



2026 INSC 506

**REPORTABLE**  
**IN THE SUPREME COURT OF INDIA**  
**INHERENT/CIVIL ORIGINAL/  
EXTRAORDINARY APPELLATE JURISDICTION**

**SUO MOTO WRIT PETITION(CIVIL) NO(S). 5 OF 2025**

**IN RE: “CITY HOUNDED BY STRAYS, KIDS PAY  
PRICE”**

**WITH**

**SLP(CIVIL) NO(S). 14763 OF 2024**

**SLP(CIVIL) NO(S). 17623 OF 2025**

**WRIT PETITION(CIVIL) NO(S). 784 OF 2025**

**SLP(CIVIL) Diary No. 45707 OF 2025**

**T.C. (CIVIL) NO. 140 OF 2025**

**CONTEMPT PETITION (C) NO(S). 749 OF 2025 IN  
SLP(CIVIL) NO(S). 14763 OF 2024**

**T.C. (CIVIL) No. 147/2025**

**T.C. (CIVIL) No. 145/2025**

**T.C. (CIVIL) No. 146/2025**

**T.C. (CIVIL) No. 144/2025**

**WRIT PETITION (CIVIL) No. 1153/2025**

**T.C. (CIVIL) No. 2/2026**

**T.C. (CIVIL) No. 4/2026**

**T.C. (CIVIL) No. 5/2026**

**T.C. (CIVIL) No. 8/2026**

**T.C. (CIVIL) No. 3/2026**

**T.C. (CIVIL) No. 12/2026**

**T.C. (CIVIL) No. 9/2026**

**T.C. (CIVIL) No. 13/2026**

**T.C. (CIVIL) No. 10/2026**

**T.C. (CIVIL) No. 14/2026**

**T.C. (CIVIL) No. 6/2026**

**T.C. (CIVIL) No. 11/2026**

**T.C. (CIVIL) No. 15/2026**

**T.C. (CIVIL) No. 7/2026**

**T.C. (CIVIL) No. 1/2026**

**T.C. (CIVIL) No. 18/2026**

**T.C. (CIVIL) No. 16/2026**

**T.C. (CIVIL) No. 17/2026**

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**J U D G M E N T**

**Mehta, J.**

For clarity of exposition and to facilitate structured consideration of the issues arising in the present matter, this judgment has been organised under the following heads: -

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## **I. INTRODUCTION**

1. This Court, *vide* its detailed and comprehensive order dated 7<sup>th</sup> November, 2025<sup>1</sup>, upon an exhaustive consideration of the compliance affidavits filed by various States and Union Territories, the summary report submitted by the learned *Amicus Curiae*, as well as the news reports highlighting the escalating incidents of stray animal intrusions and dog-bite cases across the country, was persuaded to

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<sup>1</sup> *City Hounded by Strays, Kids Pay Price, In re*, (2026) 1 SCC 774.

supplement, modify and further elaborate upon the earlier directions issued *vide* orders dated 11<sup>th</sup> August, 2025 and 22<sup>nd</sup> August, 2025. The Court took judicial notice of the grave and continuing threat posed by the unchecked presence of stray animals, both on public roads, more particularly on National Highways and National Expressways, and within institutional premises such as educational institutions, hospitals, sports complexes, bus stands/depots (including Inter-State Bus Terminals) and railway stations<sup>2</sup>, where such incidents have been reported with alarming frequency, thereby posing a serious risk to the safety of students, patients, staff and the general public. The Court observed that the persistence of such preventable hazards reflects systemic administrative lapses and a lack of effective coordination among the concerned authorities, and unequivocally underscored that such circumstances directly impinge upon and violate the fundamental right to life and safety guaranteed under Article 21 of the Constitution of India.

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<sup>2</sup> Hereinafter, being referred to as “institutional areas”.

**2.** The Court further noted that the underlying causes of this persisting menace were multifaceted, arising from factors such as the uncontrolled reproduction of stray dogs due to inadequate implementation of sterilisation programmes, improper disposal of food waste in and around public institutions, absence of effective perimeter management coupled with lack of coordination between institutional authorities and municipal bodies, and insufficient public awareness regarding preventive conduct as well as appropriate post dog-bite medical procedures, thereby necessitating a comprehensive, coordinated and sustained institutional response rather than isolated or *ad hoc* measures.

**3.** Recognising the systemic inadequacies in the enforcement of existing statutory frameworks, including the Animal Birth Control Rules, 2023<sup>3</sup>, and the evident lack of coordinated administrative action, this Court proceeded to issue a set of uniform and binding pan-India directions. These directions were structured to ensure not only the immediate

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<sup>3</sup> For short, “ABC Rules, 2023”.

mitigation of risks arising from the presence of stray cattle/animals on highways and expressways, but also to address, in a focused and institutional manner, the growing menace of stray dogs within sensitive public spaces such as educational institutions, hospitals, sports complexes, bus stands/depots and railway stations. The Court emphasised the need for accountability, inter-departmental coordination, and sustained monitoring mechanisms at both the State and local levels.

**4.** In particular, and of critical significance, is the direction issued under **Paragraph 25(E)** of the order dated 7<sup>th</sup> November, 2025, wherein this Court imposed a clear and mandatory obligation upon the jurisdictional municipal bodies/authorities to forthwith remove all the stray dogs found within the precincts of such identified institutional areas and to relocate the same to designated shelters, after ensuring due sterilisation and vaccination in accordance with the applicable statutory framework. Importantly, and with a view to securing the effective implementation of its directions, the Court expressly prohibited the re-release of such stray dogs into the

very same locations from where they were removed, observing that any such reintroduction would defeat and frustrate the object and efficacy of the directions so issued, which were specifically intended to secure institutional spaces and safeguarding the safety, health, and well-being of the public at large.

5. For the sake of ready reference, the relevant extracts from the said order are reproduced hereinbelow: -

**“PART II: Modification, Application and Implementation of the Directions issued by High Court of for Rajasthan at Jodhpur in D.B. Civil Writ Petition No. 14726 of 2025.”**

8. It is a matter of grave and continuing public concern that accidents caused by cattle and other stray animals on public roads and highways have become alarmingly frequent across the country. Such incidents, often resulting in loss of human life, grievous injuries, and damage to property, are not isolated events but symptomatic of a larger failure on the part of the administrative authorities entrusted with public safety. The uncontrolled presence of cattle and stray animals on National Highways, National Expressways, and State Highways, constitutes a serious and avoidable threat, particularly during night-time or in high-speed zones.

9. This Court cannot remain unmindful of the preventable nature of these accidents, which not only reflect administrative indifference but also undermine the constitutional guarantee of the right to life and safety under Article 21. The need for immediate, coordinated, and sustained action by all concerned agencies, i.e., municipal authorities, road

and transport departments, public works departments and highway authorities, cannot be overstated.

10. Accordingly, this Court issues the following directions: -

- A. The directions issued by the High Court of Rajasthan at Jodhpur in D.B. Civil Writ Petition No. 14726 of 2025 vide order dated 11th August, 2025, are hereby reaffirmed, to the extent that the municipal authorities, road and transport department/Public Works Department of all the States and Union Territories and the National Highways Authority of India (NHAI) shall ensure the removal of all cattle and other stray animals from the State Highways, National Highways, and National Expressways falling within their respective jurisdictions.**
- B. The concerned authorities, i.e., the municipal authorities, the road and transport department/Public Works Department of all the States and Union Territories and the National Highways Authority of India shall undertake a joint, coordinated drive to identify stretches of highways and expressways where stray cattle or animals are frequently found, and shall take immediate steps for their removal and relocation to designated shelters.** The cattle and other stray animals so picked up shall be kept in appropriate shelters or Gaushalas/cattle pounds, as the case may be, and provided with all necessary food, water, and veterinary care, in accordance with the provisions of the Prevention of Cruelty to Animals Act, 1960 and the Animal Birth Control (Dogs) Rules, 2023.
- C. Each authority shall constitute dedicated highway patrol teams and/or assign existing road-safety units for continuous surveillance and immediate response to reports of stray cattle or other animals obstructing the**

**roadways. Such patrols shall function on a 24x7 basis and coordinate with local police stations, veterinary officers, and municipal authorities/Panchayati Raj institutions.**

**D. All National Highways, State Highways, and National Expressways shall have prominently displayed helpline numbers at regular intervals, enabling commuters to promptly report the presence of stray animals or accidents caused thereby. These helplines shall be linked to the control rooms of the local police, National Highways Authority of India, and district administration for real-time redressal and monitoring.**

**E.** The Chief Secretaries of all States and Union Territories, together with the Chairperson, National Highways Authority of India, shall ensure strict enforcement of these directions through appropriate administrative orders and field-level monitoring. They shall hold the concerned officers personally accountable for lapses or recurring incidents in their respective jurisdictions.

**F.** The aforesaid directions shall be implemented uniformly across India, and the Chief Secretaries of all States and Union Territories; Chairperson, National Highways Authority of India; and Ministry of Road Transport and Highways, Union of India shall file status-cum-compliance affidavits within a period of eight weeks from today, indicating: -

- i.** the mechanism established for removal and sheltering of stray animals from highways;
- ii.** the constitution and functioning of patrol teams; and
- iii.** the operational status of helpline facilities and installation of sign boards displaying helpline numbers.

11. The Registry shall forthwith implead the National Highways Authority of India through its Chairperson.

**PART III: Directions regarding Institutional Areas, i.e., educational institutions, hospitals, sports complexes, bus stands/depots and railway stations**

12. In the interregnum, this Court has been apprised through various news reports and media accounts of disturbing increase in dog-bite incidents within the premises of educational institutions, hospitals, sports complexes, bus stands/depots (including Inter-State Bus Terminals) and railway stations, generically speaking, institutional areas. Instances of children being attacked in school campuses, patients and attendants being bitten within hospital compounds, athletes as well as officials being attacked by stray dogs inside sports stadiums and passengers/travellers being attacked by stray dogs inside sports stadiums and passengers/travellers being attacked by stray dogs at bus stands/depots and railway stations, have come to the notice of this Court.

13. The recurrence of such incidents, particularly within institutional spaces meant for learning, healing, and recreation, reflects not only administrative apathy but also a systemic failure to secure these premises from preventable hazards. The situation calls for immediate judicial intervention to safeguard the fundamental right to life and safety of citizens, especially children, patients, and sportspersons, under Article 21 of the Constitution of India.

[.....]

15. Recognising the need for a humane yet effective framework, the Government of India, in exercise of its powers under the Prevention of Cruelty to Animals Act, 1960, promulgated the Animal Birth Control Rules, 2001, subsequently amended and supplemented from time to time. These Rules established the **Capture-Sterilize-Vaccinate-Release (CSVR) model** as the principal method for controlling the stray dog population, thereby prohibiting indiscriminate culling of stray

dogs and mandating municipal authorities to manage sterilisation, vaccination, and sheltering in coordination with animal welfare organisations. **However, the implementation of these Rules has been ineffective, to say the least, across jurisdictions and the persistence of stray dog population has continued to imperil public safety in many parts of the country.**

[.....]

22. **The Court notes that the underlying causes of this enduring menace are multifaceted, including, (i) uncontrolled reproduction of stray dogs owing to inadequate implementation of sterilisation programmes; (ii) improper disposal of food waste in and around public institutions; (iii) absence of effective perimeter management and institutional coordination with municipal authorities; and (iv) lack of widespread public awareness regarding preventive conduct and post dog bite medical procedures.**

23. Despite the statutory framework of the Animal Birth Control Rules, 2001 as amended in 2023, and the existence of various municipal bye-laws/guidelines/Standard Operating Procedures, the practical outcomes have remained suboptimal. The data emerging from several States and Union Territories reveal a year-on-year increase in reported dog bite cases, many occurring within or near public institutions. The persistence of the problem calls for a holistic and coordinated approach involving municipal corporations, public health authorities, and administration of the institutions, to ensure that the constitutional mandate of safeguarding the right to life under Article 21 is not compromised by administrative inaction or inefficiency.

24. **The menace of dog bites, particularly in public and private institutions that serve as spaces of learning, healing and recreation, thus constitutes not merely a public health challenge but a matter of human safety concern. The State and its instrumentalities bear an affirmative**

**obligation to ensure that no citizen, least of all children, elderly people and patients, are exposed to preventable injury or disease within public premises.**

**IV. Directions**

25. Having regard to the alarming rise in incidents of dog bites within institutional areas such as educational institutions, hospitals, sports complexes, bus stands/depots (including inter-State Bus Terminals) and railway stations, this Court deems it appropriate to issue the following directions in the interest of public safety, health, and management of stray dogs: -

- A. The State Governments and Union Territories shall through their respective local/municipal authorities, within a period of two weeks, identify all Government and private educational institutions, hospitals (including district hospitals, primary health centres, and medical colleges), public sports complexes or stadia, bus stands/depots (including Inter-State Bus Terminals) and railway stations situated within their territorial limits.**
- B. The administrative heads of the aforesaid institutions shall through their respective local/ municipal authorities, under the overall supervision of the District Magistrate concerned, ensure that the premises are secured by adequate fencing, boundary walls, gates and such other structural or administrative measures as may be necessary to prevent the ingress of stray dogs. The said exercise shall be completed as soon as possible and preferably within a period of 8 weeks from today.**
- C. The management of every educational institution, hospital, sports complex, bus stand/depot (including Inter-State Bus Terminal) and railway station identified under Direction (A) shall designate a Nodal Officer responsible for the upkeep and cleanliness of**

**the premises and for ensuring that stray dogs do not enter or inhabit the campus. The details of the said officer shall be displayed prominently at the entrance and notified to the jurisdictional municipal body/authority.**

- D. The local municipal authorities and panchayats shall carry out regular inspections, at least once in every three months, of all such premises to ensure that no stray dog habitats exist within or in the immediate vicinity of these institutions. Any lapse in this regard shall be viewed seriously, and responsibility shall be fixed upon the concerned municipal officials/administrative authorities.
- E. **It shall be the responsibility of the jurisdictional municipal body/authority to forthwith remove every stray dog found within the premises of an educational institution, hospital (public or private), sports complex, bus stand/depot (including Inter-State Bus Terminal) or railway station and to shift such animal/s to a designated shelter, after due sterilisation and vaccination, in accordance with the Animal Birth Control Rules, 2023. The stray dogs so picked up shall not be released back to the same location from which they were picked up. We have consciously directed the non-release of such stray dogs to the same location from which they were picked up, as permitting the same would frustrate the very effect of the directions issued to liberate such institutional areas from the presence of stray dogs.**
- F. All Government and private hospitals shall maintain a mandatory stock of anti-rabies vaccines and immunoglobulin at all times.
- G. Every school and educational institution shall be directed by the Ministry of Education, Government of India, to conduct awareness sessions for students and staff on preventive

behaviour around animals, first-aid in case of bites, and immediate reporting protocols.

