

# COMMENTS ON THE DRAFT ANIMAL BIRTH CONTROL RULES 2022

Submission to  
The Ministry of Fisheries, Animal Husbandry and Dairying



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21 OCTOBER 2022

**VIDHI** | Centre for  
Legal Policy

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The authors would like to thank Dhvani Mehta (Co-Founder, Vidhi) and Ritwika Sharma (Senior Resident Fellow and Lead-Charkha, Vidhi) for sharing their inputs. The authors would also like to thank Shivani Goyal and Arushi Malik, interns at Climate & Ecosystems team at Vidhi for their research assistance.

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# A. EXECUTIVE SUMMARY

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The Ministry of Fisheries, Animal Husbandry and Dairying (“**MFAHD**”) published the Draft Animal Birth Control Rules 2022 vide notification dated 31st July 2022, and it was subsequently published in the Gazette of India on 25th August 2022. Comments on the draft notification were invited from the public within 60 days from the publication of the same in the Gazette of India.

We welcome the amendments proposed in the Animal Birth Control Rules (“**ABC Rules**”) 2022 which seek to replace the ABC Rules of 2001. We appreciate the amendments related to prescribing the obligations of the Local Authorities, Monitoring Committees and Resident Welfare Association/ Apartment Owners Associations (“**RWAs/AOAs**”) in the Rules. We also appreciate the provision for forming Animal Welfare Committees for resolution of conflicts related to feeding of free-ranging domestic dogs. While we value the intention underlying the revised ABC Rules of 2022, we observed that there is scope to refine and improve the Rules for proper implementation and greater impact. Following is the pointwise summary of our submissions on the Draft ABC Rules 2022:

- I. Using the term ‘*free ranging domestic dogs*’ will be more appropriate to scientifically depict the classification of domestic dogs which are not owned by individuals.
- II. The disposal of animal carcasses and organs as part of the ABC Rules must comply with the provisions of environmental legislations, especially Biomedical Waste Rules, 2016 (“**BMW Rules**”) to avoid overlaps and delays in the process of waste disposal, bring clarity to the law, and minimize the environmental footprint.
- III. The proposal to publicly announce sterilization and vaccination drives of free ranging domestic dogs by Local Authorities must prescribe a minimum notice period to ensure support from local volunteers and must include recognized animal caretakers and representatives of RWAs/AOAs to improve transparency and trust among people.
- IV. Once a free ranging domestic animal is sterilized and vaccinated, the same must be monitored through ear-tags with identification number for future vaccinations and to monitor the well-being of the animals.
- V. The local RWAs/AOAs must maintain records of sterilization, vaccination and population of free ranging domestic animals within their locality. This will greatly help Local Authorities and Animal Welfare Organization (“**AWO**”) to plan and execute the ABC Rules, 2022 efficiently.
- VI. Local Authorities must be mandated to publish database of free-ranging animals sterilized and vaccinated through a publicly accessible website.
- VII. The proposed clause on designating feeding spots must be complemented with proper guidelines, training, assistance, and must be supervised by Local Authorities.
- VIII. In the Animal Welfare Committees (“**AWC**”), the representative of jurisdictional Police must not be below the rank of SHO. For areas which are in or around wildlife habitats,

ecologically sensitive areas, important bird areas, etc., a representative of the Forest Department of the State not below the rank of a Range Officer must be part of the AWC.

- IX. The Monitoring Committees must include members from other relevant Ministries, State Departments and independent subject experts.
- X. The composition, eligibility criteria and qualifications of the members of the Inspection Team proposed to be constituted by Animal Welfare Board of India (“**AWBI**”) must be prescribed in the Rules itself to avoid arbitrariness and potential conflicts.
- XI. The Rules must provide a clause for claiming compensation from the State Government for injuries and deaths resulting from free-ranging domestic animals as can be seen in other laws like the Wildlife (Protection) Act, 1972.
- XII. As a public safety measure, the ABC Rules must have an enabling provision to permit the local authorities to translocate and rehabilitate excess population of free-ranging domestic dogs to a shelter in case an area has already exceeded carrying capacity.
- XIII. Suitable amendments to the Prevention of Cruelty to Animals Act, 1960 (“**PCA**”) and ABC Rules must be made to enable a scientific plan for the population management of free-ranging domestic dogs in wildlife habitats, where they are dangerous to native wildlife.

