



## THE LEGAL STANDING AGAINST THE ISSUES OF ANIMAL CRUELTY IN INDIA

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### I. ABSTRACT

*India is a vast country full of biodiversity. There are millions of species of flora and fauna found in the territory of India. The inter-dependency between the flora, fauna, and humans is necessary for the survival of life on this planet. As such, it's necessary to recognize any threat that aims toward their destruction. At present, many such species of flora and fauna have faced extinction due to the greedy actions of humans. Animals are being exploited for entertainment, food, and even their skin. Even though they are voiceless, they deserve to be granted the right to live freely. Animal rights are a need for the current times. In the present, when so many animals are facing extinction because of their unsustainable exploitation, we need to safeguard their life and habitat. Indian culture has always been in favour of recognizing a rightful life for animals. The Indian religious philosophy has played a very important role in shaping the structure of modern-day society's treatment of animals. Animal cruelty is seen as a sin and against dharma and this causes people to refrain from inflicting any suffering on any strays, or other domesticated beings or wildlife.*

**Keywords:** Animal laws; animal exploitation; animal cruelty; protection of animals: Animal cruelty prevention

### II. INTRODUCTION

To have compassion for another living being is the most humane attribute people can have. Animals are an important part of the ecosystem. Humans and animals have lived in harmony for centuries. The mutual co-dependency has existed and being a part of the ecosystem, one cannot imagine a life without any of these creatures. Their existence is an enormous contribution to the environment. Nature follows cycles that are vital for the sustainability of life on the planet. From predators and prey to the decomposition and nutrition cycle, animals are a very fundamental part of every cycle. The carnivores prey on the herbivores, the scavengers feed on the dead and decaying, the bees help in spreading pollen, etc.

Animals have been a part of the majority of necessities for humans. Mammals such as cats and dogs are needed for human companionship, resulting in stress relief and anxiety. There are service animals for therapy

who play an indescribable role in such matters. Moreover, dogs are employed for military and defence purposes as they are very capable of dealing with such intricate matters. Cows and cattle are used for milk, meat, and farming industries, fish being a necessary part of aquaculture, etc. There are innumerable examples of how vital animals are in everyday life. Even in ancient times, cattle have always been an important part of societies and cultures throughout the globe. They were seen as a symbol of wealth and prosperity. In India, cattle were given as offerings to the Brahmins, as well as during marriage as dowry.

Animals deserve to be treated with equal kindness. However, such is not the case. Often days, there are news and stories related to animal abuse. It has become a very normal scenario to exploit animals for benefits. Industries are especially responsible for such instances. Animals are kept in confinement and in poor condition, then butchered in inhumane methods. Many animals are exploited for their

skin and leather by the leather industry, the fur industry is one major example of the same. The elephants and rhinos are exploited by poachers and hunted down for their ivory tusks resulting in a major decline in their population.

Rhinos have been roaming Africa, south Asia, and Southeast Asia for ages, however, now they are on the brink of extinction. Some subspecies of rhinos have already gone extinct. According to the report, by 1970, the number of rhinos dropped to 70,000 while at present it is estimated to be around 27,000<sup>1</sup>.

These all instances have raised a serious question of whether humans should be allowed to exploit animals and to what extent should their exploitation be granted. Should animals be granted basic rights? And if so, what are the measures the government of India is willing to take in order to safeguard the animals against exploitation and daily cruelty?

### III. STATEMENT OF PROBLEM

The Constitution of India has laid down provisions for safeguarding the natural ecosystem of India. The DPSP, Fundamental Duties, as well as Fundamental Rights, have been interpreted by the Supreme Court of India in various cases to safeguard animals against cruelty and abuse. However, animals are a source of food, livelihood, and comfort to many people. If animals are granted the right to life, will it clash with the different rights humans have? How far are animal rights implemented and interpreted in India? Is the Indian government promoting and implementing enough measures to follow through with the Directive Principles and fundamental duties envisioned by the Constitution regarding wildlife?

