

## CONFERENCE FOR HUMAN RIGHTS (INDIA) REGD.

**Head Office : 83, Lawyers Chambers, Supreme Court of India, New Delhi-110001**

**Administrative Office : 35, L.G.F. NRI Complex, Mandakin,**

**Greater Kailash-IV, New Delhi-110019**

**E-mail: [nanita2001s@gmail.com](mailto:nanita2001s@gmail.com)**

---

**To,**

9.4.2025

The Hon'ble Chief Minister  
3rd level, Delhi Secretariat, I.P. Estate,  
New Delhi-110002

**Subject:** Urgent Representation- regarding your recent announcement of a **special drive to clear roads of wandering cattle and stray dogs**, as reported in the media, and the proposal to prepare a **structured plan for the relocation of stray dogs** in each municipal ward - Violation of ABC Rules, 2023 and Supreme Court Directives

**Respected Madam,**

We write to you with deep respect and concern regarding your recent announcement of a **special drive to clear roads of wandering cattle and stray dogs**, as reported in the media, and the proposal to prepare a **structured plan for the relocation of stray dogs** in each municipal ward.

While the initiative to build **proper shelters for stray cattle** is welcome and aligned with Constitutional compassion and statutory obligations, the **proposal to relocate stray dogs directly violates the established Central law and the Binding Judicial Directives.**

The proposal to forcibly remove stray animals from Delhi's streets is not just a policy failure - it is a profound moral transgression that undermines our civilizational values.

In regard to the above, we would like to humbly submit as under :

### **1. The Legal Framework Prohibiting Relocation of Stray Dogs**

## **A. Animal Birth Control (Dogs) Rules, 2023**

The ABC Rules, 2023, framed under the Prevention of Cruelty to Animals Act, 1960, are binding across all States and Union Territories. These rules prescribe the lawful method for the management of stray dog population and prohibits Relocation. The Rules mandate sterilisation, vaccination, and return to the original location (SVR) as the only permitted mechanism.

## **B. Prevention of Cruelty to Animals Act, 1960**

The very purpose of the formulation of the Act was to prevent unnecessary pain or suffering on Animal and Relocation causes immense suffering to the Animal.

Section 11 of the Prevention of Cruelty to Animals Act, 1960, defines "treating animals cruelly" and outlines various acts that constitute cruelty, including beating, overworking, and causing unnecessary pain or suffering, with penalties for violations.

**C. Complete disregard of the law** laid down by the Hon'ble Supreme Court and the Hon'ble High Court of Delhi in a catena of Judgements, on Animal protection, wherein the Hon'ble Supreme Court and the Hon'ble High Court has:

- Recognised the Animals' right to live with dignity under **Article 21**.
- Upheld **Article 51A(g)**—our fundamental duty to show compassion towards all living beings.
- **Prohibited the relocation or extermination** of stray dogs;
- Directed that only the **ABC method** shall be followed;
- Held that **relocation disturbs ecological stability** and triggers aggression among dog population;
- Called upon Municipal Authorities to act **strictly in compliance with the ABC Rules**.
- Affirmed that **community dogs have a right to live in the areas they inhabit** and feeders cannot be harassed.

(Animal Welfare Board of India v. A. Nagaraja (2014) 7 SCC 547 ,Animal Welfare Board of India V. People For v Elimination of Stray Trouble & Ors. Civil Appeal No. 5988 of 2019, People for Animals v. MCD , Maya D Chablani vs Radha Mittal & Ors. CS (OS) 277/2020 (Delhi High Court)

In Civil Appeal No 5387 of 2014 and SLP No. 11686 of 2007, the Hon'ble Supreme Court has detailed the five rights of Animal that cannot be violated by any by – law, rule of the Municipal or State Acts. The order also mentions how the Municipal Acts/Laws that violate any of these rights should be considered annulled and cannot cause subjugation of rights of animals and animal owners/Lovers/Caregivers

**D. Constitutional Duties – Article 51A(g)** The Directive Principles laid down in the Constitution mandate compassion for all living beings. Every citizen, including public authorities, has a fundamental duty to show compassion to all living creatures. The proposal to remove dogs from their territories without legal basis would violate this Constitutional mandate.

