



Animal Rights as an Integral Tenet of Environmental Policy: Statutory Constructs and Regulatory Pathways toward SDG 15 Realisation

Swarnima Gorani 

Sharda Law School, Sharda University, Greater Noida U.P., India

goraniswarnima@outlook.com

Abstract. The crossroads of environmental protection and animal rights have become one of the defining key factors to the attainment of SDG 15, which is Life on Land. With the growing international understanding of the relationship between animal welfare, conservation of biodiversity and health of ecosystems, countries all around the world are redefining legal systems that are no longer based upon traditional anthropocentric theories. Animal protection in environmental governance is increasingly being incorporated into the wider international agenda through international instruments such as the Convention on Biological Diversity and CITES, and through the emerging new standards of animal welfare and welfare standards. The acknowledgement by the European Union of animals as sentient beings, the innovative effort of the legislation in New Zealand and the constitutional reforms in Latin America have shown different but convergent methods. Nevertheless, a translation of the international commitments into practical domestic policies is not an easy task, especially in the developing countries that have been identified as rich in biodiversity. The case of India is quite interesting, whereby its constitutional provisions, as presented in the 48A and 51A(g), formed special grounds regarding the protection of the environment and animals. The presented paper evaluates animal rights as one of the key building blocks of environmental policy, determines the challenges of its implementation, considers the potential to transform the world through the recent Supreme Court ruling, and creates a coherent taxonomic legal model that puts animal rights at the centre to achieve SDG 15 goals and ensure balanced ecosystems, which serve human and ecological needs.

Keywords: Animal Rights, Environmental Policy, SDG 15, Wildlife Conservation, Ecosystem Sustainability.

1 Introduction

The global crisis of the environment in the contemporary world has caused the world to reevaluate the context of interaction between the human community, the animal community, and ecological systems. One of the sustainable development goals of the

United Nations 2030 Agenda on Sustainable Development is Sustainable Development Goal-15, where countries are asked to preserve, restore, and use terrestrial ecosystems sustainably, regulate the forest in a sustainable manner, prevent desertification, and stop and reverse the loss of biodiversity [1]. Within this general scope, it is within this general area that the construct of animal rights has come to the fore as a much-needed yet much underestimated facet of environmental regulation, and would also have to be reflected in the law and regulation, should SDG 15 be made a serious consideration.

Both the environmental law and the animal welfare law have evolved in quite opposite lines in history. The traditional orientation of environmental policy has been towards protection of habitat, regulation of pollution and natural resource usage, in which the traditional focus lies on the animals themselves as opposed to the ecological good. On the contrary, animal welfare laws have been anxious not to be cruel and with humane treatment, ordinarily in domestic or agricultural topics, with limited adventures into wider environmental problems [2]. This dichotomy has brought a lot of loopholes in regulation, especially in the fields of conservation of wildlife, control of conflicts between man and animals and conservation of life in poor environments.

Contemporary theory and policy practice have developed to appreciate more formally the fact that such a partition is conceptually unsound as well as ineffective in practice. The ecological sciences have shown that the health of people in the animal kingdom, as well as the conditions of the populations in conservation, is closely linked. The human condition of every animal is in relation to the state of the ecosystem, as well as vice versa. Likewise, other animal-based ethical theories like the Utilitarian theory and the rights theory were also problematic of anthropocentric approaches to the issue, and assisted in furnishing the moral justifications, by which the consideration of the animal within the ecological policy was justified [3].

The current paper engages in an in-depth discussion of animal rights as an environmental policy, particularly the legal and regulatory solutions and procedures that can be used to support the attainment of SDG 15. It compares international sources of law, national comparative legal provisions and the dynamic jurisprudence of India to demonstrate that animal rights may be incorporated into the environment of environmental regulation. The paper is divided into a number of parts. It begins with the introduction of the international legal environment, the national jurisdiction, and the regional system, gives an example of an international case involving India, explains the implications of recent judicial development, and presents some suggestions and a conclusion.

2. DISCUSSION

The philosophical foundations of animal rights have changed significantly as compared to the Enlightenment, when scholars like Jeremy Bentham first began to doubt the moral exceptionalism of non-humans, i.e. animals, who were not considered ethical beings. The well-known saying of Bentham, according to which the relevant question is not whether animals can reason or talk, but whether there is suffering in them, was the precursor to the use of utilitarianism in the animal welfare approach. Peter Singer, in his book *Animal Liberation* (1975), in the twentieth century, offered

the equal consideration of interests to animals based on the fact that species membership is not enough to deny moral status.