# B. ISSUE-WISE COMMENTS ON THE DRAFT ANIMAL BIRTH CONTROL RULES, 2022

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## 1. Classification of animals

The Draft Rules are titled the Animal Birth Control Rules, 2022. Although the parent legislation, PCA defines 'animal' as any living creature other than a human being, clause 7 of the proposed Rules classifies animals for the purposes of the ABC Rules 2022 as:

- a) Pet animals-dogs owned and kept indoor by individuals.
- b) Street dogs or community owned Indian dogs or abandoned pedigreed dogs which are homeless, living on the street or within a gated campus.

The proposed Rules, therefore, primarily deal with the population management of dogs.<sup>1</sup> Although, one clause addresses the issue of domestic/ feral cats to some extent,<sup>2</sup> it fully ignores the growing number of cattle, pigs and other such free ranging domestic animal species. As per information published by the MFAHD, the total population of stray dogs and stray cattle in India was 203.31 lakh, till the year 2019.<sup>3</sup>

Following are our suggestions for improving upon Clause 7 of the ABC Rules, 2022:

- I. Instead of using terms such as '*street dogs or community owned Indian dogs or abandoned pedigreed dogs which are homeless*' for classification, the term '**free-ranging domestic dogs**' should be adopted in Clause 7(b), and defined under the definitions clause. The term '*free-ranging domestic dogs*' is a scientific term used to define domestic dogs that do not have an owner and whose movements and activities are not limited by human beings but may have some interaction with human beings, which includes receiving food, petting, harassment etc.<sup>4,5</sup>

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<sup>1</sup> Animal Birth Control Rules 2022, clause 7

<sup>2</sup> Animal Birth Control Rules 2022, clause 19

<sup>3</sup> Ministry of Fisheries, Animal Husbandry & Dairying, 20<sup>th</sup> Livestock Census (2019)

<sup>4</sup> Cafazzo, Simona, Paola Valsecchi, Roberto Bonanni, and Eugenia Natoli. 'Dominance in relation to age, sex, and competitive contexts in a group of free-ranging domestic dogs.' (2010) 21(3) *Behavioral Ecology* 443-455 <<https://academic.oup.com/beheco/article/21/3/443/218736>> accessed 20 October 2022

<sup>5</sup> Bhattacharjee, Debottam, Sarab Mandal, Piuli Shit, Mebin George Varghese, Aayushi Vishnoi, and Anindita Bhadra. 'Free-ranging dogs are capable of utilizing complex human pointing cues.' (2020) 10 *Frontiers in*

- II. The ABC Rules must expand the scope of the law to other free-ranging domestic animals and suitable amendments must be made.

## **2. Management of waste must be in accordance with environmental laws**

To cater to proper waste disposal management of animal carcasses and organs following medical treatment, the Rules stress on the use of incinerators.<sup>6</sup> Clause 10(d) mandates an obligation on the Local Authorities<sup>7</sup> to install incinerators for the disposal of organs and carcasses of animals regulated under the Rules. Where incinerators are not feasible, the Rule also proposes using deep burial method for disposing animal residues.

While incineration is one of the most polluting activities, the deep burial method also has significant environmental impact. Further, any installation of incinerator or landfill type disposal method will require prior '*Environmental Clearance*' from the Ministry of Environment, Forest & Climate Change under the Environment Impact Assessment Notification 2006.<sup>8</sup> '*Consent to Establish/Operate*' for such establishments will have to be obtained from the State Pollution Control Board under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974, and fulfil all the provisions of the Hazardous and other Wastes (Management and Transboundary Movement) Rules, 2016.

Additionally, the BMW Rules apply to all waste, which is generated during the diagnosis, treatment or immunization of human beings or animals. The BMW Rules which are notified under the Environment (Protection) Act 1986, also mandatorily apply to veterinary institutions.

Therefore, we suggest that the ABC Rules mention that disposal of animal carcasses and organs must be done in accordance with the BMW Rules, 2016, and not be prescribed separately under the ABC Rules to avoid overlaps and delays in the process of waste disposal, bring clarity to the law, and minimize the environmental footprint.