**E. Systematic erasure of voiceless beings who are integral to our urban ecosystem** - Community animals are vulnerable beings who deserve Compassion, Protection and Humane treatment. The proposed plan threatens the lives of countless innocent animals and goes against the fundamental principles of animal welfare that our Nation upholds.

**F. The proposed plan contradicts our fundamental religious** beliefs and prevents us from freely practicing our spiritual principles of non-violence. In the Vedas, animals are considered sacred manifestations of Divine Energy. Infact, the vehicles of our Different Gods and Goddesses are animals. The fierce form of Lord Shiva, Bhairava, also known as Kal Bhairave, is often depicted riding a Dog, which is his Divine Vehicle.

**G. Developing a compassionate legal, and ethical approach to street animal management** and consulting with animal welfare experts and local caregivers before proposing any such action. The planning of keeping these strays in the shelter homes is impractical and cruel. The State Government run or owned or sublet animal shelters is horrific. Shelters are meant to house only ill, old or incapacitated animals in prescribed conditions. The Delhi Government and/or its various agencies have a dismal record of these shelters. This is equally true of the NGOs.

We respectfully urge the Government of Delhi to consider the following **lawful and humane alternatives**:

1. Ensure and Strengthen implementation of ABC programmes in accordance with the ABC Rules, 2023 across all wards by partnering with recognised Animal Welfare Organisations.

2. Develop and implement comprehensive vaccination programs.
3. Create sterilisation and vaccination targets ward-wise, and publish periodic compliance reports on the Websites.
4. To come out with a collective data of Dog population in Delhi and the number of dogs sterilization centres functioning in Delhi.
5. To display on their website the schedule of the 'Sterilization Programs' on quarterly basis, specifying the particular areas in which the programs will be conducted, which would facilitate the concerned area's Residents Welfare Associations and the residents of that area to assist and co-operate in the exercise of sterilization of stray dogs.
6. To carry out the Census of the stray dogs once in every two or three years in order to keep the population of the stray dogs under check and control.
7. Promote citizen awareness campaigns to sensitise communities about the legality of stray dog protection and the SVR model.
8. Implement humane animal management strategies.
9. Ensure protection of feeders and volunteers, as directed by Delhi High Court.
10. Set up a helpline and monitoring cell for addressing grievances related to stray dogs within the legal framework.
11. Consult with animal welfare experts and organizations before implementing any directive.
12. Adhere to the Prevention of Cruelty to Animals Act.
13. Follow the guidelines set by the Animal Welfare Board of India.
14. Respect the Supreme Court rulings on Animal Protection.

Thus, with great respect, it is most humbly submitted that the proposed pogrom lacks merit, is highly questionable, illegal and unacceptable to the majority of Delhi's residents and would only harass citizens who look after animals and would also lead to creating mob hysteria. These actions have already created enough panic and acute pain to compassionate citizens. In fact, it has come to our knowledge that after your statement many persons are taking law into their hands and are relocating and displacing the stray dogs from their colonies. There are pictures and videos to this effect which show how these dogs are being mistreated, while trying to relocate them. Social friction induced by such action will become the reason for community conflict and will create additional unmanageable law and order situation.

In view of the widespread media coverage of your statement and the systematic campaign of Shri Vijay Goel , we respectfully request:

- **An immediate clarification** that **no illegal relocation or removal** of stray dogs will take place;.
- A **reaffirmation of Delhi Government's commitment to implement the ABC Rules, 2023**, in line with the Hon'ble Supreme Court's directions.

Yours Sincerely,

**Nanita Sharma**

Secretary General

CONFERENCE FOR HUMAN RIGHTS [INDIA] (REGD.)