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THE LASTING TRAUMA OF ACID VIOLENCE: A STUDY ON ITS EFFECTS ON INDIAN WOMEN

AUTHORED BY - JASDEEP KAUR & DIYA GARG

Abstract

Acid attacks represent a deeply rooted social evil. Over time, the gravity of this crime has drawn the attention of social activists, lawmakers, and the judiciary, prompting efforts to combat and raise awareness about this heinous act. According to the Law Commission of India, an acid attack involves the use or attempted use of acid with the intent or knowledge that it is likely to cause severe harm, disfigurement, or lasting damage to any part of a person's body. Women are disproportionately the victims of such attacks, and this violent act continues to occur in various parts of the country. The consequences are often devastating, leading to permanent physical, emotional, and psychological trauma. One of the primary motivations behind these attacks is rooted in rejection — often when the perpetrator cannot accept a refusal of romantic or marriage proposals, leading them to attempt to destroy the life of the individual who turned them down. The attacker's intention is often to dehumanize and ruin the victim's identity and future. This study focuses on analyzing the legal framework in India that addresses acid attacks, and it also puts forth recommendations for future legal and social interventions. Additionally, it discusses several real-life cases of acid attacks to highlight the horrifying nature and impact of this crime.

Key Words: Acid Attack, Gender based Violence, Compensation, Legal system.

1) Introduction :

In our society, women contribute half of the population. However, it's really upsetting to hear that they are being mistreated and violated by a variety of factors. "Throughout her life, from birth to death, a woman is frequently subjected to persistent and multifaceted forms of violence." Acid Attack is the one that stands out the most. Studies indicate that approximately 78% of acid attack cases involving women occur as a result of their refusal to accept marriage proposals, with such rejection often leading to retaliatory violence wherein acid is thrown at

the victim's face¹. Acid attacks are extremely serious crimes. Sulphuric acid, nitric acid, and hydrochloric acid are the three most often used types of acids. Women and many other victims of this heinous crime experience physical and psychological pain as a result of it; some are not able to feel their suffering. Acid assaults are cruel crimes that have a detrimental influence on the victim's entire life. Most often committed against women in India, these crimes are typically sparked by instances of marriage proposals being turned down. By adding an additional offence to the IPC, the Criminal Law Amendment Act of 2013² addressed the problem of acid attacks. However, notwithstanding the aforementioned modification, acid assaults remain a threat. The question which arises is that who is the victim of this heinous crime. The answer to this is women but we need to think that activity is done by some bad people present in our society but for the consequence to same the women had to suffer a lot which destroys their whole life. Now, a Question Why only they suffer. The answer to this is that the mind set of those bad elements presents in society only harms the young women only because of mere rejection or jealous and with respect to this they are not only victim of acid attack but also mental, physical, economic and social attack also.

Although acid attacks can target individuals of any gender, the phenomenon in India displays a distinct gendered pattern. According to the Law Commission of India (2009), such attacks are predominantly carried out against women, especially young women, often as a consequence of refusing romantic advances, rejecting marriage proposals, or denying dowry demands. These acts of violence are frequently driven by a sense of wounded male ego, where the perpetrator, unable to accept rejection, seeks to disfigure the woman as a form of retaliation. Further supporting this, a study conducted by Nalanda University in 2019 found that most acid attack survivors were women who had resisted repeated expressions of so-called 'love' or persistent marriage proposals.

Now, let's have an example of a real happened story. Laxmi's case is an example for the same. The petition highlights the case of Laxmi, a young girl who became a victim of an acid attack after refusing a marriage proposal from the accused. The brutal assault resulted in severe disfigurement to her face, arms, and other parts of her body. Despite coming from a financially disadvantaged background, she and her family were supported by a generous benefactor who

¹ "ACID ATTACK: DISCOVERING A LOST IDENTITY" Kalpana Chandaria* * Research Scholar, Government Law College, Devi Ahilya Vishwavidyalaya, Indore.

² Mr. Alok Rawat, Dr. Saadiya "ANATOMY OF ACID ATTACKS IN INDIA: RECOMMENDATIONS FOR DETERRENCE" 3 *Jamia Law Journal* (2018).

covered her medical treatment, which cost approximately ₹2.5 lakh. However, even after undergoing four reconstructive surgeries, her physical appearance remained drastically altered, and additional surgeries were projected to be necessary to restore even a partial semblance of her original appearance.

Although comprehensive national data on acid attacks in India remains limited, several studies and reports suggest a concerning upward trend. For instance, a study documented 174 reported acid attack cases in India in the year 2003³. These statistics, however, are likely underestimates, as many survivors do not come forward due to fear of further retaliation or social ostracism. The Campaign and Struggle Against Acid Attacks on Women (CSAAAW) observed an unreported incident in Bangalore in July 2004⁴, where the survivor and her family chose to remain silent about their ordeal due to the stigma attached⁵.

By 2006, acid attack cases in Karnataka had risen to 53, yet judicial verdicts had been delivered in only 9 of those cases, as per CSAAAW's findings⁶. A newspaper report noted that this number increased to 60 by early 2007, with an additional 8 cases recorded up to February of that year. Hydrochloric and sulfuric acid were commonly used in these attacks, and all victims were women, predominantly between the ages of 16 and 25⁷. In most cases, the perpetrators were men known to the victims, and the attacks frequently occurred in public spaces⁸.

According to the India Today Data Intelligence Unit, citing National Crime Records Bureau statistics from 2014 to 2018, India witnessed 1,483 victims of acid attacks during that period. Furthermore, the Australian Broadcasting Corporation reported that India has the highest number of acid attacks globally, with an estimated 300 incidents occurring annually⁹.

When such a heinous crime takes place in a society in such a number it Impacts the society of

³ Law Commission of India ,”226th Report on The Inclusion of Acid Attacks as specific offences in the Indian Penal Code and a law for Compensation for Victims of crime”(July 2008).

⁴ “Another Face of Violence” *The Hindu*, August15, 2004 available at < <https://www.thehindu.com>> (last visited on 6th June 2025).

⁵ CSAAAW Bangalore Publication, “Burnt Not Defeated” (April, 2007).

⁶ PIL filed for” steps to curb acid attacks” *The Hindu*, September 29, 2006 available at < <https://www.thehindu.com>> (last visited on 6th June 2025).

⁷ Bageshree S. and M.V. Chandrashekhar, “The ‘acid test’: will Government regulate sale of deadly chemicals”? *The Hindu* , February 5,2007 available at < <https://www.thehindu.com>> (last visited on 10th June 2025)

⁸ Bala Chauhan, “Acid test of Humanity”Deccan Herald News Service, Bangalore.