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psychology 2818 <<https://www.frontiersin.org/articles/10.3389/fpsyg.2019.02818/full#B8>> accessed 20 October 2022

<sup>6</sup> Animal Birth Control Rules 2022, clause 16,17

<sup>7</sup> Animal Birth Control Rules 2022, clause 2(k) defines Local Authority as a Municipal Committee, Municipal Council, District Administration, District Panchayats/Board, Cantonment Board or other authority for the time being invested by the law with the control and administration of any matters within a specified local area

<sup>8</sup> Common Hazardous Waste Treatment, Storage and Disposal Facilities, Schedule 7(d)

### **3. Improving the capture/ sterilization/ immunization/ release process**

Clause 11(3) of the ABC Rules, 2022 mandates the local authority or the AWO to put up banners/ public notices to inform and educate the residents before the capturing of animals for sterilization and vaccination and releasing them back to the same area. This is a commendable effort, and we appreciate making this a statutory mandate. However, to make this process more effective and participatory we suggest the following:

- i) The announcement must be made in advance and a minimum notice period must be prescribed in the Rules. This will ensure that the dog capturing team gets the required field support from local residents who are willing to volunteer.
- ii) Representatives of local RWAs/AOAs, recognized colony animal caretakers<sup>9</sup> must be included as witnesses in the capture and release process. This will allow residents to develop a sense of ownership and also improve transparency and trust among the people.
- iii) Once a dog is sterilized and vaccinated, to identify them in the future and monitor their well-being for future vaccination boosters, there must be a provision to ear-tag them with an identification number.
- iv) In many areas, local residents and their associations voluntarily get the free-ranging domestic dogs sterilized and vaccinated at their own cost. Also, the local RWAs/ AOAs are better positioned to closely monitor the population of free-ranging domestic dogs in their locality. Therefore, it is recommended that the local RWAs/ AOAs must maintain records of sterilization, vaccination and population of free ranging domestic animals within their locality. This will greatly help Local Authorities and AWOs to closely monitor the status and identify implementation gaps for the purpose of the ABC Rules, 2022.
- v) The database on sterilization/vaccination of free-ranging domestic animals must be made available freely and accessible to the public by the Local Authority through dedicated websites.

### **4. Issues related to feeding of free-ranging domestic dogs**

Feeding of free-ranging domestic dogs has been a much-contested issue and often leads to violent conflicts within human societies. There are also incidents where RWAs/AOAs harass

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<sup>9</sup> Colony Animal Care Taker, Animal Welfare Board of India <[http://www.awbi.in/cact\\_new.html](http://www.awbi.in/cact_new.html)>

dog caregivers, unlawfully impose restrictions on stray dogs, and impose illegitimate penalties on residents.<sup>10</sup>

Clause 20 of the ABC Rules, 2022 mandates the responsibilities of the RWAs/AOAs in the proposed Rules to ensure designation of feeding spots and making necessary arrangements. This is a good addition to the ABC Rules as it clarifies the legal ambiguities on feeding spots and feeders within residential colonies. It is also worth appreciating that the newly inserted Clause 20(2) proposes forming an AWC to resolve conflicts between the RWA /AOA and the animal caregivers or other residents.

Following are some our suggestions to strengthen the proposed clauses:

- I. Mandating responsibilities to RWAs and AOAs must be complemented with adequate guidelines, training and assistance by Local Authorities and AWOs. The Rules must provide an enabling provision to make the RWAs/AOAs follow guidelines prescribed by the AWBI<sup>11</sup> for designating dog feeding spots.
- II. The decision to designate dog feeding spots must be made by the RWAs/AOAs in consultation with recognized colony animal caretakers, AWOs and approved by the Local Authority to ensure the welfare of animals takes precedence in all such decisions.
- III. The representative of jurisdictional Police in the AWC must not be below the rank of SHO. For areas which are in or around wildlife habitats, ecologically sensitive areas, important bird areas, etc., a representative of the Forest Department of the State not below the rank of a Range Officer must be part of the AWC.