### IV. RESEARCH METHODOLOGY

The researcher has done a preliminary analysis of the legislature and sociological background of the discussed problems first. Further, analytical and interdisciplinary method of research has been adopted in pursuit to gain basic knowledge of the legislature and societal

background on the issue. The socio-legal approach has also been adopted to deal with the issues of understanding the impact of societal traditions and beliefs in the incorporation of ideologies behind the current legal needs of the problems at hand. The data has all been collected from secondary sources and compiled to give shape to the following research paper.

### V. RESEARCH ISSUES

This research paper has tried to answer the following questions:

- 1) What is understood by animal rights?
- 2) How has the Indian constitution granted rights to animals?
- 3) What are the following steps taken up by the state to implement those rights?
- 4) How far has animal law developed in India?

### VI. UNDERSTANDING THE RIGHTS OF ANIMALS

All living beings have equal rights to exist on Earth, every creature is inter-dependent on each other for the survival of the ecosystem. Animals deserve to be able to exist in their habitat and be free from any exploitation. They deserve as much freedom to live freely as humans do. However, the exploitation of animals is unending. There are constant cases witnessed for abuse against animals in India. Animals are treated as private property by individuals which leads to their inhumane abuse and exploitation.

Recently, news related to overlooking animal exploitation in the name of culture and tradition has come to light. The exploitation of mules, horses, and other cattle during mountain climbing in tourism is another trending example of animal exploitation. The mules are forced to carry heavy loads and are subjected to merciless beating by their owners. They often die in such captivity and their bodies are mercilessly dumped in the river and creeks<sup>2</sup>. Understanding the various ways abuse is committed against non-human animals is the

<sup>1</sup> “Rhino.” WWF. Accessed July 15, 2023. <https://www.worldwildlife.org/species/rhino>.

<sup>2</sup> Sharma, Pankul. “HC Seeks Govt Reply on Animal Cruelty in Yatra.” The Times of India, 11 July 2023, <https://timesofindia.indiatimes.com/city/dehradun/hc-seeks-govt-reply-on-animal-cruelty-in-yatra/articleshow/101651286.cms>.

first step towards understanding their legal standing and rights.

### A. Cruelties Against Animals

Animals have always been treated as play objects by humans. They are either owned for entertainment, hunted for pleasure, tortured for satisfaction, or killed for games. Various different actions come under animal cruelty. Some of these are so common that it is often overlooked by authorities, governments as well as common citizens. There are two primary forms of animal cruelty, i.e., Abuse and Neglect<sup>3</sup>. In the following list, the subtypes are briefly defined.

i. **Experimentation on Animals:** Animal Testing refers to the use of animals for scientific research. Animals are experimented upon in laboratories, industries, etc. where they are subjected towards various inhumane experiments and projects. They are experimentation subjects for testing of medications, drugs, cosmetics, genetic studies, viruses, etc. Most of these animals are born in captivity and are subjected to a life of exploitation and death in captivity.

ii. **Sexual Abuse:** Bestiality is another form of animal abuse. It refers to the sexual relationship between a human and a non-human animal. In many cases, some animals are subjected to being used for sexual purposes by humans in a very demeaning manner.

In 2021, a 67 years old man was arrested for performing sexual acts on his neighbour's dogs in Gurugram. In July 2018, a pregnant goat was gang raped by 8 men in Haryana<sup>4</sup>.

iii. **Physical abuse:** The most common form of abuse against animals is physical abuse. Physical abuse includes hitting, torturing, and starving animals purposefully to inflict severe distress, physical and emotional trauma, and serious harm to animals.

iv. **Neglect:** Neglect of animals is defined as neglecting of needs of animals, often

domesticated in nature. The animals are neglected in terms of starving, not giving medical attention when needed, ignoring their existence, etc.

### B. What is understood by Animal Rights?

The moral belief that all animals, or non-human beings deserve to live a free life without being subject to influence by humans and their desires lays the basis of Animal rights. Activists and environmental enthusiasts have always tried to fight against the cruelties suffered by animals. The need to implement legislations to grant these basic ideologies a shape has influenced the current trends of animal rights. Animal rights aim to prevent the exploitation, abuse, illegal breeding, etc. of animals. In many cases, animals such as cats and dogs are illegally bred to be sold. The female animals in such cases are subjected to continuous breeding thus likely harming their health and life. To protect the animals from being subjected to such inhumane greed, it's very necessary to provide basic rights to animals.

