



Compliance Gaps in the Implementation of the Supreme Court 2025 Stray Dog Policy: A Case Study of the Bengaluru West City Corporation Area

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Abstract. Bengaluru recorded 361,494 dog bite cases in 2024 which increased from 232,715 cases in 2023 thereby showing a more than 55 percent increase while Karnataka showed only few rabies cases. The Prevention of Cruelty to Animals Act, 1960 together with the Animal Birth Control Dogs Rules, 2023 creates a legal framework but execution of these laws faces practical difficulties. The Supreme Court in *In Re: City Hounded by Strays, Kids Pay Price* mandated municipalities to establish feeding zones while creating dog shelters for dangerous or infected animals and developing emergency contact services. The study investigates how Bengaluru West City Corporation implemented these mandates through doctrinal and qualitative research methods which include interviews with fifty-three stakeholders. The results show that operational limitations and resource shortages prevent successful identification of feeding locations and dog behavior observation and sterilization program execution.

Keywords: Stray dog governance, Animal birth control rules 2023, Supreme court guidelines 2025, dog bite incidents, public health.

1 Introduction

India's stray dog governance system functions as a junction between three different fields which include public health, municipal administration and animal welfare. The growing population of Bengaluru which now stands at more than thirteen million people has created challenges for the city to manage waste operate sanitation systems and maintain its neighborhood infrastructure.[1] The number of dog bites reported till September 2024 for the city exceeded ninety thousand cases.[2] The data indicate a need to examine in detail the institutional mechanisms regulating curbing the stray dog population and responding to increasing public apprehension.[3]

Researchers study how communities handle stray dog populations through their work which investigates three areas of research: ecological systems, effects of sterilization, public health dangers and human animal relationships. The process of

judicial orders entering urban environments through their implementation in cities remains underexplored. The Supreme Court's ruling in *In Re: City Hounded by Strays, Kids Pay Price*[4] established a standardized system for street dog management which all Indian states must implement. The Court combined two constitutional issues which involved public safety because of rising bite incidents and the requirement to protect animals through humane treatment. The local government received instructions to create feeding locations, build shelters for dangerous or infected dogs, maintain round the clock emergency lines, and enhance scientific animal population control methods while managing their adoption processes. The new guidelines required cities to handle additional duties which needed cooperation between veterinary staff and local officials and animal rescue groups and community dog feeders.

The Animal Birth Control (Dogs) Rules, 2023 (ABC Rules, 2023) serve as the main rules which control how dogs should be captured and sterilized and vaccinated and their records should be kept and they should be returned to their home areas. The rules create a system for operation which requires administrative capacity and trained staff and financial resources and vehicles and joint operations with other agencies to function successfully. Existing scholarship approaches stray dog governance through several perspectives which include social perception, veterinary science, public health, legal frameworks, administrative capacity, and ecological research.[5]

The research on public health shows that people do not completely follow post-exposure prophylaxis treatment and dog bites still present a public health problem.[6] Some public health studies also document observed contraventions in post exposure prophylaxis (PEP) in hospitals and referral centers.[7] Animal welfare focuses, under statutory direction, towards legal scholarship, while operational studies identify financial and infrastructural constraints.[8] Ecological research further demonstrates that free-ranging dog distribution and bite risk depend on four factors which include food availability, waste patterns, climate variability together with human behavior.[9] Different societies demonstrate their attitudes towards free roaming dogs which in turn, treat this issue as an important factor shaping their urban management approaches.[10] It ultimately means that more and more government bodies aim to reinforce the concept of combining animal control and public health in the legal framework.[11] Ecological research has suggested that food rich urban environments further entrench territorial clustering, rendering sterilisation impact lower by itself.[12] These factors per se may not be held responsible for implementation outcomes, where legal design is concerned.

The research presents an original empirical study which investigates how the Supreme Court's 2025 stray dog governance framework and the Animal Birth Control (Dog) Rules, 2023 function within a defined municipal administrative area.