- H. The management of stadiums and sports complexes shall ensure the deployment of security or ground-keeping personnel specifically tasked with around the clock vigil against the entry or habitation of stray dogs.**
- I. The railway authorities having jurisdiction over the railway stations as well as the State transport corporations and municipal authorities having jurisdiction over bus stands, depots and Inter- State Bus Terminals, shall ensure that such public-transport premises/facilities are effectively secured and maintained so as to prevent the habitation or movement of stray dogs within their premises. Proper waste-management systems shall be implemented to eliminate food sources that attract animals, and regular inspections shall be conducted to detect and address the presence of stray dogs.**
- J. Animal Welfare Board of India shall, within four weeks, issue detailed Standard Operating Procedures (SOPs) for prevention of dog bites and management of stray dogs in institutional premises (public or private) including but not limited to Government and private educational institutions, hospitals (including district hospitals, primary health centres, and medical colleges), and sports complexes or stadia, to be uniformly adopted across all States and Union Territories.**

26. The aforesaid directions are being issued in continuation of and in furtherance of this Court's order dated 22nd August, 2025, to ensure that the menace of stray dog attacks within institutional areas is curbed through effective preventive and administrative mechanisms. The primary objective is to safeguard the fundamental right to life and safety of citizens, particularly children, students, patients, and sportspersons, while ensuring

compliance with the principles embodied in the Animal Birth Control Rules, 2023 framed under the Prevention of Cruelty to Animals Act, 1960.

**29. The Union of India shall also ensure that the aforesaid directions are implemented in respect of all institutional areas falling under its administrative or supervisory control, including Central Government educational institutions, hospitals, colleges, universities, sports complexes and railway stations managed by or affiliated with Central Ministries or authorities such as the Ministry of Health and Family Welfare; Ministry of Education; Ministry of Fisheries, Animal Husbandry and Dairying; Ministry of Youth Affairs and Sports; Ministry of Road Transport and Highways; Ministry of Railways; Ministry of Panchayati Raj; Ministry of Rural Development and other allied departments. The Union of India, through the Ministry of Health and Family Welfare, shall file a comprehensive affidavit of compliance within a period of 8 weeks from today, indicating the steps taken to secure such institutions, the mechanism evolved for coordination with local/municipal authorities, and the measures adopted for ensuring the availability of anti-rabies vaccines and immunoglobulin in Central Government hospitals and healthcare facilities.**

30. Animal Welfare Board of India shall also file a consolidated report indicating the nationwide status of sterilisation and vaccination drives, as well as the formulation of uniform Standard Operating Procedures for the prevention of dog-bite incidents in institutional areas/premises within 8 weeks from today.”

**[Emphasis supplied]**

**II. PART I: Consideration of Interlocutory Applications Seeking Modification, Clarification, Vacation, Recall and/or Stay of Directions Issued vide Order Dated 7<sup>th</sup> November, 2025**

6. Subsequent to the passing of the aforesaid order dated 7<sup>th</sup> November, 2025, a large number of interlocutory applications came to be instituted before this Court by various animal welfare organisations, associations, and individuals professing concern for the welfare of stray dogs, *inter alia*, seeking impleadment and intervention in the present proceedings. Several of the said applications also sought for modification, clarification, vacation, recall and/or stay of certain directions contained in the said order, particularly those pertaining to the removal of stray dogs from institutional areas and the prohibition on their re-release at the same locations.

7. At the same time, certain applications have also been filed supporting the directions issued *vide* order dated 7<sup>th</sup> November, 2025 and seeking expansion of the said directions to other areas, including gated housing societies, housing complexes, parks, and other public places frequented by the public at large.

**8.** The applicants, in support of their respective prayers, advanced a range of submissions founded upon statutory provisions, existing regulatory frameworks, and established principles governing animal welfare. These submissions have brought to the fore a set of competing considerations that warrant careful judicial scrutiny. The applications, thus, raised issues lying at the intersection of public safety and animal welfare, necessitating a considered determination by this Court. In the aforesaid circumstances, this Court is enjoined to strike a careful and principled balance between the constitutional imperative of safeguarding human life and safety under Article 21 of the Constitution of India and the statutory mandate of ensuring humane treatment and protection of animals.

**9.** In view of the multiplicity of applications and the diverse reliefs sought therein, it becomes necessary for this Court to delineate the contours of the present adjudication. Given that a substantial number of the interlocutory applications seek modification, clarification, vacation, recall and/or stay of the directions contained in the order dated 7<sup>th</sup> November, 2025, this Court considers it appropriate

to first address the submissions advanced in support of such prayers, as well as the submissions advanced by those applicants supporting the said directions and seeking their continuation and expansion, in order to comprehensively examine the competing perspectives in a structured and cohesive manner.

**1. Submissions advanced on behalf of the Applicants seeking Modification, Clarification, Vacation, Recall and/or Stay of Directions issued vide order dated 7<sup>th</sup> November, 2025: -**

**A. Alleged Conflict of the Impugned Directions with the Animal Birth Control Rules, 2023**

**10.** Learned senior counsel and other counsel appearing for the applicants submitted that the directions contained in the order dated 7<sup>th</sup> November, 2025, insofar as they mandate the removal of stray dogs from the institutional areas and prohibit their re-release at the original locations, are in direct contravention of the statutory framework governing the management of stray dog population, as codified under the ABC Rules, 2023, read with the Revised Animal Birth Control Module for Street Dog Population Management, Rabies Eradication, Reducing Man-Dog Conflict issued by the Animal

Welfare Board of India. It was contended that the impugned directions, by requiring permanent relocation of dogs, effectively supplant the existing statutory regime, which comprehensively regulates the manner in which stray dogs are to be managed.

**11.** It was further submitted that the ABC Rules, 2023 provide a detailed and exhaustive protocol governing every stage of stray dog population management, including humane capture, pre-operative care, sterilisation, vaccination and post-operative rehabilitation. Particular emphasis was placed on Rule 11(19) of the said Rules, which mandates that sterilised and vaccinated dogs shall be released back into the same locality from where they were captured. Learned counsel contended that this requirement is not merely procedural but constitutes a core component of the statutory scheme, and that any direction mandating relocation or non-release at the original site would be inconsistent with, and derogatory to the express provisions of the ABC Rules, 2023.

**12.** Elaborating further, it was submitted that the statutory mandate of release into the original territory is founded upon well-established scientific

and ecological principles, as recognised in the Revised Module issued by the Animal Welfare Board of India. It was contended that removal or displacement of dogs from a given territory creates a “vacuum effect”, leading to migration of unsterilised and unvaccinated dogs into the vacated area, thereby increasing territorial conflicts, dog bites, and the risk of spread of rabies. Learned counsel submitted that such relocation, far from mitigating the problem, may aggravate human-animal conflict and undermine the very objective of population stabilisation sought to be achieved under the Animal Birth Control framework.

**13.** It was also contended that the ABC Rules, 2023 represent the culmination of sustained judicial consideration and expert consultation, and embody a conscious legislative policy favouring the Capture-Sterilise-Vaccinate-Release (CSVV) model as the only scientifically validated and humane method of managing population of stray dogs and eradicating rabies. In this regard, reliance was placed on the National Action Plan for Dog Mediated Rabies Elimination (NAPRE), which, according to the applicants, reinforces the centrality of maintaining a stable, sterilised dog population in a given area,

rather than resorting to displacement or confinement.

**14.** Learned counsel further submitted that, in the absence of any challenge to the vires of the ABC Rules, 2023, the directions issued by this Court ought not to override or operate in derogation of a binding statutory framework. It was contended that although this Court exercises plenary powers under Article 142 of the Constitution of India, such powers cannot be invoked to supplant substantive law or to issue directions that are plainly inconsistent with express statutory provisions occupying the field. In this regard, reliance was placed on the Constitution Bench judgment of this Court in ***Prem Chand Garg v. Excise Commr.***<sup>4</sup>, wherein it was held that the power under Article 142(1) of the Constitution of India cannot be exercised to make an order which is inconsistent with or in direct contravention of statutory provisions or substantive law, much less in violation of constitutional limitations. It was thus urged that the ABC Rules, 2023, having statutory force and embodying a specific legislative policy for

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<sup>4</sup> 1962 SCC OnLine SC 37.

the management of population of stray dogs, cannot be overridden by judicial directions which mandate a course of action contrary to the express scheme of the Rules, particularly the requirement of release of sterilised and vaccinated dogs to their original locations. On this premise, learned counsel submitted that the directions mandating non-release of stray dogs to their original locations are liable to be suitably modified or clarified so as to bring them in conformity with the statutory regime under the ABC Rules, 2023.

**B. Prayer for Constitution of a Technical/Expert Committee for Comprehensive Evaluation of the Issues Involved**

15. Learned senior counsel and other counsel appearing for the applicants submitted, at the outset, that the applicants do not dispute the seriousness of dog-bite incidents or the corresponding obligation of the State to ensure the safety and security of the public at large. However, it was contended that measures such as indiscriminate removal, large-scale confinement, or elimination of community dogs are neither contemplated under the existing statutory

framework nor the same is supported by established scientific principles or India's civilisational ethos of humane coexistence. It was urged that such measures, if implemented without a calibrated and evidence-based approach, may in fact aggravate the very problem sought to be addressed by creating ecological imbalances and increasing human-animal conflict.

**16.** It was further submitted that the issue at hand is complex, multi-dimensional, and resource-intensive, involving considerations of public health, urban governance, animal welfare, infrastructure, and financial capacity of local authorities. Learned counsel contended that the implementation of the directions contained in the order dated 7<sup>th</sup> November, 2025, particularly those requiring removal and relocation of stray dogs to shelters, presupposes the existence of adequate infrastructure such as designated shelters, trained personnel, veterinary support, and sustained funding, which, according to the applicants, are presently lacking in several parts of the country. In this backdrop, it was urged that a uniform, pan-India solution cannot be effectively

devised or implemented without the benefit of expert inputs and stakeholder consultation.

**17.** In these circumstances, learned counsel submitted that it would be appropriate for this Court to constitute an expert committee comprising representatives of relevant ministries, municipal authorities, veterinary experts, public health professionals, and recognised animal welfare organisations, so as to undertake a holistic and data-driven assessment of the issue and to suggest practicable, legally sustainable, and long-term pathways for managing the presence of community dogs, particularly within institutional areas. It was contended that such a committee would meaningfully assist this Court by providing domain-specific expertise and coordinated inputs, thereby enabling the evolution of a calibrated, balanced, and effectively implementable framework that addresses public safety concerns while remaining consistent with statutory mandates and principles of humane treatment of animals.

**C. Financial, Logistical, and Infrastructural Constraints in Implementation, including Expenditure towards Creation of Shelters, Deployment of Personnel, and Maintenance of Stray Animals**

18. Learned senior counsel and other counsel appearing for the applicants submitted that the feasibility of implementing the directions contained in the order dated 7<sup>th</sup> November, 2025 must be assessed in the backdrop of the existing infrastructural deficiencies across the country, particularly within educational institutions. It was contended that a substantial proportion of such institutions lack even basic facilities, with official data indicating that tens of thousands of schools do not have access to electricity, drinking water or sanitation, and several lakh institutions lack digital and infrastructural support. These systemic shortcomings, it was urged, demonstrate the limited institutional capacity to undertake any additional and resource-intensive operational responsibilities such as the removal, transportation and long-term management of community dogs.

**19.** It was further submitted that the burden of implementation would primarily fall upon municipal bodies and urban local authorities, which are already functioning under severe financial and administrative constraints. Learned counsel referred to financial assessments indicating that most municipal bodies are unable to meet even their existing revenue-expenditure obligations from internal sources and remain dependent on often irregular and insufficient transfer of funds from State Governments. In such circumstances, it was contended that requiring these authorities to conceive, establish, and sustain large-scale sheltering infrastructure for a significant number of dogs, along with their long-term maintenance and care, would be manifestly beyond their existing administrative wherewithal and fiscal capacity.

**20.** Elaborating on the scale of the exercise contemplated, learned counsel submitted that the implications of the directions are extremely wide in their sweep, as they encompass a vast number of institutional spaces across the country, including educational institutions, hospitals, sports complexes, bus stands/depots and railway stations.

By way of illustration, it was contended that there are over 15,46,941 educational institutions in India, and even on a conservative estimate of approximately 10 dogs per institution, the directions would entail the relocation and permanent housing of over 1.5 crore dogs from educational institutions alone. When similar considerations are extended to other categories of institutional premises across urban, semi-urban and rural areas, the overall number of animals requiring relocation and long-term care would increase exponentially.

**21.** It was further submitted that accommodating such an enormous population of stray dogs across the institutional areas would necessitate the establishment of more than 77,000 shelters, even on a conservative estimate of 200 dogs per facility, along with the acquisition of extensive tracts of land spanning thousands of acres. Learned counsel contended that this would also require the creation of an extensive, nationwide logistical framework involving coordinated mechanisms for identification, capture, transportation, medical treatment, record-keeping and long-term management of animals, supported by trained personnel and continuous

administrative oversight. It was urged that the magnitude, complexity and permanence of such an exercise render it unprecedented and far beyond the scope of existing institutional and governmental capacities.

**22.** Learned counsel further submitted that the financial implications of such an exercise would be staggering and wholly disproportionate to the available public resources. It was contended that the capital expenditure required for acquisition of land and construction of shelter facilities on the scale contemplated would run into several thousand crores of rupees. In addition to this substantial upfront cost, even a conservative estimate of Rs.40/- per dog per day towards food alone would result in an annual recurring expenditure exceeding Rs.22,000 crores, assuming the scale of relocation envisaged. It was further submitted that the said estimate pertains only to basic sustenance and does not account for the significant additional expenditure that would necessarily be incurred towards veterinary care, medicines, sterilisation, vaccination, staffing, maintenance of facilities, waste management systems, utilities, transportation, monitoring

mechanisms, and administrative oversight. Learned counsel contended that when these components are factored in, the total financial outlay would increase manifold, placing an unsustainable burden on the public exchequer. In such circumstances, it was urged that the implementation of the impugned directions, in their present form, is economically unviable and incapable of being carried out in a uniform and effective manner across jurisdictions, particularly by municipal authorities and local bodies already operating under severe financial constraints.

**23.** It was also contended that, in the absence of adequate infrastructure and financial resources, the combined effect of mandatory removal, prohibition on re-release, and lack of sheltering capacity may place municipal authorities in situations of practical impossibility, leading to a real and serious risk of unlawful practices, including culling or mistreatment of community dogs. Learned counsel therefore submitted that a more sustainable and legally compliant approach would be to prioritise strengthening of sanitation systems, waste management practices, and effective implementation of the Animal Birth Control framework, which

addresses the underlying causes of human-dog conflict without imposing disproportionate financial and logistical burdens on municipal authorities, urban local bodies and other implementing agencies entrusted with the execution of these directions.

**D. Deficiencies in Implementation and Enforcement of the Animal Birth Control Framework by State and Municipal Authorities**

**24.** Learned senior counsel and the other counsel appearing for the applicants submitted that the present controversy does not proceed on the premise of asserting any absolute “right” of stray dogs to occupy public streets, but is confined to opposing their indiscriminate removal from their natural habitat in a manner that is contrary to statutory provisions, scientific principles, and humane considerations. It was contended that the applicants fully endorse the Animal Birth Control framework, which itself contemplates regulated management of community dogs, and that the real issue lies not in the inadequacy of the statutory regime, but in its deficient and inconsistent implementation by the concerned municipal and State authorities.