⁹ CHITHRA, S.Aswini, “MULTICULTURAL FACTORS AND THE REPRESENTATION OF ACID ATTACK SURVIVORS IN INDIAN SOCIETY BASED ON MULTIMODAL DISCOURSE ANALYSIS” 2 *International Journal of Multiculturalism* 85 (2021)

the country as a whole. To commit a crime like acid attack certain situations and mindset can be responsible. For better understanding over this topic and to know the impact of such a crime on the lives of Indian woman to know the causes, mindset, public view and legal remedies present to the victim we would discuss about the same in further paper. In this research paper we would examine that the new provisions added by law makers are sufficient to deal with this issue or not.

1.1) Aims and Objectives:

The central aim of this research paper is to critically explore the various challenges encountered by acid attack survivors in India. It intends to provide a comprehensive understanding of the issue by focusing on the following specific goals:

1. To understand the definition and nature of acid attacks, along with their social and legal significance.
2. To analyze the root causes that lead to acid attacks and assess their physical, psychological, and social consequences on the victims.
3. To study the policies, schemes, and legislative measures implemented by the Indian government concerning acid violence.
4. To examine the steps and interventions introduced by the authorities to address the concerns of acid attack survivors.
5. To spread awareness regarding the rights of individuals affected by acid attacks and encourage greater public and institutional support for their rehabilitation and justice.

1.2) Research Methodology:

This study is based on theological research that sought to examine the many social and physical difficulties and issues that acid victims encounter. The present study adopts a doctrinal research methodology, relying primarily on secondary sources such as academic journals, published books, official government reports, and credible online resources.

1.3) Literature Review:

1. **Kalpna Chandaria¹⁰** : The paper titled “**Acid Attack: Discovering a lost Identity**”. This paper focuses on the high rise of acid attacks and discuss the reason behind the

¹⁰ *Supra* note 2 at 10.

same. It also discusses various data related to the rise in acid attacks and shares various social and psychological aspects of this act which affects the victim's lives.

2. **Dr. Harish Verma¹¹** : This paper titled “**Acid Violence against Women and its Socio-Legal Implications: The Indian Perspective**” explains the meaning of acid attack in wider sense and discusses the social and legal impact of acid attack and implications which reflect the perspective of Indian society.
3. **Hameed, Shaheema and Bhattacharya¹²**: This paper titled, “**Scarred for Life: Thoughts on Legal Perspectives of Acid Attacks in Selected Countries with a Focus on India**” explains the legal perspective and position of India in regulation of acid attack laws and provides a wider picture of India in regulation of law.
4. **CHITHRA, S.Aswini¹³** : This paper titled “**MULTICULTURAL FACTORS AND THE REPRESENTATION OF ACID ATTACK SURVIVORS IN INDIAN SOCIETY BASED ON MULTIMODAL DISCOURSE ANALYSIS**” explains multiple factors which led to the heinous crime and provides a detail of multicultural factors present in Indian society which represent the victim's life.
5. **Mr. Alok Rawal and Dr.Saadiya¹⁴**: This paper titled “**ANATOMY OF ACID ATTACKS IN INDIA: RECOMMENDATIONS FOR DETERRENCE**” this paper discusses the various challenges faced by the victims like emotional and social challenges and argues existing legal provisions lacking somehow to address the evils of acid attacks and discusses that there is a need to introduce more stringent laws related to this.
6. **Anuj Chauhan¹⁵**: This paper titled “**Research Report on Acid attack in India**” merely explains the real-life example of acid attack victim that how they suffer all this and have a traumatic life. In this paper he well explains about the legislation and provides some suggestions to curb this issue.
7. **Anusha A., Dr. Rashmi Ram Hunnur¹⁶**: This paper titled “**A Theoretical Overview on Acid attack Victims and Government Regulations in India**” explains the number

¹¹ Dr. Harish Verma , “ Acid Violence against Women and its Socio-Legal Implications: The Indian Perspective” *48(3) Civil and Military Law Journal* 197-207 (2012)

¹² *Supra* note 1 at 12.

¹³ *Supra* note 9 at 13.

¹⁴ *Supra* note 3 at 14.

¹⁵ Anuj Chauhan , “*Research Report on Acid attack in India*” , Department of Law , Punjab University ,PUSSGRC,Hoshiarpur < <https://www.academia.edu/> > (Last visited on 10th June 2025)

¹⁶ Anusha A., Dr. Rashmi Ram Hunnur “ A Theoretical Overview on Acid attack Victims and Government Regulations in India” *21 IOSR Journal of Business and Management* 40 (2019)

of case reported in India by analysing data of different states and providing the legal framework for the same.

8. **Aarchie Chaturvedi¹⁷** : This article named “**Acid attack: Disfiguring the Face of Society**” is written by a first-year law student who explains the causes and consequences faced by the victim in her life time. So, from this article we had learned that student like us is also highlighting the issues which are prevalent in Indian society.

1.4) Novelty :

The main objective of this paper is to find about the rehabilitation schemes made by the government for acid attack victims as they go through various types of consequences and the issue of unreported cases of acid attack. Although the criminal justice system provides compensation as a remedy, it is often inadequate to fully address the harm caused. There is a need for a more effective solution that involves all stakeholders to ensure justice for acid attack survivors.

Although, many researchers worked on the this very issue that is acid attack but, very few researchers enlightened the perspective of rehabilitation scheme. As all of them mainly Focus on the causes and the laws made by the government. None of them talks about the schemes that should be made by the government for victim and while doing this research we found that no particular data of cases is available and the conviction rate of the wrongdoer is very less. This paper seeks to focus on the rehabilitation and reintegration of acid attack survivors, moving beyond the traditional approach of solely emphasizing compensation and punitive measures.

1.5) Research Gap:

The major gap in this study is linked with unavailability of real-time information regarding Acid attack cases in this country due to an increased number of unreported cases.

1.6) Definition and Meaning of Acid attack :

According to the "Prevention of Crimes (by Acids) Act 2008, (National Commission for Women-Draft Bill)" the concept of Acid Attacks and Acid is used and with respect Section 3 of above act:

“(a) Acid shall mean and includes any substance which has the character of acidic or corrosive or burning nature that is capable of causing bodily injuries leading to scars or disfigurement or

¹⁷Aarchie Chaturvedi , “ Acid attack : Disfiguring the Face of Society” available at < <https://blog.ipleaders.in/stop-acid-attacks>> (Last visited on 11th June 2025).

temporary or permanent disability.

(b) Acid attack means any act of throwing acid or using acid in any form on the victim with the intention of or with knowledge that such person is likely to cause to the other person Permanent or partial damage or deformity or disfiguration to any part of the body of such person.”¹⁸

Also, under a study which was carried out by UNICEF:

“Acid attack is a serious problem all over the world, even children are becoming victim of acid attack in many cases. In an Acid attack, acid is thrown at the face or body of the victim with deliberate intent to burn and disfigure. Most of the victims are girls, many below the age of 18, who have rejected sexual advances or marriage proposals. Acid attack is defined as the act of throwing acid onto the body of a person with the intention of injuring or disfiguring [them] out of jealousy or revenge.”

