

The Implementation of Animal Laws in India: Navigating Compassion, Culture, and Contradictions

1. Evolution of Animal Laws in India

India's relationship with animals has had a long and varied history. Contemporary literature on the history of animal welfare in India often cites cultural and religious practices that revere animals or prescribe that no violence should be committed against them (e.g., Berti 2019; Sharma et al. 2019; Shad & Joglekar 2022), particularly ahimsa, or non-violence against all living creatures. One of the earliest examples of the practical implementation of principles is recorded in the rock edicts of King Ashoka, who, after his conversion to Buddhism, banned the imperial hunting of wild animals and restricted the use of animals for food (Draper 1998).

Later, during the colonial period, India saw conflicting attitudes towards animals and their use. On the one hand, an attitude of benevolent rule over purportedly childish, uneducated, and immature Indians extended to the animals that they used, as Indians were considered to be incapable of behaving towards them with kindness or tolerance (Chakrabarti 2010). On the other, the British committed large-scale exploitation of India's natural resources that included native wildlife and domestic animals; wildlife was commonly exterminated in state-sponsored drives from the 1880s onwards, and Indian stray or 'mongrel' dogs, though objects of empathy were hunted by the British using their own dogs and widely utilized for vivisection experiments (Chakrabarti 2010). Neither was there an attitude of concern for animal welfare that included all animals among Indians. For example, in the early 20th Century campaigns for protection of cows, which was primarily led by Hindus in opposition to Muslim and Christian practices of beef consumption, were shaped more by religious identity politics than by welfare concerns (Chakrabarti 2010).

It was the institution of the first Indian Society for the Prevention of Cruelty against Animals (SPCA) by a British resident of Kolkata in response to the suffering of 'labouring and domestic animals' that provided

the impetus for the first animal welfare legislation in India (Chakrabarti 2010). This was the 1869 Act for the Prevention of Cruelty to Animals for Bengal. Though later extended to the rest of India in 1890–1891, it only included draft and sport animals used by Indians, with no mention of British use of animals in research or sports (Chakrabarti 2010). Post-Independence, when Rukmini Devi Arundale, who revitalized Bharatanatyam in India and was the first woman to be nominated to the Rajya Sabha, pushed for more stringent legislation to sufficiently address cruelty to animals in 1954 (Berti 2019) the Prevention of Cruelty to Animals Act (PCA) was passed in 1960. It established the Animal Welfare Board of India (AWBI) as the statutory advisory body to the central government on animal welfare issues. Subsequent rules expanded its reach: the Application of Fines Rules (1978), Capture of Animals Rules (1979), and decentralization through the SPCA Rules (2001). More recently, the Animal Birth Control Rules, 2023 updated the regulatory regime for sterilization and vaccination of street dogs and cats, reflecting a modern public-health as well as welfare perspective. A proposed amendment to the PCA in 2022 seeks to strengthen penalties and introduce the concept of "gruesome cruelty", but has not yet been enacted.

Despite these developments, challenges persist. India is currently one of the largest producers of animal products in the world; it was the second largest producer of beef in 2023 (Fleck 2024), the second largest producer of eggs in 2023 (Poultry Products | APEDA, n.d.), and the largest producer of milk over two decades (Hussain 2020); it also has one of the largest dog populations in the world, of which the vast majority are stray or free-ranging (Gompper 2014). These raise pressing questions about the adequacy and reach of existing animal welfare laws.

2. Colonial Legacy, Comparative Acts, and Structural Gaps

The Prevention of Cruelty to Animals Act (PCA), 1960, draws heavily from British legislation, in some cases

Table 1. Comparison of selected passages from British and Indian animal welfare Acts. Underlined sections have identical meanings and/or are identically phrased.

