

Legal Framework for Preventing Animal Cruelty in India with Special Reference to the Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022

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“For as long as men massacre animals, they will kill each other. Indeed, he who sows the seeds of murder and pain cannot reap the joy of love.”

– Pythagoras

ABSTRACT

The *Prevention of Cruelty to Animals Act*, 1960 is the principal legislation on prevention of cruelty on animals in India. But, the measures for prevention of cruelty on animals in India under this sixty-three years old legislation proved to be insufficient in achieving its objectives in the light of socio-economic changes in present day scenario. The extent and application of the *Prevention of Cruelty to Animals Act* (PCA), 1890 was limited in the sense that it was a mere permissive legislation as the application of the same was left with the state governments to extend it to the local areas at its discretion. The govt. has brought the *Draft Prevention of Cruelty against Animals (Amendment) Bill*, 2022 with enhanced punishments, depending on the harshness of the cruelty and the devaluation of money with time. Bearing in mind the harshness of the cruelty and the steep inflation rates since the enactment of the *PCA Act*, this *Amendment Bill*, 2022 was brought with updated penalties. The *Bill* was published for public comments on November 21, 2022 and great public support was witnessed in the public comments received in favour of the same. However, all these proposed changes will ripe benefits only after the *Bill* is passed and enforced accordingly. Despite the urgency of the amendment for the protection of the animals, the central government is delaying the passage of the much-awaited amendment, the *Prevention of Cruelty on Animals Amendment Bill*, 2022. Even though the Apex Court had directed at many instances that the law for the prevention of cruelty on animals is to be made better, more substantive and more stringent, the law could not be amended even after numbers of attempts to introduce new bills on the subject. Bills were brought on the table, so the recommendations were given, but, everything in vain. They (animals) might not speak out loud, but it is high time that we act, and replace the sixty-three years old legislation.

Key words: *Cruelty to Animals, law for the prevention of cruelty on animals, Prevention of Cruelty to Animals Act, 1960, Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022*

Introduction

Even after having numbers of legislations as well as

govt. policies for the protection of animals against cruelty, the incidences of torture and cruelty towards animals have been continuously rising. The

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animal rights activists at different level have been actively raising their voices on the implementation and effectiveness of the present legislations and policies in preventing cruelty on animal.

The *Prevention of Cruelty to Animals Act, 1960* is the principal legislation on prevention of cruelty on animals in India. But, the measures for prevention of cruelty on animals in India under this sixty-three years old legislation proved to be insufficient in achieving its objectives in the light of socio-economic changes in present day scenario. The present criminal liability of fifty rupees as the highest penalty against animal cruelty has been severely criticised on various social media platforms. The same is a violation of the doctrine of proportionality as well as the deterrence theory of punishment. However, such limitations under the present *Prevention of Cruelty to Animals Act (PCA), 1960* can be addressed through legal amendments. The govt. has brought the *Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022* with enhanced punishments, depending on the harshness of the cruelty and the devaluation of money with time. This paper tries to make a comparative analysis of the proposed legislation with *PCA Act* of 1960 as to make an assessment to which extent the existing flaws have been addressed.

Materials and Methods

The paper first of all, explores the historical evolution of the *PCA Act*. The author has discussed the important legal provisions for dealing cruelty on animals under the *PCA Act* along with the deficiencies therein. The paper tries to highlight the legal exigencies which requires the necessary changes in the present law dealing with animal cruelty. The author has also discussed the international legal provisions for the prevention of cruelty on animals and their implications in national legal system.

Results and Discussion

Cruelty to Animals

Whenever we hear about any incident of animal cruelty, we end up presuming it to be killing of an animal or taking the life of an animal by human. But many of us do not know that even slaughtering of an animal as per the due procedure set up under the *Prevention of Cruelty to Animals (Slaughter House)*

Rules, 2001 is quite legal, where the major incidences of cruelty on animals are witnessed in plethora of other abuse and cruel acts towards them. Although, the *PCA Act, 1960* does not define the term, 'cruelty to animals', from the provision relating to cruelty on animals we can interpret it as any act of commission of certain acts or act of wilful neglect or omission, subjecting an animal to unnecessary pain or suffering (Yadav, 2023).

Cruelty to animals is an offence against the society; thus, it is a crime just like any other criminal act against any human being. But it is very pathetic and inhumane on our part that we tend to ignore such offences. This is either because we, as human being has too insensitive towards their pain and sufferings or we are not aware about the laws and regulations for their protection against acts of cruelty. As for Example: One of the most common incidences of cruelty to animals is transportation of animals like chattels as for example tying them up, over loading cattle in a smaller vehicle one over another, etc. Although it is a crime under the rules and laws regarding transportation of animals, it is so common that any layman would not even believe that there exists such laws and regulations which in fact provide for various standards and guidelines with regard to the transportation of animals!

