

POPULATION MANAGEMENT OF STREET DOGS IN INDIA: LEGAL FRAMEWORK & CHALLENGES

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KEYWORDS

Animal Welfare, Dogs, Prevention of Cruelty to Animals Act, 1960, Animal Birth Control Rules, 2023.

ABSTRACT

A dog is regarded as a man's best friend and for centuries, humans and dogs have lived together harmoniously. Dogs are the most commonly kept domesticated species of companion animals who thrive in and around human civilizations. The increasing population of dogs, both pets and strays, can foster negative interactions between humans and dogs thereby creating considerable risks for humans and raising welfare concerns for dogs. Aggressive behavior, dog bites, and the spread of diseases particularly rabies are the major factors that affect human beings whereas, cruelty to dogs and their illegal culling are the major concerns affecting the welfare of dogs. According to the Ministry of Health and Family Welfare, incidents of dog bites in India have increased from 21.80 lakhs in 2022 to 27.59 lakhs in 2023. Furthermore, according to the World Health Organisation, India contributes to one-third of the total deaths due to rabies, out of which nearly ninety-seven percent are transmitted through dogs and cats. On the other hand, increased conflicts, diminutive punishments under the Prevention of Cruelty to Animals Act, 1960, poor implementation of Animal Birth Control Rules, and lack of sensitization of people on animal welfare and allied laws, have resulted in a sharp increase in the instances of brutality, cruelty, and killing of street dogs. Last year, the Kunnur District Panchayat even filed a petition before the Supreme Court of India to euthanize 'suspected rabid dogs' and 'extremely dangerous stray dogs'. Through this paper, the researcher analyses the major factors contributing to the increased population of dogs, the legal framework, guidelines, and judicial decisions in India regarding the population management of dogs, and the possible solutions for tackling the human-dog conflict keeping in the welfare of both groups.

Introduction

A dog is regarded as a man's best friend and for centuries both have lived in close proximity of each other. Humans and dogs often share a symbiotic relationship with humans utilizing dogs for various roles like hunting, herding, guarding, or mere companionship whilst, dogs primarily derive sustenance and companionship from humans. This long-drawn relationship has not always been harmonious with conflicts arising from time to time, particularly regarding street dogs; adversely affecting the interests of both.

One of the major challenges pertaining to street dogs is their population management. The unbridled population of street dogs results in increased instances of dog bites, diseases, and safety concerns for humans and also adversely affects the welfare of dogs. According to the Ministry of Fisheries, Animal Husbandry and Dairying, in the year 2019 the number of street dogs in India was 1.53 crore. Though their number has decreased from 1.71 crore in 2012 the human-dog conflict in India has become more prominent over the years polarizing the society into two groups; one advocating for neutering, sterilization, and sheltering of dogs as a solution for their population management and others advocating for the culling or relocation of dogs a quick and a permanent solution.

Dog population management refers to the methods or programs that are employed for minimizing the problems caused by dogs by targeting to reduce their population. Methods such as surgical and non-surgical contraception, culling, relocation, sheltering, or a combination of two or more methods can be used keeping in mind the socio-economic, legal and cultural factors. These methods should not cause unnecessary suffering to the dogs and must be such as take into account their welfare.

The researcher in this paper discusses the factors contributing to human-dog conflict and to population of street dogs and thereafter, discusses the various methods of population control, their viability, and follows by an analysis of the legal framework in India for dog birth control. In the concluding part the researcher proposes suggestions.