## **5. Expanding representation in Monitoring Committees to enhance accountability**

Clause 9 of the ABC Rules, 2022 mandates constitution of Monitoring Committees for effective implementation of ABC Programs in accordance with the ABC Rules to control the population of free ranging animals, for eradication of rabies, and for reducing man-animal conflict. The Monitoring Committees are proposed to be set up at three levels: Central, State

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<sup>10</sup> Noida Federation of Apartment Owners Associations <<https://www.nofaa.in/news-of-nofaa/residents-of-prateek-laurel-established-tight-limits-for-stray-dogs/>> accessed 20 October 2022, Abhishek Anand, 'Notice served to Greater Noida's Supertech Ecovillage 1 for imposing illegal fines on dog owners' ≤ <https://www.indiatoday.in/cities/noida/story/noida-news-greater-noida-authority-issues-notice-aoa-harassment-dog-parents-illegal-fine-2003872-2022-09-23>> accessed 20 October 2022

<sup>11</sup> Guidelines for Feeding of dogs in Residential and Other Localities, 2009 <[https://www.peopleforanimalsindia.org/images/pdf/AWBI-Guidelines%20For%20Feeding%20of%20Stray%20Dogs%20\(27.01.2010\).pdf](https://www.peopleforanimalsindia.org/images/pdf/AWBI-Guidelines%20For%20Feeding%20of%20Stray%20Dogs%20(27.01.2010).pdf)>

and Local. The Rules lay down the list of members who will be part of the respective Committees. While the composition of the Committees envisaged by the Rules is diverse, there is still a need to expand representation.

For Central Monitoring and Coordinating Committee, at least one representative of the Ministry of Environment, Forest and Climate Change must be included as several stages involve questions related to environment, waste management and interaction of free-ranging domestic animals with wildlife. Similarly, a representative of the Department of Environment and the Forest Department of the concerned State must be included in the State Level Committees. At the Local Level, the Divisional Forest Officer must be included.

We strongly suggest the inclusion of three independent experts- one independent expert on animal behaviour, one ecologist, and one social scientist as part of all the committees.

## **6. Criteria for constituting Inspection Team**

Clause 14 of the ABC Rules, 2022 empowers the AWBI to authorize an inspection team to inspect any ABC Centre. According to Clause 14(2), the Inspection Team shall have the power to enter the premises of ABC centres to inspect and gather evidence etc. with no obligation to give prior notice. However, the Rules do not specify the composition of the Inspection Team and provides unfettered discretion to the AWBI.

The expertise and integrity of the inspection team is crucial to check arbitrariness during compliance with procedures and to avoid potential conflicts. Therefore, we suggest that the Rules must at least specify the composition, eligibility criteria and qualifications of the members of the Inspection Team which the AWBI must consider during its constitution for the purpose of Clause 14.

## **7. Additional Suggestions**

### ***I. Compensation for animal-attacks***

While the PCA prohibits harming any animal, the Animal Birth Control Rules, 2001 (“**ABC Rules 2001**”) were notified to primarily control the dog population, protect citizens from rabies, and prevent human-dog conflicts. Under the ABC Rules 2001, the State is mandated to implement the ABC Program through the Local Authorities.

It is also pertinent to note that the ABC Rules will be considered successful only when 70% of the stray dog population will be stabilized.<sup>12</sup> Reportedly, the ABC Rules 2001 lead to only 11% reduction of 'free-ranging domestic dogs' - from 1.71 crores in 2012 to 1.53 crores in 2019.<sup>13</sup>

The ABC Rules have been criticized for being ineffectively implemented by the Local Authorities.<sup>14</sup> According to the MFAHD, between 2018-2020, 3860 persons were killed by animals.<sup>15</sup> According to the World Health Organization, India accounts for 36% of global deaths due to rabies<sup>16</sup> with about 18,000-20,000 deaths every year.<sup>17</sup>

Although the PCA and ABC Rules are much needed laws to ensure that free-ranging domestic animals are treated fairly, they arguably do not track account of human beings who suffer from human-dog conflict. This issue has also been the subject of litigation<sup>18</sup>. Thus, without ensuring adequate compensation to victims of dog attacks, the intentions of the PCA and ABC rules will be difficult to achieve.

Therefore, we suggest that the ABC Rules must provide a clause for claiming compensation from the State Government for injuries and deaths resulting from free-ranging domestic animals. Such compensation exists for injuries from wild animals under the Wildlife (Protection) Act, 1972 and the ABC Rules must also create a legal obligation for the State to compensate the victims of free-ranging domestic animals.