Laws and Regulations to Prevent Cruelty to Animals

The deficiencies in the present law are discussed in the light of meagre amount of penalty, non-cognizable offences leading to easy bail and other statutory limitations. To address the deficiencies in the effectiveness of the *PCA Act*, the first step would be to enhance the criminal as well as the civil liabilities under the Act to make the same more deterrent to the offenders. The provisions having faulty applications need to be amended to deal with the offences proportionate to the severity of the same. After exploring the possibilities of modifications and amendments, we would look into the *Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022* to assess whether the issues have been addressed or there is need for further improvements in the same. On conclusion, the author extends certain suggestions and recommendations for stricter application and enforcement of the *PCA Act* which will ensure decline in the number of cruelties on animals with more deterrence and will help in achieving the objective of the legislation in protecting animals from

cruelty (Nadkarni, 2017).

Prevention of Cruelty to Animals Act, 1890

The first enactment for prevention of cruelty on animals in India was the *Prevention of Cruelty to Animals Act, 1890*. The colonial Act enacted by the British government in India extended its protection to only domestic or captured animals and provided for punishments for cruelty on animals in a 'public place'.

The extent and application of the *Prevention of Cruelty to Animals Act, 1890* was limited in this sense that it was a mere permissive legislation as the application of the same was left with the state governments to extend it to the local areas at its discretion. The state governments extended the Act only to big towns leaving out the villages where the larger portion of the animals belonged to and thus the larger portion of the cases of cruelties on animals went unaccounted for (Nair, 2024).

The *Prevention of Cruelty to Animals Act, 1890* was very limited in its scope in the sense that it applied only to urban areas within municipal limits. A very strict understanding was given to the term 'animal' where it was defined to include only any domestic or captured animal. Thus, the definition excluded animals which could not fulfil the criteria of being either domestic and or captured like stray animals, wild birds etc.

Another major limitation of the Act was the extremely inadequate penalties prescribed for the offenders of animal cruelty both for the first-time offenders as well as the repeated offenders. Section 3 of the *Prevention of Cruelty to Animals Act, 1890* provided punishment for cruelty to animals, offering for sale without reasonable cause, offering for sale of dead animals killed with unnecessary cruelty with fine amounting up to fifty rupees, or with imprisonment for a term up to one month. For repeated offence within a period of three years from previous offence, the fine goes up to one hundred rupees, or with imprisonment extending up to three months, or with both.

Moreover, only very few incidences of act of cruelty towards animals was provided under the Act. The Act had provided penalties for the acts of "(1) overriding, beating or otherwise ill-treating animal, (2) keeping, carrying or transporting animals in such a way as to cause suffering to them, (3) having in one's possession any live animal which is mutilated or suffering from starvation, thirst or overcrowding

(4) killing of animals in an unnecessary cruel manner (5) overloading of animals (6) abandoning of animals in circumstances which may tender it likely that it will suffer pain by reason of starvation or thirst (7) practicing phooka (8) employing the sick or disabled animals to work and (9) baiting animals to fight."

The Act did not have any provisions for holding the owner responsible for deliberate withdrawal or and negligent act of the owner of an animal in providing sufficient food, drink and shelter to the animal (Das, 2022).

The Bombay High Court, in the case of *Emperor v. Ibrahim Meer Shikari*, 1917; held that stitching up the eyes of five Saras cranes for railway travel was not cruelty under Section 3 of the Act. The alleged act of stitching up the eyes of the birds took place before the incident of travel and not in the way the travel took place. So, it was held that even if it could be considered cruel, it did not take place in a 'public place' according to Section 3 of the Act.

In another case of *Emperor v. Nasir Wazir*, 1919; the same High Court held that there was no provision of prohibition in the law for the abandonment of an animal and, thus, the accused was held not responsible for the abandoned animal over which had no control after the same was abandoned (Sengupta, 2024).

The Supreme Court in one of its judgments, had highlighted various defects of the then existing *Prevention of Cruelty to Animals Act, 1890* as: "(1) it applies only to urban areas within municipal limits; (2) it defines the term 'animal' as meaning any domestic or captured animal and thus contains no provision for prevention of cruelty to animals other than domestic and captured animals; (3) it covers only certain specified types of cruelty to animals; and (4) penalties for certain offences are inadequate." (Yadav, 2023). Thus, with the changing time the Act of 1890 had become inadequate in attaining the objectives of the law in preventing cruelty on animals.