An acid attack refers to the act of intentionally throwing or applying acid on a person, predominantly targeting women and young girls, with the intent to cause harm¹⁹. Acid violence involves the deliberate use of corrosive substances to inflict severe physical injuries. As per the explanation to Section 326B of the Indian Penal Code (now incorporated under the Bhartiya Nyaya Sanhita, 2023) acid is defined as any substance possessing acidic or corrosive properties capable of causing bodily harm, scarring, disfigurement, or temporary or permanent disability²⁰. According to the National Commission of India (2009), an acid attack constitutes any act involving the use of acid with the intent or knowledge that it is likely to cause lasting damage, deformity, or disfigurement to any part of the victim's body.

1.7) Causes of Acid attack :

- **Male-domineering Society:** Our culture has always been a male-dominated culture, with males being encouraged to dominate and women being instructed to be submissive. Women have historically been thought to be having any identity of their own. Men are not used to hear the real word “No” in the culture where women have traditionally been governed and ruled by them. The rejection made by a woman leaves men devastated, leading them to commit one of the most heinous crimes and making the women who rejected or refused him suffer for the rest of her life if she barely manages to stay alive from the injuries and trauma caused by the attacker²¹.

¹⁸ “Prevention of Offences (by Acids) Act 2008, (NCW – Draft Bill)”

¹⁹ *Supra* note 14 at 19..

²⁰ The Indian Penal Code , 1860 (Act 45 of 1860) , s. 326B.

²¹ *Supra* note 3 at 21.

- **Revenge:** Acid attacks are often used as a way to seek revenge or to settle personal scores. This can include romantic rejection, marital disputes, or other interpersonal conflicts²².
- **Domestic Violence:** Domestic violence is also one of the major leading factor for acid attack as women are mistreated within home for various social issues which even, we can't imagine. One out of them which we all are well known off is Demand for dowry, as they are forced to bring dowery from their parental home but when they are not able to do so as a result, they become a victim of acid attack²³.
- **Jealousy:** Jealousy can also be a motivator for acid attacks, particularly in cases where one person perceives another as a threat to their relationship or social status²⁴.
- **Availability of Acid :** The open availability was a leading reason for acid attacks. As no restriction was being opposed by law on sale of acid attack. But later on, in 2013 some strict laws relating to ban on acid sale come but they had to be implemented strictly for preventing this heinous crime²⁵.

1.8) Consequences of Acid attack :

- **Physical Consequences:** The acid attack causes two layers of skin to break down, namely the fat and muscle beneath, and in some cases even dissolves the bones in addition to eating through to the bone. The strength and contact of the acid with the skin determines how severe the injury is. The lips and eyelids could completely burn off. When someone suffers from acid attacks, their breathing becomes difficult. Surgery can only bring back the most fundamental senses—hearing, seeing, feeling, and smelling—but even that is only a case maybe. Acid attacks have psychological effects in addition to their physical effects²⁶.
- **Psychological Consequences:** Depression, anger, frustration, stress, and anxiety are common psychological problem types. The victims typically avoid interacting with one another and prefer to be alone. They become disinterested in several tasks and activities as a result. This may also have an impact on your career and academic life. The victims of acid attacks may benefit from appropriate counselling and guidance to recover from this stage. The victim's family regrets being helpless and unable to do anything to assist

²² *Ibid.*

²³ *Supra* note 3 at 23.

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ Shanu chandwasia, “ Acid Attack” available at <<https://lawbhoomi.com>> (Last visited on 11th June 2025).

the situation and improve it, and the victim lives with the mental image of being a deformed and thinks to be an undesirable member of society. Many innocent young women have lost their lives as a result of these psychological and mental disorders; they had done nothing wrong other than keeping themselves away from stalkers and creeps. And somehow who continue to survive, if any, remains of their self-respect, self-dignity, self-love, self-acceptance, and empowerment are left over²⁷.

- **Social Consequences**: In addition to enduring physical and psychological trauma, acid attack survivors face severe social challenges. Many are confined to their homes due to social stigma and fear of public ridicule. They are often subjected to discriminatory behavior and are not treated as equal members of society. This marginalization results in isolation, with survivors hesitant to engage in social interactions due to the fear of being mocked or judged based on their appearance.²⁸.
- **Economic Consequences**: The economic impact of acid attacks is equally devastating. Survivors often lose their ability to earn a livelihood and become financially dependent on family or others for basic needs such as food and shelter. Due to visible disfigurements, they may face bias from potential employers, making it difficult to secure employment. Moreover, the cost of medical treatment and surgeries is prohibitively high. As highlighted in the Law Commission of India's 2009 report, many survivors are left without any source of income and are forced into dependency for survival.²⁹.

1.9) Legal Framework of Acid Attack in India:

1.9.1) The Bhartiya Nyaya Sanhita , 2023 (BNS).

The offence was registered under Sections 116 , 117(1), 117(2), 109 and 118(2) of the Bhartiya Nyaya Sanhita , 2023 (BNS).

Section 116: Acid assaults are included under Section 116 definition of "**grievous hurt**," which includes any lasting disfigurement, impairment, or destruction of a body component³⁰.

Section 117 (1): **Voluntarily causing grievous hurt.**

Ingredients

- **Actus Reus (Physical Act)**: Actual infliction of **grievous hurt**.

²⁷Supra note 17 at 27.

²⁸ Anasamu, "Acid attack and related laws : A Critical Analysis "available at <<https://legalserviceindia.com/legal/article>> (Last visited on 12th June 2025).

²⁹ Available at <<https://hrlnacidattacks.wordpress.com>>(Last visited on 12th June 2025).

³⁰ The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023) , s.116.

- **Mens Rea (Mental Element):** Presence of **intention** or **knowledge** of likely grievous injury.
- **Nature of Injury:** Must fall under the legally defined categories of **grievous hurt** (e.g., as per earlier BNS Section 116 – permanent disfigurement, fracture, prolonged pain, etc.).

Illustration : A, intending of knowing himself to be likely permanently to disfigure Z's face, gives Z a blow which does not permanently disfigure Z's face, but which causes Z to suffer severe bodily pain for the space of twenty days. A has voluntarily caused grievous hurt.

Section 117(2): Punishment for voluntarily causing grievous hurt. — Up to 7 years imprisonment + fine, unless aggravated under sub-section (3).³¹.

Section 109: Attempt to Murder –

Ingredients

- (a) The death of a human being must be attempted,
- (b) The accused must have made the attempt,
- (c) The act must be done with the intention of causing death, or it be done with the intention of causing such bodily injury as:
 - (i) the accused knew to be likely to cause death, and
 - (ii) that it was sufficient in the ordinary course of nature to cause death.
- (d) The accused attempted to cause such bodily injury as:
 - (i) that it was sufficient in the ordinary course of nature to cause death, and
 - (ii) such bodily injury as is likely to cause death, or
 - (iii) be so imminently dangerous that it must in all probability cause:
 - (a) death, or
 - (b) such bodily injury as is likely to cause death.

(2) **Punishment:** Death or with imprisonment for life, which shall mean the remainder of that person's natural life³².

