

# INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS



Open Access, Refereed Journal Multi-Disciplinary  
Peer Reviewed

[www.ijlra.com](http://www.ijlra.com)

## **DISCLAIMER**

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Managing Editor of IJLRA. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of IJLRA.

Though every effort has been made to ensure that the information in Volume II Issue 7 is accurate and appropriately cited/referenced, neither the Editorial Board nor IJLRA shall be held liable or responsible in any manner whatsoever for any consequences for any action taken by anyone on the basis of information in the Journal.

Copyright © International Journal for Legal Research & Analysis

## **EDITORIALTEAM**

### **EDITORS**

#### **Dr. Samrat Datta**

*Dr. Samrat Datta Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Samrat Datta is currently associated with Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Datta has completed his graduation i.e., B.A.LL.B. from Law College Dehradun, Hemvati Nandan Bahuguna Garhwal University, Srinagar, Uttarakhand. He is an alumnus of KIIT University, Bhubaneswar where he pursued his post-graduation (LL.M.) in Criminal Law and subsequently completed his Ph.D. in Police Law and Information Technology from the Pacific Academy of Higher Education and Research University, Udaipur in 2020. His area of interest and research is Criminal and Police Law. Dr. Datta has a teaching experience of 7 years in various law schools across North India and has held administrative positions like Academic Coordinator, Centre Superintendent for Examinations, Deputy Controller of Examinations, Member of the Proctorial Board*



#### **Dr. Namita Jain**



*Head & Associate Professor*

*School of Law, JECRC University, Jaipur Ph.D. (Commercial Law) LL.M., UGC-NET Post Graduation Diploma in Taxation law and Practice, Bachelor of Commerce.*

*Teaching Experience: 12 years, AWARDS AND RECOGNITION of Dr. Namita Jain are - ICF Global Excellence Award 2020 in the category of educationalist by I Can Foundation, India. India Women Empowerment Award in the category of "Emerging Excellence in Academics by Prime Time & Utkrish Bharat Foundation, New Delhi. (2020). Conferred in FL Book of Top 21 Record Holders in the category of education by Fashion Lifestyle Magazine, New Delhi. (2020). Certificate of Appreciation for organizing and managing the Professional Development Training Program on IPR in Collaboration with Trade Innovations Services, Jaipur on March 14th, 2019*

## Mrs.S.Kalpna

Assistant professor of Law

*Mrs.S.Kalpna, presently Assistant professor of Law, VelTech Rangarajan Dr.Sagunthala R & D Institute of Science and Technology, Avadi. Formerly Assistant professor of Law,Vels University in the year 2019 to 2020, Worked as Guest Faculty, Chennai Dr.Ambedkar Law College, Pudupakkam. Published one book. Published 8Articles in various reputed Law Journals. Conducted 1Moot court competition and participated in nearly 80 National and International seminars and webinars conducted on various subjects of Law. Did ML in Criminal Law and Criminal Justice Administration.10 paper presentations in various National and International seminars. Attended more than 10 FDP programs. Ph.D. in Law pursuing.*



## Avinash Kumar



*Avinash Kumar has completed his Ph.D. in International Investment Law from the Dept. of Law & Governance, Central University of South Bihar. His research work is on "International Investment Agreement and State's right to regulate Foreign Investment." He qualified UGC-NET and has been selected for the prestigious ICSSR Doctoral Fellowship. He is an alumnus of the Faculty of Law, University of Delhi. Formerly he has been elected as Students Union President of Law Centre-1, University of Delhi. Moreover, he completed his LL.M. from the University of Delhi (2014-16), dissertation on "Cross-border Merger & Acquisition"; LL.B. from the University of Delhi (2011-14), and B.A. (Hons.) from Maharaja Agrasen College, University of Delhi. He has also obtained P.G. Diploma in IPR from the Indian Society of International Law, New Delhi. He has qualified UGC – NET examination and has been awarded ICSSR – Doctoral Fellowship. He has published six-plus articles and presented 9 plus papers in national and international seminars/conferences. He participated in several workshops on research methodology and teaching and learning.*

## **ABOUT US**

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN- 2582-6433 is an Online Journal is Monthly, Peer Review, Academic Journal, Published online, that seeks to provide an interactive platform for the publication of Short Articles, Long Articles, Book Review, Case Comments, Research Papers, Essay in the field of Law & Multidisciplinary issue. Our aim is to upgrade the level of interaction and discourse about contemporary issues of law. We are eager to become a highly cited academic publication, through quality contributions from students, academics, professionals from the industry, the bar and the bench. INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN 2582-6433 welcomes contributions from all legal branches, as long as the work is original, unpublished and is in consonance with the submission guidelines.