Street Dogs: Meaning

The World Health Organization (“WHO”) has classified dogs into four categories viz. restricted or supervised dogs, family dogs, neighborhood dogs, and feral dogs depending on their level of dependence on humans for food, shelter, companionship, and the extent of supervision exercised by humans over them. Restricted or supervised dogs are fully dependent on humans for sustenance and are under full supervision of humans at all times. Family dogs too are fully dependent on humans for sustenance, but they are only semi-supervised and are allowed to roam freely. Family dogs may also include dogs that are accidentally lost or abandoned. Neighborhood dogs are semi-dependent on humans for sustenance but are either completely unsupervised or are only semi-supervised. This category includes community dogs which wander freely in populated areas in close proximity of humans and are usually cared for by the neighborhood or the members of the community in that area. Lastly, feral dogs are those that are completely independent and unsupervised though they may rely on human waste for their sustenance. For the purpose of this paper, the term ‘*Street dogs*’ is understood in its broadest sense to include not only feral dogs but also free roaming family dogs, community dogs and formerly owned abandoned or lost dogs whereas pet dogs shall mean restricted or supervised dogs.

Factors Contributing to the Population of Street Dogs

The size of the street dog population often correlates to the size and character of the human population of an area. Several factors may contribute to or promote the sustenance of the population of street dogs such as:

(i) *Urbanization and poor solid waste management*

The population of street dogs is strongly linked to rise of urbanization and urban slums and the associated increase in solid waste and poor waste management. The rapid immigration to urban areas contributes significantly to accumulation of solid waste which coupled with lack of infrastructure for waste management leads to waste buildup and open dumping grounds. Waste dumping sites serve as an excellent source of food for street dogs and population of dogs around such sights is higher.

(ii) *Uncontrolled breeding & poor implementation of birth control programs*

Uncontrolled breeding of street dogs can be due to absence of or the ineffective implementation of birth control programs like neuter and release including vaccination programs which are aimed at identifying and controlling the population of street dogs. Lack of programs for adoption of street dogs and absence of shelter homes for re-homing of abandoned and lost dogs also add on to the population. In India, the Animal Birth Control (Dogs) Rules 2001 (“**2001 Rules**”) were framed under the Prevention of Cruelty to Animals Act, 1960 (“**PCA Act**”) which came into force on 24th December, 2001. However, the 2001 Rules have proved to be ineffective in controlling the dog population due to its inadequate, haphazard and poorly planned implementation in most of the States.

(iii) *Irresponsible pet ownership*

Irresponsible pet ownership can also contribute significantly to the population of abandoned and lost dogs. Pedigree dogs, infirm and old dogs often need special care which some owners are unable to provide causing such owners to abandon them. Other factors for abandoning dogs may include family immigration, unbearable physiological behavior of pets, diseases and lack of funds for treatment or care of dogs. Dogs that were formerly used for breeding are abandoned after they are rendered unfit for reproduction and are often unable to survive on

their own, without supervision and care of humans. Abandoned and lost dogs may trigger and promote territorial fights, competition, and aggression and can also result in procreation with feral dogs if both are not sterilized.

Impact of Street Dog Population on Human Interest

The increased population of street dogs affects not only the welfare of dogs but also creates friction between humans and dogs, raising several public health and safety concerns such as:

(i) Dog Bite & aggressive behavior towards humans

Though dogs usually bite only when provoked, some dogs when in packs or under stress or threat or during mating season may bite unprovoked or display aggressive behavior like chasing vehicles, barking, etc. raising safety concerns for humans. According to the Ministry of Health and Family Welfare, incidents of dog bites in India have increased from 21.80 lakhs in 2022 to 27.59 lakhs in 2023, with Maharashtra recording the highest number of cases. In 2024, a two-year-old child was mauled to death by a pack of street dogs in Hyderabad with similar incidents of dog attacks being reported in Kerala and New Delhi as well.

(ii) Spread of diseases

Street dogs can be reservoirs of diseases and several zoonoses like rabies, Salmonellosis, leptospirosis, etc. that can spread and affect humans. Fights and aggressive behavior exhibited by street dogs towards pets can expose the latter to such diseases who can in turn transmit it to humans. According to the WHO, India contributes to one-third of the total deaths due to rabies, out of which nearly ninety-seven percent are transmitted through dogs and cats.