Section 118(2): Voluntarily causing grievous hurt by dangerous weapons or means.—

➤ **Ingredients**

(1) **Voluntary act:** The hurt must be caused intentionally or knowingly by the accused.

Use of dangerous means: The hurt must be caused using any of the following:

- Instruments for **shooting, stabbing, or cutting;**
- Any object **likely to cause death** when used as a weapon of offence;

³¹ The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023), s. 117(2).

³² The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023), s.109.

- **Fire** or any **heated substance**;
- **Poison** or **corrosive substance** (e.g., acid);
- **Explosive substances**;
- **Deleterious substances** (harmful if inhaled, swallowed, or introduced into the blood);
- Use of **any animal** as a means to cause hurt.

Exception: This clause does **not apply** to acts covered under **Section 122(1)** (which deals with acid attacks and similar grievous offences).

Punishment: Imprisonment of either description for up to **three years**, or with **fine** up to ₹20,000, or **both**³³.

(2) **Voluntary causation:** The accused must have intentionally or knowingly caused grievous hurt.

Use of same dangerous means as mentioned in sub-section (1).

Exception: This clause excludes cases falling under **Section 122(2)**.

Punishment:

- **Imprisonment for life**, or
- **Rigorous or simple imprisonment** not less than **1 year**, which may extend to **10 years**, and
- **Liability to fine** (in addition to imprisonment).

In India, acid attacks have frequently made headlines, highlighting the brutal nature of such crimes. However, prior to the enactment of the Criminal Law (Amendment) Act, 2013, there existed no specific legal provision addressing acid attacks as a distinct offence. This legislative gap was eventually addressed following a landmark judgment that played a pivotal role in reshaping the legal landscape. The judgment not only recognized the severity of acid attacks but also led to their classification as a separate and heinous criminal offence under Indian law.

Laxmi v. Union of India³⁴ :

The case law is the landmark judgement in the legal history of India.

Facts: In 2006, Laxmi, a minor at the time and a survivor of an acid attack, filed a Public Interest Litigation (PIL) before the Hon'ble Supreme Court of India. She was brutally attacked by three men on a busy street in New Delhi after rejecting a marriage proposal from Naeem Khan, also known as Guddu. The attack caused her severe physical injuries and psychological trauma. Despite undergoing multiple reconstructive surgeries, she could not regain her original

³³ The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023) , s.118(2).

³⁴ *Laxmi v. Union of India* , AIR 2014 SCC 4 427.

appearance, as significant portions of her upper body were permanently damaged.

Initially, a case of attempted murder was registered against the accused, and they were convicted by the District Court of Delhi. However, they were later granted bail by the High Court, which came as a shock to Laxmi, considering the grave nature of the crime and the extent of suffering she endured.

This sequence of events compelled her to approach the Supreme Court through a PIL, highlighting critical concerns such as the unregulated sale of acid, the lack of adequate legal provisions dealing specifically with acid attacks, and the absence of a structured mechanism for covering medical treatment, rehabilitation, and compensation for victims.

Issue:

- Can there be amendments made in the CrPC, 1973 and IPC 1860 relating to acid attacks?
- What all procedure has to be followed to buy and sell acids?
- Can there be a complete ban on acids?
- Are there proper laws related to acids attacks victims in various states and UTs and if it persists, are they properly implemented?

Judgement: An amendment was made in Code of Criminal Procedure 1973 and a new {section 357 A} was inserted. Pursuant to a legislative amendment, Sections 326A and 326B were incorporated into the Indian Penal Code to explicitly criminalize acid attacks and related acts. An amendment was made to code of criminal procedure and a fresh section 357- C was inserted in 2013. Supreme court of India issued directions to all state government and union territories that minimum compensation which should be payable to each victim attack victim will not be less than 3 lakh rupees. Acid should be declared as poison and will not be available so easily. Full medical assistance and free medical aid should be provided to every victim. Provision for Ban on acid sale were made and some strict provisions were added related to the same.

The Indian Penal Code was amended on **2 April 2013** with the passage of the 2013 'The Criminal Law (Amendment) Act. The modification resulted in the insertion of **Sections 326A and 326B specifically for the management of acid violence (Now Bhartiya Nyaya Sanhita,2023) :**

Section 326A: Voluntarily causing grievous hurt by use of acid, etc.—

Ingredients

Whoever causes permanent or partial damage, deformity, burns, maiming, disfigurement, or disability to any part of a person's body by throwing acid or using any corrosive substance, with the intention to cause such injury or with knowledge that such act is likely to cause such injury, shall be punished with:

- **Imprisonment of either description**, for a term **not less than ten years**, which may **extend to imprisonment for life**, and
- **Fine**, which shall be just, reasonable, and proportionate to the medical expenses incurred by the victim.

The amount of **fine imposed** shall be **paid to the victim** to cover **medical treatment, rehabilitation, and other related expenses**³⁵.

Section 326B: Voluntarily throwing or attempting to throw acid.—

Ingredients

- **Mens Rea (Intent):** The offence is complete when there is an *attempt* to cause harm using acid with the *intention* of inflicting grievous bodily injury. Actual injury need not occur.
- **Nature of Substance:** The term "*acid*" is interpreted broadly, encompassing all substances with corrosive or burning potential, not just chemically defined acids.
- **Extent of Harm:** The provision criminalizes the attempt regardless of whether the harm is irreversible. This progressive inclusion protects victims even in cases of unsuccessful attacks.
- **Punishment:** The minimum punishment is **five years of imprisonment**, extendable up to **seven years**, along with a **mandatory fine**³⁶.

Explanation 1:

For the purposes of Sections 326A and 326B of the Indian Penal Code, the term "*acid*" is to be interpreted broadly. It includes any substance—regardless of its chemical nomenclature—which possesses **acidic, corrosive, or burning properties**, and which is **capable of causing bodily injury** that may result in **scarring, disfigurement, or temporary or permanent disability**. This definition ensures that the legal framework covers a wide range of harmful substances beyond just conventional or laboratory-defined acids, thereby closing potential loopholes in prosecution.

Explanation 2

In determining the offence under Sections 326A and 326B, it is not necessary that the **damage or deformity caused** be **irreversible**. The law recognizes **permanent or partial harm**—including burns, scars, and disfigurement—as sufficient, irrespective of whether medical intervention can later reverse the effects.

³⁵ The Indian Penal Code, 1860 (Act 45 of 1860), s. 326A, Ins. by Act 13 of 2013, s. 5 (w.e.f. 3-2-2013).

³⁶ The Indian Penal Code, 1860 (Act 45 of 1860), s. 326B, Ins. by Act 13 of 2013, s. 5 (w.e.f. 3-2-2013).

1.9.2) Treatment and rehabilitation of survivors:

In recent legislative reforms, both the Bharatiya Nyaya Sanhita, 2023 (BNS) and the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS) have incorporated specific provisions to ensure the protection, treatment, and rehabilitation of acid attack survivors.