2 Legal Framework

The legal framework for managing stray dogs in India operates through a welfare-based system which combines constitutional principles and statutory laws and delegated authority and municipal regulations. The system requires humane methods for

capturing animals and their subsequent sterilisation and vaccination processes which allow them to return to their original habitat. The emerging conflict between public health requirements and animal welfare standards establishes the main framework which judges must use to interpret recent court decisions.

The constitutional foundation is anchored in Articles 21, 48A, and 51A(g) of the Constitution of India.[13] Judicial interpretation has expanded Article 21 to provide protection against all forms of animal cruelty while Articles 48A and 51A(g) establish environmental protection and kindness toward all living creatures as mandatory duties for both the state and citizens. The Supreme Court in *A. Nagaraja* recognised the intrinsic worth of animals and affirmed the ‘five freedoms’ doctrine as a guiding welfare standard. Earlier decisions, including *Animal Welfare Board of India v. People for Elimination of Stray Troubles*[14] and *All India Animal Welfare Association v. Brihanmumbai Municipal Corporation*[15], prohibited all methods of stray dog killing or relocation and enforced complete compliance with the Animal Birth Control system. The combined results of these legal decisions establish that humane population control represents a constitutional requirement.

The Prevention of Cruelty to Animals Act, 1960 establishes these values as binding legal requirements.[16] The law prohibits all forms of cruel treatment while it establishes the Animal Welfare Board of India as an official body and it allows euthanasia to occur only in specific medical situations. The primary regulatory framework for this statute exists in its delegated authority which establishes the Animal Birth Control (Dogs) Rules, 2023. The Rules require humane methods for catching dogs which must then undergo sterilisation and anti-rabies vaccination and identification marking before being returned to their original location. The system creates monitoring committees that operate at state, district and municipal levels while it establishes record keeping requirements and controls how certified organizations work with Resident Welfare Associations to help find feeding locations. Veterinarians need to confirm that an animal is either unhealable or infected with rabies before euthanasia can take place. The 2023 framework introduces expanded requirements for documentation, accountability and oversight processes than what the Animal Birth Control (Dogs) Rules, 2001 established.

The Supreme Court of India issued an interim order in *In Re: City Hounded by Strays, Kids Pay Price* which mandated the authorities to conduct comprehensive dog impoundments across specific locations in the National Capital Region Delhi (NCR). The three-judge bench reversed its previous decision by restoring catch, sterilize, vaccinate and return as the standard procedure while permitting control measures for clinical rabid or dangerous animals. The Court required municipal bodies to establish designated feeding areas and operational helplines. They must report their infrastructure capabilities and submit compliance documents. The judgment preserved the essential welfare component of the ABC framework but established stronger mechanisms for public safety protection and accountability requirements.

Multiple statutory instruments exist at both state and municipal levels which determine how implementation processes should proceed. The Karnataka Municipal Corporations Act, 1976[17] creates requirements for sanitation and public health operations which the Karnataka Police Act, 1963 uses to handle public order and

nuisance issues.[18] National laws and regulations are implemented through municipal bye laws and operational guidelines and dog bite compensation schemes which create local administrative procedures.[19] The Bruhat Bengaluru Mahanagara Palike's 2023 street dog census found that the city had about estimated 2,79,000 dogs which had an average sterilization rate of 71.81 percent yet showed different results between various zones.[20] The different results demonstrate that legal requirements assume veterinary capacity and transportation resources and operational collaboration will exist in all situations.

Implementation scholarship provides analytical tools to assess these constraints. The state capacity theory asserts that when governments lack sufficient personnel and financial resources and necessary infrastructure their regulatory requirements become merely aspirational. Street level bureaucracy theory demonstrates that frontline officials use their discretion to implement formal rules as they make operational decisions. The framework for collaborative governance mechanism establishes that successful stray dog management needs planned collaboration between municipal authorities and animal welfare organizations and Resident Welfare Associations and community feeders.

The stray dog governance system of India displays both strong doctrinal foundation and complete normative consistency. The system encounters challenges due to the complicated administrative and ecological conditions which exist in its operational areas. The research study examines how legal professionals and government agencies implement current laws in their work throughout Bengaluru West as shown in table 1.