**25.** It was further submitted that the continued presence of large numbers of stray dogs on streets is a direct consequence of the failure of municipal authorities to effectively implement the Capture-Sterilise-Vaccinate-Release (CSV) model envisaged under the ABC Rules, 2023. Learned counsel contended that underfunded, sporadic and partial execution of sterilisation and vaccination programmes has rendered the framework ineffective in practice, even though the underlying scientific methodology has been globally recognised as the most effective means of controlling the population of stray dogs, reducing dog-bite incidents, and eliminating rabies.

**26.** In support of the efficacy of the Animal Birth Control framework, learned counsel submitted that wherever the ABC Rules, 2023, have been implemented in a sustained and scientifically compliant manner, it has yielded demonstrable and measurable results. By way of illustration, it was pointed out that in Dehradun, where a structured Animal Birth Control programme was implemented in collaboration with local authorities, dog-bite incidents have reportedly reduced by over 68% over

a period of time. It was also submitted that the applicants and associated organisations have undertaken large-scale sterilisation and vaccination efforts across multiple municipalities, covering several lakh dogs, and have conducted systematic population surveys in cities such as Delhi, Ahmedabad, Mumbai and Lucknow, thereby demonstrating the viability and effectiveness of the statutory model when properly executed.

**27.** It was thus contended that the persistence of the stray dog issue is not attributable to any inherent flaw in the ABC Rules, 2023, but rather to the lack of adequate infrastructure, funding, and administrative commitment on the part of implementing authorities. Learned counsel submitted that instead of resorting to measures such as mass removal or long-term confinement of dogs, which are inconsistent with the statutory scheme, efforts ought to be directed towards strengthening and scaling up the Animal Birth Control programme by establishing adequate sterilisation centres, ensuring availability of trained personnel, and providing necessary financial and logistical support.

**28.** In this regard, it was urged that a coordinated, adequately funded, and rigorously monitored implementation of the Animal Birth Control framework, complemented by active community participation and strengthened urban management practices such as effective waste management and sanitation, would provide a far more sustainable, legally compliant, and scientifically sound solution to the issue of stray dog population and human-animal conflict, as opposed to the measures contemplated under the impugned directions, which, it was contended, do not address the root causes of the problem and may yield counterproductive outcomes.

**2. Submissions advanced on behalf of the Applicants supporting the Directions issued vide order dated 7<sup>th</sup> November, 2025 and seeking their continuation as well as extension to other public and institutional areas: -**

**29.** Learned senior counsel and other counsel appearing for the applicants supporting the directions submitted that the order dated 7<sup>th</sup> November, 2025 constitutes a necessary, timely and constitutionally justified intervention to address a grave, pervasive and escalating public safety crisis

arising from the unchecked presence of stray dogs in public and institutional spaces. It was contended that the existing Animal Birth Control framework, which has been in operation since 2001, has not only failed to achieve its core objectives of effective population control and reduction of human-dog conflict, but has, in fact, resulted in a steady and alarming proliferation of the stray dog population across the country, thereby exacerbating risks to public health, safety and mobility.

**30.** It was further submitted that despite the extensive efforts for full implementation of the Animal Birth Control framework, the stray dog population in India has risen exponentially, from an estimated 2.5 crore in the early 2000s to nearly 8 crores at present, leading to a deepening and widespread public health and safety emergency of gargantuan proportions. Learned counsel pointed out that India continues to account for the highest number of dog-bite incidents and rabies-related fatalities globally, with major hospitals reporting an overwhelming and ever-increasing caseload of dog attack victims each year, placing an immense burden on public healthcare system. It was contended that such empirical data

and ground realities unequivocally establish the inadequacy and ineffectiveness of the existing sterilisation-and-release model, which, instead of mitigating risks, has miserably failed to arrest population growth or meaningfully reduce incidents of attacks and disease transmission, thereby posing a continuing and serious threat to human life and health.

**31.** Learned counsel further submitted that the continued release, feeding and maintenance of stray dogs in public spaces, as contemplated under the ABC Rules, 2023, has resulted in systemic and widespread infringement of the fundamental rights of citizens at large under Article 21 of the Constitution of India. It was contended that the right to life encompasses not only mere survival but also the right to live with dignity in an environment which is safe, secure, hygienic, free from threats to life, mobility and livelihood. Learned counsel emphasised that this Court has, in a catena of judgments, expanded the scope of Article 21 to include rights such as safe public spaces, unobstructed movement, peaceful sleep, and protection from health hazards and public nuisance, all of which are directly

impacted by the unchecked presence of stray animals.

**32.** It was further submitted that the presence of large numbers of free-roaming dogs in public areas, including roads, parks, residential complexes and institutional premises, creates a continuous and pervasive risk of attacks, disease transmission (including rabies), obstruction of pathways, and disruption of daily life, thereby impeding the exercise of fundamental rights. Learned counsel contended that such conditions particularly affect children, elderly persons, persons with disabilities, and economically weaker sections, who are disproportionately vulnerable and often lack access to timely medical intervention. It was urged that the cumulative effect of such conditions results in a denial of equal and meaningful access to public spaces, thereby undermining the constitutional guarantee of life and personal liberty under Article 21 of the Constitution of India.

**33.** It was further contended that a proper and harmonious construction of the provisions of the ABC Rules, 2023 does not support the proposition that stray dogs have an indefeasible right to occupy

or remain within all categories of premises, including institutional or gated areas. Learned counsel submitted that Rule 7(2) of the said Rules, which classifies “street dogs” or “community owned dogs” including those found within gated campuses, is merely a classificatory provision and cannot be construed as conferring any perpetual or enforceable right upon such animals to inhabit such premises indefinitely. It was further urged that Rule 11(19), which provides for release of dogs to their original locality, must be read in consonance with the parent statute, namely the Prevention of Cruelty to Animals Act, 1960<sup>5</sup>. In this regard, reliance was placed on the definition of “street” under Section 2(i) of the PCA Act, 1960, which confines the expression to public spaces such as roads, lanes, passages and other areas accessible to the public. It was therefore contended that the term “locality” occurring in Rule 11(19) must be interpreted to mean such “street” or public areas alone, and cannot be extended to include private premises, institutional campuses, or controlled-access spaces such as hospitals, colleges and other

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<sup>5</sup> For short, “PCA Act, 1960”.

similar establishments. On this basis, learned counsel submitted that the statutory scheme does not mandate, nor can it be interpreted to require, the continued presence or reintroduction of stray dogs within institutional premises or similar restricted areas, which poses great threat to the stakeholders of these sensitive areas, and that the directions issued by this Court are, in fact, consistent with and constitute a proper interpretation of the governing statutory framework.

**34.** It was also contended that the issue extends beyond public safety and has wide-ranging ecological, environmental and economic consequences of a serious magnitude. Learned counsel submitted that stray dogs have emerged as a significant threat to wildlife, with studies indicating attacks on a large number of species, including several that are classified as threatened and critically endangered, thereby contributing to the disruption of fragile ecosystems and biodiversity loss. It was further submitted that in rural and semi-urban areas, stray dogs have started to indulge in systematic livestock predation, including attacks on sheep, goats and poultry, resulting in recurring and

measurable economic losses for farmers and economically vulnerable communities. Learned counsel contended that the unchecked proliferation of stray dogs also leads to ecological imbalance and increased pressure on native species, and alteration of natural predator-prey dynamics, thereby exacerbating environmental stress in both urban and rural landscapes. It was, therefore, urged that the issue must be viewed not merely as one of public safety but as a matter of broader environmental and socio-economic concern, warranting a comprehensive, and scientifically grounded regulatory response.

**35.** In this backdrop, learned counsel submitted that the directions issued by this Court for removal of stray dogs from institutional areas ought not only to be amplified and also expanded to other public spaces such as public parks, gated housing societies and residential complexes, as well as other areas of high human congregation including marketplaces, pedestrian zones and recreational spaces, where similar risks to human safety and public order exist. It was contended that such areas, by virtue of dense and continuous human activity, presence of

vulnerable populations such as children, elderly persons and daily commuters, particularly require protection from the hazards posed by free-roaming animals, including risks of attacks, spread of disease, obstruction of movement and disturbance of public order. It was further urged that the absence of regulatory control in such spaces leads to the formation of territorial dog packs, thereby increasing the likelihood of aggressive behaviour and human-animal conflict.

**36.** It was further submitted that globally accepted models of dog population management do not permit unrestricted presence of unowned dogs in public spaces, and instead emphasise upon regulated ownership, strict control measures, impounding of stray animals, and, where necessary, humane euthanasia of dangerous or unclaimed dogs. It was contended that these models are designed not only to ensure animal welfare but also to prioritise public safety, urban hygiene and ecological balance. Learned counsel therefore contended that a calibrated framework incorporating such measures, consistent with public safety imperatives, would better serve both human interests and principles of

responsible animal welfare, as opposed to the existing regime which, according to the applicants, fosters unregulated presence of stray dogs in public spaces without adequate accountability or control mechanisms.

**37.** In conclusion, it was urged that the directions issued by this Court represent a necessary and constitutionally grounded intervention towards restoring the primacy of human rights, public safety and preservation of other endangered species, which, it was submitted, must remain paramount under Article 21 of the Constitution of India. It was further contended that the scope of these directions ought to be suitably broadened and extended so as to comprehensively address the menace of stray dogs not only within institutional areas but also across other public and residential spaces such as parks, streets, gated housing societies and residential complexes, where similar risks to life, mobility and public health persist, while ensuring that any measures adopted remain humane, lawful and effectively implemented.

**3. Consideration and Analysis of the Submissions  
Advanced by the Parties: -**

**38.** We have bestowed our anxious consideration to the rival submissions advanced on behalf of the applicants, both seeking modification, clarification, vacation, recall and/or stay of the directions and supporting their continuation and expansion. Upon a careful perusal of the pleadings, documents and material placed on record, we now proceed to examine the issues that arise for determination. The task before us is to strike a careful and principled balance between competing considerations, namely, the imperative of safeguarding the fundamental rights of public at large under Article 21 of the Constitution of India, including the right to life, safety and meaningful access to public spaces, and the statutory mandate of ensuring humane treatment and management of stray animals in accordance with the prevailing legal framework. Accordingly, the analysis that follows evaluates the legality, scope, efficacy and practical implications of the directions issued *vide* order dated 7<sup>th</sup> November, 2025 so as to determine their conformity with constitutional principles, statutory provisions and the requirements

of effective implementation, in the light of these competing concerns.

**A. Scope and Applicability of the Animal Birth Control Rules, 2023 in Relation to Institutional and Restricted-Access Premises**

**39.** At the outset, it is evident from the submissions advanced that the principal and foremost thrust of the submissions advanced on behalf of the applicants seeking modification, clarification, vacation, recall and/or stay of the order dated 7<sup>th</sup> November, 2025 was that the directions issued by this Court, insofar as they prohibit the re-release of stray dogs captured from institutional areas to the same place or location from where they were removed, are contrary to and inconsistent with Rule 11(19) of the ABC Rules, 2023, which mandates that sterilised and vaccinated dogs shall be released back to their original place or locality from where they were picked up. It was thus contended that the impugned directions transgress and are in derogation of the statutory scheme governing the management of community dogs. It was also the fervent caution of the proponents that the directions so given run contrary to the statutory provisions. In this backdrop, the principal issue that

arises for consideration before this Court is ***whether stray dogs found within public institutions such as educational institutions, hospitals, sports complexes, bus stands/depots (including Inter-State Bus Terminals) and railway stations can be regarded as “street dogs” or “community dogs” within the classification as provided under Rule 7(2) of the ABC Rules, 2023, so as to entitle them to the benefit of re-release to the same place or location from where they were picked up under Rule 11(19) thereof, or whether such public institutions fall outside the contemplation of “same place” or “locality” as envisaged under Rule 11(9) of the said Rules, thereby making them ineligible for re-release.***

40. For the purpose of examining the aforesaid issue, it becomes necessary to advert to the relevant statutory provisions governing the field. In the first instance, Rule 7(2) of the ABC Rules, 2023 provide for the classification of animals and, *inter alia*, recognise “street dogs” or “community owned dogs” as those which are homeless and are found living either on streets or, within gated campuses. This classification assumes relevance in identifying the

category of animals to which the regulatory framework applies. Secondly, it is necessary to consider the definition of the term “street” as contained in Section 2(i) of the PCA Act, 1960, which circumscribes the expression to public spaces such as roads, lanes, passages and other areas to which the public has access. The conjoint reading of these provisions is material for determining the scope and meaning of the expression “same place” and “locality” under Rule 11(19) of the ABC Rules, 2023, particularly in the context of whether such expression extends beyond public streets to include institutional or restricted-access premises. For the sake of ready reference, the relevant provisions are reproduced hereinbelow: -

**“Rule 7 of the ABC Rules, 2023**

7. Classification of animals: - Animals classified for the purpose of these rules are as under:  
[.....]

**(2) Street dogs or community owned Indian dogs or abandoned pedigreed dogs which are homeless, living on the street or within a gated campus.**

**Rule 11(19) of the ABC Rules, 2023**

11. Capturing or sterilisation or immunisation or release: -  
[.....]

**(19) The dogs shall be released at the same place or locality from where they were captured and the date, time and place of their release shall be recorded after their complete recovery and the representative of the local authority or of the animal welfare organisation shall accompany the team at the time of release and from time to time, the Board may provide a suitable application for geo-tagging the location of the dogs during capture and release.**

**Section 2(i) of the PCA Act, 1960**

2. Definitions. — In this Act, unless the context otherwise requires, —

[.....]

**(i) “street” includes any way, road, lane, square, court, alley, passage or open space, whether a thoroughfare or not, to which the public have access.”**

**[Emphasis supplied]**

**41.** Upon a careful examination of the relevant provisions, we are of the considered view that a proper and harmonious construction of the provisions of the Animal Birth Control Rules, 2023, when read in conjunction with the parent enactment, namely the Prevention of Cruelty to Animals Act, 1960, does not support the proposition that stray dogs possess an indefeasible or absolute right to occupy or remain within all categories of spaces or premises, irrespective of their nature or use. The provisions must be interpreted in a purposive and

contextual manner, having regard to the object and scheme of the legislation. The scheme of the ABC Rules, 2023, properly understood, is regulatory in character, intended to facilitate humane management of stray dog populations, including their control, sterilisation, vaccination and regulated presence in appropriate public areas, and cannot be elevated to confer a perpetual or unqualified right of existence upon such animals in every location where they may be found, particularly in spaces where considerations of public safety, health and institutional functioning assume significance.

**42.** At the outset, it must be noted that Rule 7(2) of the ABC Rules, 2023, which classifies “street dogs” or “community owned dogs” as those that are homeless and are found living on streets or within a gated campus, is merely a classificatory provision. Its purpose is to identify and demarcate categories of animals for the limited purpose of regulation, management and application of the statutory framework, which is directed towards scientific control and stabilisation of the canine population in the interest of safeguarding public health and safety and not to create or recognise any substantive or

vested right in favour of such animals to continue occupying those spaces indefinitely. The provision is thus descriptive in nature and not declaratory of any enforceable entitlement. A classification provision, by its very nature, cannot be construed and interpreted to be a source of enforceable rights, much less one that overrides considerations of public safety, institutional integrity, or statutory limitations, particularly where such an interpretation would defeat the object and purpose of the PCA Act, 1960 and the ABC Rules, 2023 themselves.