Prevention of Cruelty to Animals Act, 1960

To meet the shortcomings and loopholes in the existing *Prevention of Cruelty to Animals Act, 1890*, the *Prevention of Cruelty to Animals Act (PCA), 1960* was enacted. The Prevention of Cruelty to Animals Act, 1960 was enacted with the objective of preventing cruelty on animals.

The PCA Act is divided into 7 chapters and 41 sections. Section 11 in Chapter 3 stipulates punish-

ments for instances of 'animal cruelty'. However, the *Act* also not free from statutory flaws as for example, applicability of the *Act* is very limited, punishments provided for the offences were quite inadequate, and same punishments for both severe and trivial offences etc. The penal liabilities therein were long due for necessary amendments since then. The *PCA Act* has been severely criticised for being a toothless tiger and for having no deterrence in preventing cruelty on animals. To examine the effectiveness of the *PCA Act*, it is necessary to examine the important provisions of the primary legislation in India.

Limitations under the *Prevention of Cruelty to Animals Act, 1960*

The *PCA Act* has provided for several offences and prescribed penalties for the same as well. Section 11 of the *PCA Act* is the main provision which provides for a long list of specific offences and penalties against such instances of cruelty. It punishes the acts of over-loading, kicking, beating, over-riding, over-driving, torturing or causing unnecessary pain or suffering etc. to any animal.

One of the major limitations of section 11 is that it has provided for same punishment irrespective of the gravity of the offence. For instance, Section 11(1)(l) prescribes punishment for mutilating or killing any animal by using cruel methods and Section 11(1)(m)(ii) prescribes punishment for inciting animals to fight with other animals and for both of these offences of animal cruelty, the *Act* has prescribed for the same punishment and penalty. Differentiation of punishments based according to the gravity of the offence is imperative and failing to categorise them leads to failure in bringing deterrence against the particular offence (Raj, 2022).

Thus, any element of 'unnecessary suffering' shall make any activity 'cruel' within the plain language of the section. Animals should not be made to suffer unnecessarily has become the consensus on animal cruelty. Most animal welfare legislations throughout the world have made this principle, the basis for liability (Hurnik, 1982).

However, it is difficult to draw a fine line between what would be considered necessary and what would constitute unnecessary suffering. However, highlighting the importance of the concept of 'unnecessary pain', the Supreme Court has held that in cases of offences against animals it was important to see whether the suffering caused to the animal,

could have been reasonably avoided or reduced or whether the conduct causing the suffering was for a 'legitimate purpose', i.e. for example, the same was necessary for the benefit of the animal, protection of other animal, saving human life or property, etc.

On the contrary, Section 31 has made only Section 11(1) clause (l), clause (n) and clause (o) cognizable offences and has left Section 11(1) clauses (a) to (k) and clause (m) as non-cognizable. It is important to note that all the acts of animal cruelty are barbaric and punishable under Section 11.

Another major flaw of the legislation is that the penal liabilities for indulging in any form of cruelty on animals under Section 11 is ineffective in the sense that it provided for fine ranging from 10 rupees to 100 rupees and maximum imprisonment of three months. In case of first-time violation of any of the provisions provided under Sections 11(1)(a) to (o) of the *Prevention of Cruelty to Animals Act, 1960*, a penalty extending up to only fifty rupees is prescribed for the offender. And for further violations, within three years of the first-time violation, a penalty from twenty-five rupees to one hundred rupees or imprisoned for a term extending up to three months or both is prescribed. Moreover, for subsequent offences, the vehicle of the offender is to be confiscated, and he shall not be allowed for keeping an animal further (Animal Welfare Board of India, 2014).

From the deterrence point of view, the penal sanctions provided in the *PCA Act*, the principal legislation enacted for the protection and safety of animals, are ineffective and toothless. Considering the gravity of the offences against animals, the prescribed penalties are neither proportionate to the severity of the offences committed nor are deterrent enough to prevent such offences. The meagre penalty provided for penalising the offences against animals in no way match the grave offenses. Even in case of severe injury or death of animals a fine of fifty rupees is no way justified. As a result, the offenders get away easily, without any serious consequences for their actions or inactions towards animals. In the same list of liabilities provided under Section 11 of the *PCA Act*, there are some grave offences causing extreme discomfort resulting into severe pain to animals, and in certain circumstances may even result in death.

At the time of enactment of the legislation, the same might have served the purpose, but, the same punishment even after 60 years is no more creating

any deterrence for the offenders. The *Malimath Committee* has also stressed on the revision of these punishments (Government of India, Ministry of Home Affairs, 2003). It was also emphasized that on the contrary, these punishments would not be able to prevent the offenders from involving in the acts of animal cruelty.