BBM P Zone	Popula- tion	95% Confi- dence Interval (CI)	Male	Fe- male	Un- known	Neu- tered (%) / Steri- lised	Are a	Do gs per sq. km
West Zone	22025	21493 22557	13870	6261	1894	79.48	50.1	439 .62

Table 1. BBMP West Zone: Dog Population, Density and Sterilisation (2023),
Source: Bruhat Bengaluru Mahanagara Palike (BBMP) Street Dog Census, 2023.

3 Data And Methods

The research uses mixed research methods to study the stray dog management practices of Bengaluru West Municipal Corporation through a combination of doctrinal, empirical and qualitative research methods. The study analyzes policy implementation through its examination of the legal requirements and the actual methods used by staff members to meet those requirements. The research framework consists of three parts which include doctrinal legal system assessment and qualitative research about municipal employee and veterinarian and feeder and resident understanding of

regulatory requirements and field research conducted in Bengaluru West. The doctrinal research component evaluates three legal sources: Supreme Court decision *In Re: City Hounded by Strays, Kids Pay Price* and Animal Birth Control (Dogs) Rules 2023 and Prevention of Cruelty to Animals Act 1960 together with administrative circulars and municipal guidelines issued by the Karnataka Department of Animal Husbandry and the Bruhat Bengaluru Mahanagara Palike. The official documents do not reveal complete operational information which academic literature and reports together with media records provide as secondary materials.

The empirical research uses three methods which include semi-structured interviews and questionnaires and field observations and documentary analysis to investigate sterilization coverage and rabies control methods and animal feeding patterns and waste management practices and complaint resolution procedures. The researchers conducted their fieldwork from September 1st, 2025 to November 6th, 2025. The researchers selected sample of 53 stakeholders through stratified purposive sampling and snowball identification which included veterinarians and NGO representatives and dog-catching personnel and Primary Health Centre staff and ASHA workers and residents. The researchers used thematic coding to analyses qualitative data which they compared through triangulation between interviews and field observations and administrative records. The ethical safeguards provided protection for participants by ensuring their rights to voluntary participation and informed consent and privacy protection and institutional ethics approval. The study has two limitations which arise from purposive sampling bias and its investigation of one municipal zone, yet the method of methodological triangulation provides better analytical validation. The analysis shows the legal situation that existed on 22nd August 2025.

4 Data Findings

The research results contain six interrelated themes which include legal awareness, operational capacity, ecological drivers, feeding conflicts, and behavioural assessment challenges, and institutional coordination. The implementation gaps emerged between the themes because administrative, environmental and coordination constraints prevented their execution according to doctrine.

4.1 Legal Awareness Across Stakeholder Groups

The Animal Birth Control (Dogs) Rules, 2023 and Supreme Court 2025 directions received different levels of awareness among various stakeholder groups. Senior municipal officials demonstrated clear understanding of the return to site mandate for sterilised dogs. Frontline field staff displayed uncertainty about handling allegedly aggressive animals because 68 percent of them did not have information about proper procedures. Showing ambiguous observation, public health personnel often considered sterilization to be the tenet of general health. Among residents and feeders, awareness was minimal, only 14 percent reported knowledge of the 2025 judicial directions. The operational activities of the organization experience major consequences because

frontline workers handle their responsibilities according to their individual understanding of capture and release and conflict resolution methods as shown in figure 1.