In India, cows are revered and thus granted a right to be not slaughtered and killed. Beef is banned in most of the Indian states, an example of the legislature at work. The Prevention to Animals (Slaughterhouse) Rules, 2001 made it illegal to slaughter animals anywhere other than a registered slaughterhouse.

Having rights mean living a life of dignity and protection. The idea behind animal rights is an indication that non-human beings also deserve to live a life with dignity and safety. Their lives are also valuable and not subject to being owned by humans.

## VII. INDIAN PHILOSOPHICAL VIEWPOINT ON ANIMAL PROTECTION

India is a country that takes huge pride in its cultural and religious philosophies, practices, traditions, and customs. With a religious history as old as 3000 years old, the philosophy it has been entailing is still felt in the mindset of the present-day population. The 3 oldest religions of the Indian subcontinent, i.e., Hinduism, Buddhism, and Jainism play a significant role in

<sup>3</sup> What is animal cruelty and what are its main types? available at, <https://www.sinergiaanimalinternational.org/single-post/animal-cruelty>, (last visited July 7, 2023).

<sup>4</sup> Animal Protection Laws under IPC and Constitution, available at, <https://www.legalserviceindia.com/legal/article-7056-animal-protection-laws-under-ipc-and-constitution.html>, (last visited July 7, 2023).

the populaces' treatment and approach towards animals and their protection.

The main concept that exhibits respect for animals is the doctrine of 'Ahimsa'. 'Ahimsa parmo dharma' is a Sanskrit shloka that translates to 'Non-violence is the ultimate source of dharma' and is the driving force behind most non-violence and respect towards animals and the environment among the Hindus, Buddhists, and Jains.

In Hinduism, there is the belief that every sentient being has a soul, i.e., gods reside in every living being, known as the 'Atman.' Thus, killing or hurting a living being goes against the principle of Ahimsa and is said to be an action against Dharma.

In the Vedas, there are excerpts mentioned that prohibit the killing of animals. For instance, in Rigveda, certain animals such as Cows are commanded not to be killed. In Yajurveda, it is declared "O humans! Animals are aghanya-not to be killed!"<sup>5</sup> In the Vedic yagya, it is mentioned that killing animals or eating meat is totally prohibited, and as such animals such as cows or horses were only used to be given in charity! In this regard, Hindus have been following ahimsa and such practices have revolved around following vegetarianism. Animals are also worshipped and revered and seen as a form of Gods. This has not only prevented the cruelty towards animals in society but has also shaped actions in the protection of many such wildlife.

Similarly, in Buddhism and Jainism, there are even stricter beliefs regarding the principles of ahimsa. Inflicting pain on any other being is seen as against dharma. In Jainism, Ahimsa is one of the 5 vows that must be strictly followed. Killing of animals for food is prohibited. Jains also follow special measures to not hurt even a tiny insect. Their practices are the strictest among the three.

In Buddhism, Ahimsa is a part of 5 precepts, where abstaining from killing is the most important principle that is to be followed<sup>6</sup>.

Mahayana Buddhism is the most ardent follower of vegetarianism as it believes in the concept that 'one can only escape their own suffering when they don't inflict any suffering on others.'<sup>7</sup>

The Indian religious philosophy has played a very important role in shaping the structure of modern-day society's treatment of animals. Animal cruelty is seen as a sin and against dharma and this causes people to refrain from inflicting any suffering on any strays, or other domesticated beings or wildlife.

## VIII. LEGAL FRAMEWORK FOR ANIMAL PROTECTION IN INDIA

India has always followed the path of its ancient philosophy and culture. Animals are a very necessary part of its ecosystem; they are but without a voice and it falls upon the state to pay some attention to their protection and welfare. Our legislation has granted many laws for different areas of the legal field, such as environmental law for conserving Nature and reducing climate change and others. Below are some of the important legislations that were established in favour of the principle that animals deserve the protection of the state and criminalize any method of exploitation that thus entails them.