Again in one another instance, while giving interpretation to Section 3 of the *PCA*, the court had also put restriction on causing the suffering even for a 'legitimate purpose'. The Court made it clear that Section 3 does not allow any person with any positive right 'to inflict necessary/unnecessary pain or suffering'. However, the Court also highlighted that although animals cannot be subjected to unnecessary pain, certain acts may be allowed out of necessity, for instance, destruction of stray dogs in a compassionate way, or using animals for food etc.

So far as the filing of information against any act of cruelty on animal is there, Section 24 of the *PCA* authorises only the police officer or any officer specifically authorised to make a complaint to the court about any animal being subjected to unnecessary pain or suffering during training for exhibition or performances. The critical part of this provision is that the powers for filing a complaint is restricted to certain specific authorities only and cannot be exercised by any common person who might have witnessed such an offence being committed. But the question arises here is that what if the authorities themselves chose to turn a blind eye to such acts of cruelty to animals not reporting an offence. So, when the power to make a complaint, itself has been restricted to such authorities, the rights of the animals cannot be protected (Choudhary, 2020).

In *Bali Parida v. Nira Parida*, 1969, SCC Online, Ori 129, the Orissa High Court while giving narrow interpretation to this section, beating an animal was held not punishable under Section 11(1) of the *Act* and the same was held not as an offence under this sub-section, unless the animal is subjected to unnecessary pain or suffering. From this observation, for holding someone liable under Section 11 the action of cruelty must be proved to have a nexus with unnecessary pain or suffering, with main emphasis being on unnecessary pain or suffering.

The judiciary has also highlighted many statutory flaws SC, in number of cases. In *Animal Welfare Board of India v. A. Nagaraja* ('Nagaraja'), 2014, 7, SCC 547, pp 89-90, the Supreme Court observed, "Penalty... is insignificant... The punishment prescribed in Sec-

tion 11(1) is not commensurate with the gravity... defeating the very object[ive]... Parliament [should] amend *PCA*..., adequate penalties and punishments should be imposed".

Justice Radhakrishnan also stressed the point, "until now the rights that we as a nation bestowed upon animals were merely statutory rights and the time had come for animal rights to be elevated to the status of fundamental rights in the Indian constitution. All animals, all living beings have the right to five freedoms:

1. Freedom from hunger, thirst and malnutrition;
2. Freedom from fear and distress;
3. Freedom from physical and thermal discomfort;
4. Freedom from pain, injury and disease; and
5. Freedom to express normal patterns of behaviour."

Amendment Bills

An urgent need to bring in a more promising and responsible legislation for the protection of rights of animals was the need of the hour. The penal liabilities for the acts of cruelty on animal should be modified to deter the offenders of animal cruelty. Without which true objective of the law could never be achieved. Thus, there has been a pressure to amend the laws to prevent cruelty on animals, to make the provisions more strict, so that the issues of animal cruelty could be addressed more effectively. The Indian judiciary has also stressed on the need and importance of preserving and protecting animal rights in India from time to time.

There had been several attempts for amending the *PCA*, to address the shortcomings of the law, to make the legislation more exclusive and to make its provisions, more effective to give force to its aims and objectives (Yadav, 2023). However, all the previous attempts to amend the *PCA* had been unsuccessful.

A. *Animal Welfare Act, 2011*

For the first time a draft bill, the *Animal Welfare Act, 2011 (Draft Bill, 2011)* was introduced by the Animal Welfare Board of India, in the year 2011, to replace the present *PCA*. Out of the various changes sought by the welfare-driven and well-being-oriented *Draft Bill*, it proposed an enlarged definition of abuse on animals, keeping in view with the judicial pronouncements and the change in time (Yadav, 2023). The *draft bill* not only laid down several categories of new offences on cruelty to animals, but also pro-

vided for greater and more proportionate penalties for cruelty towards animals by enhancing the penal liabilities under the PCA. For the first offenders, Section 17(1) of the *Animal Welfare Act, 2011*, provides for a fine amounting minimum ten thousand rupees and maximum up to twenty-five thousand rupees and an increased imprisonment for up to 2 years, or both. For repetitive offenders the bill provided for a heavy fine, amounting minimum fifty thousand rupees and maximum up to one lakh rupees, and long imprisonment for a term ranging from one year which may extend up to three years. But, even though the bill was comprehensive and well drafted as according to the need of the hour, it was not passed.