(iii) Other nuisance

Dogs may damage property by exhibiting their natural behavior of digging and chewing thereby damaging public spaces and personal property like cars, etc. Excessive barking can cause noise disturbances in residential areas. Road traffic accidents, defecation, fighting, scavenging on open waste, running behind vehicles, attacking people, and urinating in public spaces can also raise public health and safety concerns.

Welfare Concerns of Street Dogs

Animal welfare is a complex and a multi-dimensional concept which takes into account scientific, ethical, economic, cultural, social, religious and political dimensions. The World Organization of Animal Health (“OIE”) has described it as “*the physical and mental state of an animal in relation to the conditions in which it lives and dies*”. The internationally accepted five freedoms, i.e. the freedom from hunger and thirst, the freedom from thermal discomfort, freedom from pain, injury and disease, freedom to express normal behavior, and freedom from fear and distress, are the touchstone of animal welfare and are used as a framework to assess it in any given context. A street dog in its arduous life may not experience all or most of these freedoms due their exposure to the risk of death and injuries from road accidents, cruelty from human beings, mass killings, exposure to life threatening diseases like rabies, canine distemper, canine parovirus, mange, etc. Increased population of dogs further forces them to compete for food, water, shelter and mates encouraging fights and resulting in injury and stress. Mass relocations and abandonment of formerly owned dogs can also trigger stress and territorial fights exposing them to injuries, making survival difficult. During the period of 2010-2020 a total of eighteen thousand street animals were killed or relocated, as part of the mass killing drives, of which seventeen thousand two hundred thirty five were dogs. This number does not account for isolated instances of cruelty and killings of dogs as there is no public record in India of crimes against animals. Controlling the population of dogs is therefore, in the interest of both humans as well as dogs.

Methods of Population Management of Stray Dogs

The methods of population management of stray dogs include surgical and non-surgical contraception, culling by using poison, administering sodium pentathol, shooting, etc., sheltering and

relocating. In order to achieve long term results all or any of these methods may employed depending on the demographics of the dog population, the nature of human-dog relationship in the given culture, availability of financial resources, infrastructure, and trained personnel. The researcher, in this part discusses each of these methods and their viability.

i. Contraception

Contraception refers to the use of surgical and non-surgical methods to prevent the occurrence of pregnancy. Surgical contraception in dogs is commonly referred to as the Trap-Neuter-Return program or the Capture-Sterilize-Release program wherein the street dogs are humanely captured, sterilized, immunized, and released back to the territory of their initial capture. The sterilization is carried out by veterinary surgeons through spaying of female dogs and castration of male dogs under anesthesia. This is method is considered humane and is recommended by several animal welfare organizations. The costs of using this method are high as it requires adequate infrastructure for housing the dogs' pre and post operation, trained and qualified personnel, and support staff, surgical supplies, etc. The success of this method depends on its structured and effective implementation. Inadequate infrastructure and lack of trained personnel can result in cruelty to dogs. The dog population in Jodhpur reduced by 40 percent from five dogs to three dogs per 100 humans within the first three years of the implementation of the Capture-Sterilize-Release program. Further, in the city of Jaipur, wherein a low-level sterilization program has been implemented since 1994, the population of dogs had fallen by a 50% between 1991-2014.

Non-surgical methods of contraception include the use of pills, injections, vaccines or implants to administer contraceptive drugs and chemicals that suppress reproductive hormones and functions in male and female dogs resulting in their infertility by targeting different parts of the reproductive system such as brain, pituitary gland and gonads. An example of non-surgical contraception approved for use in male dogs in Australia, New Zealand and EU is the deslorelin implant that suppresses pituitary function resulting in infertility for 6 to 12 months. Non-surgical methods are cheaper alternatives to surgical contraception since they do not require veterinary surgeons, surgical supplies and recovery space. However, most of these methods are either still under research or are temporary or are yet not commercially available for use.

