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STRAY DOGS AT THE CROSSROADS OF LAW AND SOCIETY

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ABSTRACT

India's large stray dog population poses a public health risk due to the spread of rabies. While the Supreme Court supported the Trap-Neuter-Vaccinate-Return (TNVR) policy for stray dogs, it also banned feeding them in streets and public spaces. This decision sparked protests from animal welfare activists, who expressed concerns about overcrowding and potential violations of the TNVR policy.

The rise in India's stray dog population is attributed to overpopulation, careless pet ownership, inadequate animal control, easy access to food, and cultural attitudes. The COVID-19 pandemic exacerbated these issues, leading to more pet abandonments, halted sterilisation programmes, and a surge in the stray population. Addressing this problem requires a comprehensive approach that prioritises both public safety and compassionate care.

The uncontrolled growth of street dogs in India leads to poor health, high death rates, and cruelty. While the Prevention of Cruelty to Animals Act, 1960 prohibits cruelty to animals, its enforcement is insufficient. The Animal Birth Control (Dogs) Rules, 2001 mandate sterilisation and vaccination of stray dogs, promoting a humane method of controlling their population. Tackling the overpopulation of street dogs and the rabies issue necessitates a compassionate approach that brings together animal welfare, public health, and community involvement. This should include mass vaccination campaigns, animal birth control programmes, encouraging responsible pet ownership, and collaboration between communities and governments.

INTRODUCTION

Stray Dogs at the Crossroads of Law and Society

Dogs are one of the most lovable animals on the planet, but sadly, their worth is often judged solely by their appearance. While some people may love dogs for their looks, they fail to recognise their true qualities, such as loyalty, compassion, and affection. The world has become

increasingly cruel, and even so-called animal lovers are unable to treat all dogs equally. They only seem to love the attractive ones, leaving street dogs to fend for themselves. Despite this, there are still people who genuinely care about dogs, regardless of their appearance. In fact, India alone has over 15 million dogs, as revealed by the 2019 livestock census.

There are three main categories of people regarding street dogs: those who feed them daily with utmost care and love, those who despise them, thinking they're dirty and dehumanising, and the worst of all, those who beat them to death simply because they're around or barked at. People need to realise that mercy and caring for animals isn't enough; they must also support their rights when injustice is done to them. Dogs can't speak human language, so their only voice is those who care about their well-being. It's our duty to care and stand up for them, not just show them love.

Dog adoption has become a significant issue in India. While certain breeds, such as Golden Retrievers, German Shepherds, Pugs, Shih Tzus, and Siberian Huskies, are the most popular, Indian dog breeds like Indian Pariah Dogs, Chippiparais, Kannis, Mudhol Hounds, and Rajapalyams are not being adopted. This is because many people prefer foreign breeds, believing they are of better quality. However, this is completely false. People should be aware of the quality of their native Indian dogs during adoption rather than blindly choosing foreign breeds.

There are certain kinds of dogs which are violent in nature, they must be treated in the same way a human is treated when he has mental illness. Dogs carry one of the most dangerous diseases which is rabies, where person dies within few hours if the dog bites that person. This rabies is present in dogs and it will transfer the rabies through its saliva when it bites someone or lick the place where there is an injury to any person. There were several deaths reported due to rabies. The Indian Council of Medical Research (ICMR) estimates that over 5,700 lives are lost annually to rabies in India. In 2024, the states with the highest reported death tolls were Tamil Nadu (43), Karnataka (42), and Andhra Pradesh (39)¹. From January to July 2025, Delhi reported 49 cases of rabies, although the number of fatalities is not specified. Dog bites also pose a substantial challenge. In 2024, Delhi reported 68,090 dog bite cases, a significant

¹ The Hindu Bureau, *Manifold increase in rabies deaths in two years: Centre*, THE HINDU, Aug. 5, 2025, <https://www.thehindu.com/news/national/manifold-increase-in-rabies-deaths-in-two-years-centre/article69898162.ece>

increase from the 17,874 cases reported in 2023. From January to July 2025, the city witnessed 35,198 animal bite incidents. According to data provided by the Ministry of Fisheries, Animal Husbandry, and Dairy in Parliament on April 1, 2024, Delhi recorded the following dog bite cases in 2022 around 6,691, in 2023 around 17,874, in 2024 around 25,210 and in January 2025 around 3,196²