**43.** It must also be noted that while including “gated campus” within the ambit of Rule 7(2) of the ABC Rules, 2023, the rule-making authority could not have contemplated a situation where stray dogs are permitted to inhabit and roam around in sensitive institutional premises such as hospitals, schools, colleges, sports complexes, airports and similar establishments. The expression “gated campus” must be understood in a limited and contextual sense, and cannot be expansively construed to cover all categories of controlled-access institutional spaces, particularly those where safety, hygiene and regulated activity are of paramount importance. Such

locations are frequented by large numbers of persons, including children of tender age, patients, elderly individuals and other vulnerable sections of society, who are inherently more susceptible to risks arising from presence of animals, including attacks, disease transmission and disruption of essential services. Furthermore, by their very nature, institutions such as hospitals, schools, colleges, sports complexes, airports and similar establishments are required to be sterile and free from all kinds of obstructions and intrusions. The presence of stray dogs in such environments not only poses serious safety and health hazards but may also impede the proper functioning of these institutions, which are designed to serve critical public purposes. The inclusion of “gated campus” in the classification clause, namely, Rule 7(2) of the ABC Rules, 2023, therefore, cannot be read in a manner that legitimises or perpetuates the presence of stray dogs in such sensitive and high-risk spaces, nor can it be interpreted to override the obligation of the State and municipal/local authorities to ensure safe, secure and hazard-free institutional environments.

**44.** Further, Rule 11(19) of the ABC Rules, 2023, which mandates the release of sterilised and vaccinated dogs to the same place or locality from where they were picked up, must necessarily be read in a manner consistent with the parent statute. The PCA Act, 1960, being the source of delegated authority, circumscribes the scope within which subordinate legislation must operate, and any interpretation of the Rules must remain within the contours of the enabling statute. In this context, the definition of “street” under Section 2(i) of the PCA Act, 1960 assumes considerable significance, as it expressly limits the expression to public spaces such as “any way, road, lane, square, court, alley, passage or open space, whether a thoroughfare or not”, to which the public has access. This definition, being provided under the principal enactment, must guide and inform the interpretation of expressions used in the subordinate legislation framed thereunder. This statutory definition therefore provides an important interpretative guide for understanding the scope and ambit of the expression “same place or locality” used in Rule 11(19) of the ABC Rules, 2023, and indicates that the same cannot be construed in a manner that

travels beyond the concept of publicly accessible spaces as contemplated under the parent statute.

**45.** When Rule 11(19) of the ABC Rules, 2023, is read in light of the aforesaid definition, it becomes evident that the expression “same place or locality” cannot be construed in an unbound or expansive manner so as to include private premises, institutional campuses, or controlled-access spaces such as hospitals, colleges and similar establishments. To do so would be to disregard the statutory context, the scheme of the parent enactment, and the clear legislative intent underlying the use of the term “street” in Rule 7(2) and would effectively extend the operation of the ABC Rules, 2023 beyond their intended domain. The term “same place or locality” must therefore be confined to public streets and other analogous open-access areas to which the public has unhindered access, where the regulatory balance between animal management and public interaction is contemplated, and where the statutory scheme can be effectively implemented without compromising public safety or institutional integrity.

**46.** This interpretation is further reinforced by the nature and function of institutional and restricted-access premises. Spaces such as educational institutions, hospitals, transport hubs and other public utility areas are designed for specific purposes involving the safety, health and movement of large numbers of people, often including vulnerable groups. These premises are expected to maintain a controlled, secure and hygienic environment, where human safety measures are to be maintained at the optimum level and all risk factors have to be eliminated. To read the Rules as mandating the continued presence or reintroduction of stray dogs in such spaces would be contrary to the very purpose for which these premises exist, and would create a direct, unavoidable, and irreconcilable conflict between statutory interpretation and the constitutional imperative of ensuring public safety in such environments, thereby resulting in serious practical and administrative difficulties in the discharge of their core functions.

**47.** Moreover, a contrary interpretation, which treats the presence of stray dogs in all locations as a matter of right, would lead to serious, anomalous and

manifestly impractical consequences. It would effectively deprive authorities of the ability to exercise necessary regulatory control or take preventive measures to restrict the presence of animals in sensitive or high-risk areas, even where such presence poses clear, immediate and demonstrable risks to public safety, health, or institutional functioning. This would, in effect, result in a situation where administrative authorities are rendered helpless to discharge their statutory and constitutional obligations towards ensuring safety and order in public and institutional spaces. Such an outcome could not have been intended by the rule-making authority and would render the regulatory framework internally inconsistent, operationally unworkable, and incapable of effective enforcement in real-world conditions.

**48.** In view of the foregoing discussion, it must be held that the statutory scheme underlying the PCA Act, 1960, and the Rules framed thereunder, namely, the ABC Rules, 2023, does not mandate, nor can it be interpreted to require, the continued presence or compulsory reintroduction of stray dogs within institutional premises or other restricted-access

**areas. Consequently, stray dogs found within such institutional spaces or similar controlled environments, including educational institutions, hospitals, sports complexes, airports, bus stands/depots (including Inter-State Bus Terminals) and railway stations cannot be held to fall within the scope of the classification contemplated under Rule 7(2) of the ABC Rules, 2023, i.e., “street dogs” or “community owned dogs,” inasmuch as the said provision, read in conjunction with Rule 11(19) of the ABC Rules, 2023, cannot be construed to extend to sensitive or restricted premises of this nature.**

**49.** In the aforesaid view of the matter, we reiterate and affirm the directions issued by this Court *vide* order dated 7<sup>th</sup> November, 2025, insofar as they exclude such premises from the operation of re-release under Rule 11(19) of the ABC Rules, 2023, and hold that the same are in consonance with a proper, purposive and harmonious interpretation of the governing statutory framework, and serve to align the implementation of the ABC Rules, 2023 not only with the statutory scheme but also with the practical realities obtaining in such spaces, with due regard to

considerations of public safety, institutional integrity and constitutional obligations.

**B. Exercise of Jurisdiction under Article 142 of the Constitution of India and Validity of the Directions Issued**

**50.** Having considered the statutory framework governing the present controversy, this Court must now advert to the contours of its jurisdiction under Article 142 of the Constitution of India, particularly in the context of the submission that the directions issued *vide* order dated 7<sup>th</sup> November, 2025 are inconsistent with the provisions of the ABC Rules, 2023. It is trite that Article 142 of the Constitution of India vests this Court with wide and plenary powers to do “complete justice” in any cause or matter pending before it, and such power constitutes a distinct and independent source of jurisdiction, not circumscribed by the limitations applicable to ordinary statutory provisions.

**51.** In ***Union Carbide Corporation v. Union of India***<sup>6</sup>, a Constitution Bench of this Court underscored the breadth and amplitude of its powers under Article 142 of the Constitution of India by

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<sup>6</sup> (1991) 4 SCC 584.

holding that the expression “cause or matter” is of the widest import, encompassing all forms of proceedings before the Court. It was further observed that “*prohibitions or limitations contained in ordinary laws cannot, ipso facto, act as prohibitions or limitations on the constitutional powers under Article 142*”, and that the power under Article 142 is “*at an entirely different level and of a different quality*”. At the same time, this Court clarified that while exercising such power, due regard must be had to statutory provisions, particularly those founded on fundamental considerations of public policy, in assessing what would constitute “complete justice” in a given case. For ready reference, the relevant extract from the said judgment is reproduced hereinbelow: -

“83. It is necessary to set at rest certain misconceptions in the arguments touching the scope of the powers of this Court under Article 142(1) of the Constitution. These issues are matters of serious public importance. **The proposition that a provision in any ordinary law irrespective of the importance of the public policy on which it is founded, operates to limit the powers of the apex Court under Article 142(1) is unsound and erroneous.** In both Garg [1963 Supp 1 SCR 885, 899-900 : AIR 1963 SC 996] as well as Antulay cases [(1988) 2 SCC 602 : 1988 SCC (Cri) 372] the point was one of violation of constitutional provisions and constitutional rights. The observations as to the

effect of inconsistency with statutory provisions were really unnecessary in those cases as the decisions in the ultimate analysis turned on the breach of constitutional rights. We agree with Shri Nariman that the power of the Court under Article 142 insofar as quashing of criminal proceedings are concerned is not exhausted by Section 320 or 321 or 482 CrPC or all of them put together. **The power under Article 142 is at an entirely different level and of a different quality. Prohibitions or limitations or provisions contained in ordinary laws cannot, ipso facto, act as prohibitions or limitations on the constitutional powers under Article 142. Such prohibitions or limitations in the statutes might embody and reflect the scheme of a particular law, taking into account the nature and status of the authority or the court on which conferment of powers — limited in some appropriate way — is contemplated. The limitations may not necessarily reflect or be based on any fundamental considerations of public policy.** Sri Sorabjee, learned Attorney General, referring to Garg case [1963 Supp 1 SCR 885, 899-900 : AIR 1963 SC 996], said that limitation on the powers under Article 142 arising from “inconsistency with express statutory provisions of substantive law” must really mean and be understood as some express prohibition contained in any substantive statutory law. He suggested that if the expression ‘prohibition’ is read in place of ‘provision’ that would perhaps convey the appropriate idea. **But we think that such prohibition should also be shown to be based on some underlying fundamental and general issues of public policy and not merely incidental to a particular statutory scheme or pattern. It will again be wholly incorrect to say that powers under Article 142 are subject to such express statutory prohibitions. That would convey the idea that statutory provisions override a constitutional provision. Perhaps, the proper**

**way of expressing the idea is that in exercising powers under Article 142 and in assessing the needs of “complete justice” of a cause or matter, the apex Court will take note of the express prohibitions in any substantive statutory provision based on some fundamental principles of public policy and regulate the exercise of its power and discretion accordingly. The proposition does not relate to the powers of the Court under Article 142, but only to what is or is not ‘complete justice’ of a cause or matter and in the ultimate analysis of the propriety of the exercise of the power. No question of lack of jurisdiction or of nullity can arise.”**

**[Emphasis supplied]**

**52.** The scope and limits of this extraordinary jurisdiction were further delineated in ***Supreme Court Bar Association v. Union of India***<sup>7</sup>, wherein a 5-Judge Bench of this Court also considered the apparent conflict between the principles enunciated in ***Union Carbide Corporation (supra)*** and ***Prem Chand Garg (supra)***. It was held that there existed, in fact, no real conflict between the two lines of authority. While affirming that the powers under Article 142 of the Constitution of India are plenary and supplementary in nature, the Court clarified that they are nonetheless curative and cannot be exercised in a manner that would “supplant”

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<sup>7</sup> (1998) 4 SCC 409.

substantive law or disregard express statutory provisions governing the field. This Court emphasised that although statutory provisions do not fetter the existence of the power under Article 142 of the Constitution of India, the exercise of such power must remain consistent with the statutory framework, save in exceptional circumstances where the demands of justice so warrant. For ready reference, the relevant extract from the said judgment is reproduced hereinbelow: -

**“47. The plenary powers of this Court under Article 142 of the Constitution are inherent in the Court and are complementary to those powers which are specifically conferred on the Court by various statutes though are not limited by those statutes. These powers also exist independent of the statutes with a view to do complete justice between the parties. These powers are of very wide amplitude and are in the nature of supplementary powers. This power exists as a separate and independent basis of jurisdiction apart from the statutes. It stands upon the foundation and the basis for its exercise may be put on a different and perhaps even wider footing, to prevent injustice in the process of litigation and to do complete justice between the parties. This plenary jurisdiction is, thus, the residual source of power which this Court may draw upon as necessary whenever it is just and equitable to do so and in particular to ensure the observance of the due process of law, to do complete justice between the parties, while administering justice according to law. There is**

**no doubt that it is an indispensable adjunct to all other powers and is free from the restraint of jurisdiction and operates as a valuable weapon in the hands of the Court to prevent “clogging or obstruction of the stream of justice”. It, however, needs to be remembered that the powers conferred on the Court by Article 142 being curative in nature cannot be construed as powers which authorise the Court to ignore the substantive rights of a litigant while dealing with a cause pending before it. This power cannot be used to “supplant” substantive law applicable to the case or cause under consideration of the Court. Article 142, even with the width of its amplitude, cannot be used to build a new edifice where none existed earlier, by ignoring express statutory provisions dealing with a subject and thereby to achieve something indirectly which cannot be achieved directly.** Punishing a contemner advocate, while dealing with a contempt of court case by suspending his licence to practice, a power otherwise statutorily available only to the Bar Council of India, on the ground that the contemner is also an advocate, is, therefore, not permissible in exercise of the jurisdiction under Article 142. The construction of Article 142 must be functionally informed by the salutary purposes of the article, viz., to do complete justice between the parties. It cannot be otherwise. As already noticed in a case of contempt of court, the contemner and the court cannot be said to be litigating parties.

48. The Supreme Court in exercise of its jurisdiction under Article 142 has the power to make such order as is necessary for doing complete justice “between the parties in any cause or matter pending before it”. **The very nature of the power must lead the Court to set limits for itself within which to exercise those powers and ordinarily it cannot disregard a statutory provision governing a subject, except perhaps to balance the equities between the conflicting claims of the litigating parties by**

**“ironing out the creases” in a cause or matter before it. Indeed this Court is not a court of restricted jurisdiction of only dispute-settling. It is well recognised and established that this Court has always been a law-maker and its role travels beyond merely dispute-settling. It is a “problem-solver in the nebulous areas” (see K. Veeraswami v. Union of India [(1991) 3 SCC 655 : 1991 SCC (Cri) 734] but the substantive statutory provisions dealing with the subject-matter of a given case cannot be altogether ignored by this Court, while making an order under Article 142. Indeed, these constitutional powers cannot, in any way, be controlled by any statutory provisions but at the same time these powers are not meant to be exercised when their exercise may come directly in conflict with what has been expressly provided for in a statute dealing expressly with the subject.”**

**[Emphasis supplied]**

**53.** The contours of the powers under Article 142 of the Constitution of India were further expounded by a Constitution Bench of this Court in ***Shilpa Sailesh v. Varun Sreenivasan***<sup>8</sup>, wherein the nature, scope and limitations of this extraordinary jurisdiction were comprehensively analysed. This Court observed that though the power under Article 142(1) of the Constitution of India is plenary and appears to be unfettered, it is nonetheless tempered by self-imposed restraints founded on fundamental

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<sup>8</sup> (2023) 14 SCC 231.

considerations of public policy. It was clarified that such limitations operate at two levels, namely, general public policy, encompassing fundamental constitutional values such as fundamental rights, secularism and federalism, and specific public policy, reflected in express and pre-eminent prohibitions contained in substantive law. The Court further held that the exercise of power under Article 142 of the Constitution of India is impermissible only where it results in an order that is plainly contrary to substantive statutory provisions rooted in such fundamental public policy considerations. Drawing upon the principles laid down in ***Union Carbide Corporation (supra)*** and ***Supreme Court Bar Association (supra)***, it was reiterated that while this Court cannot “supplant” substantive law or construct a new legal regime in disregard of express statutory provisions, it retains wide discretion to mould relief, balance equities and address situations where the law may be silent or inadequate. The power under Article 142 of the Constitution of India was thus characterised as a residuary and elastic jurisdiction, enabling this Court to act as a “problem-solver in the nebulous areas”, so long as the exercise of such

power does not transgress fundamental principles of general or specific public policy. For ready reference, the relevant extract from the said judgment is reproduced hereinbelow: -