A deontological argument developed by Tom Regan in his book *The Case for Animal Rights* (1983) held that animals with an intrinsic value are subjects-of-a-life, and thus have inviolable rights which cannot be superseded by the aggregate utility. The implications of these philosophical systems on environmental policy are very strong. When animals have intrinsic value or rights, then the management of the environment should also consider their interests, not just as being part of the ecosystem as tools, but as living beings who have rights and need protection as such [4]. This view questions the strictly conservationist models, which can deem the welfare of individual animals important to population or habitat-level goals, and requires a more subtle form of germination of animal-rights concerns into environmental decision-making.

SDG 15 covers an area in relation to animal rights, protecting and sustainable utilisation of freshwater ecosystems, whether inland or marine (Target 15.1), preventing the extinction of the endangered species (Target 15.5), as well as fighting the poaching and trafficking of the endangered species (Target 15.7). The achievement of those goals will not be possible solely through the habitat-level measures that indeed necessitate the species-specific safeguarding of the needs of a single animal. The new framework of global biodiversity in 2020 should have a more holistic approach that will close the divide between conservation and animal welfare because both factors are vital to sustainable development.

2.1 The Convention on Biological Diversity (CBD) is a global contract on the protection and safeguarding of all forms of life, biological, on the earth. The Convention on Biological Diversity, which was adopted in 1992, forms the main international framework of conservation of biodiversity and the sustainable use of biological resources. Even though the CBD does not clearly define animal rights, its guidelines on the conservation of biological diversity (Article 1), identification and monitoring of biodiversity components (Article 7) and in-situ conservation (Article 8) bring a platform through which the consideration of animal rights can be incorporated [5]. This platform is further strengthened by the KunmingMontreal Global Biodiversity Framework, which was adopted in December 2022, and sets ambitious goals to safeguard ecosystems, species, and genetic diversity, among them the commitment to protect thirty per cent of land and sea areas by 2030 [6].

However, the focus of the CBD on biodiversity at the population, species, and ecosystem levels has been criticised as not paying attention to the welfare of specific groups of animals [7]. The fact that the framework is concerned with sustainable use could allow practices that, though sustainable at a population level, cause a great deal of suffering to individual animals, e.g. specific types of hunting or wildlife control. To overcome this constraint, it will be required to include animal welfare standards in the CBD implementation mechanisms, which a number of experts have long advocated, but which has yet to be realised completely.

2.2 CITES and Regulation of Wildlife Trade.

The first convention, called the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), adopted in 1973, governs international

trade in specimens of the species in its appendices. Through a permit system and trade restrictions, CITES has played a major role in checking the overexploitation of endangered species. The three appendices of the convention divide the species in terms of their conservation, in which Appendix I bans commercial trade of the most species, which are the most endangered. Whereas CITES touches more on the conservation issues, it also has strong implications for the topic of animal welfare. The transport of live specimens requires adherence to the International Air Transport Association (IATA) Live Animals Regulations, thus incorporating the welfare standards into trade regulation [8]. However, there is still no balance in the enforcement of CITES practises and many of the signatory states do not have the institutional capacity or political will to enforce its provisions [9]. The problem of endangering conservation and animal welfare goals due to the illegal trade of wildlife valued at an estimated 23 billion USD per year shows the need to tighten the belt of the regulatory instruments [10].

2.3 The Universal Declaration of Animal Welfare.

The process of creating a universalist model of animal welfare has led to the proposal of a Universal Declaration on Animal Welfare (UDAW), which would treat animals as sentient beings and have the capacity to suffer, and internationally set up minimum standards of welfare (World Animal Protection, 2014). The UDAW is yet to be ratified by the United Nations General Assembly, but the support it has received in the civil society, by individual governments of nations and by international bodies is overwhelming. Such a declaration would become an important normative step, which would provide a point of reference when implementing animal welfare into environmental governance systems, such as SDG 15 [11].

2.4 European Union: Sentience and Legal Recognition.

The European Union has been at the forefront in incorporating animal welfare into the legal system. Article 13 of the Treaty on the Functioning of the European Union (TFEU) acknowledges the fact that animals are sentient entities and that full consideration should be given to their welfare needs when developing and adopting policies by the Union on agriculture, fisheries, transport, internal market, research, and technological development [12]. Such awareness has been realised by a set of codes and rules to govern animal welfare within the material of farming, transport, research, and the protection of wildlife.

