found.

4. Laws relating to Aquatic Animals

The Wildlife Protection Act is applicable to aquatic animals too. Protection of marine species in India is done through creation of Marine Protected Areas (MPA).

- Schedule 1-4 of the Wildlife Protection Act provides a list of all the protected marine species, for e.g seahorse, giant grouper, hermatypic corals, organ pipe, fire coral, sea fans, etc.
- Schedule III protects all species of sponges and Schedule IV comprises of a wide variety of mollusks.
- Dolphins have been recognized as the national aquatic animal of India and find themselves placed in Schedule I. India has banned use of dolphins for commercial entertainment, thereby placing a ban on establishment of any 'dolphinarium' in the country.

5. Laws relating to Birds

Birds, too, are protected under the Wildlife Protection Act, 1972 (WLPA) and in Prevention of Cruelty to Animals Act (PCAA), along with land and aquatic animals.

- Section 11 (o) of the PCAA provides for punishment of any person who promotes or himself takes part in any shooting match/competition where animals are released from captivity for shooting.
- Under Section 16 (c) of the WLPA, it is unlawful to injure or destroy wild birds, reptiles, etc. or damaging or disturbing their eggs or nests. The person who is found guilty of any of this can be punished for up to 7 years in jail and be made to pay a fine of up to Rs 25,000.

6. Laws relating to Zoo Animals

Laws relating to zoo animals are also found in The Wildlife Protection Act.

- Section 38A of the Act provides for establishment of a Central Zoo Authority by the Central Government, which has the following functions:
 - i. specifying the minimum standards for keeping of animals inside the zoo.
 - ii. recognize or derecognize zoos.
 - iii. recognize endangered species and assign responsibilities to zoos for their captive breeding, etc.
- According to Section 38 H, no zoo is allowed to function in India without recognition of the Central Zoo Authority.
- The CZA provides the guidelines that are necessary for Establishment & Scientific Management of Zoos in India. These include rules like providing sufficient area, healthcare, freedom of movement, a naturalistic environment to the animals, etc.

7. *Laws relating to Pets*

A lot of laws relating to pets are found in Section 11 of the Prevention of Cruelty to Animals Act. The punishment, as mentioned above, for any of these offences is up to Rs 100, and three-months imprisonment in case of repetition of the offence.

- Any person, who is the owner of an animal, negligently or intentionally chains a dog in close confinement, habitually
- Any owner who fails to provide his animal with sufficient food, drink or shelter- Section 11 (h)
- Any person who, without any reasonable cause, abandons an animal in such a situation where the animal is bound to suffer pain due to starvation or thirst- Section 11 (i)
- Any owner of an animal who consciously allows an infected, diseased or disabled animal to go into any street without any permit or leave the animal to die in any street- Section 11 (j)

- Any person intimidating another person and preventing him/her, who is the owner of a pet, from keeping or taking care of his/her pet can be held liable under Section 503 of the IPC.

8. *Laws relating to Animals used for the purpose of Entertainment*

- No animal can be used for the purpose of entertainment except without registering under The Performing Animals Rules, 1973.
- Chapter V of the PCAA deals with performing animals.
- Section 26 of the PCAA provides for punishment for any person who uses any animal for the purposes of entertainment/performance with a fine of up to Rs 500 or with an imprisonment of up to three months or with both.

In *Compassion Unlimited Plus Action v. Union of India and ors.*^{xxvii}, in this case, the Hon^{ble} Supreme Court of India held that bulls cannot be used as a Performing Animals for Jallikattu and Bullock-cart Race, since they are basically draught and pack animals, not anatomically designed for such performances. It observed that Sections 21, 22 of the PCA Act and the relevant provisions have to be understood in the light of the rights conferred on animals under Section 3, read with Sections 11(1)(a) & (o) and Articles 51A(g) and (h) of the Constitution.

9. *Laws relating to Testing or Experiment on Animals*

Millions of animals, especially white mice, guinea pigs, rabbits, monkeys, etc. are used for experimentation all over the world, and suffer and die with great pain in this process. Use of animals for experimentation in the cosmetic industry amounts to grave cruelty.

- Through the Drugs and Cosmetics Rules (Second Amendment) 2014, animal testing for cosmetic products was prohibited all over India.
- Any person who violates the Act is liable for punishment for a term which may extend from 3 to 10 years or shall be liable to a fine which could be Rs.500 to Rs.10,000, or both.

- According to Rule 135B of the Drugs and Cosmetic (Fifth Amendment) Rules 2014, no cosmetic that has been tested on animals shall be imported into the country.
- A committee, established under the provisions of Prevention of Cruelty to Animals Act–The Committee for the Purpose of Control and Supervision of Experiments on Animals (CPCSEA) released the Breeding of and Experiments on Animals (Control and Supervision) Rules, 1998 (amended in 2001 and 2006) that regulate the experimentation on animals.
- Dissecting and experimenting on animals in schools and colleges is banned in India, under the PCCA.^{xxviii}

SUGGESTION

In the course of this paper researcher have attempted to analyse the existing deficiencies in the animal welfare provisions of our country. Researcher have also attempted to suggest the need of the situation to amend the current punishment in PCA Act for violation of the rights of animals, in legislations protecting the rights of animals.