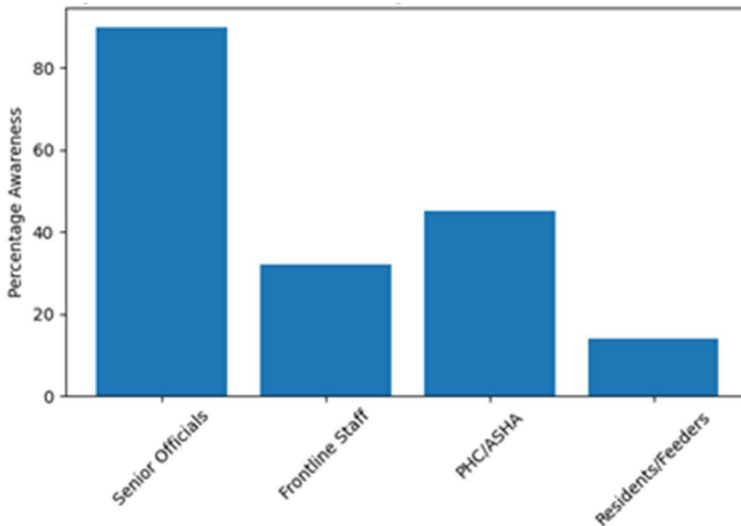


Fig. 1. Awareness levels of ABC Rules 2023 and Supreme Court Guidelines 2025 among stakeholders.

4.2 Operational and Resource Constraints

Respondents consistently identified logistical bottlenecks that impacted project implementation. The dog catching teams reported that their vehicle shortage together with their delayed transport schedule reduced their daily capacity to sterilise animals. ABC centres reached their surgical limits during the day which forced veterinarians to either delay operations or cut back on their post-surgical monitoring period. The primary health centre records showed that there were two different times when anti rabies vaccines were unavailable and that the medical facility did not follow the Post Exposure Prophylaxis schedule completely. The veterinary teams and health units operated with poor coordination which restricted their ability to track dog bite outbreaks using data about sterilisation coverage as shown in figure 2.

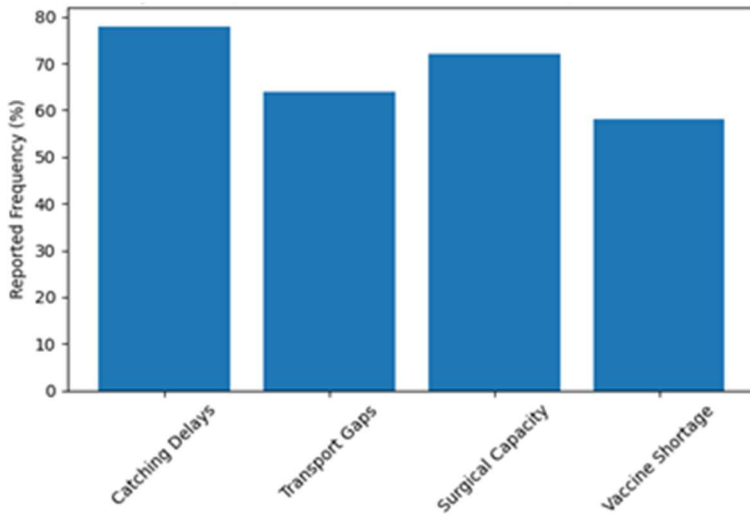


Fig. 2. Distribution of operational bottlenecks reported across the ABC implementation chain

4.3 Ecological Drivers of Dog Behaviour

The findings point to a strong connection between waste accumulation and dog congregation. The study found that 83 percent of residents in the area identified three specific locations which included garbage sites, hotel waste disposal points and market areas as places where people gathered. The veterinary staff members explained that dogs develop territorial behavior because they need to protect their food supply instead of their sterilization status. Sterilization produced permanent changes in pack behavior because dogs maintained stable food sources which restricted their interaction with humans and other dogs as shown in figure 3.