B. Animal Welfare Bill, 2014

After the judgment of *Animal Welfare Board of India v. A. Nagaraja* ('Nagaraja'), 2014, 7, SCC 547, pp 89-90, the Animal Welfare Board of India came up with a fresh draft, the *Animal Welfare Bill, 2014*. This bill had also prescribed for substantially higher penalties for animal abuse, but the same also could not be passed by the Parliament.

C. Private Member Bill, 2016

A private member's bill was brought by Poonam Mahajan, then member of Parliament, in the year 2016. This bill also provided for strict penalties and made every offence under Section 11 of the PCA, cognizable offences (Yadav, 2023). Yet, this attempt, being a private bill, could not be passed in the parliament either because of not getting due support from the parliament or because of not getting enough opportunity being a private member bill.

Even after numbers of attempts, the inability of the legislature to amend the animal welfare legislation has left the animals in atrocities. From time to time, this reticent attitude of government has also faced public outrage against animal cruelty. It is the high time, the government should realise the dire need for revamping the age-old animal welfare legislation and the cause, which the judiciary has recognised long before.

D. Draft Prevention of Cruelty Against Animals (Amendment) Bill, 2022

The *Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022* was brought by the Ministry of Fisheries, Animal Husbandry and Dairy. Bearing in mind the harshness of the cruelty and the steep

inflation rates since the enactment of the PCA Act, this *Amendment Bill, 2022* was brought with updated penalties. The Bill was published for public comments on November 21, 2022 and great public support was witnessed in the public comments received in favour of the same.

The *Draft Prevention of Cruelty against Animals (Amendment) Bill, 2022* has sought 61 amendments in the PCA, 1960. The Bill proposes to impose higher penalties for the offence committing animal cruelty. To bring deterrence against the offences against animals, a few of the offences are made cognizable under this Bill.

One new category of offence, as "gruesome cruelty" is introduced under Section 11(A) to penalise the act of bestiality. It also includes any conduct on animals which may result in severe pain and suffering to the animal, resulting into permanent disability. A punishment up to three years of imprisonment is prescribed against the offences of "gruesome cruelty". For violations under this Section, one may be sentenced imprisonment from one year up to three years, in addition to penalties amounting from Rs.50,000 and up to Rs.75,000 or the price of the animal, whichever is higher.

The Bill, in another newly inserted provision, Section 11(B) provides for punishment for committing any act with the intention causing harm to an animal resulting into its death or killing of an animal. It provides for an imprisonment from three years to five years, in addition to that a penalty ranging from seventy-five thousand up to one lakh rupees or three times to the price of the animal.

The addition of the draft Bill is that for the first time, this bill provides for five liberties to animals. Any animal in the custody of a person or under his control shall enjoy the said liberties. The Bill in Section 3A has inserted the following five freedoms to be granted to animals. They are:

1. freedom from thirst, hunger and malnutrition;
2. freedom from discomfort due to environment;
3. freedom from pain, injury and diseases;
4. freedom to express normal behaviour for the species and
5. freedom from fear and distress.

The Bill by proposing new definition "community animals", has tried to include any animal born in a community without any ownership from any individual. The draft has entrusted the local governments the responsibility for taking care of community animals.

However, all these proposed changes will ripe benefits only after the *Bill* is passed and enforced accordingly. Despite the urgency of the amendment for the protection of the animals, the central government is delaying the passage of the much-awaited amendment, the *Prevention of Cruelty on Animals Amendment Bill*, 2022. Around 140 members of Parliament had written to the Prime Minister's Office (PMO) stressing the urgency of the *Bill*.

Conclusion

The principal legislation in force, i.e., the *PCA Act* of 1960 has severely failed to achieve its objectives as a law to prevent cruelty to animals for its inadequate as well as insufficient safeguards against growing incidences of animal rights violations. Though the prohibition of certain acts of cruelty under Section 11 and 12 of the *Act* do seem to be in favour of protecting the rights of animals, but the effectiveness of such provisions falls apart on account of the trivial punishments they prescribe which grossly fails to deter the wrongdoers. Moreover, Section 24 leaves the power to make a complaint cases of animal cruelty only with the police or certain authorities, whom the judiciary itself has recognised to be amongst the violators and the lawbreakers and not the protectors. Even though the Apex Court had directed at many instances that the law for the prevention of cruelty on animals is to be made better, more substantive and more stringent, the law could not be amended even after numbers of attempts to introduce new bills on the subject. Bills were brought on the table, so the recommendations were given, but, everything in vain. They (animals) might not speak out loud, but it is high time that we act, and replace the sixty-three years old legislation.

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