### A. The Constitution of India

The constitution of India is the supreme law of the land as it is the source of all the laws that govern the land of India. It lays down fundamental rights, fundamental duties, the directive principle of state policy, etc. which deals with various areas of rights that curtail its citizen. The constitution not only grants rights to its citizens but also works to safeguard the rights of animals under its territory.

Article 21 of the Indian Constitution grants its citizens the 'Right to Life', which has expanded to not only its citizens but also all wildlife. Article 21<sup>8</sup> reads 'No person shall be deprived of his or her personal liberty except according to the procedure established by law.'

<sup>5</sup> Animal rights, available at, [https://www.hindupedia.com/en/Animal\\_rights](https://www.hindupedia.com/en/Animal_rights), (last visited July 10, 2023).

<sup>6</sup> Ibid.

<sup>7</sup> Animal rights in Indian religions, available at, [https://en.wikipedia.org/wiki/Animal\\_rights\\_in\\_Indian\\_religions](https://en.wikipedia.org/wiki/Animal_rights_in_Indian_religions), (last visited July 10, 2023).

<sup>8</sup> The constitution of India.

The declaration that the Right to Life under Art. 21 also expands to animals and wildlife was made clear in the case of the *Animal Welfare Board of India v A. Nagaraja & Ors.*<sup>9</sup>, also known as the Jallikattu Case. In the aforementioned case, the Animal Welfare Board of India (AWBI) filed a case in the Supreme Court to ban the practice of Jallikattu. Jallikattu is a sports practice where bulls are employed as a means of entertainment. A bull is released among a crowd of people and then further, people try to jump on the hump of the bull and hang on to the position while the bull tries to escape. Before the bulls are released towards the crowd, it's beaten with sticks, cut with knives, or even in many cases applied chilli powder to their eyes, in hopes to aggravate the bulls for the sport<sup>10</sup>. This practice has not only seen unnumerable deaths over the years but also raises concern for animal cruelty. The Hon'ble Supreme Court ruled the decision in favor of AWBI, banning the practice of Jallikattu. The court considered that the rights of animals are also constitutional rights. It was held that in accordance with Art. 51A(g), it is a part of the fundamental duties of the citizens of India to protect animals and the environment. Through this landmark judgment, it was declared that the Right to Life mentioned in Art. 21 also contains the right to life for animals.

Article 48A<sup>11</sup>, which comes under the Directive Principles of State Policy, declares that *the State shall endeavour to protect and improve the environment and to safeguard the forests and wildlife of the country*<sup>12</sup>. The 42nd amendment act of 1976 added this article to Part IV, DPSP and although it is not judicially enforceable, it places an obligation on the State to keep its principles in check and to oversee that those suggestions are being mandated.

The Constitution of India also lays down its vision of protecting the environment under the

Fundamental Duties provided in the Part IV-A of the Constitution. Art. 51A declares that it should be the natural duty of the citizens of India to protect and safeguard the natural environment and wildlife of India including lakes, forests, rivers, etc., and to have compassion for animals<sup>13</sup>.

#### **B. The Prevention of Cruelty Act, 1960**

The Parliament of India enacted an Act to safeguard animals from being inflicted with unnecessary pain and to amend laws in order to prevent acts of cruelty against them. This Act of Parliament was named The Prevention of Cruelty to Animals Act. According to the Act, an animal is defined as 'any living creature that is not a human being'<sup>14</sup>.

Chapter II of the Act determines the need for the establishment of a governing body that would be solely responsible to oversee the promotion and governing of the Act, which was achieved through the formation of the Animal Welfare Board of India.

Art. 11 contained in Chapter III of the Act mentions the grounds that would amount to cruelty to animals, some of which are:

- i. Beating, kicking, torturing, over-loading, or any other act which would cause unnecessary injury and inflict any harm or sufferings on any animal.
- ii. Employing any animal with labour or work despite it being unable to carry so, by reason of old age or any underlying disease, causing soreness; wounds, etc.
- iii. Administering any animal with any injurious drug or substance willfully or unreasonably of the cause.
- iv. Carrying or conveying any animal on a vehicle in such a way that subjects it to the infliction of unnecessary suffering or pain.
- v. Confining any animal in any such cage which is not sufficient in containing the animal without inflicting discomfort and suffering in its movement, as well as keeping any animal chained by a heavy chord or chain.