Penalty for Denial of Medical Treatment (Section 200, BNS):

Under the BNS, any individual who holds a managerial or supervisory role in a hospital—whether public or private, and irrespective of whether it is operated by the Central Government, State Government, a local body, or any private entity—shall be penalized if they fail to comply with the obligation to treat victims as mandated under Section 449 of the BNSS. The prescribed punishment includes imprisonment for up to one year, or a fine, or both. This provision seeks to ensure that no victim of acid violence is denied emergency medical care due to institutional negligence.

Compensation to Victims (Section 396, BNSS):

The BNSS stipulates that victims of acid attacks are entitled to receive a minimum compensation of ₹3,00,000 from the respective State Government or Union Territory. This amount is intended to aid the victim's recovery, rehabilitation, and long-term aftercare.

Free Medical Treatment (Section 397, BNSS):

The statute further provides that complete medical care, including surgeries, medications, and hospital stays, must be made available free of charge to acid attack survivors in both government and private hospitals. Importantly, the cost of such medical treatment shall be exclusive of and not adjusted against the monetary compensation awarded under Section 396.

Reserved Beds in Hospitals:

Recognizing the prolonged medical attention required—often involving multiple reconstructive and plastic surgeries—State Governments are encouraged to reserve at least one or two dedicated hospital beds in private medical institutions specifically for acid attack patients.

Social Reintegration and Rehabilitation Support:

To promote the holistic rehabilitation of survivors, States are also advised to implement social integration programs. Such initiatives may include funding and support for Non-Governmental Organisations (NGOs) that specialize in providing long-term care, vocational training, psychological counseling, and rehabilitation services tailored to the specific needs of acid attack survivors.

1.9.3) Laws on Regulation of Acid sale:

- **The Poisons Act, 1919**³⁷: Following increased incidences of acid attacks, particularly those targeting women, the legal regulation of acid sales has become a matter of urgent public interest. In a landmark judgment delivered in 2013, the Supreme Court of India, while adjudicating in *Laxmi v. Union of India*, directed both the Union and State Governments to formulate and implement regulatory mechanisms to control the sale of corrosive substances, particularly concentrated acids.
- Pursuant to these directions, the **Ministry of Home Affairs (MHA)** issued an advisory to all States and Union Territories to regulate acid sales under the framework of the **Poisons Act, 1919**, a central legislation enacted to control the import, possession, and sale of substances classified as poisons. In response, the MHA framed the **Model Poisons Possession and Sale Rules, 2013** under the authority of the Poisons Act, thereby providing model guidelines for States, which were urged to adopt or adapt them within their local jurisdictions, since the subject falls within the **State List (Entry 6)** of the Seventh Schedule to the Constitution of India.

Under this regulatory framework, several important safeguards were introduced:

- **Mandatory Record-Keeping**: Retail sale of acid is prohibited unless the seller maintains a **logbook or register** documenting each transaction. The record must include the **purchaser's name and address**, the **quantity sold**, the **purpose of purchase**, and the **date of transaction**. These records are subject to inspection by administrative authorities.
- **Age Verification and Identity Proof**: Sale of acid is restricted to individuals above **18 years of age** and only upon presentation of valid **government-issued photo identification**, including proof of residence.
- **Declaration and Confiscation of Stock**: Acid vendors are required to **declare their stock to the Sub-Divisional Magistrate (SDM)** within 15 days. Failure to comply empowers the SDM to **confiscate the undeclared stock** and impose a **fine of up to ₹50,000**, as stipulated under the Poisons Act, 1919.
- **Institutional Storage Protocols**: Organizations such as **educational institutions, research bodies, hospitals, and government departments** that require acid for lawful purposes must **maintain a usage register** and **submit reports** to the SDM at regular intervals.

³⁷ The Poisons Act, 1919 (Act 12 of 1919) .

- **Accountability Measures:** Each institution must designate a **responsible officer** to oversee the **storage, use, and monitoring** of acid. Additionally, compulsory **exit checks** must be conducted to prevent unauthorized removal or misuse of the substance.

1.9.4) NALSA (Legal Services to Victims of acid attacks) Scheme, 2016³⁸:

The National Legal Services Authority (NALSA), constituted under the Legal Services Authorities Act, 1987, is mandated to ensure that justice is accessible to every individual, especially those belonging to disadvantaged or marginalized sections of society. In furtherance of this aim, NALSA launched a dedicated scheme in 2016 to support individuals who have suffered acid attacks, offering them legal, medical, and rehabilitative assistance.

Objectives of the Scheme

- **Strengthening Legal Representation:**

The scheme was designed to improve legal aid mechanisms for acid attack survivors at various levels—national, state, district, and sub-district—ensuring that they receive appropriate legal support and are able to assert their rights under law and benefit from compensation schemes.

- **Ensuring Medical and Rehabilitation Support:**

One of the major goals of the scheme is to help victims access proper medical treatment and post-treatment rehabilitation. This includes both immediate care and long-term assistance aimed at physical, psychological, and social recovery.

- **Identifying Policy Gaps:**

The scheme promotes the study of existing laws and welfare policies affecting acid attack survivors to identify areas where improvements are needed. This research helps highlight the practical difficulties survivors face while seeking help.

- **Expanding the Legal Aid Network:**

Efforts are made to increase the number of trained professionals—such as panel lawyers, paralegal volunteers, police personnel, and members of civil society organizations—who are equipped to handle such sensitive cases with the required knowledge and compassion.

- **Training and Sensitization:**

The scheme emphasizes conducting workshops and training programmes aimed at

³⁸ NALSA (Legal Services to Victims of acid attacks) Scheme, 2016 *available at* <<https://nalsa.gov.in>> (Last visited on 12th June 2025.)

sensitizing key stakeholders such as legal professionals, police, and healthcare workers. These sessions aim to foster understanding of the trauma that victims endure and to encourage victim-centric support.

- **Raising Awareness:**

Another key aspect is spreading public awareness about the legal rights and available support mechanisms for acid attack survivors. This includes community outreach efforts, distribution of informational materials, and engagement with media to build public sensitivity on the issue.

1.10) Judicial Interpretations:

Gulnaaz Khan V. State of Uttarakhand & Ors. (WP No. 26/2019)³⁹:

In this writ petition, the petitioner—a survivor of an acid attack—sought monetary compensation amounting to ₹50,00,000 for the grievous physical and psychological harm she had suffered. She also requested the issuance of a writ of mandamus directing the government to formulate a comprehensive rehabilitation scheme and ensure that her future medical treatment expenses were paid directly to the hospitals concerned. Additional reliefs were also sought.

Factual Background:

The incident took place on November 29, 2014, when the petitioner was attacked with acid, resulting in third-degree burns to her face, chest, and upper body. She sustained nearly 60% burn injuries and lost her right ear. The accused was tried and convicted under Section 326A of the Indian Penal Code by the Sessions Court at Udham Singh Nagar and sentenced to ten years of rigorous imprisonment with a fine of ₹20,000. The Sessions Judge also recommended the matter to the District Legal Services Authority (DLSA) for compensatory relief, following which the petitioner was awarded ₹1,60,000 by the District Programme Officer.

