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LAWS RELATING TO DOG BITES IN INDIA. **(APPEARANCE AND REALITY)**

AUTHORED BY - KANAD YADAV

I. INTRODUCTION

“The greatness of a nation and its moral progress can be judged by the way its animals are treated.”

— Mahatma Gandhi

Dogs are typically thought of as man's best friend because of their loyalty, but recently, where there has been an upsurge in dog bites, people are beginning to look at them with fear and distrust on the streets and in their homes. Article 21 of the Indian constitution guarantees us the right to life and personal liberty which includes the right to live in a fear free environment, this right has been infringed by the menace caused by the stray dogs around the street. This research is focused on the various laws which have been enacted to deal with the perils of dog bites. The research is divided into different chapters. The chapters are as following:

HISTORICAL SETTINGS

To go into the depth of the subject ,it is always necessary to find its traces in history.

PROTECTION OF DOGS: A CROSS JURISDICTIONAL STUDY

This chapter inquires into laws of different countries relating to dogs. **LEGAL FRAMEWORK FOR DOGS IN INDIA**

In this chapter we will have a look at the legislation we have for dogs. **CONCLUSION**

This chapter of the paper tells about the measures to be taken for efficient working of the laws.

Dogs bite cases widely need to be addressed to draw attention of the government to the rising cases of dog bites and measures to be taken by them to reduce it.

II. HISTORICAL SETTINGS

To begin our study of dogs it will be good to start with the history of dogs in connection with humans. We should know the purpose and importance of dogs in ancient times. Quran sharif tells us about the position of dogs in muslim community and similarly the bible and hindu mythology is useful to know the position of dogs in respective religion.

1. Scriptures

As per Quran

There are two mentions of dogs in the Quran. The first is in Surah Al-Maidah. In short, Allah says it is permissible to eat that which the dog has hunted for you. The second mention of Dogs from The Quran is found in Al-Kahf. This Surat, tells a story of a child who was protected by a dog that was guarding the entrance of a cave¹.

As per the Bible:

Matthew 7:6

6 “Do not give dogs what is sacred; do not throw your pearls to pigs. If you do, they may trample them under their feet, and turn and tear you to pieces.

Philippians 3:2

2 Watch out for those dogs, those evildoers, those mutilators of the flesh².

As per Hindu mythology

The Rigveda contains the oldest reference to dogs. In the Rigveda, we learn about a bitch named Sarama who is Indra's servant and aids in the search for the Panis' theft of Indra's cows. So, Sarama could be thought of as Indra's hunting dog or watchdog. All dogs in the world are thought to be descendants of Sarama, whose offspring are known as the Sarameya. The Rigveda specifically refers to Shama and Shabala, the two offspring of Sarama who are four-eyed beasts who are frequently associated with Yamaraj³. Dogs have been discovered in Harappan civilization seals. People buried with dogs can be found in burial sites that date back to the Harappan civilization. This would suggest that dogs have been a beloved domesticated species in

¹ Ahmed Abdulla, Islam teaching, my Islam, <https://myislam.org/are-dogs-haram/>

² Bible verses about dogs, bible study tools (aug.23,2019), <https://www.biblestudytools.com/topical-verses/bible-verses-about-dogs/>

³ Devdutt Pattnaik, dogs of the gods, Devdutt (april.28,2019, mid-day), <https://devdutt.com/articles/dogs-of-the-gods/>

India for a very long period.

2. Nomadic to pasture, the utility of dogs

In a nomadic period when people were supposed to move from place to place in search of food, they were accompanied by their dogs for their safety. They used to keep dogs to protect their belongings and children safe from any unforeseeable intrusion. Dogs play a vital role in their life, the cattle of the nomadic people were protected by them. This gradually increased the importance of dogs. The trend can also be seen in the present time, where people keep dogs to protect their property.

III. PROTECTION OF DOGS: A CROSS JURISDICTIONAL STUDY

1. UNESCO

The first Universal Declaration of Animal Rights was adopted in 1978, making it a landmark year for animal rights. This crucial report was written by the International League for Animal Rights and presented to a UNESCO committee in an effort to promote stricter animal protection regulations. This movement recognized the notion that animals have an equal right to exist as we do, among many other things it accomplished for animal rights.