**“19. Given the aforesaid background and judgments of this Court, the plenary and conscientious power conferred on this Court under Article 142(1) of the Constitution of India, seemingly unhindered, is tempered or bounded by restraint, which must be exercised based on fundamental considerations of general and specific public policy. Fundamental general conditions of public policy refer to the fundamental rights, secularism, federalism, and other basic features of the Constitution of India. Specific public policy should be understood as some express pre-eminent prohibition in any substantive law, and not stipulations and requirements to a particular statutory scheme. It should not contravene a fundamental and non-derogable principle at the core of the statute.**

Even in the strictest sense [ Some jurists have opined that the judgments on the powers of this Court under Article 142(1) of the Constitution of India can be divided into three phases. The first phase till late 1980s is reflected in the judgments of Prem Chand Garg v. Excise Commr., 1962 SCC OnLine SC 10 : AIR 1963 SC 996 and A.R. Antulay v. R.S. Nayak, (1988) 2 SCC 602 : 1988 SCC (Cri) 372, which inter alia held that the directions should not be repugnant to and in violation of specific statutory provision and is limited to deviation from the rules of procedure. Further, the direction must not infringe the Fundamental Rights of the individual, which proposition has never been doubted and holds good in phase two and three. **The second phase has its foundation in the ratio of**

**the judgment of the eleven-Judge Constitution Bench of this Court in Golak Nath v. State of Punjab, 1967 SCC OnLine SC 14 : AIR 1967 SC 1643, dealing with the doctrine of prospective overruling, which held that Articles 32, 141 and 142 are couched in such wide and elastic terms as to enable this Court to formulate legal doctrines to meet the ends of justice, the only limitation thereon being reason, restraint and injustice. In Delhi Judicial Service Assn. v. State of Gujarat, (1991) 4 SCC 406, this Court observes that any prohibition or restriction contained in ordinary laws cannot act as a limitation on the constitutional power of this Court to issue any order or direction to do “complete justice” in any “cause” or “matter”. Finally, the moderated approach has its origin in Union Carbide Corpn. v. Union of India, (1991) 4 SCC 584, which holds that this Court, in exercising powers under Article 142 and in assessing the needs of “complete justice” of a “cause” or “matter”, will take note of the express prohibitions in any substantive statutory provision based on some fundamental principles of public policy and regulate the exercise of its power and discretion accordingly. The judgment of Supreme Court Bar Assn. v. Union of India, (1998) 4 SCC 409, applies cautious and balanced approach, to hold that Article 142 being curative in nature and a constitutional power cannot be controlled by any statutory provision, but this power is not meant to be exercised ignoring the statutory provisions or directly in conflict with what is expressly provided in the statute. At the same time, it observes that this Court will not ordinarily discard a statutory provision governing the subject, except perhaps to balance the equities between the conflicting claims of the parties to “iron out the creases” in a “cause or matter” before it. [See Rajat Pradhan, “Ironing out the Creases : Re-examining the Contours of Invoking**

Article 142(1) of the Constitution”, (2011) 6 NSLR 1; Ninad Laud, “Rationalising ‘Complete Justice’ under Article 142”, (2021) 1 SCC J-30; and Virendra Kumar, “Notes and Comments : Judicial Legislation Under Article 142 of the Constitution : A Pragmatic Prompt for Proper Legislation by Parliament”, (2012) 54 JILI 364]. **As observed by us, the ratio as expounded in Union Carbide Corpn. v. Union of India, (1991) 4 SCC 584 holds good and applies., it was never doubted or debated that this Court is empowered under Article 142(1) of the Constitution of India to do “complete justice” without being bound by the relevant provisions of procedure, if it is satisfied that the departure from the said procedure is necessary to do “complete justice” between the parties.** [See Prem Chand Garg (Prem Chand Garg v. Excise Commr., 1962 SCC OnLine SC 10 : AIR 1963 SC 996, para 13.]

20. Difference between procedural and substantive law in jurisprudential terms is contentious, albeit not necessary to be examined in depth in the present decision [However, this aspect has been, to some extent, examined in paras 24 to 37, 56 and 57 herein.], as in terms of the dictum enunciated by this Court in Union Carbide Corpn. [Union Carbide Corpn. v. Union of India, (1991) 4 SCC 584] and Supreme Court Bar Assn. [Supreme Court Bar Assn. v. Union of India, (1998) 4 SCC 409] , exercise of power under Article 142(1) of the Constitution of India to do “complete justice” in a “cause or matter” is prohibited only when the exercise is to pass an order which is plainly and expressly barred by statutory provisions of substantive law based on fundamental considerations of general or specific public policy.

21. As explained in Supreme Court Bar Assn. [Supreme Court Bar Assn. v. Union of India, (1998) 4 SCC 409], the exercise of power under Article 142(1) of the Constitution of India being curative in nature, this Court would not ordinarily pass an

order ignoring or disregarding a statutory provision governing the subject, except to balance the equities between conflicting claims of the litigating parties by ironing out creases in a “cause or matter” before it. In this sense, this Court is not a forum of restricted jurisdiction when it decides and settles the dispute in a “cause or matter”. **While this Court cannot supplant the substantive law by building a new edifice where none existed earlier, or by ignoring express substantive statutory law provisions, it is a problem-solver in the nebulous areas. As long as “complete justice” required by the “cause or matter” is achieved without violating fundamental principles of general or specific public policy, the exercise of the power and discretion under Article 142(1) is valid and as per the Constitution of India. This is the reason why the power under Article 142(1) of the Constitution of India is undefined and uncatalogued, so as to ensure elasticity to mould relief to suit a given situation. The fact that the power is conferred only on this Court is an assurance that it will be used with due restraint and circumspection.** [See DDA v. Skipper Construction Co. (P) Ltd., (1996) 4 SCC 622.]”

[Emphasis supplied]

54. The decision in *Shilpa Sailesh (supra)* therefore affirms that the jurisdiction under Article 142 is both expansive and carefully circumscribed, expansive in its ability to transcend procedural limitations and craft appropriate relief, yet circumscribed by the obligation to remain consistent with substantive law and constitutional values. It is this delicate balance between breadth of power and

restraint in its exercise that informs the application of Article 142 of the Constitution of India in the present case.

**55.** It must also be noted that the present proceedings arise out of the exercise of *suo moto* jurisdiction by this Court, which is *sui generis* in nature and is invoked to address situations having wide-ranging consequences and adverse effects on the public at large. Such jurisdiction is exercised not for the resolution of an *inter se* dispute between identifiable parties, but to remedy systemic issues and to ensure that constitutional guarantees are not rendered illusory on account of administrative inaction or regulatory failure. In that sense, the proceedings transcend the conventional adversarial framework and assume the character of a public law action undertaken in furtherance of this Court's constitutional duty. The absence of a conventional *lis* does not dilute the judicial function, rather, it enlarges the scope of inquiry, requiring the Court to consider broader societal implications and long-term consequences of its directions.

**56.** The paramount consideration guiding the exercise of such jurisdiction is the protection and

enforcement of the fundamental rights of public at large, particularly the right to life and safety guaranteed under Article 21 of the Constitution of India. Where a situation discloses a continuing or recurring threat to public safety, health or dignity, this Court is constitutionally obligated to intervene and to devise appropriate remedial measures. The focus, therefore, shifts from adjudication of individual grievances to the preservation of collective rights and the prevention of systemic harm. The exercise of such jurisdiction thus entails a careful calibration of competing interests, with the overarching objective of ensuring that systemic deficiencies are rectified and that threats to public safety are mitigated in a sustained and meaningful manner.

**57.** In the aforesaid backdrop, this Court proceeds to examine the specific contention advanced on behalf of the applicants that Rule 11(19) of the ABC Rules, 2023 must be applied in an absolute and unqualified manner across all categories of spaces. This Court is unable to accede to the said submission for the reasons that follow. While it is true that the said Rule provides for the re-release of sterilised and

vaccinated dogs to the same locality from where they were picked up, such a provision cannot be read in isolation or expanded in a manner that would extend its application to sensitive and restricted premises such as hospitals, schools, colleges, sports complexes, transport hubs including airports and other similar institutional areas. Such an interpretation would be divorced from the statutory context and would amount to an impermissible generalisation of a regulatory provision beyond its intended scope.

**58.** As has already been held in the earlier part of this judgment, a harmonious and purposive construction of the PCA Act, 1960 and the Rules framed thereunder, namely, the ABC Rules, 2023, does not support the continued presence or compulsory reintroduction of stray dogs within such institutional spaces. On the contrary, an expansive application of Rule 11(19) of the ABC Rules, 2023 that contemplates re-release in these areas would be misconceived, as it would run contrary to the scheme of the statute and may have serious adverse consequences on public safety and health. The material placed on record, as well as the factual

backdrop leading to the issuance of the directions, clearly demonstrate that the presence of stray dogs in such locations has resulted in grave risks, particularly to vulnerable sections of society including children, patients and the elderly.

**59.** It is also pertinent to note that this Court, while exercising its jurisdiction, has consistently sought to strike a careful balance between the statutory framework governing animal welfare and the fundamental rights of public at large under Article 21 of the Constitution of India. The directions issued *vide* order dated 11<sup>th</sup> August, 2025, which effectively obviated the principles underlying Rule 11(19) of the ABC Rules, 2023, were subsequently revisited and modified by order dated 22<sup>nd</sup> August, 2025, wherein this Court observed that a blanket direction to pick up stray dogs from the National Capital Region would give rise to a ‘catch-22’ situation, inasmuch as such directions may be incapable of practical compliance, and accordingly approved the re-release of such dogs to the same location from where they were picked up. The order dated 7<sup>th</sup> November, 2025 was thus issued after due deliberation, with a calibrated approach aimed at reconciling the competing considerations of

animal welfare and human safety, and in exercise of the powers conferred under Article 142 of the Constitution of India to restore the balance by excluding from the operation of re-release those institutional and public spaces, such as schools, colleges, hospitals and similar establishments, where the presence of stray dogs is neither permitted nor conducive to public safety.

**60.** The directions contained in the order dated 7<sup>th</sup> November, 2025 were, therefore, intended to operate within a limited and specific domain, namely, to safeguard institutional environments from the hazards posed by the presence of stray dogs, while continuing to conform to the broader statutory framework in other contexts. In doing so, this Court has not supplanted the statutory scheme, rather, it has merely tailored its application in a manner consistent with constitutional imperatives and practical realities, particularly in spaces where the risk to human life and safety is both immediate and significant.

**61.** In the considered view of this Court, no principle of general or specific public policy, as understood in the context of Article 142 of the

Constitution of India and the jurisprudence governing its exercise, can be said to mandate or even contemplate the continued presence of stray dogs within such institutional areas. The concept of public policy, whether general or specific, cannot be construed in a manner that legitimises conditions which pose a demonstrable and recurring threat to human life, safety and health, particularly in spaces frequented by vulnerable sections of society such as children, patients and the elderly. To hold otherwise would be to elevate a regulatory provision, intended for humane control of canine population, to a position where it overrides fundamental rights and compromises the safety and well-being of public at large. Such an interpretation would not only be contrary to the scheme of the governing statute, but would also run afoul of the constitutional mandate under Article 21 of the Constitution of India, which obligates the State to ensure a safe and secure environment for all individuals. Public policy, properly understood, must operate in furtherance of constitutional values, and cannot be invoked to justify outcomes that are manifestly opposed to public safety.

**62.** It is equally necessary to bear in mind that the power under Article 142 of the Constitution of India is exercised to bridge gaps where the statutory framework, though otherwise valid, may not adequately address emergent or exceptional situations. The present case discloses precisely such a situation, where the application of a general statutory principle, if extended without limitation, would lead to consequences inconsistent with the broader objectives of the law and the Constitution. The directions issued by this Court, therefore, do not supplant or override the statutory scheme, but rather modulate and regulate its application in a manner that is consistent with both legislative intent and constitutional imperatives. The exercise of power under Article 142 of the Constitution of India in the present case, thus, remains well within the permissible limits as delineated by the precedents referred *supra*. It is guided by constitutional values, informed by the statutory framework, and directed towards achieving a just and workable balance between competing interests. Above all, it is anchored in the overarching requirement of doing complete justice, ensuring that the protection of human life

and safety is not compromised by an unduly expansive or mechanical application of subordinate legislation. In the aforesaid view of the matter, the contention urged on behalf of the applicants seeking modification, clarification, vacation, recall and/or stay of the directions contained in the order dated 7<sup>th</sup> November that, notwithstanding the plenary nature of the power under Article 142 of the Constitution of India, the same cannot be invoked so as to supplant substantive law or to issue directions plainly inconsistent with express statutory provisions occupying the field, does not merit acceptance in the facts of the present case, inasmuch as the directions issued herein neither contravene nor override the governing statutory framework, but supplement, clarify and operationalise it in a manner consistent with its object and purpose.

**C. Examination of Ancillary Contentions Raised on Behalf of the Applicants**

**63.** Upon consideration of the ancillary submissions advanced on behalf of the applicants, this Court is of the view that the prayer for constitution of an expert committee does not merit acceptance. The directions issued *vide* order dated 7<sup>th</sup>

November, 2025 are neither sweeping nor unstructured, but are calibrated, limited in scope, and confined to specific categories of institutional areas such as educational institutions, hospitals, sports complexes, bus stands/depots (including Inter-State Bus Terminals) and railway stations. These are spaces where the presence of stray dogs has been found to pose a direct and immediate threat to public safety. The issues sought to be addressed are neither indeterminate nor incapable of implementation so as to necessitate the constitution of an expert body. The existing statutory framework, coupled with the directions issued by this Court, provides a sufficiently clear and workable mechanism, and what is required is effective implementation rather than further deliberation. The constitution of an expert committee at this stage would only delay and deter remedial action in a matter involving urgent concerns of public safety.

**64.** The submission regarding the enormity of financial and infrastructural requirements has, in the opinion of this Court, been overstated. This Court is unable to accept the premise that the directions necessarily entail large-scale acquisition of land or

the creation of permanent shelter infrastructure of the magnitude suggested. The directions do not mandate the establishment of new and permanent facilities across the country, but rather contemplate the utilisation of existing infrastructure, including *gaushalas*, cattle pounds, animal shelters and other such facilities, which may be suitably augmented or adapted for the purpose. The implementation of the directions is thus capable of being achieved through optimisation of existing resources rather than the creation of an entirely new infrastructure ecosystem.

**65.** It must also be borne in mind that the responsibility of managing stray animals is not confined to the State alone. Animal welfare organisations, recognised non-governmental organisations<sup>9</sup>, and individuals engaged in animal care, including those who profess concern for the welfare of community dogs, can and ought to play a constructive role in assisting the authorities. Collaborative efforts between municipal authorities and such organisations would significantly reduce the operational burden and facilitate humane and

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<sup>9</sup> For short, “NGOs”.

effective management of stray dogs in accordance with the statutory framework. The apprehension that the directions would impose an insurmountable financial burden on the State does not find favour with this Court.