Court's Observations:

The Court held that the petitioner's fundamental right to live with dignity under Article 21 of the Constitution had been seriously violated. Based on the recommendations of the Uttarakhand State Legal Services Authority (UKSLSA), the Court acknowledged that ₹23,00,000 should be granted to her in addition to vocational support. Referring to Section 19 of the Rights of Persons with Disabilities Act, 2016, it was also suggested that she be provided with skill development or self-employment support by the government.

³⁹ Available at <www.casemine.com/judgement.in> (Last visited on 12th June 2025).

Judgment:

Taking into account all aspects, including her academic qualifications and employment with Flipkart, the Court determined that a total compensation of ₹35,00,000 was appropriate and just. Furthermore, it directed that she be provided with free and continued medical treatment, including advanced surgeries such as skin grafting. If such treatment was not available in hospitals within Uttarakhand, the State was mandated to facilitate treatment in premier institutions such as PGI Chandigarh or hospitals in New Delhi. All expenses—including travel and accommodation for both the petitioner and her attendant—were to be borne by the State Government. The Court instructed UKSLSA to transfer the compensation amount to the petitioner via RTGS/NEFT after the expiration of the appeal period. The writ petition was accordingly allowed.

Parivartan Kendra vs. UOI & Ors. (WP (CIVIL) No. 867/2013)⁴⁰ :**Facts**

In this case, the petitioner, Parivartan Kendra, a registered NGO, approached the Hon'ble Supreme Court of India by filing a Public Interest Litigation under Article 32 of the Constitution. The matter involved two young Dalit sisters from Bihar who were subjected to a heinous acid attack on the night of 21st October 2012. The assailants, four local men, had been harassing the elder sister for some time by making obscene comments, following her to work, and issuing threats when she refused to accept their demands for sexual relations. While the sisters were sleeping on the rooftop of their house, the attackers threw acid on them — causing serious injuries, particularly to the elder sister's face and body, and burn injuries to the younger sister's arms.

Following the incident, the girls were taken to Patna Medical College, but due to alleged medical negligence, they did not receive immediate or proper treatment. The family had to bear the expenses for medicines and care, which amounted to around ₹5,00,000. The State provided financial assistance of ₹2,42,000, which was deemed grossly inadequate. It was also alleged that the police were reluctant to file a timely complaint, reflecting caste-based discrimination.

Issue

The central issue raised in the petition was the inadequacy of legal safeguards, enforcement mechanisms, and compensation schemes for acid attack victims, especially in light of the Supreme Court's earlier directions in *Laxmi v. Union of India*. The matter also questioned the

⁴⁰ *Parivartan Kendra vs. UOI & Ors*, AIR 2015 SCW 6597.

lack of accountability in regulating the sale of acid and failure of state institutions to uphold victims' rights to medical care, rehabilitation, and financial aid.

Judgment

The Supreme Court, after examining the facts and legal arguments, reaffirmed the principles established in the *Laxmi* judgment. It ruled that ₹3,00,000 must be the minimum compensation awarded to acid attack victims under the Victim Compensation Scheme framed under Section 357A of the Code of Criminal Procedure, 1973. In the present case, considering the gravity of the injuries and circumstances, the Court directed the State to pay ₹10,00,000 as compensation to the elder sister and ₹3,00,000 to the younger sister.

Further, the Court emphasized the failure of state authorities in regulating acid sales and instructed strict compliance with the earlier guidelines. It also ordered that acid attack victims be included in the disability list to ensure their access to long-term support and government welfare schemes. The Court strongly condemned the systemic negligence and reiterated that the right to life under Article 21 includes the right to live with dignity, receive free medical aid, and be rehabilitated appropriately.

Ravinder Singh Vs. State of Haryana Ors. (1975⁴¹)

Facts : Husband (Ravinder Singh) asked her wife to give divorce to him long back. The husband is having affairs with another woman, so he wants divorce to his wife. The wife refused to give divorce to him. And she got to know that his husband was having extra-marital affairs. She had ignored and also refused to give divorce to her husband. The husband did not like that she refused to give him divorce when he asked. The husband used a weapon like acid and threw it on her face. As a result of the acid attack, the deceased suffered serious injuries and fell to the ground. And later, the wife of Ravinder, she died. He had charged under section 302 of IPC. The act of the husband caused death and throwing acid is illegal.

Judgement: The accused was prosecuted under Section 302 of the Indian Penal Code for the offence of murder. Notwithstanding the fact that the victim succumbed to her injuries, the sentence of life imprisonment was not imposed. As the incident occurred prior to the legislative amendments introduced in 2013, the specific statutory provisions pertaining to acid attacks were not applicable in the present case.

⁴¹ *Ravinder Singh Vs. State of Haryana* (1975) 3 SCR 453.

State Of Maharashtra V. Ankur Panwar (2019⁴²)**Facts of the Case:**

The victim, Preeti Rathi, a 23-year-old aspiring nurse, hailed from the Bhakra Beas Management Board Colony in New Delhi. A bright and ambitious young woman, she had been selected for a position as a staff nurse at INHS Asvini, a naval hospital in Colaba, Mumbai.

The accused, Ankur Panwar, was Preeti's neighbor, an unemployed hotel management graduate. He had previously proposed marriage to Preeti, but she had politely declined, expressing her desire to focus on her professional goals. This rejection, coupled with his growing jealousy of her success, led to deep resentment. His parents often compared him to Preeti, further fueling his frustration and inferiority complex.

On the day of the incident, Preeti boarded the Maribharat Express to Mumbai and arrived at Bandra Terminus. As she deboarded the train, Ankur Panwar approached her, tapped her shoulder, and when she turned around, he threw acid directly onto her face. The assault caused severe injuries, and despite being hospitalized, Preeti succumbed to her wounds after a month-long battle for survival.

Judgment:

The case was tried before the Special Court for Women under Judge A.S. Shinde. Recognizing the brutality and premeditated nature of the crime, the court initially awarded the death penalty to the accused, invoking the gravity of the offense and its impact on society. This case was notably one of the first acid attack cases in India resulting in the death of the victim.

However, upon reconsideration in light of Supreme Court precedents emphasizing restraint in awarding the death penalty (reserving it for the "rarest of rare" cases), the sentence was commuted to life imprisonment.

Additionally, the court imposed a fine of ₹50,000, directing that the amount be paid as compensation to Preeti Rathi's parents, acknowledging their emotional and financial suffering.

Piyali Dutta vs State of West Bengal⁴³ :**Facts of the Case:**

In this case, Piyali Dutta, an acid attack survivor, approached the Chief Secretary of the State of West Bengal seeking an interim compensation of ₹3 lakhs to support her recovery and rehabilitation. Despite her written plea, she received no response from the state authorities. Left

⁴² *State of Maharashtra v. Ankur Narayanlal Panwar* 2019 SCC On line Bom 968 : (2019) 2 AIR Bom R (Cri) 753.