2. The animal welfare act, 1966(USA)

In 1966, Congress passed legislation that later became known as the Animal Welfare Act (P.L. 89-544) with goals of preventing the theft and sale of pets to research laboratories and regulating the humane care and handling of dogs, cats, and other laboratory animals.

Covered Animals and Animal Use

The AWA applies to any live or dead warm-blooded animal, including dogs, cats, nonhuman primates (e.g., lemurs, monkeys, apes), guinea pigs, hamsters, and rabbits determined by USDA to be used for research, exhibition, or as a pet. Covered animals include warm-blooded zoo animals (e.g., tigers, red pandas, and gorillas) and captive marine mammals (e.g., orcas, narwhals, and polar bears). The AWA covers birds not used for research, but as of July 2022, USDA has not finalized its proposed rule to establish regulatory standards for birds.⁷ The AWA's statutory definition of animal excludes birds, rats, and mice bred for research; horses not used for research; and other farm animals used in the production of food and fiber.⁸ Cold-blooded animals (e.g.,

fish, reptiles, crustaceans) are not covered under the AWA.

Importing Dogs for Resale

The AWA establishes specific requirements for the importation of dogs intended for resale in the United States (7 U.S.C. §2148), except for dogs intended for research or veterinary treatment. Dogs imported for resale must be vaccinated and healthy. They also must be at least six months old, except in the case of importation from certain countries into Hawaii⁴.

3. Laws relating to dogs in the UK

In the UK there is various legislation made for the protection of dogs and also for the protection of civilians from dogs. These laws make the owner of the dogs liable for negligence on their part.

Following is the legislation enacted relating to dogs in the UK:

1. Dogs act 1906 - according to section 1 of this act, the owner must be held liable for the injury caused to cattle by his dogs. Section 3 of this act talks about the seizure of stray dogs.
2. Dangerous dogs act 1991- this act is related to dangerous dogs which may be a threat to people and which are bred for fighting.⁵

IV. Legal framework for dogs in india

1. INDIAN CONSTITUTION

The Indian Constitution honors the existence and welfare of animals by establishing the responsibility of all Indian citizens to respect and have compassion for all living things.

General protection of animal rights is provided under the Indian Constitution. It is a fundamental duty in Article 51A (G) to protect wildlife and to show compassion for all living things.

Article 48 mandates that the State prepares agriculture and animal husbandry on contemporary, scientific lines, takes action to preserve and enhance breeds, and forbids the slaughter of cows and their calves as well as the use of cattle for drought.

⁴ Genevieve K. Croft, The Animal Welfare Act: Background and Selected Issues, Congressional Research Service(19 July,2022),<https://crsreports.congress.gov/product/pdf/R/R47179>

⁵ legislation.gov.uk,Legislation.gov.uk,12 dec,2022

The State is required by Article 48A to preserve, conserve, and improve the nation's forests and animals.

LEGISLATIVE POWER

Article 245 of the Indian constitution confers the power of parliament to make laws for the whole part of the territory of India, the territory of India includes the territory of states, union territory, and other territories which may be acquired. Also, the state legislature is empowered to make laws for the whole or any part of the state.

Article 246 of the constitution lays down the subject matter on which parliament and state legislature can make laws. This subject matter is distributed in three lists contained in the seventh schedule:

1. Union list - The Parliament has exclusive power to make laws concerning the matters enumerated within this list.
2. The State List: For the things included in this list, only state legislatures have the authority to enact laws.
3. Concurrent List: The State Legislatures and the Parliament both have the authority to enact laws about the topics listed here.

The State and Concurrent List have the following items assigned to it about animal rights.

Under Item 14 of the State List, the States are given the authority to "[p]reserve, maintain and improve stock and prevent animal diseases and enforce veterinary training and practice."