**66.** There has been much clamour on the part of some NGOs whose learned counsel have tried to convince the Court that, given the appropriate opportunities, financial and logistics support, the NGOs can meaningfully and effectively tackle the issues of free-ranging dogs in the public areas by executing the Capture-Sterilise-Vaccinate-Release (CSV) model. We have not made any observations restricting the role of the NGOs in carrying out these activities. However, contrary to what was stated on behalf of the NGOs, an argument was advanced that as a matter of fact, many of the NGOs are indulging in raising fraudulent bills for procedures that have never been carried out or in submitting repetitive bills for procedures previously carried out. This alarming piece of information has been manifested in a recent news report which points out that in a particular area of Madhya Pradesh, the concerned NGO preserved the private parts of dogs to raise multiple bills for

Capture-Sterilise-Vaccinate-Release (CSV) activities and attempted to manipulate the procedure for the purpose of monetary gain.<sup>10</sup> The news article referred to above makes it clear that not all the NGOs are carrying out these activities for charity and that they are charging heavily for the procedures undertaken by them. Hence, we are not inclined to give any further directions in this regard, leaving it to the concerned municipal authorities to decide as to whether the NGOs should be involved in the Capture-Sterilise-Vaccinate-Release (CSV) model so as to alleviate the financial constraints faced by municipal authorities.

**67.** However, it is made clear that the concerned municipal authorities shall be well-advised to undertake rigorous and comprehensive due diligence, including detailed background checks, verification of credentials, assessment of past performance, technical capability and financial integrity, before awarding any contracts or tenders to such NGOs for the implementation of the Capture-

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<sup>10</sup> **MP: 795 dog reproductive organs stockpiled in sterilisation scam; attempt to pass fake bills; LINK: <https://www.aajtak.in/madhya-pradesh/story/mandla-dog-sterilization-scam-ngo-fake-bill-reproductive-organs-seized-fir-lcln-rpti-2522850-2026-04-13>.**

Sterilise-Vaccinate-Release (CSV) model. The process of empanelment or engagement shall not be undertaken in a routine or mechanical manner, but must be preceded by a careful evaluation of the track record and credibility of such organisations. Given that substantial public funds are involved, the authorities must ensure that the process of engagement is fair, transparent and in accordance with established norms. The execution of work by such NGOs shall be subject to continuous supervision, periodic inspections, and independent audits, including financial and performance audits, so as to ensure fidelity to the sanctioned work. These safeguards are necessary to prevent misuse, duplication or diversion of public funds, and to ensure that the objectives of the Animal Birth Control programme are not defeated by irregularities or lack of oversight, but are effectively achieved in a verifiable and accountable manner.

**68.** At the same time, this Court cannot lose sight of the fact that the present situation is, to a considerable extent, a consequence of the persistent failure on the part of State authorities and municipal/local bodies to effectively implement the

Animal Birth Control framework. The Animal Birth Control framework, initially introduced in 2001 and subsequently strengthened through the amendment of 2023, has remained largely deficient in its execution across several jurisdictions. The sporadic, underfunded and inconsistent implementation of sterilisation and vaccination programmes has resulted in an unchecked increase in the stray dog population and a corresponding rise in incidents of dog bites and related hazards.

**69.** This Court has, in its order dated 7<sup>th</sup> November, 2025, as well as in the preceding orders dated 11<sup>th</sup> August, 2025 and 22<sup>nd</sup> August, 2025, has categorically recorded the lack of effective and coordinated steps taken by the authorities in addressing the issue. The material placed on record, coupled with the factual circumstances noted in the aforesaid orders, reveals a consistent and continuing failure on the part of the concerned authorities to discharge their statutory obligations. Despite the existence of a well-defined statutory framework, there has been a conspicuous absence of sustained administrative effort, institutional accountability, adequate allocation of resources, and meaningful

monitoring mechanisms. The present proceedings are, therefore, not merely a response to isolated incidents, but are demonstrative of a deeper and continuing pattern of systemic administrative lapses and lethargy extending over a considerable period of time.

**70.** The difficulty, therefore, lies not in the absence or inadequacy of the statutory framework, but in the failure of its effective and sustained implementation by the concerned authorities. In this backdrop, the directions issued by this Court are intended to catalyze compliance and ensure that the existing statutory regime is meaningfully enforced in practice. The authorities concerned are, therefore, required to discharge their statutory obligations in a diligent, coordinated and time-bound manner, with clearly defined responsibilities and enforceable accountability mechanisms, and to take concrete steps towards ensuring effective enforcement of the Animal Birth Control framework, so that the recurring risks to public safety are addressed in a structured and sustained manner.

#### **D. Accountability and Tortious Liability in the Context of Stray Dog Management**

71. At this stage, it also becomes necessary to address an important facet which has a direct bearing on the submissions advanced on behalf of certain applicants professing concern for the welfare of stray dogs. While considerable emphasis has been placed on the protection, feeding and continued presence of community dogs in public and institutional spaces, a pertinent question arises as to whether such individuals, organisations and associations would be willing to assume corresponding legal responsibility for the consequences arising therefrom. In particular, whether such animal welfare organisations, associations, or individuals, who claim to care for or exercise control over stray dogs in a given locality, would be willing to accept tortious liability in respect of any injury, harm or damage caused by such dogs to members of the public. The issue assumes significance inasmuch as the assertion of a right to protect or maintain stray dogs in public spaces cannot be divorced from the obligation to ensure that such actions do not result in harm to others.

**72.** A similar concern arises in the context of institutional premises, particularly educational institutions, where certain animal welfare groups or student-led bodies are stated to be engaged in the care and feeding of stray dogs within campuses. In such situations, the question assumes even greater significance as to whether such entities/animal welfare groups would be willing to accept tortious liability for any incident involving dog bites or attacks upon students, staff or visitors within the campus. Institutional spaces, by their very nature, require a heightened standard of safety, and any activity that potentially compromises such safety must be accompanied by a corresponding assumption of responsibility. The absence of any clear framework for fixing such liability further underscores the imbalance between the assertion of rights in favour of stray animals and the lack of accountability for the consequences of their presence in sensitive environments. This aspect, in the considered view of this Court, merits serious consideration in the overall approach towards managing the issue of stray dogs in public and institutional spaces.

**73.** It must be noted that fervent arguments were raised on behalf of the National Academy of Legal Studies and Research, University of Law, Hyderabad<sup>11</sup> that it has institutionalised humane treatment of stray dogs in its campus by creating an Animal Law Centre and that all stakeholders including the students, staff, etc. are being sensitised towards the dogs present in the campus. It was submitted that similar social experiments could be undertaken in other educational institutions which would act in furtherance of the spirit of the ABC Rules, 2023, emphasise the inculcation of empathy among students and inspire them to be kind to the animals in both letter and spirit of the statutory regime. In this regard, we may simply observe that, in case the Animal Law Centre wishes to carry out the work in terms of the Capture-Sterilise-Vaccinate-Release (CSVV) model inside the campus of NALSAR University of Law, Hyderabad, such activity can be permitted on an experimental basis, subject to the pre-condition that the Animal Law Centre shall furnish an undertaking to the Vice Chancellor of the

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<sup>11</sup> Fort short, “NALSAR University of Law, Hyderabad”.

NALSAR University of Law, Hyderabad, that, in the event of any incident of stray dog bite occurring within the campus, the Animal Law Centre shall be liable to face tortious liability for the injury caused to the individual/s concerned.

**74.** This Court is of the considered opinion that any framework concerning the management and protection of stray dogs must necessarily be accompanied by clearly defined principles of accountability. The assertion of rights or interests in favour of such animals cannot operate in isolation, divorced from the corresponding responsibility to safeguard human life and safety. Insofar as the animal welfare groups or student-led bodies in educational institutions are concerned, it shall be mandatory for any such group or body operating within such campuses to expressly undertake such liability by filing an affidavit to this effect with the Head of the Institution concerned, failing which no such activity of maintaining or feeding stray dogs shall be permitted within the institutional premises. Failure to comply would entail suitable action against the Head of the Institution concerned.

#### **4. Conclusion: -**

**75.** As an upshot of the aforesaid discussion, this Court holds that the statutory scheme under the PCA Act, 1960 and the ABC Rules, 2023 does not mandate, nor can it be interpreted to require or justify the continued presence or re-release of stray dogs within institutional premises or other restricted-access areas. Consequently, such dog population cannot be held to fall within the scope of Rule 7(2) read with Rule 11(19) of the ABC Rules, 2023. The directions issued *vide* order dated 7<sup>th</sup> November, 2025, excluding such premises from the operation of re-release, are in consonance with a purposive and harmonious interpretation of the statutory framework and fall within the permissible exercise of this Court's powers under Article 142 of the Constitution of India, being guided by constitutional values and the imperative of ensuring public safety.

**76.** In view of the above, the submissions advanced on behalf of the applicants seeking modification, clarification, vacation, recall and/or stay of the directions contained in the order dated 7<sup>th</sup> November, 2025, particularly those pertaining to the removal of stray dogs from institutional areas and the

prohibition on their re-release at the same locations, are found to be devoid of merit. Accordingly, all interlocutory applications seeking modification, clarification, vacation, recall and/or stay of the aforesaid directions stand dismissed.

**III. PART II: Consideration of Interlocutory Applications Challenging the Standard Operating Procedure Issued by the Animal Welfare Board of India in Compliance of Direction (J) Contained in Order Dated 7<sup>th</sup> November, 2025**

**77.** At the outset, it is required to be noted that the Animal Welfare Board of India<sup>12</sup>, in compliance with **Direction (J)** issued by this Court *vide* order dated 7<sup>th</sup> November, 2025, proceeded to formulate and publish Standard Operating Procedures<sup>13</sup> dated 27<sup>th</sup> November, 2025 governing the prevention of dog bites and management of stray dogs in institutional premises. The said SOPs were intended to provide a uniform framework to be adopted across all States and Union Territories for effective implementation of the directions issued by this Court. The issuance of such SOPs was in furtherance of the mandate cast by

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<sup>12</sup> For short, "AWBI".

<sup>13</sup> For short, "SOPs".

this Court to ensure a coordinated, structured and time-bound response by all concerned authorities in addressing the issue of stray dog management, particularly in sensitive public spaces. The SOPs, thus, broadly seek to translate the directions of this Court into operational guidelines capable of uniform application, while also delineating the roles and responsibilities of municipal authorities, institutional managements and other stakeholders involved in the process.

**78.** The SOPs, in essence, lay down a comprehensive operational framework addressing multiple facets of stray dog management, including identification and establishment of shelters, regulation of shelter capacity in accordance with prescribed spatial parameters, feeding protocols, waste management systems, and deployment of adequate personnel for maintenance and supervision. They further mandate the identification of institutional areas such as educational institutions, hospitals (including district hospitals, primary health centres and medical colleges), sports complexes or stadia, bus stands/depots and railway stations, and also extend to other public spaces

including religious places, children's parks, airports, helipads, seaports, tourist sites and recreational areas. The SOPs require the securing of such premises through fencing and other infrastructural measures to prevent ingress of stray dogs, the appointment of nodal officers for supervision, and the coordinated removal of stray dogs from such areas, followed by their sterilisation, vaccination and relocation to designated shelters. They also contemplate the involvement of animal welfare organisations, establishment of community kennels, and mobilisation of financial and logistical resources. Additionally, the SOPs emphasise public awareness measures, responsible waste disposal practices, structured feeding protocols, and periodic monitoring and reporting mechanisms to ensure effective implementation across jurisdictions.

**79.** Subsequent thereto, multiple interlocutory applications came to be filed assailing the validity of the aforesaid SOPs on diverse grounds. Learned counsel appearing for the applicants contended that the SOPs are *ultra vires* the directions issued by this Court and travel beyond the scope of the order dated 7<sup>th</sup> November, 2025. It was urged that while this

Court had confined its directions to specific institutional areas such as educational institutions, hospitals, sports complexes, bus stands/depots and railway stations, the SOPs issued by the AWBI impermissibly expands their applicability to a wider category of public spaces including religious places, parks, tourist sites and recreational areas. According to the applicants, such expansion amounts to an unwarranted assumption of jurisdiction by the AWBI and is liable to be struck down.

**80.** It was further contended that the SOPs are contrary to the statutory framework under the PCA Act, 1960 and the ABC Rules, 2023, inasmuch as it envisages large-scale removal and permanent sheltering of stray dogs, thereby departing from the Capture-Sterilise-Vaccinate-Release (CSV) model contemplated under the ABC Rules, 2023. Learned counsel submitted that the shelter-based model prescribed under the SOPs is not only legally unsustainable but also scientifically flawed and violative of internationally recognised animal welfare standards, particularly with respect to group housing and spatial requirements. It was also urged that the SOPs fail to incorporate necessary safeguards such

as behavioural assessment, veterinary supervision and appropriate grouping criteria, thereby rendering them arbitrary and detrimental to animal welfare.

**81.** It was additionally submitted that the SOPs have been formulated without adequate stakeholder consultation or consideration of ground-level realities, thereby resulting in a framework that is both impractical and incapable of effective implementation. Learned counsel emphasised that the logistical and financial implications of establishing large-scale shelter infrastructure, as contemplated under the SOPs, have not been duly assessed, and that the burden of implementation would disproportionately fall upon already resource-constrained municipal authorities. It was, thus, urged that the SOPs, in their present form, are liable to be set aside or suitably modified to align with the statutory scheme, scientific principles and practical feasibility.

**82.** Having considered the aforesaid submissions, this Court is unable to accede to the challenge laid to the SOPs. A careful reading of the order dated 7<sup>th</sup> November, 2025 makes it abundantly clear that while this Court had, illustratively, referred to certain

categories of institutional areas such as educational institutions, hospitals, sports complexes, bus stands/depots (including Inter-State Bus Terminals) and railway stations, the said enumeration was not intended to be exhaustive or restrictive in nature. The directions were issued in the context of addressing serious concerns relating to public safety in sensitive and high-footfall areas, and the examples furnished therein were merely illustrative of the nature of spaces where such concerns arise. The emphasis of this Court was not on the nomenclature of the public spaces, but on their functional character, namely, areas which witness substantial public movement, congregation and vulnerability, thereby necessitating heightened safeguards against risks posed by the presence of stray dogs. It would, therefore, be contrary to the very object of the directions to construe them in a restricted or pedantic manner so as to confine their applicability only to the specific categories expressly mentioned, to the exclusion of other similarly situated public spaces exhibiting comparable characteristics.

**83.** In that view of the matter, the inclusion of additional categories of public places such as

religious sites, parks, tourist locations and other similar areas in the SOPs cannot be said to be beyond the scope of the directions issued by this Court. On the contrary, such places are equally characterised by significant public access and congregation, often involving continuous and dense footfall, including by vulnerable sections such as children, elderly persons and tourists unfamiliar with local conditions, and therefore stand on a similar footing as the institutional areas expressly referred to in the order dated 7<sup>th</sup> November, 2025. The nature and use of such spaces, coupled with the attendant risks to public safety, bring them squarely within the broader concerns that weighed with this Court while issuing the said directions. The extension of the SOPs to such analogous spaces is thus in furtherance of the object underlying the directions issued by this Court, namely, the protection of public safety and prevention of dog-bite incidents in areas frequented by the general public, and ensures that the remedial framework is not rendered ineffective by an unduly narrow or compartmentalised application limited only to specifically enumerated categories.