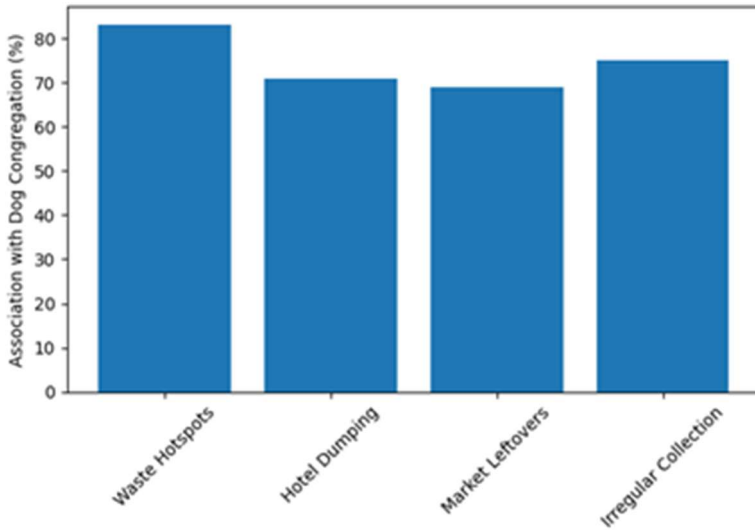


Fig. 3. Ecological contributors to dog bite incidents in Bengaluru West

4.4 Feeding Practices and Community Conflict

The study period did not see the establishment of designated feeding areas which judicial orders mandated to be created in particular zones. Residents used residential lanes as their feeding locations for dogs. The study found that 62 percent of residents experienced feeding related disputes while only 18 percent of feeders reported such conflicts. Health workers observed that dog feeding practices created dangerous situations because attempts to move the dogs away from food led to aggressive dog behavior which resulted in more bite incidents. The existing patterns demonstrate that collaborative governance mechanisms have not been established as formalized processes yet as shown in figure 4.

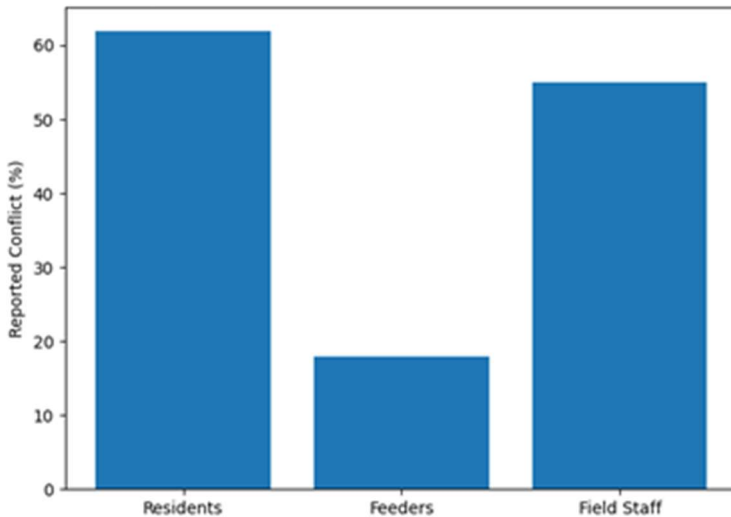


Fig. 4. Stakeholder groups reporting feeding related conflict.

4.5 Aggressive Dog Identification and Adoption Constraints

Stakeholders identified behavioural assessment as one of the least standardised components of the framework. Residents often struggled to identify specific animals involved in bite incidents. PHC records did not provide complete dog identification and veterinary teams announced they had no formal methods to evaluate dog behaviour. The decision-making process relied more on personal expertise than established guidelines. The pathway for adoption faced similar limitations because NGOs reported their inability to shelter more dogs and people showed little interest in adopting adult free roaming dogs.[21]

4.6 Institutional Coordination Gaps

The different departments lost their ability to communicate with one another because of the implementation process. The NGO representatives kept their own records which did not link to municipal databases while field staff used spoken orders as their only source of information. The residents reported that municipal helplines showed different degrees of responsiveness. The organization operated its separate functions which prevented them from conducting systematic risk assessment and sterilisation operations and creating high risk zone maps through data analysis.

The ABC Rules, 2023 and Supreme Court 2025 directions show their effectiveness through awareness gaps, logistical obstacles, environmental stressors, unregulated feeding practices, insufficient operational standards and departmental silos. The legal framework maintains its normative coherence because its implementation depends on administrative resources and established interdepartmental links.

5 Analysis of Findings

The Animal Birth Control (Dogs) Rules, 2023 together with the Supreme Court's 2025 regulations create a complete legal framework which regulates humane control of stray dogs yet the implementation of this framework in Bengaluru West depends on multiple elements which include both administrative capabilities and environmental conditions and the choices of street workers and the community conduct of nearby residents. The implementation gap between established protocols and actual fieldwork results in ongoing dog human conflicts despite high rates of reported dog sterilization.