Both the Center and the States have the authority to pass laws on the Concurrent List regarding: "Prevention of animal cruelty" is item 17 on the list. The protection of birds and wild animals is item 17B.

2. LEGISLATION AND RULES

In India we have various laws for the protection of animals. The wild animals are protected by the wildlife protection act 1972. If we have laws for the protection of wild animals which are rarely seen in everyday life, the protection of the domestic animal is crucial because interaction with these animals is seen generally in day to day life. It is necessary to have a look on the laws

protecting the domestic animal. If any domestic animal cause injury to the people, who should be held liable? What are the remedies available to the victim? Answers to these questions can be given by the thorough study of the laws relating to domestic animals.

Domestic animal protection

The term domestic animal is defined in section 2(d), of the Prevention of Cruelty to Animals Act, 1960 which states that “domestic animal” means any animal which is tamed or which has been or is being sufficiently tamed to serve some purpose for the use of man or which, although it neither has been nor is being nor is intended to be so tamed.

For the protection of domestic animals, parliament has enacted the Prevention of Cruelty to Animals, Act of 1960

Section 4 of the act calls for the establishment of the Animal Welfare Board of India for the promotion of animal welfare generally and to protect animals from being subjected to unnecessary pain and suffering.

Section 38 of the act lays out the power to make rules, Section 38(1) of this act reads that the central government may, by notification in the official gazette, and subject to the condition of previous, make rules to carry out the purpose of the act.

PROTECTION OF DOGS

In India dogs are protected under the Prevention of Cruelty to Animals, Act of 1960, and rules made under section 38 of the PCA act of 1960, specifically, the Animal Birth Control(Dogs) rules, 2001.

In IPC under sections 428 and 429, there are punishments for a person hurting pet animals.

Article 51A(g) of the constitution speaks about the duty of the citizen to protect and improve the natural environment including forests, lakes, rivers, and wildlife, and to have compassion for living creatures.

NEED FOR PROTECTION OF DOGS

Taking note of the incident which took place recently in Ghaziabad, where a pet dog bites a boy inside the lift as its owner looks on instead of protecting the child, stray dogs are a public issue in India that need to be addressed properly. Similar incidents of dog bites have been recorded in countries where children were attacked by dogs. India has the largest number of stray dogs and the highest number of rabies cases in the world. Our government is very well aware of this situation but still, there is no solution for the menace caused by the stray dog.

RECENT INCIDENTS OF DOG BITES

Dog bite cases are increasing rapidly in the country. A schoolboy was attacked by a pet dog inside the lift of a Greater Noida housing society on Tuesday. The child, accompanied by his mother, was on his way to school. They were joined by a man and his pet dog inside the lift. CCTV footage shows the dog attacking the child, biting his hand before being subdued by its owner⁶.

PANCHKULA: A man has been booked after his pet dog attacked a group of people buying vegetables at Amravati Enclave. An Army officer who tried to stop the canine was also bitten by the dog.

In his complaint to the police, Lt Col R P Singh, a resident of Amravati Enclave, alleged that the Labrador was aggressive by nature and his owner Somvir kept it unchained, creating fear among other residents.

He claimed that around 10 am on Friday, the dog attacked people who were buying vegetables at a shop. When Lt Col Singh tried to help calm the dog, it struck him and bit him on his left arm. "This is the second time, this dog has bitten me without provocation."

Police have registered a case under Section 289 (Negligent conduct with respect to animal) of the IPC against the dog owner at Pinjore police station⁷.

According to livestock, as per the 2019 census dogs count 153.1 lakh in the country. Many states witness a rise in dog bite cases. The cases in the urban areas are greater in number as compared

⁶ NDTV, <https://www.ndtv.com/noida-news/video-pet-dog-bites-schoolboy-in-apartment-building-lift-in-greater-noida-3525048>, 17 dec, 2022

⁷ The times of India, Pet Dog Bites One, Attacks Others; Owner Booked | Chandigarh News - Times of India (Indiatimes.com), 17 dec 2022

to the ruler area. States have legislation to control the menace caused by dogs but the nuisance of dogs continues.