It is important to note that Delhi has not recorded a single case on rabies related death since January 2022 to January 2025. However a recent case has again come into light where on June 30th, 2025 a six year old girl named Chavi Sharma from Delhi's Pooth Klan, while walking to her aunt's house got attacked by a dog and the dog lunged, tearing her skirt and resulting a deep bite wounds on her thigh, arm, knee, and hand. She was rescued by neighbours from the dog. The family then took her to Dr. Baba Saheb Ambedkar hospital. The doctors examined the girl in emergency ward by giving her anti rabies injection. There were several times the girl faced issues like swelling near her injection jab area and within no time she was very hyper active and her voice change in two days and on July 24th, 2025 the girls eyes rolled up and her lower body was stiffened and she started convulsing. She was taken to New Jeevan Hospital. On the next day which is on July 25th, 2025 the girl died due to rabies and no hospital took her as they knew she was infected with rabies and it was communicable disease with no cure. The family holds Municipal corporation of Delhi (MCD) accountable for lack of responsibility. Many people complained MCD to take action against the dogs by shifting them to shelters as there were infected with rabies but there were no actions taken by the MCD.³

On August 11, 2025 her demise sparked public outrage and prompted the Supreme Court to mandate the removal of stray dogs from Delhi-NCR localities and their relocation to shelters, following widespread protests and concerns expressed by animal rights activists. This ruling was prompted by a *suo motu* case benched by Justices J.B Pardiwala and Justice R. Mahadevan concerning the escalating number of dog bite and rabies cases. The order prompted widespread protests from animal welfare activists and dog enthusiasts who contended that it was

² Rhythma Kaul, *Timely rabies vaccine administration key: Experts*, HINDUSTAN TIMES, Aug. 12, 2025, <https://www.hindustantimes.com/cities/delhi-news/timely-rabies-vaccine-administration-key-experts-101754936870063.html>.

³ Aditya Sharma & Unzila Sheikh, *A judgment awaits: The SC Special Bench's stray dog decision could bring closure to many stories*, The Leaflet (Aug. 21, 2025), <https://theleaflet.in/environment/a-judgment-awaits-the-sc-special-benches-stray-dog-decision-could-bring-closure-to-many-stories>.

unscientific, impractical, and inhumane.⁴ Following the public outcry, on August 22, 2025 a larger three-judge bench of the Supreme Court took up the matter. This new bench modified the previous order, ruling that:⁵

- The court upheld the “Trap-Neuter-Vaccinate-Return” (TNVR) policy, a widely recognised humane method for population control. This policy involves capturing stray dogs, sterilising them, vaccinating them against rabies, and then releasing them back into the same area.
- **However**, the court clarified that the TNVR policy does not apply to dogs infected with rabies or exhibiting aggressive behaviour. These dogs are to be kept in shelters and not released back onto public spaces.
- **Furthermore**, the court prohibited feeding stray dogs on public streets and in designated areas. It directed municipal authorities to establish designated feeding zones within each ward. Failure to comply with this directive may result in legal consequences.
- The case’s jurisdiction extended beyond Delhi-NCR to encompass the entire nation. The court initiated a process to compile all similar petitions from various high courts, establishing a uniform national policy for managing stray dogs.
- Following the Supreme Court’s landmark decision in the street dog case, the city witnessed a surge in civic engagement and public celebrations. However, this moment of triumph swiftly transformed into a crisis for its citizens. On August 23, 2025, they received distressing news regarding the Rohini ABC (Animal Birth Control) unit in Delhi. This facility had been the subject of recent protests and allegations, subjecting it to intense scrutiny and concern.
- Animal activists and protesters have lodged serious allegations of inhumane treatment of stray dogs at the facility. These claims include the discovery of bones and deceased dogs in the backyard, lethargic dogs, and unsanitary conditions characterised by waste and organs left exposed. A report also asserted that certain puppies were being held captive within the premises, which is illegal.

4 Poorva Joshi, *Stray dogs SC verdict highlights: Animal lovers celebrate at Jantar Mantar after relief*, HINDUSTAN TIMES, Aug. 22, 2025, <https://www.hindustantimes.com/india-news/supreme-court-verdict-on-stray-dogs-in-delhi-live-updates-sc-judgement-101755832285040.html>.

5 The Hindu Bureau, *SC verdict on stray dogs Highlights: SC modifies earlier directive, allows release of stray dogs in original localities after vaccination*, THE HINDU, Aug. 22, 2025, <https://www.thehindu.com/news/national/supreme-court-verdict-on-stray-dogs-live-updates-august-22-2025/article69963272.ece>.