ii. Culling

Culling refers to the selective removal or killing of dogs using methods like euthanasia, poisoning, shooting, electrocution, gassing, and starvation. Euthanasia involves the administration of large dosages of anesthetic drugs like barbiturates, and ketamine resulting in the death of the animals. Euthanasia by itself, let alone as a measure of population control raises moral and ethical concerns. Some animal welfare organizations like the World Society for the Protection of Animals ("WSPA") support it for animals suffering from illnesses, injury, behavioral problems, or who pose threat to the safety and health of humans and other animals. Euthanasia as a measure of population control is expensive as it requires procuring of drugs including anesthesia and personnel to capture and administer the drugs. It also requires proper infrastructure for the disposal of the carcasses of the euthanized dogs. According to the Terrestrial Animal Health Code of the OIE euthanasia alone is not an effective population control measure and should be used in combination with other measures for attaining long term results. Other measures of culling like shooting, poisoning, gas chambers, electrocution, etc., are regarded as cruel and can raise public health risks if the carcasses of poisoned and/or culled dogs are not properly disposed of, affecting the environment and other species. Killing of dogs using inhumane methods can create public apathy, alienate people from the concerns of animals and may foment violence towards them.

Further, culling dogs is not suitable in areas where the population of street dogs is large since it is impossible to eliminate all the street dogs at once. Elimination of dogs in one area attracts dogs from neighboring territories due to increased availability of food increasing the fertility and survival of other dogs. Moreover, since the population of street dogs includes abandoned, lost, and other free roaming dogs culling is not effective when used in isolation without other measures like sheltering and neutering.

The Bombay Municipal Corporation (“**BMC**”) killed nearly 45,000 dogs per year during the period 1988-1993 spending approximately 1.67 crores, only to realize its futility. In a circular dated 25.3.1994 it adopted the sterilization program admitting therein the inability to bring down the population of street dogs through the catch and kill program. Between 1998 and 2006 1,00,483 dogs were sterilized which resulted in substantial reduction in number of dog-bites as well as death due to rabies. Dog bites cases reduced from 61,377 in 2000 to 48,183 in 2006. The legality of culling of dogs under present laws in India is examined in the later part of this paper.

iii. Relocation

Relocation of dogs is often suggested as a measure for population management, however, the same can result in increased aggression due to stress and territorial fights with dogs in relocated areas. Relocation increases the risk of spread of diseases from infected dogs to other animals or humans in the relocated area making it difficult to trace patient zero. It can hamper the effective implementation of area-wise sterilization program as keeping tabs of the number of unsterilized dogs would practically be impossible due to their relocation. The Animal Welfare Board of India (“**AWBI**”) in its advisory dated 7th December 2022 on stray dogs and pet dogs reiterated that relocation of dogs is not permitted according to the orders of the Supreme Court.

Legal Framework in India for Street Dog Population Management

India is one of the few countries to constitutionally address animal welfare. Article 51 A(g), referred to as the Magna Carta of animal rights by the Supreme Court of India in *Animal Welfare Board of India v. A. Nagaraja & Ors.* casts a duty upon every citizen to, *inter alia*, have compassion for living creatures. This fundamental duty read along with Article 48 reflects and embodies the Indian cultural theme of compassion and respect towards nature and animals, though neither provision is enforceable. The PCA Act and the rules framed thereunder are the primary laws that deal with the various aspects of animal welfare and aim to prevent the infliction of unnecessary pain or suffering to all animals by penalizing uses, practices, and conduct that inflict cruelty, regulate use of performing animals and animals used for research purposes. In addition to this, there are several State laws and municipal laws that prohibit slaughter of cows, bulls, etc.