**84.** In the preceding part of this judgment, this Court has already held that stray dogs do not possess an indefeasible right to be re-released to the same location from where they were picked up, and their presence in sensitive or restricted-access public spaces cannot be justified by invoking Rule 7(2) read with Rule 11(19) of the ABC Rules, 2023. The said provisions, when construed in their proper statutory context, do not confer any absolute or unqualified entitlement of re-release, irrespective of the nature of the premises or overriding considerations of public safety. Once it is held that such provisions do not mandate the continued presence or reintroduction of stray dogs in such areas, the challenge to the SOPs on the ground that it departs from the principle of re-release must necessarily fail. The argument founded upon an alleged inconsistency with the statutory scheme thus stands completely obliterated in view of the interpretation already placed by this Court on the relevant provisions. The SOPs issued by the AWBI, in substance, seek to operationalise the directions issued by this Court in a structured and implementable manner, and cannot be said to transgress either the statutory framework or

constitutional principles, but rather constitute an administrative mechanism to give effect to the mandate of this Court in a uniform and effective manner across jurisdictions.

**85.** In view of the foregoing discussion, this Court finds no reason whatsoever to interfere with the Standard Operating Procedures dated 27<sup>th</sup> November, 2025 issued by the Animal Welfare Board of India in compliance with the directions of this Court. The challenge laid to the SOPs, both on the ground of alleged excess of jurisdiction as well as on the basis of inconsistency with the statutory scheme, does not merit acceptance in light of the conclusions recorded hereinabove. Accordingly, all interlocutory applications challenging the validity of the said SOPs stand dismissed.

**IV. PART III: Status of Compliance by the States and Union Territories with the Directions Issued by this Court**

**86.** A perusal of the record indicates that the States, Union Territories, the National Highways Authority of India<sup>14</sup> and the Union of India have filed their

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<sup>14</sup> For short, "NHAI".

respective affidavits in compliance with the directions issued by this Court *vide* order dated 7<sup>th</sup> November, 2025. The learned *Amicus Curiae*, Shri Gaurav Agrawal and his associates have made painstaking and commendable efforts in placing before this Court a comprehensive summary report delineating the status of compliance across the States and Union Territories.

**87.** A bare examination of the compliance affidavits reveals a pervasive and deeply concerning pattern across several States and Union Territories, namely, the glaring inadequacy of infrastructural capacity to effectively respond to a situation of such unprecedented magnitude. It has been brought to the notice of this Court that the number of Animal Birth Control (ABC) centres is grossly insufficient, and even where such centres exist, they are frequently constrained by a lack of trained personnel, veterinary expertise, equipment and logistical support. In several instances, the facilities are operating far below their intended capacity, thereby severely limiting their ability to undertake sterilisation and vaccination drives in a sustained and systematic manner.

**88.** The cumulative effect of these deficiencies is that the existing institutional framework remains wholly ill-equipped to deal with the scale, complexity and urgency of the problem relating to the growing population of stray dogs and the attendant risks to public safety and health. The material on record, thus, clearly indicates that, in its present form, the infrastructure across States and Union Territories is neither commensurate with the magnitude of the issue nor capable of ensuring effective implementation of the statutory and judicial mandates governing the field.

**89.** This Court cannot lose sight of the fact that the Animal Birth Control framework was first introduced as early as in the year 2001, and was subsequently revised and strengthened by the ABC Rules, 2023. Despite the passage of more than two decades, there has been a discernible absence of sustained, systematic and incremental efforts on the part of the States and Union Territories to expand and fortify the requisite infrastructure in proportion to the steadily increasing population of stray dogs. The material placed on record reveals that the implementation of the Animal Birth Control framework has, in large

measure, remained sporadic, under-funded and uneven across jurisdictions, lacking both continuity and institutional depth. In several regions, sterilisation and vaccination programmes have been undertaken in a fragmented manner, without adequate planning, monitoring or follow-through, thereby significantly undermining their efficacy. Such an approach not only falls short of the statutory mandate but also defeats the very object sought to be achieved by the framework, which envisages a long-term, coordinated and scientifically driven mechanism for population control and mitigation of public health risks.

**90.** Had the States and Union Territories acted with due diligence and foresight in implementing the mandate of the Animal Birth Control framework from its inception, including the timely and phased augmentation of sterilisation capacity, sustained vaccination drives and the development of adequate institutional infrastructure, the present situation would not have assumed such alarming proportions. The framework envisaged under the ABC Rules, 2023 was intended to operate as a preventive and long-

term mechanism, which required continuous and coordinated effort over time.

**91.** The failure to adopt such a proactive, structured and sustained approach has, therefore, resulted in a largely reactive and crisis-driven response, necessitated by the escalation of the problem rather than its prevention. Such an approach is neither efficient nor capable of yielding durable solutions, particularly in a matter involving public health, human safety and ecological balance. This Court is, therefore, constrained to observe that the prolonged inaction, coupled with the absence of institutional commitment to the effective implementation of the Animal Birth Control framework, has contributed significantly to the persistence as well as the aggravation of the problem, which has now assumed dimensions warranting urgent and systemic intervention.

**92.** After reserving judgment in the present matter, this Court has been apprised of multiple reports indicating that incidents of dog bites and stray dog attacks continue to occur across different parts of the country with alarming frequency and severity. The reports brought to the notice of this Court reveal that

the magnitude of the problem and the resultant threat posed to public safety has assumed deeply disturbing proportions. The incidents disclosed are not isolated or sporadic occurrences, but reflect a continuing and widespread pattern of attacks resulting in severe physical injury, psychological trauma and, in several cases, loss of human life. It is clear that the unchecked population of dogs has become increasingly feral, and such animals have no place in areas densely populated by human beings owing to the serious threat they pose to public safety.

**93.** A newspaper report from Rajasthan brought to the notice of this Court highlights that in the city of Sri Ganganagar alone, as many as 1840 dog-bite incidents were reported within a span of merely three months, while in Sikar, several incidents involving attacks on children by stray dogs have been reported during the same period. In Udaipur, approximately 1750 cases of dog bites have reportedly been recorded in the year 2026 till the date of publication of the report, whereas Bhilwara witnessed 42 persons being bitten by stray dogs in a single day. The report further refers to deeply disturbing incidents in which young

children suffered grievous injuries, including mauling of the face and limbs by stray dogs.

**94.** The situation prevailing in other States is even more alarming. It has been brought to the notice of this Court that the State of Tamil Nadu alone recorded approximately 2.63 lakh dog-bite cases within the first four months of the year 2026, along with 17 reported deaths attributable to such incidents. It has been reported that nearly 62,000 dog-bite cases were recorded in each of the months of January and February, 71,000 cases in March, and approximately 68,000 cases in April, 2026, thereby constituting a substantial proportion of the total 6.25 lakh dog-bite cases and 34 deaths recorded during the entirety of the previous year.<sup>15</sup>

**95.** This Court has also been apprised of further reports published in leading national newspapers which demonstrate that the menace of stray dog attacks has extended to public spaces of critical importance, including airports, residential areas and urban centres across multiple States. A report

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<sup>15</sup> **In just four months of 2026, Tamil Nadu records 2.63 lakh dog bites, 17 deaths; LINK: <https://www.thehindu.com/news/national/tamil-nadu/in-four-months-tamil-nadu-records-263-lakh-dog-bites-17-deaths/article70947531.ece>.**

concerning the Indira Gandhi International Airport, New Delhi, states that airport authorities themselves acknowledged that at least 31 dog-bite incidents had been reported across the airport terminals since 1<sup>st</sup> January, 2026.<sup>16</sup> The report further records allegations of aggressive stray dogs within airport premises and the consequent attempts by authorities to remove or relocate such animals after incidents involving passengers being bitten on 30<sup>th</sup> and 31<sup>st</sup> March, 2026. The very occurrence of repeated dog-bite incidents within one of the country's busiest international airports demonstrates the grave inadequacy of existing containment and public safety measures.

**96.** Another report relating to the State of Karnataka records that more than 2 lakh dog-bite cases were reported within merely the first four months of the year 2026, accompanied by at least 25 rabies-related deaths during the same period.<sup>17</sup> The

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<sup>16</sup> **Airport cites 31 bite cases, attempted relocation for action on stray dogs;** **LINK:**

<https://www.newindianexpress.com/states/delhi/2026/Apr/05/airport-cites-31-bite-cases-attempted-relocation-for-action-on-stray-dogs>.

<sup>17</sup> **Health department on high alert as Karnataka records over 2 lakh dog bite cases, 25 deaths in four months;** **LINK:** <https://www.news9live.com/city/bengaluru/health-department-on-high-alert-as-karnataka-records-over-2-lakh-dog-bite-cases-25-deaths-in-four-months-2968920>.

report notes that Vijayapura district alone recorded approximately 13,997 cases, while the Greater Bengaluru Authority region reported more than 13,400 cases involving both stray and pet dogs. Bengaluru Urban district was stated to have recorded the highest number of rabies-related deaths with six fatalities. The report further indicates a steep and continuing rise in dog-bite incidents in the State over the preceding years, with the number of cases increasing from approximately 2.3 lakhs in 2023 to nearly 5 lakhs in 2025. Such figures reveal that the issue has acquired the dimensions of a serious public health and law and order concern affecting millions of citizens.

**97.** This Court has additionally been informed of alarming incidents reported from the city of Surat in the State of Gujarat, including a widely reported occurrence involving a foreign national, namely a German traveler, who was allegedly attacked and bitten by stray dogs while visiting the city.<sup>18</sup> Reports concerning Surat further indicate a substantial rise

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<sup>18</sup> **German man praises India's healthcare after getting free treatment for dog bite; LINK:** <https://www.indiatoday.in/trending-news/story/german-man-praises-indias-healthcare-after-getting-free-treatment-for-dog-bite-in-gujarat-2894660-2026-04-11>.

in dog-bite incidents over recent years, causing increasing concern amongst residents and local authorities alike. Such incidents not only endanger the safety and dignity of citizens and visitors but also adversely affect public confidence in civic administration and urban governance.

**98.** The aforesaid figures, viewed cumulatively, reveal the staggering dimensions of the problem and underscore the pressing necessity for immediate, sustained and effective intervention. The harm caused by such incidents is not merely statistical in nature, but has grave human, societal and public health consequences, the extent whereof is both enormous and, in many cases, unfathomable. This Court is constrained to observe that, notwithstanding the directions issued by this Court *vide* orders dated 22<sup>nd</sup> August, 2025 and 7<sup>th</sup> November, 2025, as well as the statutory framework operating in the field, the material placed on record and the subsequent reports brought to the notice of this Court indicate that the intended effect of the directions has yet not adequately percolated to the ground level. The continued occurrence of such incidents reflects serious deficiencies in implementation and

enforcement on the part of the concerned authorities. This Court, therefore, makes it clear that any continued non-compliance or apathy in the implementation of the directions issued by this Court and hereinafter, by the jurisdictional High Courts shall be viewed seriously, and the erring officials of the municipal authorities and the concerned departments of the States and Union Territories shall render themselves liable for appropriate proceedings, including proceedings for contempt of Court, disciplinary proceedings and tortious liability.

**99.** In this backdrop, it must be emphatically reiterated that the States and Union Territories are under a continuing and untrammelled constitutional obligation to ensure the protection of the fundamental right to life and safety of citizens under Article 21 of the Constitution of India. This obligation is not merely passive in nature but casts an affirmative duty upon the States and Union Territories to take all necessary and effective measures to prevent conditions that pose a threat to public safety, health and well-being. Such obligation necessarily extends to the creation, augmentation and sustained maintenance of adequate

infrastructure for the effective implementation of the Animal Birth Control framework, including sterilisation, vaccination, sheltering and overall scientific management of stray dogs. The right to live with dignity under Article 21 of the Constitution of India necessarily encompasses the right of every citizen to move freely and access public spaces without living under a constant apprehension of physical harm, attack or exposure to life-threatening events such as dog bites in public areas. The State cannot remain a passive spectator where preventable threats to human life continue to proliferate in the face of statutory mechanisms specifically designed to address them.

**100.** The responsibility of the States and Union Territories, in this regard, cannot be diluted or deferred on the ground of administrative inconvenience, financial constraints or logistical challenges. These are matters that fall squarely within the domain of governance and prioritisation, and cannot be permitted to operate as constitutional *alibis* for executive paralysis in matters directly implicating human life and public safety. The constitutional mandate under Article 21 of the

Constitution of India obligates the State to act with due diligence, foresight and urgency, and to ensure that statutory frameworks such as the Animal Birth Control framework are implemented in a manner that is both effective and responsive to ground realities. Financial limitations or logistical inconvenience can never furnish a valid defence where the continued failure of the State results in avoidable injury, trauma and loss of human life.

**101.** This Court must also emphatically observe that while considerations pertaining to animal welfare and the protection of sentient beings constitute matters of undeniable constitutional, statutory and moral significance, such considerations cannot be permitted to eclipse or subordinate the paramount obligation of the State to safeguard human life, bodily integrity and public safety. When the safety and lives of human beings are weighed against the interests and welfare of sentient beings, the constitutional balance must necessarily and unequivocally tilt in favour of the preservation and protection of human life. The right guaranteed under Article 21 of the Constitution of India stands at the highest pedestal of constitutional protection, and casts upon the State

an affirmative, non-negotiable and continuing duty to take all expedient, effective, preventive and legally permissible measures necessary to secure citizens against threats to life and safety arising from stray dog attacks and related dangers. Any failure, hesitation or administrative apathy in adopting such measures would strike at the very core of the constitutional guarantee under Article 21 and would render the fundamental rights guaranteed to citizens illusory, hollow and incapable of meaningful enforcement in the lived realities of society. Compassion for animal life, howsoever important, cannot be interpreted in a manner that compels citizens to endure recurring threats to their own lives, safety and bodily integrity.

**102.** The States and Union Territories cannot, therefore, plead helplessness in the face of an emergent situation of this nature. Governance, in its true sense, demands anticipatory planning, timely execution and sustained adherence to statutory mandates, particularly in matters bearing upon public health and safety. The continued inadequacy of infrastructure, despite the existence of a well-defined legal framework, reflects a systemic lack of

institutional prioritisation and administrative will, which cannot be countenanced any further. It is incumbent upon the authorities concerned to recognise that issues of this magnitude require proactive, coordinated and time-bound interventions, and not *ad hoc* or reactive measures. The failure to do so not only undermine the efficacy of the statutory regime but also erodes the ability of the State to discharge its constitutional obligations.

**103.** This Court must also observe that the repeated incidents continuing to surface even after the issuance of directions by this Court which demonstrates that the administrative machinery tasked with implementation at the field level has remained grossly inadequate and, in several cases, lacking in seriousness and accountability. The continued recurrence of such incidents despite repeated judicial intervention reflects a disturbing degree of administrative inertia which this Court cannot permit to persist any further. Where State authorities fail to discharge their constitutional and statutory obligations despite repeated warnings and directions, constitutional courts would be fully

justified in adopting stricter supervisory and coercive measures to secure compliance.