- **Protests and confrontations** have erupted outside the Rohini ABC centre, with demonstrators demanding entry to investigate the allegations. These protests have led to clashes with police, with protesters claiming instances of assault, which the police have denied.
- Following the protests, the Delhi Police allowed a limited number of volunteers and a legal representative to conduct an inspection of the premises. However, the protesters expressed dissatisfaction with the findings, stating that the facility had undergone recent cleaning and that they were denied access to certain areas, including the kitchen and vaccine room.
- The unit, similar to others in Delhi, has faced overcrowding issues. Some reports suggest that the Supreme Court's earlier order to permanently house dogs in shelters has strained the capacity of these centres. There have also been allegations that the centre, managed by a non-governmental organisation (NGO), has been acquiring and relocating dogs, including neutered ones and puppies, from across Delhi, which contradicts the TNVR policy.
- A comprehensive analysis of Delhi's ABC program reveals several issues. Inadequate infrastructure, insufficient funding from the Municipal Corporation of Delhi (MCD), and understaffed centres are among the problems. Many centres are reportedly operating beyond their capacity, and some have been identified as non-functional or lacking essential veterinary equipment.

The people were happy about the about the courts decision but little did they no that there was also something devastating thing happening in the government shelters. On Friday night of August 22, 2025 the animal rights activists and the dog lovers had raised many allegation against the Centre in Rohini Sector 27 was subject to cruel treatment. There were stating that the dogs were in a very miserable position where they were the dogs legs were tied, the centre was over crowded and no proper sanitation was maintained by the authorities of that centre. Protesters also claimed that dogs were not given proper food and water and were left to sit on their own excreta. Several videos were circulating the internet showing that animals were unwell and frail. There were also serous allegations like made against the Rohini ABC centre that they found skulls and bones of the dogs due to negligence of the authorities which were results of maybe any kind of experiment on dogs or selling the dog meat. The MCD has denied all the allegations by conducting an investigation the centres but they did not find any ill-treatment of the dogs and they claimed that dogs are healthy.

CAUSES FOR RISE IN STREET DOG POPULATION:

- **Uncontrolled Breeding:**

There will be increasing in population of street dogs due to no proper sterilisation of dogs on a large scale. The female dogs can give birth to multiple puppies in a year.

- **Abandonment of pets:**

The abandonment of pet is one of the biggest reason for overpopulation. Especially during COVID-19 the people who could not afford to take care of the dogs due to financial problem have left their dogs on roads without mercy. These abandoned dogs joins the street dog population.

- **Lack of Effective Policies and Implementation:**

Though there are laws existing on sterilisation and vaccination, enforcement is often weak. The municipal authorities do not take proper responsibilities to sterilise and vaccinate the street dogs.

- **Improper waste management**

The food which is thrown is not stored in proper way where there is no proper waste management. The main source of food that street dogs get is from the leftovers in the dustbins. This will lead to increase the population.

- **Urbanisation and habit shifts:**

Due to urbanisation which leads to expansion of cities, the dogs in rural areas are being forcefully pushed to the urban areas. The construction sites, slums become their shelter and food.

CONSEQUENCES OF OVERPOPULATION OF STREET DOGS:

There are many consequences for the overpopulation of street dogs like:

Public health:

- There will be rabies transmission as dogs are primary source of rabies.
- Other zoonotic diseases like leptospirosis, echinococcosis, and parasitic infection.
- Dog bites can be increased causing severe risk to lives of children and old people.

Animal welfare consequences:

- Suffering of street dogs due to malnutrition, lack of veterinary care, and injuries caused due to attacks by other dogs or by accident.
- Puppies will be left to starve due to no proper availability of food.
- There are high chances of spreading diseases to other dogs.

Legal and Policy Framework for Stray Dog Management in India

The management of stray dogs in India involves a combination of animal welfare laws, municipal duties, and court rulings. While India has implemented numerous laws and policies to regulate the treatment and control of stray dogs, enforcement challenges, resource management difficulties, and public attitudes persist, hindering the overall effectiveness of these measures. The Prevention of Cruelty to Animals Act of 1960, though outdated with relatively low penalties, serves as the foundation for animal welfare legislation in India. It establishes the Animal Welfare Board of India and aims to prevent unnecessary suffering to animals, including stray dogs. The ABC Rules, 2001, introduced sterilisation and immunisation as alternatives to culling. Additionally, the 2023 amendments incorporated community involvement in stray dog care and mandated collaboration between municipalities and animal welfare organisations.