Protection of Animals Act, 1911 (British)	The Prevention of Cruelty to Animals Act, 1960 (Indian)
<p>(Under ‘Definitions’, c) The expression “captive animal” means any animal (not being a domestic animal) of whatsoever kind or species, and whether a quadruped or not, including any bird, fish, or reptile, which is in captivity, or confinement, or which is maimed, pinioned, or subjected to any appliance or contrivance for the purpose of hindering or preventing its escape from captivity or confinement;</p>	<p>(Under ‘Preliminary’, 2.c): “captive animal” means any animal (not being a domestic animal) which is in captivity or confinement, whether permanent or temporary, or which is subjected to any appliance or contrivance for the purpose of hindering or preventing its escape from captivity or confinement or which is pinioned or which is or appears to be maimed;</p>
<p>(Under ‘Offences of cruelty’, a): (If any person) shall cruelly beat, kick, ill-treat, over-ride, over-drive, over-load, torture, infuriate, or terrify any animal, or shall cause or procure, or, being the owner, permit any animal to be so used, or shall, by wantonly or unreasonably doing or omitting to do any act, or causing or procuring the commission or omission of any act, cause any unnecessary suffering, or, being the owner, permit any unnecessary suffering to be so caused to any animal;</p>	<p>(Under ‘Cruelty to animals generally’, 11.a): (If any person) beats, kicks, over-rides, over-drives, over-loads, tortures or otherwise treats any animal so as to subject it to unnecessary pain or suffering or causes or, being the owner permits, any animal to be so treated;</p>
<p>(Under ‘Injured animals’, 1) If a police constable finds any animal so diseased or so severely injured or in such a physical condition that, in his opinion, having regard to the means available for removing the animal, there is no possibility of removing it without cruelty, he shall, if the owner is absent or refuses to consent to the destruction of the animal, at once summon a duly registered veterinary surgeon, if any such veterinary surgeon resides within a reasonable distance, and, if it appears by the certificate of such veterinary surgeon that the animal is mortally injured, or so severely injured, or so diseased, or in such physical condition, that it is cruel to keep it alive, it shall be lawful for the police constable, without the consent of the owner, to slaughter the animal, or cause or procure it to be slaughtered, with such instruments or appliances, and with such precautions, and in such manner, as to inflict as little suffering as practicable, and, if the slaughter takes place on any public highway, to remove the carcass or cause or procure it to be removed therefrom.</p>	<p>(Under ‘Cruelty to animals generally’, 13.3): Any police officer above the rank of a constable or any person authorised by the State Government in this behalf who finds any animal so diseased or so severely injured or in such a physical condition that in his opinion it cannot be removed without cruelty, may, if the owner is absent or refuses his consent to the destruction of the animal, forthwith summon the veterinary officer in charge of the area in which the animal is found, and if the veterinary office certifies that the animal is mortally injured or so severely injured or in such a physical condition that it would be cruel to keep it alive, the police officer or the person authorised, as the case may be may, after obtaining orders from a magistrate, destroy the animal injured or cause it to be destroyed [in such manner as may be prescribed].</p>

reproducing provisions verbatim while losing clarity and safeguards in the process. A comparison with the British Protection of Animals Act, 1911, highlights these shortcomings. For instance, while the British law provided detailed definitions for terms such as “captive animal” and specific procedures for euthanasia, the Indian version simplified these provisions, sometimes drastically, and introduced additional procedural hurdles, such as requiring magistrate approval for destroying mortally injured animals. The comparison

below demonstrates the dilution of provisions in the Indian Act as well as phrases that were taken verbatim from the British 1911 Act.

Evidently, British animal welfare laws – even from more than a century ago – are more nuanced than Indian laws (Srinivasan 2013). The discrepancy has increased with the advent of the British Animal Welfare Act of 2006. This Act consolidates many different pieces of legislation to create one cohesive

and more relevant Act that addresses a wide range of aspects of animal welfare, from video recordings of animal fights to the time limit within which an animal welfare violation can be prosecuted in court, and the explanatory notes of this act state that ‘The provisions of the 1911 Act no longer reflect modern practice’ (Department for Environment, n.d.). It follows that the Indian PCA, which still draws imperfectly from the British 1911 Act, is not adequate to ensure modern animal welfare.

For example, the British 2006 Act explicitly names and defines those actions that cause ‘unnecessary suffering’, which the currently prevailing 1960 Act in India fails to do despite using the same term and determining that is a punishable offence. It also refers to scientific definitions, such as stating that the Act applies to animals, which are defined as ‘(all) vertebrate(s) other than man’ and does not apply to ‘an animal while it is in its foetal or embryonic form’, while the Indian Act states only that it applies to animals which are ‘any living creature other than a human being’. The Indian Act may therefore be argued to apply to insects like cockroaches and agricultural pests, potentially making their killing a punishable offence unless it can be proved that they were not subjected to ‘unnecessary suffering’, which cannot be proved without evidence that they feel pain at all. Indeed, this classification would technically include living creatures like plants, fungi and bacteria.