LIABILITY OF OWNERS OF DOGS

As per section 2(f) of the Prevention of Cruelty to Animals Act, 1960 owner, used in reference to an animal, includes not only the owner but also any other person for the time being in the possession or the custody of the animals, whether with or without the permission of the owner. The dog owner's liability means the responsibility of the owner to take care of the dog and to make sure that the dog does not cause injury to other people.

Section 3 of the act states the duties of persons having charge of animals.

A. Civil liability

The ownership of the dogs comes with the responsibility and accountability for its action and the damages caused by them. Under the common law if any person who owns or has control over the animal is held responsible for the damages caused by it to others. The owner or controller of the animal may be held liable under the ordinary law of torts for negligence towards the animal or towards others. If a person owns a dog and the dog bites the neighbor without any provocation then the owner will be held liable for his negligence in taking care of his dog. Most of the cases of dog bite cases are of strict liability where you don't have to prove negligence by the owner. The remedy in the torts will be compensation for the damages sustained by the person.

B. CRIMINAL LIABILITY

The owner of the dog can be held liable under section 289 of the IPC. According to section 289 whoever knowingly or negligently omits to take such order with any animal in his possession as is sufficient to guard against any probable danger to human life, or any probable danger of grievous hurt from such animal, shall be punished with imprisonment of either description for a term which may extend to six months, or with fine which may extend to six months, or with fine which may extend to one thousand rupees, or with both.

LIABILITY AND RESPONSIBILITY OF THE STRAY DOG

India has the largest number of stray dogs and the highest number of rabies cases in the world. If

a dog bites a person we can hold its owner liable, but who can be held liable if the injury is caused by the stray dog? Article 21 of the Indian Constitution guarantees the "Right to life" to its residents and requires state and local governments to maintain a secure and disease-free environment. The government has a responsibility to instruct the local authorities to protect public spaces, especially those with stray animals to prevent public nuisance. For the protection and management of the stray dogs, The Animal Birth Control (Dogs) Rule 2001 was published, as required under the sub-section (1) of section 38 of the Prevention of Cruelty to Animals Act, 1960.

Some of the important rule for the better understanding of our topic is given below

Rule 3. Classification of dogs and their Sterilization : (1) All dogs shall be classified in one of the following two categories (i) pet dogs, (ii) street dogs. (2) The owner of pet dogs shall be responsible for the controlled breeding, immunization, sterilization and licensing in accordance with these rules and the law for the time being in force within a specified local area. (3) The street dogs shall be sterilized and immunized by participation of animal welfare organizations, private individuals and the local authority.

RULE 4. FORMATION OF THE COMMITTEE

Rule 5. Functions of the Committee : The committee constituted under rule 4 shall be responsible for planning and management of dog control programmes in accordance with these rules. The committee may:

- a) issue instructions for catching, transportation, sheltering, sterilization, vaccination, treatment and release of sterilized vaccinated or treated dogs.
- b) authorize veterinary doctors to decide on a case to case basis the need to put to sleep critically ill or fatally injured or rabid dogs in a painless method by using sodium pentathol. Any other method is strictly prohibited.
- c) create public awareness, solicit cooperation and funding.
- d) provide guidelines to pet dog owners and commercial breeders from time to time
- e) get a survey done of the number of street dogs by an independent agency.
- f) take such steps for monitoring the dog bite cases to ascertain the reasons of dog bite, the area where it took place and whether it was from a stray or a pet dog.
- g) Keep a watch on the national and international development in the field of research pertaining to street dogs' control and management, development of vaccines and

cost effective methods of sterilization, vaccination, etc.