**104.** This Court cannot also remain oblivious to the harsh and deeply disturbing ground realities emerging from various parts of the country, where young children have been mauled, elderly persons have been attacked, ordinary citizens have been left vulnerable in public spaces and even international travellers have fallen victim to such incidents. If such conditions are permitted to continue unchecked, the inevitable consequence may lead to a regression towards a state where the Darwinian theory of evolution, namely, the survival of the fittest would effectively govern civic life and public spaces. Such a situation would be wholly incompatible with a constitutional democracy governed by the rule of law. The Constitution of India does not envisage a society where children, elderly persons and vulnerable citizens are compelled to survive at the mercy of physical strength, chance or circumstance owing to the failure of the State machinery to discharge its constitutional and statutory obligations. The fundamental guarantee under Article 21 of the Constitution of India exists precisely to ensure that

the weak and vulnerable are afforded equal protection of life, safety and dignity under the constitutional order.

**105.** It is further necessary to observe that the responsibility of ensuring compliance with the directions issued by this Court must cascade across all levels of administration, from the State Governments down to municipal authorities, Panchayati Raj institutions and local bodies. Effective implementation would require coordinated action, regular monitoring, inter-departmental convergence and clearly defined lines of accountability. The role of supervisory authorities, including District Magistrates and senior administrative officials, assumes particular significance in ensuring that the directions are not reduced to mere formality but are implemented in their true spirit.

**106.** In the course of the present proceedings, this Court has also considered the compliance affidavit filed by NHAI. A perusal thereof indicates that NHAI has taken the position that it is substantially dependent upon the respective State Governments and Union Territories for the removal of stray cattle

and other animals from National Highways and National Expressways, and that such functions are ordinarily discharged through the local administrative and municipal machinery, with NHAI assuming a limited role of coordination and facilitation.

**107.** This Court is unable to accept such a position in its entirety. The NHAI, being a statutory authority entrusted with the development, maintenance and management of National Highways and National Expressways, cannot absolve itself of its crucial responsibility of maintaining road safety by placing exclusive reliance upon the States and Union Territories. The obligation to ensure safe, efficient and obstruction-free highways necessarily encompasses the duty to address hazards arising from the presence of stray cattle and other animals. The NHAI possesses the requisite administrative, financial and logistical wherewithal to respond effectively to such situations, including by deploying dedicated transport mechanisms, creating necessary holding or shelter infrastructure, and entering into structured arrangements with animal welfare organisations, *gaushalas* and other competent

agencies for the safe handling and relocation of such animals. The discharge of this responsibility must, therefore, be proactive, coordinated and institutionally owned, and cannot be relegated entirely to State or local authorities, particularly in matters directly impinging upon public safety on National Highways and National Expressways.

**108.** In view of the aforesaid, this Court deems it appropriate to issue the following directions: -

**A.** The States and Union Territories shall forthwith take decisive, coordinated and time-bound steps for enhancing and augmenting the infrastructure necessary for effective implementation of the Animal Birth Control framework, including the expansion of sterilisation and vaccination capacity, strengthening of existing facilities, and creation of additional institutional mechanisms commensurate with the scale and urgency of the issue.

**B.** The States and Union Territories shall ensure the establishment of at least one fully functional Animal Birth Control Centre in each district, duly equipped with requisite veterinary

infrastructure, trained personnel, surgical facilities and supporting logistics, so as to enable the systematic, continuous and large-scale implementation of sterilisation and vaccination programmes. Such centres shall be made operational in a time-bound manner and shall function with adequate capacity to address the local population of stray dogs, with proper record-keeping, monitoring and periodic reporting to ensure effective and sustained implementation of the Animal Birth Control framework. It is further directed that, having regard to the population density and territorial extent of each district, the concerned departments of the States and Union Territories shall take an appropriate decision with respect to the expansion of the number of Animal Birth Control Centres, wherever necessary, so as to ensure effective coverage and implementation of the Animal Birth Control framework.

- C.** The concerned departments/authorities of the States and Union Territories shall take all necessary measures to implement the directions issued by this Court, and shall

ensure that the same are carried out in letter as well as in spirit, without any delay or dilution, and shall also strictly comply with the Standard Operating Procedures issued by the Animal Welfare Board of India in this regard.

- D.** The concerned departments/authorities of the States and Union Territories, as well as the Union of India (in respect of public areas/spaces falling within its jurisdiction), shall take an informed and reasoned decision regarding the extension of the directions issued by this Court to other public spaces characterised by high footfall and public utility, including but not limited to places of public congregation and transit, having due regard to the necessity of ensuring a safe and secure environment for public at large. Such decision shall be taken upon a careful assessment of ground realities, risk to public safety, and the functional nature of such spaces, and shall be implemented in a time-bound and coordinated manner so as to ensure uniformity and effectiveness in enforcement.

- E.** The States and Union Territories shall undertake comprehensive capacity-building measures, including training of personnel, augmentation of veterinary services, strengthening of vaccination drives and creation of adequate shelter facilities, in coordination with relevant departments and agencies.
- F.** The States and Union Territories shall also ensure adequate availability of anti-rabies vaccines and immunoglobulin in all Government medical facilities, and shall put in place effective public health response mechanisms to deal with cases of dog bites.
- G.** The NHAI shall, in coordination with the concerned States and Union Territories, formulate and implement a comprehensive and time-bound mechanism for addressing the presence of stray cattle and other animals on National Highways and National Expressways, including the deployment of specialised transport vehicles for the safe handling and relocation of stray cattle and other animals, and the creation or earmarking of appropriate holding and shelter facilities, and entering into

appropriate arrangements with animal welfare organisations, *gaushalas*, and other competent agencies for their safe handling and relocation. The NHAI shall also establish an effective monitoring and coordination framework to ensure continuous oversight and prompt response in such matters.

- H.** In areas where the population of stray dogs has assumed alarming proportions and where incidents of dog bites or aggressive attacks have become frequent and pose a continuing threat to public safety, the concerned authorities may, subject to due assessment by qualified veterinary experts and strictly in accordance with the provisions of the Prevention of Cruelty to Animals Act, 1960, the Animal Birth Control Rules, 2023 and other applicable statutory protocols, take such measures as may be legally permissible, including euthanasia in cases involving rabid, incurably ill or demonstrably dangerous/aggressive dogs, so as to effectively curb the threat posed to human life and safety.
- I.** It is made emphatically clear that the officers and officials of the municipal authorities,

Panchayati Raj institutions, local bodies and the concerned departments of the States and Union Territories, autonomous bodies/institutions and the persons in-charge of all other institutions, i.e., schools, colleges, hospitals, etc., who are entrusted with the implementation of the directions issued by this Court, shall be entitled to due protection for acts performed by them in good faith and in *bona fide* discharge of their official duties and compliances carried out pursuant to the present order and the earlier orders passed by this Court in the present proceedings. Accordingly, no First Information Report, criminal complaint or coercive proceedings shall ordinarily be initiated against such officers or officials in respect of actions *bona fide* undertaken for the purpose of implementing the directions issued by this Court, save and except where a *prima facie* case of *mala fides*, gross abuse of authority or actions wholly *dehors* the directions issued by this Court is made out. If necessary, the High Court in *seisin* of the continuing mandamus in terms of the present

order shall be at liberty to pass appropriate orders to prevent frivolous, vexatious or malicious proceedings against such officers or officials.

**109.** The concerned authorities of the States and Union Territories, the National Highways Authority of India, as well as the Union of India shall ensure strict and faithful compliance with the directions issued by this Court *vide* orders dated 22<sup>nd</sup> August, 2025 and 7<sup>th</sup> November, 2025, in addition to the directions contained in the present order, and shall take all necessary measures to ensure that the same are implemented effectively, in a coordinated and time-bound manner, without any deviation or dilution.

**110.** Having dealt with all the applications and having delineated the measures requiring compliance, what now remains for consideration is whether the task of monitoring and ensuring compliance with the directions issued by this Court ought to be retained by this Court, or whether the same can be more appropriately entrusted to the jurisdictional High Courts. In this context, and in view of the nature, extent, expanse, outreach and

complexity of the directions issued herein, and bearing in mind that their effective implementation primarily lies within the domain of local municipal bodies, panchayats and district administrations, this Court is of the considered opinion that decentralised continuous judicial oversight would be far more efficacious than exclusive centralised monitoring. The issues arising in the present proceedings are inherently fact-specific, regionally nuanced and require sustained supervision at the grassroots level, which can be more appropriately undertaken by the jurisdictional High Courts in exercise of their constitutional jurisdiction.

**111.** A pan-India monitoring exercise by this Court, in respect of day-to-day compliance, would not only be administratively burdensome and time-intensive, but may also not achieve the degree of responsiveness and efficacy that the situation demands. On the other hand, entrusting the High Courts with the responsibility of monitoring would ensure closer engagement with local conditions, timely corrective intervention and more effective enforcement of the directions issued, while also enabling the formulation of context-sensitive

measures suited to the peculiar needs of each State and region. In this backdrop, and with a view to securing effective, continuous and result-oriented implementation of the orders passed by this Court, the following directions are given: -

- A.** For the purpose of ongoing compliance and monitoring, all High Courts are directed to register a *suo moto* writ petition, in the name and style of: ***“In Re: Compliance with the directions issued by the Supreme Court in Suo Motu Writ Petition (Civil) No(s). 5 of 2025”***, as a continuing mandamus, for monitoring compliance with the directions issued by this Court *vide* orders dated 22<sup>nd</sup> August, 2025 and 7<sup>th</sup> November, 2025, in addition to the directions contained in the present order, and the same shall be placed before and, as far as practicable, taken up by a Division Bench of the concerned High Court.
- B.** The Registry of this Court is directed to forthwith transmit a copy of the present order, as well as the orders dated 11<sup>th</sup> August, 2025, 22<sup>nd</sup> August, 2025 and 7<sup>th</sup> November, 2025, to the Registrar Generals of all the jurisdictional

High Courts, for the purpose of ensuring effective compliance, implementation and monitoring of the directions issued therein.

**C.** While ensuring full compliance with the directions issued by this Court, the concerned Bench of the High Court shall be at liberty to expand or tailor the scope of such directions, as may be necessary to address local conditions and exigencies, without in any manner diluting the tenor and intent of the directions issued by this Court.

**D.** It is made clear that any continued failure or deliberate non-compliance with the directions issued by this Court, including the directions contained in the orders dated 22<sup>nd</sup> August, 2025, 7<sup>th</sup> November, 2025 and the present order, shall render the erring officials of the municipal department, administrative authorities and the officials of the concerned departments of the States and Union Territories liable to appropriate proceedings in accordance with law. The jurisdictional High Courts, while undertaking the monitoring exercise in terms of the present order, shall be fully empowered to

take appropriate action, including initiation of contempt proceedings, against the erring officials responsible for non-compliance, inaction or wilful disregard of the directions issued by this Court.

**E.** The Chief Secretaries and the Secretaries of the relevant departments of all the States and Union Territories shall file their updated affidavits of compliance before the respective jurisdictional High Courts on or before 7<sup>th</sup> August, 2026. Likewise, the Union of India and the National Highways Authority of India shall also file their respective affidavits of compliance before the jurisdictional High Courts, in relation to areas falling within their respective domain, within the aforesaid period, clearly indicating the measures undertaken in compliance with the directions issued by this Court.

**F.** The Registry of this Court is directed to forthwith transmit the records of all transferred cases/applications to the respective jurisdictional High Courts, and the matters so transmitted shall be appropriately tagged and heard along with the *suo moto* writ petition to be

registered by the High Courts in terms of **Direction (A)** above.

**G.** The High Courts, through their respective Registrars General, shall compile and forward a consolidated report to this Court every four months, summarising the status of compliance by States and Union Territories, the progress achieved, best practices identified, and persistent gaps requiring policy or judicial intervention. **The first such consolidated report shall be placed on record before this Court at least one week prior to the next date of hearing, i.e., 17<sup>th</sup> November, 2026.**

**112.** The Registry is directed to forthwith transmit a copy of this order to the Chief Secretaries of all States and Union Territories, as well as to the Union of India through the Ministry of Health and Family Welfare and the National Highways Authority of India, to ensure due compliance with the directions issued herein.

**113.** In order to ensure uniformity, clarity and effective monitoring of compliance with the directions issued by this Court, all States and Union Territories

are directed to furnish their compliance affidavits before the jurisdictional High Court in the prescribed format appended hereto as **Annexure titled “Compliance Reporting Format (States/Union Territories)”**, duly filled in with complete and accurate particulars, along with supporting material wherever necessary.

**114.** List the matter on 17<sup>th</sup> November, 2026, for receiving the consolidated compliance reports to be forwarded by the High Courts through their respective Registrars General and for further directions.

**115.** This Court places on record its deepest appreciation for the assistance rendered by the learned *Amicus Curiae*, which has greatly facilitated an informed adjudication of the issues arising herein.

.....**J.**  
**(VIKRAM NATH)**

.....**J.**  
**(SANDEEP MEHTA)**

.....**J.**  
**(N.V. ANJARIA)**

**NEW DELHI;**  
**MAY 19, 2026.**

**Annexure: Compliance Reporting Format**  
**(States/UTs)**

<b><u>S. No.</u></b>	<b><u>Particulars</u></b>	<b><u>Details/Status (to be filled by State/UT)</u></b>
<b>1</b>	Total number of districts in the State/UT	
<b>2</b>	Number of functional ABC Centres	
<b>3</b>	Number of districts with at least one ABC Centre	
<b>4</b>	Details of additional ABC Centres proposed/under establishment	
<b>5</b>	Total number of veterinarians available for ABC programme	
<b>6</b>	Total trained staff/personnel deployed for ABC implementation	
<b>7</b>	Number of stray dogs sterilised (last 6 months)	
<b>8</b>	Number of stray dogs vaccinated (last 6 months)	
<b>9</b>	District-wise breakup of sterilisation and vaccination (Chart to be annexed separately)	
<b>10</b>	Identification of institutions under Direction (A) of order dated 7 <sup>th</sup> November, 2025	
<b>11</b>	Steps taken for removal of stray dogs from institutional areas	
<b>12</b>	Steps taken for securing such premises under Direction (B) of order dated 7 <sup>th</sup> November, 2025	

<b>13</b>	Appointment of Nodal Officers under Direction (C) of order dated 7 <sup>th</sup> November, 2025	
<b>14</b>	Inspection mechanism under Direction (D) of order dated 7 <sup>th</sup> November, 2025	
<b>15</b>	Statistics regarding Removal and relocation of stray dogs under Direction (E) of order dated 7 <sup>th</sup> November, 2025	
<b>16</b>	Compliance with SOPs issued by AWBI	
<b>17</b>	Decision taken for extension to other public areas	
<b>18</b>	Availability of anti-rabies vaccines	
<b>19</b>	Availability of anti-rabies immunoglobulin	
<b>20</b>	Mechanism for coordination	
<b>21</b>	Monitoring and reporting mechanism	
<b>22</b>	Budget allocation for ABC implementation	
<b>23</b>	Infrastructure gaps identified	
<b>24</b>	Timeline for addressing gaps	
<b>25</b>	Creation of helpline number for reporting dog bite incidents	
<b>26</b>	Creation of dedicated feeding spaces for stray dogs in each municipal ward	
<b>27</b>	Mechanism for adoption of stray dogs	
<b>28</b>	Any other relevant information	