The Animal Birth Control Rules, 2023 under the PCA, which is relatively recent, states that incurably ill and mortally wounded dogs can be euthanised, during specified hours, after being diagnosed by a team appointed by the Local Animal Birth Control Monitoring Committee consisting of the Jurisdictional Veterinary Officer, the project-in-charge and a representative of the Board or State Board. Although this procedure accounts for possible ethical violations by involving multiple stakeholders, it prolongs the animal’s suffering needlessly by restricting the execution to a certain time period when the law fundamentally aims to prevent unnecessary pain to an animal.

Many such lacunae indicate the pressing need for a complete revision of the act to reach modern standards. In practice, the PCA’s emphasis has been

on domestic and livelihood animals rather than comprehensive welfare. The limitations of the PCA are further complicated by its interaction with another cornerstone of Indian animal law - the Wildlife Protection Act, 1972 (WPA).

3. Overlap between the PCA and WPA

A landmark legislation, the Wildlife Protection Act, 1972 (WPA), along with the PCA forms the backbone of the legal framework that deals with animals (excluding humans). The WPA and PCA (as well as subsequent Rules enacted under it) share several clauses, particularly those pertaining to welfare, cruelty, and confinement - providing guidelines for handling, housing conditions, transport stipulations and conditions under which an animal can be euthanized or harmed (in case of self-defense).

The PCA mainly deals with preventing ‘unnecessary suffering’ of animals especially those in human custody or interaction, while also regulating performing animals (Sec. 22) through provisions such as “If any person treats any animal cruelly he shall be punishable” (PCA Sec. 11) and “It shall be the duty of every person having the care or charge of any animal to take all responsible measures to ensure the well-being of such animal” (PCA Sec. 3). On the other hand, the WPA is primarily concerned with the protection of wild species and their habitats. It bans hunting (Sec. 9) and restricts possession, sale, or transfer of wild animals (Sec. 40). It says, “No person shall hunt any wild animal specified in Schedule I to IV” (WPA Sec. 9) and “No person shall acquire, receive, keep in his possession, sell or transfer any wild animal” (WPA Sec. 40). But when they are kept by humans (in temples, zoos, or circuses), they are treated as captive wild animals under the PCA which states that “No person shall exhibit or train any performing animal unless registered” (PCA Sec. 22) although the PCA fails to recognise or define wild animals in the first place. Hence, instances involving captive wild animals are not explicitly referred to the WPA.

As a result, enforcement agencies are often uncertain about whether the PCA or the WPA applies. This jurisdictional confusion enables offenders to exploit legal grey areas, particularly when cultural or religious justifications are invoked.

The 2022 Amendment

The proposed PCA amendment for 2022, which is yet to be passed, aims to address several shortcomings by defining “gruesome cruelty”, imposing harsher punishments, penalties suitable to current economic standards and establishing responsibilities of care. The PCA is strengthened by these changes, particularly for communal and domesticated animals. Nevertheless, the structural issue of PCA–WPA overlap remains unresolved by the change. It still doesn’t properly handle religiously or traditionally motivated captive animal issues, nor does it clearly legalize the transfer of wildlife-related cruelty cases to the WPA. Therefore, the amendment essentially ignores the jurisdictional conflict and captive animal concerns, even while it improves deterrence for cruelty in general.

Recent events show how serious this issue is. In May 2023, police and PETA raided the Karur Latha Circus in Neyveli, Tamil Nadu, rescuing several animals including a baby monkey, which were being forced to perform without permits (Express News Service 2023). In another instance, the Kerala High Court questioned the Guruvayur temple committee about whether its elephants at Punnathur Aanakotta were being misused for non-ritual purposes, raising welfare concerns (TOI 2025). Elsewhere, a study of 25 temple elephants in Tamil Nadu revealed problems such as chaining, isolation, concrete enclosures, and injuries (Srikrishna 2022). These cases highlight how both laws technically apply, but because of unclear boundaries, captive wild animals continue to fall into a regulatory vacuum despite being “protected” under the law.

4. Difficulties in Implementation

From a conservation point of view, the implementation of the law is restricted by great complexity at various levels. Enforcement is often undermined by political influence, limited institutional capacity, and the anthropocentric priorities of the judiciary. The boards and committees, for instance the AWBI, can be politically influenced, as six Members of Parliament are mandated to be members. This makes the AWBI and their decisions questionable given that the issues at hand require specific scientific knowledge, usually lacking in those that hold power.

Implementation of the Rules under the PCA pertaining to the monitoring and execution of duties stipulated

often involve approval from specific committees or a long chain of command slowing it down. For instance, in the Animal Birth Control Rules, 2023 the reproductive organs removed from male and female dogs for during sterilization have to be stored and disposed of only after inspection and approval by a team of four officials. Although this specificity enforces accountability and thorough execution it employs more personnel than necessary.