⁴³ Available at <<https://indiankanoon.org/doc/21784779/>>(Last visited on 13th June 2025).

with no other remedy, she was compelled to file a writ petition before the Calcutta High Court, invoking the court's constitutional jurisdiction.

Judgment

During the proceedings, the West Bengal State Legal Services Authority (SLSA) intervened and argued that no compensation could be granted in her case, as the acid attack had occurred in 2005, which was prior to the 2009 amendment to the Code of Criminal Procedure (CrPC) that introduced Section 357A, and before the 2013 Supreme Court decision in *Laxmi v. Union of India*, which recognized the right of acid attack survivors to financial assistance.

However, the Calcutta High Court rejected this narrow interpretation. It observed that under the West Bengal Victim Compensation Scheme, 2017, both the State and District Legal Services Authorities have the power to award compensation even in cases where the crime occurred before the enactment of Section 357A, provided the survivor is still in need of rehabilitation.

The Court directed the appropriate authority to consider her claim under Section 357A (4) of the CrPC. As a result, in February 2018, Piyali Dutta was finally awarded ₹3 lakhs as compensation for the physical and psychological trauma she had endured.

Devanand v. State:

In this case, the accused threw sulphuric acid on his own wife while she was residing at her parental home. He had allegedly tried to force her into sexual intercourse, and upon her refusal, he attacked her with acid, targeting her face. As a result of this horrific act, the victim lost vision in one of her eyes, suffering permanent and life-altering injuries. Taking serious note of the brutality and the irreversible harm caused, the Court sentenced the accused to seven years of rigorous imprisonment, holding him accountable under the relevant provisions of criminal law.

Story of Delhi Dwarka Acid Attack : In a shocking incident that shook the capital, a young Class 12 student became the victim of a brutal acid attack in the Dwarka Mor area of Delhi. The attack occurred on the morning of December 14, just moments after she stepped out of her home to head to school. Accompanied by her younger sister and standing near the Dwarka Metro station, the girl was suddenly targeted by two masked assailants on a motorcycle, who flung acid on her before fleeing the scene.

The attack left the teenager with severe injuries, especially to her face and eyes, with doctors later confirming 7 to 8 percent burn injuries. She was rushed to Safdarjung Hospital, where she

began receiving intensive medical care.

Police investigations quickly identified three individuals involved in the heinous act. The prime accused, Sachin Arora, along with his accomplices Harshit Aggarwal (19) and Virender Singh (22), were arrested in connection with the attack. During the inquiry, electronic evidence revealed that the acid used had been purchased through an online platform — Flipkart. This raised serious questions, as the Supreme Court had already imposed a ban on the over-the-counter sale of acid due to its misuse in such crimes.

Law enforcement authorities have since questioned Flipkart officials, holding them accountable for allegedly allowing the sale of the restricted substance on their platform. The matter has also drawn national outrage, prompting immediate responses from both the National Commission for Women (NCW) and the Delhi Commission for Women (DCW).

DCW Chairperson Swati Maliwal strongly condemned the incident, criticizing the central government for not taking sufficient measures to prevent such attacks. She pointed out that despite repeated warnings, recommendations, and demands to regulate acid sales, it remains easily accessible — "as freely as vegetables" — posing a continuous threat to public safety, especially for women.

This tragic case has once again brought to light the urgent need for strict enforcement of laws regulating acid sales and the implementation of stronger protection mechanisms for women in India⁴⁴.

1.10.1) Success story of Indian women :

- **Anmol Rodriguez:** Anmol Rodriguez was just two years old when her father, in a horrific act of violence, threw acid on her mother, resulting in her mother's death. At the time, Anmol was in her mother's lap and suffered severe injuries as acid droplets trickled onto her. The attack left her with serious burns, the loss of one eye, and permanent disfigurement of her face. After the tragedy, Anmol was placed in an orphanage, where she struggled with social interactions and faced difficulties in connecting with others. As she grew older, she continued to face challenges, including workplace discrimination, which led her to resign from her job. Despite these obstacles, Anmol refused to let her trauma define her. She reinvented herself and emerged as a symbol of strength and confidence. Today, she is a fashion icon, having modeled for various Instagram platforms and YouTube channels. She is also the face of an online nightwear brand, proudly representing confidence and beauty

⁴⁴ Sharangee Dutta , "Delhi acid attack : Accused bought substance online , claim police" , *Hindustan Times* , Dec .14, 2022 available at < <https://www.hindustantimes.com/>> (Last visited on 13th June 2025) .

beyond conventional norms. Anmol's words echo her indomitable spirit: "*Acid can only change our face, not ruin our soul. We are the same inside out, and we should accept ourselves for who we are and live our lives happily*⁴⁵."

- **Madhu Kashyap** : Over two decades ago, Madhu became the victim of a brutal acid attack when a man threw acid on her face. The attack caused severe damage—melting the skin on her forehead and cheeks, and leaving her blind in one eye. For years, she lived in fear and isolation, unable to show her face in public. The visible scars not only affected her confidence but also denied her employment opportunities. She was repeatedly told that her appearance was unsuitable for front-facing roles. However, Madhu's life took a positive turn in 2016 when she joined *Sheroes Café*, a café run by acid attack survivors. Working as a waitress, she began interacting with customers from around the world. Tourists often visit the café and take photographs with the staff, helping Madhu shed her shame and embrace her identity with pride. Today, she no longer hides behind her scars. Instead, she stands tall as the sole breadwinner of her family, supporting her husband and three children. Madhu's journey is a testament to resilience and the power of opportunity in transforming lives⁴⁶.

1.11) Conclusion:

Acid attacks have devastating and long-lasting consequences on the lives of victims. The physical injuries are often accompanied by deep emotional trauma, leading to social withdrawal, embarrassment, and a profound loss of confidence. Many survivors become too traumatized to step outside their homes or perform basic tasks, let alone pursue goals such as education, employment, marriage, or motherhood. Even when they attempt to resume a normal life, they often face discrimination and rejection from society due to the visible scars and disabilities caused by the attack.

These earth-shattering incidents often leave victims unable to work or secure employment, pushing them into financial hardship. Their entire world changes drastically post-attack. Hence, to effectively combat such crimes, stringent punishments must be imposed on offenders so that the consequences of their actions are deeply felt. Moreover, society must recognize and address the hidden violations of human rights that are rooted in patriarchal and regressive cultural norms.

Justice must extend beyond compensation for physical harm—it must also acknowledge the

⁴⁵ *Supra* note 25 at 45

⁴⁶ *Ibid.*

psychological and emotional toll acid attack survivors endure. Unfortunately, despite a rise in such crimes, many government laws and schemes remain ineffective. While they appear promising on paper, their actual implementation is weak. A critical review of the existing rehabilitation schemes and Supreme Court directives reveals that although a legal framework exists, it lacks robust enforcement. The reality is that the administration's response often fails due to apathy and lack of social awareness.