The recent Biodiversity Strategy adopted by the EU as part of the European Green Deal continues to incorporate the issue of animal welfare into its environmental targets by pledging to increase the amount of protected areas in the country, cut the usage of pesticide products, and restore damaged ecosystems [13]. The plan clearly accepts the importance of animal welfare in meeting biodiversity objectives and offers solutions to eliminate the menace of wildlife trafficking, invasive alien species and ecological effects of intensive agricultural production. This concerted initiative can be emulated by other areas that want to implement animal welfare that is compatible with environmental sustainability.

2.5 New Zealand: Ecosystem Rights and Legal Personality.

New Zealand has embraced new legal practices that have obscured the historic distinction between environmental and animal welfare law. The Animal Welfare Act, 1999, which was updated in 2015, is one of the acts that explicitly acknowledges the presence of animals as living things, and enforces liability on the owners and the people in charge to address and provide physical, health and behavioural needs of animals [14]. This appreciation has been matched by groundbreaking enviro-legal legislation, the most notable one being the Te Awa Tupua (Whanganui River Claims Settlement) Act 2017, giving the Whanganui River legal personhood that set a precedent of considering non-human systems as rights- holders [15]. The New Zealand understanding of wildlife conservation, protection of habitats and management of human-animal conflicts has largely taken this holistic view, providing other jurisdictions a model that they have attempted to follow.

2.6 Constitution of Latin America Reform.

A number of Latin American nations have included environmental and animal rights stipulations within their constitutions as a result of the influence exerted by indigenous cosmologies and the rights-of-nature movement. In 2008, Ecuador became one of the first countries in the world to declare, under Article 71 of the Constitution, that nature had the right to the maintenance and regeneration of life cycles, structure, functions and evolutionary processes of nature, the first to do so in the world. Litigation has also been used on this provision of the constitution to secure the habitat of animals and stop the destruction of ecosystems under which wildlife cannot survive.[16]

The Constitutional Court of Colombia has also enhanced the incorporation of animal rights into the environmental statute. The Court declared the Atrato River basin a subject of rights in a landmark 2017 decision, reminding its constitutional safeguarding of the environment, as well as utilising the precautionary principle [17]. To a greater extent, in more recent years, the rights of individual animals, such as a spectacled bear called Chuchito, have been extended by the courts of Colombia, and the animal has the right to freedom and a natural habitat [18]. These developments in the judiciary indicate a tendency in Latin American jurisprudence where there has been a shift to an ecocentric legal system that integrates the rights of animals within the wider environmental protection system.

2.7 Constitutional Framework under Article 48A, 51A(g)

The constitutional system of India offers a unique basis for incorporating the rights of animals and protecting the environment. Article 48A, inserted by the 42nd Amendment Act of 1976, is a Directive Principle of State Policy that directs the State to attempt to protect and improve the environment and to safeguard the forests and wildlife of the country. To supplement this, the basic duty that Article 51A(g) places upon all citizens is the safeguarding and bettering of the natural environment, forests, lakes, rivers, and all living beings, and the existence of a feeling of kindness towards all living things [19]. The combination of these provisions in the text of the constitution indicates the holistic viewpoint that relates the preservation of the environment to the moral approach toward animals. According to the observations made, the relationship between the ecological integrity and the care of non-human life in the environmental

responsibilities of the Indian Constitution offers a normative account on the use of the law as well as judicial interpretation of the norms that dominate in the two dimensions [20]. This constitutional ground has been put into practice by the following successive statutes.

2.8 Legal Regulatory Environment

As the amendment, it is the Wildlife Protection Act of 1972 that provides the main framework of legislation for the conservation of wild animals, birds and plants in India. The Act establishes the regulated system of protected areas, including national parks, wildlife sanctuaries and conservation reserves and regulates hunting, trade, and possession of wild animals and products thereof [21]. The topmost protection is provided to the species at risk of extinction, such as the Bengal tiger, the Asian elephant and the Great Indian Bustard, through Schedule I of the Act. The Prevention of Cruelty to Animals Act of 1960 deals with animal welfare of domestic and wild animals in criminalising cruel acts, and through the creation of an animal welfare board, to enforce care to animals [22]. Although the act has been disparaged as having weak penalties and few enforcement instruments, it represents one of the foundations of the animal welfare system in India.

More amendments and court interventions have been made in the recent past to make its provisions stronger, especially when it comes to using animals in entertainment, transport, and scientific research. The Environment Protection Act, 1986 that was adopted in the aftermath of the Bhopal gas tragedy gives an overall structure to environmental regulation making the central government to have the ability of taking measures towards environmental protection (Environment Protection Act, 1986). The Act, however, does not directly cover animal welfare, but due to its sweeping mandate, the Indian kingdoms are seen by courts to protect wildlife and their ecosystems, hence the connection between environmental protection and animal protection.