The failure of India’s judiciary system to attend the 50 million criminal and civil cases highlights the systemic issue exacerbated by political interference (Gill 2024). This picture of legal operations when humans are directly involved as the culprit and the victim makes it difficult to imagine how critically the criminal cases pertaining to animals and wildlife would be dealt with. Additionally, even if cases are successfully prosecuted in court, the penalties that can currently be imposed under the PCA are woefully inadequate, with the highest penalty for cruelty to animals in ordinary circumstances (that is, outside of cruelty to laboratory or performing animals) being one hundred rupees or a jail term of up to three months.

Overall, the implementation of the PCA becomes challenging because of the loopholes, contradictions and overlaps with the WPA. These include:

- Potential for political influence in the formulation and execution of Rules under the Act
- Lack of scientific measures, nuance and detail in the phrasing of rules and definitions
- Overcomplicated monitoring and evaluatory mechanisms in the execution of the laws requiring a host of officials to move procedures forward.
- Grey areas between the PCA and WPA, regarding captive wild animals
- Lack of stringent penalties to effectively deter instances of cruelty to animals

These limitations are best understood through case studies, which reveal how contradictions between law and practice play out on the ground.

5. Case Studies of Implementation On stray dogs:

In India, dogs hold a unique and conflicted status. A large part of the population is neither entirely wild nor fully domesticated but exist as free-ranging “community animals”, often fed, named, and cared for by the residents of a street. This acceptance, however, lives alongside a deep-seated fear of aggression and disease due to an estimated 30–35 million stray dogs and the tragic distinction of accounting for 36% of the world’s rabies deaths (Sreekandan 2025).

The Prevention of Cruelty to Animals Act, 1960 (PCA) formed the basis for the modern Animal Birth Control (ABC) Rules of 2023, which mandate a scientific and compassionate solution: catching stray dogs, sterilising and vaccinating them, and releasing them back into their original territories. This approach acknowledges their territorial nature and their right to live without undue suffering (Press Information Bureau 2025).

However, this is where a fundamental contradiction emerges between the laws we have framed and the actions often taken against dogs. This conflict was brought into sharp focus in August 2025 when, following a rise in dog-bite incidents, the Supreme Court ordered the removal of all stray dogs from public areas in Delhi-NCR to shelters (Reuters 2025). This directive, aimed at ensuring public safety, directly opposed the PCA and the ABC Rules’ core principle of sterilise-and-release. It represented a significant shift towards a fear-driven, human-centric policy that prioritised removal over coexistence.

The backlash was immediate and fierce. Animal welfare organisations, veterinarians, and citizens argued that India’s shelter system is woefully inadequate to house even a fraction of its 30 million-plus stray population. They labelled the order a “death warrant,” predicting that overcrowded and underfunded shelters would simply become sites of a different kind of cruelty (TOI 2025). Responding to the public outcry, the Court revised its order on August 22, 2025. It created a compromise, allowing healthy, sterilised dogs to be returned to their areas while mandating that only rabid or incurably aggressive dogs be confined. The court also called for the creation of designated feeding zones and the drafting of a

national policy for stray dog management (MacRae 2025). Despite this course correction, the underlying tension persists and contradicts the treatment that wild animals are given under the same Act.

On one hand, the PCA and the Indian Penal Code criminalise the poisoning or killing of dogs. On the other, frustration and fear at the community level often lead to brutal acts of vigilantism. Such incidents reveal the deep chasm between legal ideals and lived reality, as seen in contrasting cases. In Pune, after several dogs were poisoned, two individuals were arrested under IPC Section 429. Here, the court took a firm stand by remanding them in police custody, thereby affirming the legal process (TNN 2010). In stark contrast, after a mass poisoning of nearly 20 dogs in Mugalivakkam, Chennai, an FIR was filed under the same laws but no arrests were ever made. In this instance, the court was unable to take any stand as the case never reached the judiciary due to investigative failure, leaving the crime unpunished (Shekhar 2016). The Supreme Court’s initial order, while coming from a place of authority, echoed the same impulse for removal seen at the village level, illustrating India’s judiciary system’s weak commitment to providing justice within India’s legal boundaries when the need to pacify the public takes over.