First, the status of animals under Indian Constitution and its interpretation by various courts has been examined, only to conclude that the provisions of the primary animal welfare legislation in India (that is the PCA), are toothless and the penalties prescribed by it neither offer adequate protection to animals, nor deter acts of cruelty. However, it has also been identified that the judiciary is increasingly attempting to accord rights to animals under the Constitution and also impose duties upon citizens to protect such rights.

This recognition of animals' rights and our corresponding duty to not only prevent any infringement of such rights but also to protect their rights, paves the way for recognizing a legal duty to base civil liability upon.

Thereafter, the reasons for improving the PCA have been discussed, in light of defects such as deficient penalties, non-cognisibility of offences, statutory limitations, and easy grant of bail. Based on the flaws highlighted, possible amendments have been proposed, so that the defects

identified may be removed. These changes include imposing higher penalties, and ensuring differential treatment of offences, so as to ensure proportionality of punishments and effective deterrence.

But since improving the position of criminal sanctions may not be a sufficient enough action, imposition of civil liability for offences committed against animals is critical as it is a matter of life and death. There is a need to do away with specialism which characterises most policies and laws, aimed at protecting animals and thus, researcher suggest the imposition if civil liability which will allow citizens to bring suits for harm done to animals.

For this it is necessary to recognize the status of animals as legal persons, so as to enable the bringing of civil suits on their behalf, through the acknowledgement of the States position as trustee or guardian of animals under the doctrine of *parens patriae* and the Public Trust Doctrine and by giving animals "equitable self-ownership title. Due to the inadequacy of the legislations, which seek to protect animals' rights and the Parliaments efficiency to recognize the rights of animals and prescribe any effective measures to protect basic rights; change in the law is necessary. Three amendments to the PCA have already been proposed. However, they are yet to be passed by the parliament.

Every day, there are new cases of animal cruelty being written about and spoken of. In light of the situation, solutions to mitigate the suffering of animals have to be found. Therefore, proposed changes are required to the PCA, such as civil liability being imposed on those who violate the rights of animals, for their failure to perform their duty of protecting the rights of animals. The provision for imposing civil liability, can be included in the PCA, because of the intrinsic worth of animals and their ability to feel pain as sentient beings. Animals do not merely exist for human benefit. Thus, we must stop place them to an inferior position and must offer them adequate safeguards and rights, since it is our duty to do so.

CONCLUSION

Under Article 51A(g); it is mandatory for all citizens of India to be compassionate towards living creatures.

Sections 428 and 429 criminalizes the killing or maiming of animals including stray animals.

Section 11(1)(i) and Section 11(1)(j) of the PCA, 1960 criminalizes the abandoning of animal for any reason with a three months jail term for offenders.

Any animal including chicken can only be slaughtered in the slaughter house and it is an offense to kill a sick or pregnant animal for consumption under Rule 3 of PCA, Slaughter House Rules 2001 and Chapter 4 of FFS Regulations 2011.

No authority or person is to capture or relocate any stray dog that has been operated upon for birth control under ABC Rules 2001.

Section 11(1) (h) of PCA criminalizes the neglect of animals by keeping it in chains for longer hours, refusing her food, exercise and shelter. Violation of this law attracts a fine or a 3 months' imprisonment or both.

Monkeys cannot be used for public display or owned under the wildlife Protection Act 1972.

Section 22(ii), PCA Act, 1960, prohibits the use and training of lions, monkey, bears, tigers, panthers and bulls for entertainment purposes in the public glare.

The use of animals for sacrifice in any part of the country is prohibited under Rule 3 of Slaughter House Rules 2001.

Section 11(1)(m)(ii) and Section 11(1)(n) of PCA Act, 1960 criminalizes the participation, inciting and organizing of fights between animals.

The use and the importation of cosmetics that has been tested on animals is prohibited under Rules 148-C and 135-B of Drugs and Cosmetics rules, 1945.

Section 38J of Wildlife Protection Act, 1972, criminalizes the feeding and teasing of animals in the zoo or the littering of the zoo environment. Offenders will pay a fine of Rs. 25000 or 3-years imprisonment or both.

The baiting, capturing, poisoning or trapping of an animal is prohibited and the violation of this provision attracts a fine of Rs. 25000 or 7-years imprisonment or both under Section 9 of the WP Act 1972.

Section 9 of the WP Act, 1972 criminalizes the destruction or disturbing of eggs or nests of birds or reptiles or cutting off trees that harbor the eggs or nests of birds or reptiles or attempting such acts. This attracts a fine of 25000 or 7-years imprisonment or both.

Any discomfort, suffering or pain occurring to the animal because of its posture during its conveyance by a vehicle or by any means is punishable under Section 11(1)(d) of PCA, Transport of Animals rules 2001 and MVA 1978.

ENDNOTES

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