Etc.

<sup>9</sup> [(2014)7 SCC 547].

<sup>10</sup> The Constitutional Scheme of Animal Rights in India, available at <https://www.animallaw.info/article/constitutional-scheme-animal-rights-india#:~:text=The%20Right%20to%20Life%20of%20life%2C%20out%20of%20human%20necessity,> (last visited July 12, 2023).

<sup>11</sup> The Constitution of India.

<sup>12</sup> The Constitution of India, art 48A.

<sup>13</sup> The Constitution of India, art 51A(g).

<sup>14</sup> The Prevention of Cruelty Act, 1960, art. 2(i).

Chapter IV deals with animal experimentation, where it's mentioned that the experimentation on animals for the purpose of gaining knowledge is not unlawful however the board should advise the government to create a committee to supervise the limits on experimentation.

In *Gauri Maulekhi v. Union of India*<sup>15</sup>, the case was filed against the illegal transportation of cattle from India to Nepal for the sacrificing of animals during the Gandhimai Festival. The Supreme Court of India declared that unnecessary pain or suffering should not be inflicted on any non-human beings simply to satisfy the desires of humans and thus prohibited such trade under the Prevention of Cruelty to Animals Act, 1960.

### C. The Wildlife Protection Act, 1972

The Wildlife Protection Act was enacted by the act of parliament in 1972 for the purpose of protecting wild animals, plants, and birds to ensure the ecological and environmental security of the country. The act provides for the establishment of wildlife advisory boards in every state to maintain the implementation of the Act. It was the first legislation that prepared a comprehensive list of all the endangered wildlife species in the country. The Act prohibits the killing, poaching, poisoning, or inflicting harm on any wild animal or bird. It outlawed hunting and harvesting of any protected species of fauna and flora respectively.

It consists of 6 schedules that give varying degrees of protection to all the listed flora and fauna. Out of those, Schedule I and Part II of Schedule II provide absolute protection and any offence committed under these receive the highest penalties<sup>16</sup>. Section 11 of the Act prohibits the hunting of any wild animal listed in Schedules I, II, and III. Section 48A prohibits the transportation of any wild animals, plants, or birds except in cases where permission is

granted by the chief wildlife warden<sup>17</sup>. Section 49 criminalizes the illegal trading of wild animals from dealers without a license. The Act also provides for the establishment of wildlife sanctuaries, national parks, etc.

In the case of the *State of Bihar v Muraid Ali Baig*<sup>18</sup>, there was an issue related to the Wildlife Protection Act where the question was raised whether elephant hunting is justified. The Supreme Court of India held that since elephants fell under the list of animals mentioned in Schedule I, elephant hunting was deemed illegal and prohibited according to the Wildlife Protection Act.

### D. The Indian Penal Code, 1860

The Indian Penal Code which deals with all criminal offences has 2 defined sections pertaining to animal cruelty. Section 428 and Section 429 of the Act reads: '*Whoever commits an act of mischief by maiming, killing, poisoning, or rendering any animal useless shall be punishable by fine or imprisonment of up to 5 years, or both.*'

However, both these sections deal with animals that have a value of 10 rupees and 50 rupees upwards respectively, thus only expanding to the domain of domesticated animals.

Section 377 declares any sexual relationship between a man and an animal as a cognizable and non-bailable offence<sup>19</sup>.

## IX. INTERNATIONAL CONVENTIONS

The need for protecting and safeguarding the life of animals is felt on a global level. Just like how human rights or environmental laws are recognized as important needs of society, the right to safeguard animals are taking up worldwide recognition as well.

Many organizations are being formed that aim to bring rescues to the lives of endangered animals; prevent animal cruelty and animal exploitation; reduce unethical testing on

<sup>15</sup> Writ Petition (PIL) No. 77 of 2010.