On Temple Elephants:

The tradition of keeping elephants in temples dates long back. However, the actual time when temples started associating themselves with elephants is not clear. Traditionally, elephants were kept to carry water from the river to bathe the deity, they would stand for auspicious hours and were allowed to roam free in the forest associated with the temple. Temples tend to mainly maintain female elephants because of the occurrence of musth in male elephants during which they show aggressive behaviour making it risky for them to perform in rituals. With the changing time, the temples lost their forest area, and the source of water changed. With time these temples were not able to generate revenue and started exploiting elephants instead by making them “bless” the devotees (Varma et al. 2009).

In the original 1972 Wildlife (Protection) Act the Asian Elephant *Elephas maximus* was listed in Schedule I affording it the highest level of protection, the same

as tigers, lions, and rhinos. This meant no hunting, capture, or trade, except under extraordinary circumstances and with official permission (Sections 9 & 11), although legally possessed captive elephants can be gifted. It creates a loophole in the law. Despite bans, wild elephants continue to be captured to meet demands in temples, especially in the southern part of the country, as they are the only wild species that individuals may legally own in captivity, subject to ownership certificates from the Chief Wildlife Warden, and transfers including sale or gifting require prior approval (WPA, Sections 40 & 42).

Legally owned elephants may be used for religious, tourism, or ceremonial purposes, provided they are not subjected to cruelty, with states empowered to regulate their transport and use. Their welfare in captivity is governed by the Prevention of Cruelty to Animals Act, 1960 (PCA, Section 11), and the captive elephants (Transfer or Transport) Rules and Management and Maintenance Rules of 2021, which prohibit abuse, set standards for housing, food, chaining, exercise, veterinary care, and require monitoring and record-keeping.

Despite these provisions, enforcement remains weak: many elephants in temples and tourism are overworked, chained for long hours, denied exercise, or used without AWBI registration. Illegal transport and transfers continue, inspections are infrequent, and political or religious pressures often undermine compliance. Courts have emphasized that PCA and WPA must be applied together, mandating monitoring committees and welfare oversight; however, exceptions on religious or traditional grounds persist, leaving significant gaps between legal standards and actual practice.

The issue in this matter is that temple elephants get very little time to exercise, averaging around one hour a day and are chained for more than 16 hours a day, limiting their movement. Moreover, blessing ceremonies in a crowded temple means highly restricted and altered behaviour that may have negative physical and psychological effects on the elephant, contributing to a poorer quality of life compared to that of their wild counterparts. Centre for Cellular and Molecular Biology (CCMB) studies in 2019 says that prolonged participation of elephants

in religious ceremonies puts elephants under severe stress (Special Correspondent 2019).

Recently, a male elephant injured 24 humans in a mosque feast, Malappuram, Kerala. Kerala high court took the suo moto cognizance and mandated 3-m distance between two elephants, 5m between an elephant and flaming torches, 8 m between an elephant and the public or percussion displays and 100 m between elephants and fireworks. This limited the participation of elephants based on availability of space which affected Kerala's largest religious festival Thrissur Poornam. The festival organisers approached the Supreme Court saying maintaining 3m distance is impractical. The Supreme Court reversed the order of the high court stating the court should not involve in law making and reverted the safety norms under Kerala Captive Elephants (Management and Maintenance) Rules, 2012. This reversal shows the Supreme Court's ignorance for both the elephants' welfare and citizens' safety.

Additionally, the recent 2022 amendment to the WPA has centralised the power to frame the rules regarding the transfer of elephants and the state government has no role in it. These changes have allowed loopholes in the laws and hence requires re-evaluation of the need for temple elephants and the ambiguity that this provision creates in the case of employing wild animals for any reason.

Conclusion: Unresolved Questions and Shortcomings

As discussed in the earlier sections, the PCA requires several amendments in order to make it competent to serve all animals or even those that it defines poorly. On the surface, the Act and the Rules under it have detailed procedures and clear instructions regarding involved personnel but it fails to consider and elucidate fundamental definitions, such as "unnecessary suffering," leading to inconsistent interpretation. Persistent overlap between PCA and WPA, particularly regarding captive wild animals, create loopholes in penalties, ownership, and transfer provisions. These overlapping jurisdictions and definitional gaps are compounded by broader implementation challenges, where politics, capacity, and enforcement mechanisms not only limit the effectiveness of both laws but evidently skew how

different animals are served. On one hand stray dogs that are a result of domestication are deemed worthy to roam free while elephants that belong in the wild are deemed expendable to be tamed and confined for human usage for revenue production and religious practices. These unresolved issues point to a pressing need for comprehensive reform that consolidates overlapping provisions, introduces scientific clarity, and ensures enforceable welfare standards. Until then, the gap between law and justice for animals in India will remain wide.

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