Before the enactment of the 2001 Rules under the PCA Act, there were no specific laws on population management of Street dogs and each State relied only on their municipal laws/policies for dealing with the same. Culling of Street dogs was undertaken in several States as a method of population control as the municipal authorities were empowered to destroy nuisance-causing animals. The 2001 Rules for the first time introduced and laid down detailed guidelines for the systematic implementation of the Animal Birth Control Programme (“**ABC Program**”) comprising of capture, sterilization, immunization, and subsequent release of the street dogs in the locality of their original capture as a humane method for effective population control of Street dogs and prevention of rabies transmission. The 2001 Rules, however, have now been replaced by the Animal Birth Control Rules 2023 (2023 Rules) due to their non-implementation and failure to yield results.

II. Animal Birth Control (Dogs) Rules 2001 (2001 Rules)

The onus of undertaking sterilization and immunisation of street dogs was placed on the local authority i.e. the municipal committee, district board or other authority vested with the control

and administration of a specified local area. For this the local authority could engage the participation of Animal Welfare Organization's ("AWO's") like the Society for Prevention of Cruelty to Animals ("SPCA") or others recognized by the AWBI. The local authority was further, obligated to provide infrastructure like dog pounds, ambulance, drivers, dog catchers, incinerators, etc. The planning and management of the ABC programme was vested with the Monitoring Committee ("**Monitoring Committee**") which was to be constituted by the local authority for 3 years. The Monitoring Committee was empowered to issue directions for capture, sterilization, vaccination, treatment of dogs etc., create public awareness, issue guidelines to pet owners and commercial breeders, get a census of street dogs through independent agencies, etc. The 2001 Rules adopted a compassionate approach towards animals by laying down welfare standards to be followed while implementing the ABC Program. The capture of dogs was to be done by humane methods like lassoing, sack and loop or methods which rendered dogs insensible to pain before capture; captured dogs were to be provided clean and sufficient space for housing and free movement with proper ventilation and natural lighting and adequate food and water. Abortion and sterilization of pregnant female dogs, relocation and mixing of dogs from different localities was prohibited. Post sterilization and immunisation, dogs were to be clipped or tattooed for identification and avoidance of re-capture. Euthanasia was permitted only for those dogs that were diagnosed by a qualified veterinarian appointed by the Monitoring Committee as incurably ill and mortally wounded. A dog suspected of rabies was also to be isolated till its natural death and not prematurely killed to ensure certainty of its diagnosis.

Factors Contributing to the Failure of the 2001 Rules

The major factors contributing to the failure of the 2001 Rules are its poor and unplanned implementation by the local authorities, the inadequacy of funds, and the lack of required coordination between the Centre and the State governments, between local authorities, implementation agencies, and other stakeholders. In several petitions filed before various High Courts and the Supreme Court, the Court has issued directions for implementing the 2001 Rules observing that several local authorities despite substantial lapse of time had failed to constitute even the Monitoring Committees. In 2006-07, a sum of 4 crores allotted for the sterilization of dogs by the BMC lapsed due its non-utilization. The Bombay High Court noting this along with the haphazard implementation of the ABC program issued directions in 2007 to the Municipal Commissioner of Greater Mumbai to constitute the Monitoring Committee. A similar direction was issued by the Kerala High Court in 2015 along with a direction to the State Government to provide adequate infrastructure for sterilization. Similarly, the High Court of Punjab and Haryana in 2012 directed the State of Punjab & Haryana and the Union Territory of Chandigarh to formulate within two months of the judgement, a comprehensive scheme for tackling the menace of stray dogs. Several local authorities that were implementing the ABC program were found by the AWBI to be contravening the provisions of the 2001 Rules by assigning tenders to unregistered AWO's or organizations with poor infrastructure, untrained animal handlers and experts; selecting them solely on the basis of financial criteria causing cruelty to dogs.