<sup>16</sup> Wild Life (Protection) Act, 1972, available at, [https://en.wikipedia.org/wiki/Wild\\_Life\\_\(Protection\)\\_Act,\\_1972](https://en.wikipedia.org/wiki/Wild_Life_(Protection)_Act,_1972), (last visited July 12, 2023).

<sup>17</sup> An overview of animal protection laws in India, available at, <https://blog.iplleaders.in/overview-animal-protection-laws-india/>, (last visited July 12, 2023).

<sup>18</sup> 1989 AIR, 1 1988 SCR Supl. (3) 455.

<sup>19</sup> Animal Protection Laws under IPC and Constitution, available at, <https://www.legalserviceindia.com/legal/article-7056-animal-protection-laws-under-ipc-and-constitution.html>, (last visited July 12, 2023).

animals, etc. Some of the most famously recognized international organizations that work towards the protection of animal rights, and prevention of animal cruelty are OIPA (International Organization for Animal Protection), PETA (People for the Ethical Treatment of Animals), World Animal Protection, etc.

Moreover, various international conventions have been taking place to promote the welfare of animals. Some of the most important initiatives taken up by nations to preserve wildlife are:

#### **A. Convention on International Trade in Endangered Species of wild fauna and Flora (CITES)**

It is one of the largest and oldest international agreements in existence<sup>20</sup>. A resolution was adopted by the International Union for Conservation of Nature (IUCN) in 1963 which further led to the drafting of this international treaty. The main aim of this treaty was to make sure that the international trading of wild animals and plant specimens should not threaten their existence and survival<sup>21</sup>.

With the increase in trade in animal-related industries, it was necessary to create regulations for such trading practices. The industries specializing in animal products such as fur, leather, meat, exotic pets, etc. are estimated to be over billions of dollars annually<sup>22</sup>. As such, illegal trade and black-marketing needs to be limited and regulated.

CITES has created a list of an estimated 36,000 species of plants and animals which are included on the 3 CITES list known as Appendices<sup>23</sup>. Appendix I includes a list of 931 species that are the most endangered plants and animals in nature, such as sea turtles, giant

pandas, etc. Article 3<sup>24</sup> of the said Act mentions the regulations needed for the import and export of species mentioned in Appendix I. As such, the import of the species is strictly forbidden unless it's for scientific purposes. Appendix II includes the list of approx. 34,419 species that are not yet endangered but might become so if the trade isn't strictly regulated<sup>25</sup>. Some of the examples of species in Appendix 2 are American alligators, corals, American ginseng, etc. Furthermore, Appendix III contains a list of 147 species, for instance, Map turtles, cape stag beetles, etc.<sup>26</sup>. As such, it protects the species from illegal and excessive trading and exploitation which threatens and compromises their survival and endangers their existence on the planet. At present, 183 countries and organizations have joined the list of members of this convention that came into effect in 1975.

#### **B. The World Heritage Convention**

The World Heritage Convention, which was established in 1972 by UNESCO, can be considered one of the most important instruments in the preservation of wildlife and sites of natural importance. The main aim of the convention is to identify and protect the natural and cultural heritage around the world<sup>27</sup>.

In India particularly, the Ministry of Environment has the responsibility to overlook the preservation of natural sites. Some of the most important natural sites that are protected under the convention in India are *Kaziranga National Park*, *Keoladeo National Park*, *Manas Wildlife Sanctuary*, *Sundarban National Park*, etc.

#### **C. International Union for Conservation of Animals (IUCN)**

It was established in 1948 with the aim to work towards the sustainable utility of natural resources as well as the preservation of wildlife and the environment. It plays a very important role in overseeing the implementation of several natural conventions for the preservation of

<sup>20</sup> CITES, available at, <https://en.wikipedia.org/wiki/CITES>, (last visited July 14, 2023).

<sup>21</sup> International conventions and treaties dealing with wildlife, available at, <https://blog.ipleaders.in/international-conventional-treaties-wildlife/>, (last visited July 14, 2023).