Judicial Interventions

The Indian judiciary has been crucial in shaping the laws related to stray dogs. The relevant case laws are given below:

Animal Welfare Board of India v. People for Elimination of Stray Troubles (2015):

In 2015, the Supreme Court intervened in the ongoing debate regarding the management of stray dog populations. The Court directed local authorities to adhere to the PCA Act, 1960, and the Animal Birth Control (Dogs) Rules, 2001, which stipulated the implementation of humane methods such as sterilisation instead of indiscriminate euthanasia. Although this decision primarily focused on enforcing existing legal frameworks, subsequent developments, including a Supreme Court order in 2024, addressed the concerns raised. Consequently, the case was resolved with the introduction of the revised Animal Birth Control Rules, 2023.⁶

M.R. Ajayan v. State of Kerala (2016):

In response to the escalating number of dog-bite incidents, the Kerala High Court recognised the inherent conflict between public safety and animal welfare. The court emphasised the imperative of implementing stringent control measures and judicious culling in instances involving rabid or terminally ill dogs. While acknowledging the concerns for public safety and victims, the court consistently declined to comply with government orders for mass culling.

⁶ Animal Welfare Board of India v. People for Elimination of Stray Troubles, (2015) 12 SCC 553

Instead, the court prioritised the implementation of effective Town and Village Roadside Right-of-Way (TNVR) programs and the provision of compensation to victims. Furthermore, the court demanded accountability from local self-government institutions, suggesting that *Gram Panchayat secretaries* should be held responsible for dog attacks within their jurisdiction to ensure their adherence to the ABC Rules.⁷

SUGGESTIONS:

Addressing street dog overpopulation and rabies demands a humane, multi-faceted approach that combines animal welfare, public health, and community engagement. Mass culling is ineffective and inhumane.

- Mass vaccination campaigns are essential for eliminating rabies. These campaigns involve vaccinating at least 70% of the dog population to create herd immunity and break the cycle of transmission. Large-scale, organised vaccination drives targeting both owned and unowned dogs are crucial.
- Regular booster doses are crucial to maintain herd immunity and prevent rabies from resurging.⁸ Animal birth control (ABC) programs, such as trap-neuter-vaccinate-return (TNVR), help manage street dog populations, prevent diseases, and find homes for adoptable dogs. Promoting responsible pet ownership involves educating the public about spaying/neutering, proper animal care, and the consequences of abandonment. Government responsibility includes establishing and funding ABC units, providing financial assistance to NGOs, and creating legal frameworks for humane dog management. Community engagement involves training citizens on bite prevention, rabies education, and responsible feeding practices. Data-driven approaches are used to map dog populations, track vaccination coverage, and measure the effectiveness of management programs.

CONCLUSION

The coexistence of pet and stray dogs in India is a complex socio-legal issue. Concerns about rabies and dog bites impact public health and safety. The Supreme Court supports the “Trap-Neuter-Vaccinate-Return” (TNVR) policy for stray dogs, but reports of cruelty and poor conditions at the Rohini ABC unit in Delhi have led to protests. This highlights the need for a

⁷ M.R. Ajayan v. State of Kerala, 2016 (1) KLT 234.

⁸ Worldwide Veterinary Service, *Mission Rabies*, WVS, <https://wvs.org.uk/missionrabies/> (last visited Aug. 23, 2025).

balanced approach to stray dog management that prioritises public safety while treating animals humanely.

The stray dog population in India is a complex issue stemming from overpopulation, irresponsible pet ownership, lack of animal control, easy access to food, and cultural beliefs. The COVID-19 pandemic has exacerbated these problems, leading to increased abandonment, halted sterilisation, and a surge in strays. This underscores the urgent need for long-term solutions that prioritise public safety while promoting humane animal management.

The issue of stray dog overpopulation is a complex sociological and legal problem. It requires finding a balance between protecting public health and safety and respecting animal rights. Residents want safe neighbourhoods free from dog attacks and health risks, while animal welfare groups and individuals emphasise the importance of kindness and the constitutional duty to treat animals with respect. This conflict often leads to court cases, as it challenges the right to life and safety (Article 21) with the obligation to show compassion toward animals (Article 51A(g)).⁹

The overpopulation of street dogs in India poses significant challenges to public health, safety, and the environment. While legal frameworks such as the Prevention of Cruelty to Animals Act and the Animal Birth Control (Dogs) Rules exist, enforcement and resource distribution remain issues. Court rulings emphasise the need for humane methods like sterilisation and vaccination over culling.

India's humane and rights-based approach to stray dog management prioritises sterilisation and vaccination over culling. However, the legal framework faces challenges due to inadequate funding, municipal accountability, and responsible pet ownership enforcement. Strengthening this framework is crucial to safeguard animals and ensure public safety, health, and social cohesion.

⁹ Vision IAS, *Stray Dogs Management in India: Balancing Public Safety with Animal Welfare*, VISION IAS, <https://visionias.in/blog/current-affairs/stray-dogs-management-in-india-balancing-public-safety-with-animal-welfare> (last visited Aug. 23, 2025).