The research results show that organizations fail to implement legal requirements because they experience challenges with compliance. Senior officials expressed their complete knowledge about the requirements for returning to specific sites and the rules which prohibit relocating to other locations. Frontline staff members and public health workers functioned with incomplete knowledge which they obtained through spoken directions instead of documented procedures. The implementation process at street level follows traditional patterns because workers implement regulations based on their personal judgment during times when they need to interpret rules that have not been established yet and they lack essential resources. The process of deciding how to handle animal bites involves making choices about whether to capture animals or evaluate their behavior or conduct follow up procedures.

The Catch, Sterilise, Vaccinate and Return (CSVVR) model requires operational execution because structural bottlenecks create multiple obstacles. The framework needs to create stabilizing effects which face reduction because of three factors, which include transport delays and limited surgical throughput and constrained post-operative monitoring, above operational limits. Similar operational limitations have been observed in other Indian sterilisation programs.[22] The West Zone census data show high sterilization rates but both intra ward differences and catching inefficiencies prevent complete coverage. The research findings validate state capacity theories because ambitious regulatory requirements demand infrastructure development together with staff hiring and operational planning activities to achieve consistent outcomes.

The ecological variables serve as the main factors which determine the results of the implementation. The presence of waste accumulation sites which supplied constant food sources established a direct connection between dog congregation patterns and dog bite incidents. Veterinarians confirmed that dogs establish their territorial behaviour based on their food access rather than their sterilization status. The necessary sterilisation coverage requirement exists because it cannot reduce conflict which occurs in areas where waste management systems function irregularly and waste disposal locations become concentrated. The interaction between sanitation systems, territorial pack behaviour and human practices creates public health risks.

Feeding practices create additional difficulties for people. People provide food to others within their social networks when there are no designated feeding areas. People living in the area together with the feeders, have different views about danger. The system fails to establish feeding practices through formal methods which restricts the collaborative work described in judicial instructions. The community will remain

divided into two groups because people choose to follow their own ways in which dogs move around and create their own territorial areas.

The research shows how dog adoption systems fail to identify aggressive dogs through their current identification methods. The current method for conducting behavioral assessments relies on personal experience instead of standardized assessment tools. Bite records lack systematic documentation capable of linking incidents to identifiable animals. NGOs reported restricted shelter capacity and limited public willingness to adopt adult free ranging dogs. The system faces challenges because the judicial requirement to separate dangerous animals for judgment procedures cannot be defined through standardized methods. Since the organization has a variety of behavior management programs, an integrated tracking system will help it to properly administer programs. The issues become more severe because institutional fragmentation creates extra barriers to solving them. The veterinary teams and sanitation departments and NGOs and public health units face limitations when they try to access shared data resources. The existence of separate record keeping systems together with unpredictable response times from helplines hinders the ability to establish unified plans based on verified research. The implementation literature shows that multi agency programs fail when their information systems remain partitioned among different departments. This pattern is demonstrated by the findings which originated from Bengaluru West.

The evidence shows that the governance of stray dogs in Bengaluru West operates through an ecosystemic process which legal rules and environmental forces and administrative restrictions and social interactions create.[23] The legal system establishes humane standards which create organized procedures but actual results require veterinarians and sanitary workers and healthcare professionals and community members to work together. The study demonstrates that law exists as operationalized through daily practice which three elements determine its effectiveness, discretion, resource limits, and local relationships. The analysis of findings shows that effective and humane stray dog management needs more than court orders and sterilization targets to succeed. The implementation process requires sustainable waste governance which should establish standard methods for assessing behavior and improve training for front-line staff while delivering organized solutions for community disputes and managing complete data systems. The following targeted recommendations use these findings as their foundation.

6 Recommendations

The research findings of this section lead to requirements which all institutions must fulfill according to the regulations established by the Animal Birth Control (Dogs) Rules of 2023 and the Supreme Court directives issued in 2025. The spatial design system which requires digital systems to function would bring operational efficiency to dog catching and transport operations. The Geographic Information Systems (GIS) technology will enable mapping of dog clusters at ward level while the Global Positioning Systems (GPS) technology will improve route optimization to achieve

faster response times and expanded sterilisation coverage. Catching teams should use handling methods which cause the least disturbance to animals which include handling techniques from Least Intrusive, Minimally Aversive (LIMA) behavioural principles.[24] The combination of dog feeding times and scheduled operations with humane baited enclosure traps will boost capture success rates while keeping both animals and handlers in a state of low stress.[25] The standard procedure for handling animals after capture requires climate controlled transport which includes separate crates and immediate digital entry of location data and temporary identifiers to follow Rule 9 of the Animal Birth Control Rules, 2023.