Trupti Panchal, a member of a special cell under the Tata Institute of Social Sciences (TISS), rightly pointed out that, "the scheme rings a bell, but in the absence of substantial groundwork, it is currently just on paper." This reflects the gap between policy and practice. Moreover, the insensitivity of both media and society further victimizes survivors, adding to their suffering rather than supporting their recovery.

Legal provisions alone cannot provide effective relief and rehabilitation. Survivors need holistic support—emotional, financial, psychological, and legal. This includes assistance from family, friends, counselors, government agencies, and even the police, who often act as the first point of contact. There is an urgent need to educate law enforcement and members of society to become more empathetic and sensitive to the issue.

Additionally, establishing a dialogue between the offender and the survivor—only on a voluntary basis—can sometimes help survivors express their pain and begin to heal emotionally. However, this must never be a substitute for justice or accountability.

To illustrate the ineffectiveness of current measures, consider data presented by the Union Home Ministry in Parliament. Between 2018 and 2022, 386 cases of acid attacks on women were officially registered. While this number may appear lower than expected, it could be due to underreporting during the COVID-19 pandemic. In contrast, between 2014 and 2018, 1,483 acid attack cases were reported—an average of around 370 per year⁴⁷.

What's more alarming is the low conviction rate. In 2016, only 10 people were convicted; in 2017, 15 were convicted out of 442 cases; and in 2018, only 19 convictions occurred out of 523 cases⁴⁸. These figures highlight a major gap in the criminal justice system's ability to deliver timely and effective justice.

Despite a 2013 Supreme Court judgment in *Laxmi v. Union of India*, which brought acid under the Poisons Act of 1919, enforcement remains weak. The judgment mandated that acid sales be strictly regulated—shops must maintain a sales register, verify the buyer's identity, and keep

⁴⁷ "India sees over 100 acid attack cases every month", *The Sunday Guardian*, December 17, 2022, available at < <https://sundayguardianlive.com> >, (Last visited on 13th June 2025).

⁴⁸ *Ibid.*

records of inventory. However, ground reports, such as one by the Delhi Commission for Women in 2016, revealed that many shops were still selling acid without asking for ID proof. So, we can say how implementation of laws is made⁴⁹.

Furthermore, the attitude of police authorities has been questionable for low reporting of the crime of such type. It has created the fear among the victim and their families which stop them to take the legal help altogether and they end up not filing case against the wrongdoer. And if any of the victim attempts to take the legal course, they are harassed by many types of the context questions which attempt to defame them by questioning their morality staying out late at night, being with friends, the way they dress up, which are not only unreasonable but causing shock to the common sense⁵⁰. So, this type of factors led to unrecording of many cases. Most of the victims of the acid attacks are adult, aged 20-25 years, but there have been many scenarios where even the children were not spared from the clutches of such heinous crime. Behaviour of the law enforcements in many ways have resulted in lag of the judicial processes which totally hampers the role of justice⁵¹.

1.12) Recommendations

The following are some recommendation which we would like to highlight after conduction this research:

1. As if we talk about the making of laws with regard to such heinous crime first question that arises in our mind is that Are Laws which are made by Government sufficient to deal with this heinous crime? We think that after Criminal Law Amendment Act, 2013 our government has taken a very wider step to curb out this problem by declaring it as a separate crime under Section 326-A and Section 326-B of Indian Penal Code (Now Bhartyia Nyaya Sanhita, 2023). But the problem which remains in our society is the proper Implementation of that paper written rules and regulations.
2. The person who are victim of such heinous crime should come forward to file a complaint against the accused person as while writing this research paper we found that no particular data of Acid attack cases is available. The major reason behind the same is that the people do not come forward in fear that society would criticize them only and as a result they live in a mental stress which impacts their whole life. For, citing the same recommendation we

⁴⁹*Ibid*.

⁵⁰ *Supra* note 18 at 50

⁵¹ *Supra* note 19 at 51.

- would like to suggest that the victims to have a strong attitude like Laxmi an acid attack victim who came forward and her strong attitude led to a great change in our legal history.
3. After 2013 government has banned the counter sale of acid but while research, We came through a real-life story of a victim from Delhi famously known as Delhi's Dwarka Acid Attack Case in which even after the major amendment regarding the sale of acid the person had openly purchased the acid from online shopping website. This type of instances really Questions the implementation of laws by Government. So, we think government should positively and strictly implement the laws as at present they are only paper written.
 4. A person who comes across such a big struggle should be provided with a good behaviour by the society and victims own family as if we normally see the instances which are happened so ago, the person is already a victim of a crime but due to this negative behaviour of society victim has to come across different scenario which society gives. So, we strongly believe that there is a need to change the mindset of the society.
 5. The government has taken progressive steps by introducing various laws and schemes, including restrictions on acid sales, stricter punishments for offenders, and ensuring free healthcare access for acid attack survivors. While these efforts by lawmakers are noteworthy, the core emphasis must shift towards prevention. To achieve this, measures such as empowering NGOs and launching widespread campaigns through electronic, print, and social media should be adopted to challenge and transform the deep-rooted sociocultural norms that perpetuate violence against women.
 6. In severe offences like acid attacks, survivors often experience intense trauma and emotional shock, which can lead to social withdrawal, feelings of shame, and a lack of trust in others. Many victims also struggle with self-blame, especially when the perpetrator is someone they knew. Alongside the existing compensation schemes, a voluntary *restorative mediation* process could be introduced, involving the survivor (and sometimes their family) and the offender. This would provide a space for the survivor to express their pain directly to the person responsible, potentially helping them release negative emotions and take meaningful steps toward emotional healing and moving forward in life.
 7. Provisions must be established to ensure the employment and rehabilitation of acid attack survivors, as they often face not only physical and emotional trauma but also financial instability.
 8. The law should explicitly state that mediation is not applicable in cases related to acid attacks. As this is one of the reason that many cases are unreported as people solve it out of court of law and the wrongdoer is not punished for the same.

9. While the government at times provides substantial compensation to victims, it is essential to recognize that the effective implementation of any law requires a dedicated budget. This includes funding for infrastructure, trained personnel, and awareness initiatives. Both the Central and State governments must actively allocate resources and prioritize these aspects to ensure the law is enforced meaningfully.
10. After all this research, we find that some rehabilitation schemes should be made so that the victim can come out of fear and have a happy life. As providing compensation is not enough.
11. For providing complete justice, required is that the policy makers and legislators should provide them to take part in the process of redress. In other words, it should not be a one-sided decision
12. The administration should be monitored by statutory bodies like the National Commission for Women, working in coordination with both governmental and non-governmental organizations.
13. Regular awareness campaigns and sensitization programs must be conducted to help prevent future incidents. Most importantly, social inclusion is crucial for the rehabilitation of acid attack survivors. They can truly rebuild their lives only with the compassion, encouragement, and support of their families, friends, colleagues, and the broader community.

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