# **THE STRAY DOG DILEMMA: LAW, LOVE, AND PUBLIC SAFETY IN INDIA**

AUTHORED BY - VIKRAMJEET SINGH

A Law Graduate from UILS, Panjab University, Chandigarh

On August 11, 2025, the Supreme Court of India passed a judgment that has set off one of the biggest public debates in recent memory. The court directed civic authorities in Delhi, Noida, Ghaziabad, and Gurugram to begin removing stray dogs from public spaces and placing them in shelters. The order set an initial target of five thousand dogs to be relocated from high-risk areas within a period of six to eight weeks. It went further by warning that anyone who interferes with this process could face legal action. The court also rejected the long-standing policy of sterilizing stray dogs and returning them to the same location, calling that approach absurd. The judges said the safety of citizens, especially children, must come before sentiment, and no infant or child should become a victim of dog attacks.

This decision came against a troubling backdrop of statistics. In 2024, India recorded over 3.7 million dog bite incidents nationwide. By January 2025 alone, more than 370,000 cases had already been registered, and at least 54 suspected rabies deaths had occurred. Delhi, which has one of the highest stray dog populations in the country, saw nearly 2,000 bite cases every single day by late 2024. Estimates put the number of stray dogs in the capital anywhere between half a million and one million. Hospitals have struggled to keep up with the flood of bite victims. Safdarjung Hospital, one of Delhi's largest government hospitals, had treated over 90,000 bite cases in just the first half of 2025. Many of these patients were children, some with serious injuries and trauma.

Public reaction to the court's order was swift and deeply divided. In many Resident Welfare Association groups, there was a sense of relief that the authorities were finally taking strong action. Some parents said their children no longer felt safe walking to school or playing in parks because of packs of dogs in the neighbourhood. Elderly residents spoke about being chased or knocked down during morning walks. Supporters of the ruling said it was high time the government took control of the situation before more lives were lost or damaged. They argued that the constitutional right to life and personal safety must take priority over the rights of

animals to roam freely in public spaces.

On the other side were animal lovers and welfare organizations who saw the verdict as a betrayal of humane principles and scientific methods. They pointed out that the Animal Birth Control Rules, updated in 2023, clearly lay out a framework for controlling stray dog populations through sterilization, vaccination, and release back into their original territories. This system, backed by years of legal precedent and World Health Organization guidelines, was designed to be both humane and effective. Removing all dogs from their territories, they warned, would cause the so-called vacuum effect where new unsterilized and possibly more aggressive dogs move in, making the situation worse. For many animal welfare advocates, the court's order was not only impractical but also in direct violation of existing law.

The clash between these two camps quickly spilled onto social media. Hashtags like #DogsAreDelhiites and #CompassionNotCruelty trended on X (formerly Twitter). Users posted pictures and videos of neighbourhood dogs wearing collars, sweaters, or tags to show they were part of the community and often vaccinated. Others shared personal stories of how a stray dog had protected them from thieves or become a loyal companion over years. At the same time, bite victims posted pictures of injuries and demanded the government act quickly, with some calling for complete removal or even euthanasia of aggressive strays.

The debate soon pulled in celebrities and political figures. Raveena Tandon called the order ridiculous and accused the authorities of targeting animals instead of fixing waste management problems that help stray populations grow. John Abraham, Janhvi Kapoor, and Vir Das voiced their support for keeping community dogs where they are, with better vaccination and feeding management. In contrast, politicians like Rahul Gandhi criticized the blanket removal as cruel and short sighted but acknowledged that bite incidents needed serious solutions.