III. Animal Birth Control Rules 2023 (2023 Rules)

The Supreme Court in *Animal Welfare Board of India v. People for the Elimination of Stray Troubles & Ors. (AWBI v. PEST)* vide. the interim orders dated 18.11.2015 and 9.03.2016 directed all local bodies to strictly implement the 2001 Rules and laid down a comprehensive three-tier framework comprising of the Central Co-ordination Committee for Street Dog Population Control at the Centre, the State Monitoring and Implementation Committees at the State / Union Territory level, and the Animal Birth Control Monitoring Committees at the district level for effective implementation and monitoring of the ABC Program. The 2023 Rules, notified by the Central Government on 10th March, 2023, incorporate this framework and introduces several novel provisions to address the lacunae of the erstwhile Rules.

The 2023 Rules prescribes detailed standards for the capture, housing and post-operative care of sterilized dogs and for the first time defines Street dogs as those living on the streets or in a gated campus and includes community-owned dogs and homeless abandoned dogs. The local authority is responsible for immunization and sterilization of Street dogs and for making available within its jurisdiction facilities such as kennels, vans, incinerators, CCTV's etc. to Animal Birth Control Centre ("**ABC Centre**"). The ABC Program can be carried out at the ABC Centre's run by veterinary officers of the local authority or by any AWO's recognized by the AWBI. Every ABC Centre is required to obtain a Project Recognition Certificate ("**Certificate**") from the AWBI which is granted only after an inspection by the State Animal Husbandry Department. A Certificate once granted is non-transferable and valid for a period of 3 years. Violations of the 2023 Rules are deemed to be offences under the PCA Act for which the office bearers of the AWO's or the Project In-charge of the local authority may be charged. The AWBI is empowered to periodically or upon receipt of complaints carry out inspections of ABC Centres, issue show cause notices, cancel registration, blacklist or initiate action against AWO's found to have contravened the 2023 Rules or other provisions of the PCA Act.

To ensure co-ordination at Central, State and District level the 2023 Rules provides for the constitution of three committees viz. the Central Animal Birth Control Monitoring and Coordination Committee for Dog Population Management and Rabies Eradication ("**CMCC**") responsible for, *inter alia*, inter-ministerial coordination, making budgetary arrangements, policy intervention; the State Animal Birth Control Implementation and Monitoring Committee ("**the SIMC**") responsible for developing district wise plan for phase-wise implementation, enlisting recognized agencies for undertaking the ABC program, providing proper infrastructure; the local Animal Birth Control Monitoring Committee ("**the MC**") at the local authority level responsible for developing infrastructure, conducting census of dogs, monitoring dog bite cases, issuing guidelines to pet owners, breeders, etc., creating public awareness. Monthly reporting requirements for effective monitoring and data collection have been introduced whereby the Project In-charge of each ABC Centre is required to submit a detailed report of the number of dogs caught, housed, sterilized, surgeries undertaken, and deaths to the MC.

Whether culling of dogs is permissible in India?

The question of the permissibility of culling of dogs has been raised before several High Courts and the Supreme Court subsequent to the enactment of the 2001 Rules. This question persistently arose due to the ambiguity in the provisions of the PCA Act, the 2001 Rules and the municipal laws of the States. The PCA Act does not prohibit the killing of animals *in toto*; killing animals in a humane manner is permissible. Section 11 of PCA Act makes beating, kicking, willfully drugging, abandoning without reasonable cause, mutilating, killing in an unnecessary cruel manner, etc. punishable as cruelty. However, Section 11 (3)(b) and (c) states that Section 11 does not apply to the destruction of stray dogs in lethal chambers or by other methods that may be prescribed, and to the extermination or destruction of any animal under the authority of any law for the time being in force respectively. The 2001 Rules and now the 2023 Rules permit euthanasia only for Street dogs that are incurably ill and wounded, therefore, conflicting with Section 11 (3)(b) and (c) of the PCA Act. Further, both the Rules are in conflict with some municipal/local laws such as the Karnataka Municipal Corporations Act, 1976, the Mumbai Municipal Corporation Act 1888 that permit the destruction of stray dogs. The High Courts of Bombay, Karnataka, and Himachal Pradesh held that there no conflict between PCA Act read with the 2001 Rules and the municipal laws and the local authorities had discretionary powers to kill Street dogs that were a source of nuisance. However, the Supreme Court in an interim order challenging these decisions directed the High Court's not to pass any order in contravention of the provisions of the PCA Act emphasizing on the duties of the local authorities in implementing the 2001 Rules and on compassion for dogs, prohibiting their indiscriminate killings. After the notification of the 2023 Rules, the Supreme Court *vide*. order dated 9th May 2024, dismissed a batch of petitions