1. JUDICIAL APPROACH

Judiciary plays an indispensable role for protection of the animals, irrespective of their nature whether it is the wild animal or the domestic animal. The utmost importance given by the judiciary to protect animals is because they cannot express their suffering by words like humans. The judiciary supports and promotes animal rights in the same ways that they do for human rights because it is crucial to defend and protect animals from oppression, attack, and harsh treatment that they may be subject to at the hands of humans. It is the responsibility of the judiciary to place emphasis on animal rights because animal rights can be seen as the voice given to animals to interact and coexist with humans amicably. The judiciary played an important role in protecting domestic animals in INDIA. In **Prof Ajay Singh Rawat vs Union Of India & Others on 9 April, 2015** It was held that in the case of dog biting, victims of dog biting shall be paid compensation of Rs. two lacs, Rs. one lac by the Municipality and Rs. one lac by the State Government, within a week from the date of dog biting. We further direct that in the case of ape and monkey biting, the victim shall also be paid Rs. two lacs by the State Government⁸.

In **Kavita Prashant Magar vs The Additional Commissioner ... On 14 September 2016** it was contended by the plaintiff that the funeral place of the village was not in order and stray dogs had created problems at that place and there were cases of dog bites and complaints of 35 to 40 persons were received that they suffered due to dog bites at the funeral place. She contended that one lady, Sakwarbai Panditrao Magar had died due to dog bite. So for cleaning the place, urgent action was necessary and the work was given to one Bharat Madhukar Khairnar for that sand mixed with clay was also spread at funeral place the payment of Rs.44,000/- was made to said Khairnar. She contended that Gram Sabha had approved this work, though subsequently⁹.

In **All India Animal Welfare ... vs Brihanmumbai Municipal ... on 20 April, 2007** it was held by the Bombay High Court directed to build the shelter homes for the dogs. The said Dog Shelter Homes should have proper dog homes, veterinary Doctors to take care of the dogs and to carry out sterilization programmes, in an organized and effective manner¹⁰.

⁸ Prof Ajay Singh Rawat vs Union Of India & Others on 9 April, 2015

⁹ Kavita Prashant Magar vs The Additional Commissioner ... On 14 September 2016

¹⁰ All India Animal Welfare ... vs Brihanmumbai Municipal ... on 20 April, 2007

In **Manas Mandar Godbole versus The State of Maharashtra, 2023 LiveLaw (Bom) 10** it was held that the owners may treat dogs as their children but dogs aren't human beings and hence a person cannot be booked under Sections 279 and 337 of the IPC¹¹.

Recently, The **Telangana High** Court on Wednesday initiated a Public Interest Litigation (PIL) over the gruesome death of a five-year-old boy who was mauled to death by stray dogs in Hyderabad on Sunday.

The High Court blamed "negligence" on part of the Greater Hyderabad Municipal Corporation (GHMC) for the boy's death and asked the municipal body what steps are being taken to curtail incidents of stray dog attacks. The High Court expressed condolences for the five-year-old's death and assured that it would look into the matter of compensation for his family¹²

3. CONCLUSION

It is easier said than done in a country with 60-80 million dogs. It is unrealistic to expect a developing country like India to invest thousands of crores of rupees in infrastructure and deploy lakhs of people to catch dogs, operate on them, and care for them. Especially given that many areas of the country lack adequate public health infrastructure. Even if they are sterilized, dogs that continue to live on streets will still bite, chase people and vehicles, get into accidents, suffer from hunger and disease, and remain in conflict with people. Where resources are available, dog density will continue to increase, especially if people feed dogs on the streets. The only long-term solution is to implement strict pet ownership laws, prohibit people from carelessly feeding dogs everywhere, and set up facilities funded by animal welfare organizations that can either house dogs for life, or humanely euthanize them so they don't suffer on the streets. This policy is implemented across the world and was also espoused by Mahatma Gandhi over a century ago when he exhorted local authorities to build a pinjrapole for dogs or eliminate them altogether.

As long as dogs are homeless on the streets, the idea of a rabies-free India, with harmonious coexistence between people and dogs, will be a utopian dream. Keeping dogs homeless is bad for

¹¹ Manas Mandar Godbole versus The State of Maharashtra, 2023 LiveLaw (Bom) 10

¹² NDTV, <https://www.ndtv.com/telangana-news/high-court-blames-civic-body-after-hyderabad-boy-mauled-to-death-by-dogs-3807773> (last visited april. 2, 2023)

dogs, bad for people, and bad for wildlife.