This is not the first time the Supreme Court has weighed in on stray dog management. In 2024, another bench had ruled that healthy stray dogs could not be held in captivity indefinitely and should not be forcibly removed from their areas. That earlier judgment reinforced the ABC framework as the standard approach. The August 2025 order directly conflicts with that precedent, creating legal uncertainty for municipal authorities. Lawyers expect petitions and review applications to be filed soon, which could result in the case returning to court for further clarification or even reversal.

Practical challenges also loom large. Delhi's stray dog population is massive, and the city's existing shelters are already overcrowded and underfunded. Many facilities lack proper veterinary staff, adequate ventilation, or space for exercise. To house even a fraction of the targeted dogs would require huge investments. Experts estimate that a comprehensive shelter system for the capital alone could cost upwards of ₹15,000 crore, money that most civic budgets cannot spare without major cuts elsewhere.

Other cities show the scale of the problem. Bengaluru has no permanent dog shelters at all and operates only a limited number of Animal Birth Control centres. With hundreds of thousands of strays and rising bite incidents, it would be logistically impossible for the city to comply with such an order without massive new infrastructure. In smaller towns, the situation is even more strained, with almost no resources for animal housing beyond temporary kennels.

At the heart of the issue is a deeper conflict between India's tradition of ahimsa, or non-violence toward all living beings, and the constitutional mandate to protect human life. Religious and cultural values often frame stray dogs as part of the community, deserving of care and protection. For centuries, feeding street animals has been considered an act of compassion. Yet when public safety is at risk, these same values face hard questions. How far can compassion go when lives are at stake?

There are international models that offer possible answers. The Netherlands, often cited as a benchmark, managed to bring its stray dog numbers to near zero through a national program of sterilization, strict control of breeding, and widespread adoption campaigns, all without mass culling. Sri Lanka has focused heavily on rabies vaccination drives while allowing street dogs to remain in familiar territories, reducing fatalities without large scale removals. Indian animal welfare advocates argue that adapting these approaches would be more effective than trying to shelter every stray dog in major cities.

Meanwhile, on the ground in Delhi, the order's implementation has already begun. The day after the ruling, municipal workers accompanied by police began capturing dogs from designated high-risk areas. Animal lovers staged protests at India Gate, carrying signs that read Shelters Are Not Homes. Some demonstrators tried to block the trucks, but police warned them about contempt of court charges. At the same time, residents in other neighbourhoods welcomed the vans, clapping and offering directions to known trouble spots.

Online, the divide grew sharper. Bite victims continued to share graphic accounts, while dog feeders uploaded videos of friendly, vaccinated animals being taken away. Some posts went viral, fueling more protests and counter protests.

The Delhi government has announced it will build additional shelters and set up a helpline for reporting bite cases and dangerous dogs. Officials say the priority will be high risk zones such as areas near schools, hospitals, and marketplaces where attacks have been most frequent. Animal welfare groups are pushing for these shelters to meet proper standards and for the dogs to be treated humanely.

Other states are watching closely. If the order survives legal challenges and shows measurable impact on bite numbers, similar policies could be adopted elsewhere. But if the problems of shelter overcrowding, poor animal care, or new aggressive dogs moving in become visible, the ruling could face backlash and reversal.

From my perspective, any sustainable solution must address the fears of the public without discarding the moral duty toward animal welfare. This means ramping up mass sterilization and vaccination drives with strict accountability, expanding well-equipped shelters, and creating designated feeding zones monitored by municipal bodies. Technology can be harnessed through mobile apps for reporting bites, tracking vaccination, and registering community dogs. Resident Welfare Associations should be brought into the fold, trained on safe interaction and feeding guidelines, while hospitals need stronger rabies management facilities. Public awareness campaigns should bridge the divide between compassion and caution, showing that it is possible to prevent attacks without resorting to cruelty. Balancing these measures can protect all stakeholders like children, the elderly, pedestrians, and the dogs themselves, ensuring that public safety and humane treatment are not mutually exclusive goals. The stray dog dilemma in India has always been about more than just animals. It is about how a society balances compassion with safety, rights with responsibilities, and legal principles with practical realities. It is also about trust in institutions that whether the public believes that the courts, governments, and municipal bodies can deliver a fair and workable solution. At its heart, this judgment asks whether Earth belongs chiefly to humans or is a shared home for all life. The answer will shape both our safety policies and our moral legacy.