wherein the moot issue was whether the PCA Act read along with the 2001 Rules would prevail over the local/ municipal laws and directed the parties to approach the respective High Courts. Though this issue has not been conclusively dealt with by the legislature or the judiciary, the current position appears to be that indiscriminate killings of dogs is prohibited and the ABC Program is to be implemented as a population control method for street dogs.

Conclusion

Population management of street dogs is indispensable for protecting the right to life, safety, and health of humans, and promoting and ensuring the welfare of dogs as an uncontrolled population poses a risk to both human and dog interests. The legal framework and methods used for population management ought to be such as reconciling and balancing both groups' interests whilst promoting a co-existence and harmonious relationship. The PCA Act read along with the Animal Birth Control Rules does not give blind precedence to human interest by permitting indiscriminate killing of dogs, rather in line with Constitutional provisions it adopts a compassionate approach formulating an elaborate scheme for systematic implementation of surgical castration as a method of population management which in its implementation is designed to prevent cruelty to dogs. This method is endorsed by International organizations such as OIE and WHO.

Population management of street dogs has been a recurrent issue in India despite specific laws being in place since 2001. The main reason for this has been the failure of the ABC program in several States due to the poor implementation and lack of co-ordination between various authorities. Several local bodies even after a decade of the notification of the said Rules had failed to even constitute the Monitoring Committees. Certain local authorities who were implementing the ABC Program through AWO's were found to be violating the provision of the PCA Act by causing cruelty to dogs either due their violations of welfare provisions found therein or due to a lack of trained staff and proper infrastructure.

The notification of the 2023 Rules is a welcome move as they are exhaustive and adequately address the lacuna of the erstwhile Rules. The three-tier framework ensures allocation of budget from the Centre as well as adequate monitoring of the ABC Program by Centre, State, and the AWBI. The welfarist approach embodied in the erstwhile Rules is also retained and strengthened by introducing accountability from organizations engaged in the implementation of the ABC Program. Elaborate record maintenance and conduct of dog census is likely to address the issues of lack of data regarding dog population, dog bites, and the efficacy of the ABC program. Whether the ABC program is successful in managing the population of street dogs will have to be seen as its success largely depends on its actual implementation. For ensuring responsible ownership of pet dogs and tackling illicit breeding, the implementation of the allied Rules like the Prevention of Cruelty to Animals (Dog Breeding and Marketing Rules), 2017, Prevention of Cruelty to Animals (Pet Shop) Rules, 2018 and the provisions of the PCA Act is also imperative.

Securing participation from the community is vital for effective implementation of the ABC Program. Coordinating with authorities, reporting unsterilized dogs, monitoring and reporting births and suspected cases of rabies in an area can be easily done if more people are involved, informed and encouraged to participate in the ABC program. For this end, sensitizing people about the ABC program, its advantages, the law on culling of dogs and its disadvantages and ineffectiveness as tool of population management is necessary. One of the functions of the MC under the 2023 is to create awareness however, a structured plan for the same needs to laid down. The collaboration of AWO's, municipal authorities, and educational institutions in organizing such awareness programs and incentivizing housing societies who actively participate in implementing the ABC program can help with large scale community outreach. Additionally, sensitization programs on adoption of street dogs over purchase and responsible pet ownership need to be undertaken. Stringent punitive penalties with imprisonment need to imposed for promoting responsible pet ownership.

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