<sup>22</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), available at, <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=650&menu=3170>, (last visited July 14, 2023).

<sup>23</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, available at, <https://cites.org/eng/disc/text.php>, (last visited July 14, 2023).

<sup>24</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora.

<sup>25</sup> *Supra* note 20.

<sup>26</sup> *Ibid*.

<sup>27</sup> *Supra* note 5.

wildlife and the environment under the UN. Some of the popular conventions are The World Heritage Convention (1972), Ramsar Convention (1975), Convention on Biological Diversity, etc.<sup>28</sup>

In the 1960s, it was involved in the compilation of data regarding the protection of species and the ecosystem necessary for their survival. The data was published in the form of the *IUCN Red List of Threatened Species* in 1964 which is considered as one of the most precise and authoritative guides for biodiversity<sup>29</sup>.

#### D. Global Tiger Forum (GTF)

It is the only inter-governmental international organization, established in 1995, which is working towards the protection of Tigers. There are 13 countries, that belong to the Tiger range countries, which is a part of the Global Tiger Forum. The countries included are India, Bangladesh, Bhutan, Myanmar, China, Cambodia, Indonesia, Nepal, Thailand, Russia, Laos, and Vietnam.

The main objectives it entails are<sup>30</sup>:

- i. To promote globally recognized campaigns to protect tigers, their prey, and their habitat.
- ii. To put aims in increasing the number of secure and natural habitats for the tigers.
- iii. To promote legislative actions and framework in encompassing provisions related to the conservation of tigers.
- iv. To promote proper and necessary training and research to further the study concerning tigers, their natural habitats, and their protection.

Etc.

#### E. United Nations Convention on Biological Diversity (UNCBD)

It is one of the most important UN treaties signed up by 196 countries in 1992 at the Earth Summit in Rio de Janeiro. It is dedicated to the sustainable development and conservation of biological diversity. During its Nagoya summit, it

adopted the Aichi Biodiversity Targets which contains 20 attainable aims known as Aichi Targets. The 3 main aims of the aforementioned treaty are<sup>31</sup>:

- i. To oversee the conservation of natural biological diversity in the world.
- ii. To promote the sustainable use of the components of biological diversity.
- iii. The fair and equitable sharing of the benefits arising out of the utilization of genetic resources.

The above-mentioned international conventions have played a very significant role in the adoption of measures for the worldwide conservation of biodiversity as well as wildlife. Animals' right to life has been clearly prioritized through the various implementations that seek to prevent their exploitation and cruelty.

#### X. CONCLUSION

India is a biodiversity hotspot. There are millions of species of flora and fauna found here. Animals are a very important part of the ecosystem. Without animals, human survival won't be possible. Animals deserve to be able to live in their natural habitat, away from the exploitation of humans. However, the greed of humans knows no limits. Animal cruelty is a massive problem behind the destruction of the natural environment of the world. Animals have always been used for entertainment purposes by humans which has put them a risk of extinction. In such cases, we need some rights to safeguard animals and their interests. Animal protection has seen global recognition in the form of various International Conventions. In India, animals and plants have always been revered and protected via ancient cultural philosophy. The Indian Legislature has passed many laws and acts safeguarding the interests of animals, their protection, and their survival.

The development of animal rights in India has seen a significant increase in the current times owing to the awareness being observed regarding the inevitable climate change. Animals deserve to be protected and

<sup>28</sup> International Union for Conservation of Nature, available at, [https://en.wikipedia.org/wiki/International\\_Union\\_for\\_Conservation\\_of\\_Nature](https://en.wikipedia.org/wiki/International_Union_for_Conservation_of_Nature), (last visited July 14, 2023).

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<sup>30</sup> For conservation of tiger and its habitat, available at, <https://globaltigerforum.org/>, (last visited July 14, 2023).

<sup>31</sup> The Convention on Biological Diversity, available at, <https://www.cbd.int/intro/>, (last visited July 14, 2023).



safeguarded by the states. They are not humans' play things, and neither are they a source of entertainment. They have their rights and deserve to enjoy life as nature has granted them.

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