## ***II. Carrying-capacity based exception for rehabilitation of free-ranging domestic animals***

The ABC Rules must contain an enabling provision to relocate and rehabilitate dogs as an exception where the population of free-ranging animals exceeds the carrying capacity. Carrying capacity is the average population density or population size of a species below

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<sup>12</sup> Government of India, Ministry of Home Affairs, Lok Sabha, Unstarred Question No. 2572 <<https://www.mha.gov.in/MHA1/Par2017/pdfs/par2016-pdfs/lis-020816/2572%20E.pdf>> accessed 20 October 2022

<sup>13</sup> Express News Service, 'Telling Numbers: 18 lakh fewer stray dogs in 7 years, and the 1.53 crore still on streets' *The Indian Express* (New Delhi 3 August 2022) <<https://indianexpress.com/article/explained/18-lakh-fewer-stray-dogs-in-7-yrs-and-the-1-53-crore-still-on-streets-8066644/>> accessed 20 October 2022, Rakesh Chandra, 'Street Animals Deserve Special Care and Attention As They are Human-friendly and an Asset' (*People's Reflections*, 6 September 2022) <<https://reflections.live/articles/1392/street-animals-deserve-special-care-and-attention-as-they-are-human-friendly-and-an-asset-by-rakesh-chandra-6334-l7po3wst.html>> accessed 20 October 2022

<sup>14</sup> n12

<sup>15</sup> n3

<sup>16</sup> World Health Organization, *WHO expert consultation on rabies: third report* (WHO Vol. 1012, 2018)

<sup>17</sup> World Health Organization, 'Rabies in India' <<https://www.who.int/india/health-topics/rabies>> accessed 20 October 2022

<sup>18</sup> *Porathissery Grama Panchayat v. Anthony & Another*, RSA. No. 1061 of 2010 (B) Kerala High Court (2016), *G. Master Jishnu & Others v/s Bruhat Bangalore Mahanagara W.P. Nos. 37197 of 2011 (LB-RES-PIL) C/W 7641, 7642 & 7644 of 2007 (LB-RES-PIL), 6229 & 4034 of 2007 (GM-RES-PIL) & 4920 & 427 of 2007 (LB-BMP-PIL)* High Court of Karnataka (2012)

which its numbers tend to increase and above which its numbers tend to decrease because of a shortage of resources.<sup>19</sup>

We suggest that the Local Authorities in consultation with RWAs/AOAs and AWOs must ensure that the number of free-ranging domestic animals in any given geographic area does not exceed the carrying capacity by taking measures to manage the population in accordance with the ABC Rules. As a public safety measure, the ABC Rules must have an enabling provision to permit the local authorities to translocate and rehabilitate the excess population of free-ranging domestic dogs to a shelter in case an area has already exceeded carrying capacity. The AWBI may publish guidelines to be followed for translocation and rehabilitation of such animals.

### ***III. Management of free-ranging dogs in wildlife habitats***

Domestic dogs are considered to be one of the top five invasive animal species (species which drives out native species) globally.<sup>20</sup> Free ranging domestic dogs are a threat to both herbivores (which they hunt/kill/chase etc.) and to carnivores as a carrier of various infectious diseases like rabies, parvovirus, and distemper. Free ranging domestic dogs also modify the natural ecosystem by altering the food web through competition with other carnivores and scavengers, fear-mediated behavioural changes in native wildlife, and hybridization with species such as wolves.<sup>21</sup>

According to a study, free ranging domestic dogs attacked 80 species of Indian wildlife, out of which 31 were listed in the International Union for Conservation of Nature's red list of threatened species.<sup>22</sup> According to the National Tiger Conservation Authority's last tiger census of 2018<sup>23</sup>, free ranging domestic dogs were detected in almost all tiger reserves. Such a situation poses a threat to both tigers as well as other wildlife due to increased competition for food resources and transmission of diseases.

Free ranging domestic dogs have been referred to as one of the most dangerous threats to native wildlife and birds in almost all states/UTs in India. In Leh, free-ranging dogs are

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<sup>19</sup> *Encyclopedia Britannica*, T. Editors of Encyclopedia. 'carrying capacity' (September 25, 2019) <<https://www.britannica.com/science/carrying-capacity>> accessed 20 October 2022

<sup>20</sup> Doherty, Tim S., Chris R. Dickman, Alistair S. Glen, Thomas M. Newsome, Dale G. Nimmo, Euan G. Ritchie, Abi T. Vanak, and Aaron J. Wirsing, 'The global impacts of domestic dogs on threatened vertebrates.' *Biological conservation* 210 (2017), 56-59