The second requirement is an integrated Dog Identity and Behavior Registry which needs to be developed at each ward. Primary Health Centers currently document human bite cases without establishing connections between attacks and specific animals. The system can use permanent visible identifiers which include ear notches and tags that Indian welfare frameworks recognize as tracking procedures. Free roaming dogs create permanent territory boundaries which can use to observe their movement patterns. The municipal platform will enable better identification of behavioral risk patterns when PHC bite records and sterilization registers and vaccination data are integrated into one system.

The public health surveillance models which use similar monitoring methods show that the coordinated reporting system for bite incidents improves emergency response capabilities and enables better preventive measures. The integration will create a functioning system which enables the Court to scientifically detect and manage dangerous animals by following the ABC Rules 2023 requirements from Rules 9 and 10.

Structured feeding regulations need proper alignment which waste governance must establish. Dogs exhibit territorial behavior because they use their sense of smell to detect upcoming meal times. The sudden termination of food distribution without offering replacement options will lead to more intense territorial disputes and protective behavior. The city needs to test special feeding areas which should include input from Resident Welfare Associations and feeders and municipal sanitation teams. The zones must establish regular cleaning procedures which will occur at specific times throughout the day. Local kitchens and food businesses should create partnerships to set up permanent feeding locations which will also support joint sterilization and vaccination efforts. If the community practice, follow court orders through structured collaborative governance mechanism frameworks it would also reduce informal disputes. The reforms focus on four major objectives including capacity building, behavioral standardization, digital system integration and community engagement through negotiated processes. The existing legal obligations should not receive new extensions through additional requirements because the current legal framework requires better execution which needs enhanced operational systems and infrastructure improvements.

7 Conclusion

The street dog management system in India currently operates through its existing legal framework which results in ineffective outcomes according to the study. The Animal Birth Control (Dogs) Rules 2023 together with the Supreme Court's 2025 guidelines create a complete system that implements humane treatment. The research results from Bengaluru West show that administrative abilities and environmental obstacles and community interaction patterns have greater influence on results than doctrinal uncertainty.

First, different levels of legal awareness among stakeholder groups lead to different outcomes during implementation. Senior officials together with institutional actors understand statutory and judicial requirements yet frontline personnel and public health workers and residents operate through informal or partial legal knowledge. The different reactions between individuals lead to changes in return to site procedures and feeding regulations and complaint resolution methods.

The second point describes how structural limitations decrease the operational reliability of the Catch-Sterilise-Vaccinate-Return model. The ability to achieve complete coverage gets affected by delays in catching, which together with limited transport capacity and high surgical workloads, and insufficient post operative monitoring. The reported sterilisation rates fail to show the complete distribution of sterilisation across different areas and operations within the system.

Third, ecological conditions create substantial effects on patterns of conflict. Waste accumulation together with predictable feeding points and territorial pack behaviour establish the conditions which control how dogs gather and interact with humans. The environmental factors which cause bite incidents require more than sterilisation to control their impact.

The study provides evidence that stray dog management needs multiple urban governance sectors to solve its issues because it cannot be treated as a problem requiring only veterinary solutions. The system needs collaboration between its sanitation, veterinary, public health, and community components to achieve successful operation. The street level and interpretive perspectives of this research demonstrate how legal norms obtain their functioning power through the actual work done by people who have the authority to choose their actions and use available resources and settle matters in their particular locations. The research demonstrates Through its examination of one specific urban area the study establishes a system which enables researchers to investigate how policies function in different urban environments. The study combines doctrinal analysis with field based research to create evidence based recommendations for developing humane and coordinated and administratively workable systems of stray dog management.

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