<sup>21</sup> Leonard, Jennifer A., Jorge Echegaray, Ettore Randi, Carles Vilà, and M. E. Gompper. 'Impact of hybridization with domestic dogs on the conservation of wild canids.' *Free-ranging dogs and wildlife conservation* 170 (OUP 2013)

<sup>22</sup> Home, Chandrima, Yash Veer Bhatnagar, and Abi Tamin Vanak, 'Canine Conundrum: domestic dogs as an invasive species and their impacts on wildlife in India.' (2018) *Animal Conservation* 21(4) 275-282 <<https://zslpublications.onlinelibrary.wiley.com/doi/epdf/10.1111/acv.12389>> accessed 20 October 2022

<sup>23</sup> National Tiger Conservation Authority, Government of India, New Delhi, and Wildlife Institute of India, Dehradun, 'Status of tigers, copredators and prey in Indi' (2018) <[https://ntca.gov.in/assets/uploads/Reports/AITM/Tiger\\_Status\\_Report\\_2018.pdf](https://ntca.gov.in/assets/uploads/Reports/AITM/Tiger_Status_Report_2018.pdf)> accessed 20 October 2022

threatening the Snow Leopard,<sup>24</sup> in Haryana, they are known to attack Blackbucks,<sup>25</sup> and in Rajasthan, they are considered as one of the major threats to the critically endangered Great Indian Bustard.<sup>26</sup> In January 2021, the Himachal Pradesh government described the density of feral dogs as an imminent threat to the state's ecosystem.<sup>27</sup>

While the ABC Rules acknowledge and address the public safety and health concerns from free-ranging dogs, they completely ignore the impending threat free-ranging domestic dogs are posing to the native wildlife of the country. It must be understood that the capture-sterilize-vaccinate-release method is not sufficient to address the concerns regarding the safety of wild animals. Although the Wildlife (Protection) Act, 1972 has a provision to cull certain wild animals after declaring them as vermin when they are a threat to human life and property, the PCA and ABC Rules 2001 prevents taking such steps for free-ranging domestic dogs by Forest Departments as the Act only allows for capture/ sterilization/ immunization/ release of free-ranging domestic dogs. Although sterilization and vaccination may help in managing their population, but it doesn't stop the animals from competing with wildlife as the Act also mandates that the sterilized and vaccinated animals must be released back in the same place from where they have captured.

We strongly suggest that the MFAHD in consultation with MoEFCC and State Wildlife Departments come up with suitable amendments to the PCA and ABC Rules so as to enable a scientific management of domestic dogs in wildlife habitats. This may be done through creating exceptions in ABC Rules to enable removal of free-ranging domestic animals instead of releasing them back to the wildlife habitats, especially in landscapes where they are known to threaten survival of endangered wild animals.

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<sup>24</sup> Naseer Ganai, 'To Save Wildlife And Birds, Ladakh Govt Asks Army To Train Pure-Bred Ladakhi Dogs' *Outlook India* (29 October 2021) <[<sup>25</sup> Sneha Mahale, 'In Haryana, packs of stray dogs are attacking blackbucks and other wildlife' \(\*Scroll\*, 4 August 2022\) <<https://scroll.in/article/1029602/in-haryana-packs-of-stray-dogs-are-attacking-blackbucks-and-other-wildlife>> accessed 20 October 2022](https://www.outlookindia.com/website/story/india-news-to-save-wildlife-and-birds-ladakh-govt-asks-army-to-train-pure-bred-ladakhi-dogs/399216#:~:text=of%20armed%20forces,-Over%20the%20years%20feral%20dogs%20have%20been%20on%20a%20rampage,eggs%20of%20black%20Dnecked%20crane.> accessed 20 October 2022</a></p></div><div data-bbox=)

<sup>26</sup> 'Fatal wires, dogs threat to Great Indian Bustard | Ahmedabad News' (*Times of India*, 4 January 2012) <<https://timesofindia.indiatimes.com/city/ahmedabad/Fatal-wires-dogs-threat-to-Great-Indian-Bustard/articleshow/11358130.cms>> accessed 20 October 2022

<sup>27</sup> Mahima Jain, 'Feral dogs aggravate biodiversity crisis in Himalayas' (*The Third Pole*, 23 March 2021) <<https://www.thethirdpole.net/en/nature/feral-dogs-aggravate-biodiversity-crisis-in-indian-himalayas/>> accessed 20 October 2022

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