2.9 Court Measures

The Hon'ble Supreme Court of India has actively undergone a transformative role to promote animal rights under the scope of environmental law. In *Animal Welfare Board of India v. A. Nagaraja* (2014), it was determined that animals have the right to live as guaranteed in the Constitution in Article 21 and that jallikattu (bull-taming) was against the right to life of animals. The decision applied to animals the principle of life and personal freedom, and thus the considerable change in the interpretation of the Constitution directed at anthropocentrism [23].

On the same note, in *Centre for Environment Law, WWF-I v. Union of India* (2013), also known as the lion translocation case, the Supreme Court case dealt with conservation of the Asiatic lion by discussing the relationship between conservation of species, protection of their habitat, and rights of the local communities. The Court in its decision emphasised the significance of scientific proof and precautionary advantage in the provision of wildlife management, and likewise accepted that the welfare of the separate animals in conservation planning [24].

The most recent and possibly far-reaching judicial intrusion in this area is the landmark Supreme Court decision of November 7th. Although the exacts of the judgment remain open to be judged over a long period, early evaluations point to a

situation where the Court has acknowledged the inherent relationship between animal rights and environmental sustainability, and that may lead us to a new constitutional system of integrated governance. It fills in serious gaps in the reconciliation of animal welfare with conservation of wildlife and management of human-animal conflicts on a national scale, and the case is likely to make a difference in the national policy as well as international legal discourse [25].

2.10 Challenges and Limitations

Institutional fragmentation is one of the greatest obstacles to the inclusion of animal rights in environmental policy. Most jurisdictions share the duties and responsibilities of environmental protection, wildlife conservation and animal welfare, and each government agency has different legislative mandates, capacity and resources in this regard [26]. In India, the Ministry of Environment, Forest and Climate Change deals with wildlife conservation, and the Animal Welfare Board of India, which is a statutory agency under the Prevention of Cruelty to Animals Act of 1960, deals with the welfare of animals. This department often causes duplication of mandate, lapse in coordination and gaps in implementation, especially on matters related to human-animal conflict management and wildlife trade control.

2.11 Enforcement Deficits

The successful implementation of animal rights and environmental laws is one of the long-term challenges, especially in the cases of developing countries with weak establishment powers. Poaching of birds, destroying their habitats, and infliction of cruelty to the animals are some actions that cannot be punished sufficiently because of poor policing, clogging of courts, and weak sentences [27]. In a situation in India, in which there are strong statutory provisions, the Wildlife Protection Act and the Prevention of Cruelty to Animals (PCA) legislation have lacked full implementation due to inadequate personnel, lack of training, corruption, and the lack of specialised wildlife courts. The gaps in enforcing such regulations undermine the legitimacy and usefulness of legal structures, hence requiring a fundamental change in the systems.

2.12 Conservation vs. Welfare

Among the central problems of the abortion of animal rights and environmental policy, a need to balance between the conservation objectives on the one hand and the individual welfare of the animals on the other hand must be considered. Culling of invasive species, controlled hunting and breeding captive programs are some of the most prevalent exercises of conservation biology that are not in line with the concepts of animal rights [28]. A case in point is the control of feral creatures in environmentally delicate areas, which in most developments employs lethal methods that, despite the fact that they can be accepted in the interest of preserving our environment, raise very serious moral concerns. Subtle processes are required to inform both science and moral consideration in order to arrive at regulatory mechanisms that ensure that these antagonist imperatives are harmonised.

2.13 Human-Animal Conflict

One of the most complicated quandaries where animal rights and environmental policy meet is human-animal conflict. With the growth of human populations in that

place, the number of human-wild animal interactions, such as those between humans and elephants, Tigers, leopards, and primates, has increasingly been common and in most cases fatal to both species. Such fights also result in the death of more than 500 individuals and the loss of about 100 elephants every year in India [29]. To tackle these conflicts, there needs to be integrated approaches of habitat rehabilitation, the use of corridors to facilitate connectivity, community-based conservation, early warning systems and employment of compensation structures anchored in legal frameworks that acknowledge the rights and well-being of people as well as animals.

3. SUGGESTIONS

3.1 Constitutional and Legislative Reforms

It requires basic changes in law in order to realise the incorporation of animal rights as a component of environmental protocol. Countries ought to take the actions of amending their constitutions to explicitly acknowledge the concept of animal sentience and the intrinsic value of non-human species to emulate the European Union and a number of Latin American countries [11]. The harmonisation of animal welfare and environmental laws at the legislative level must be carried out to remove legislative loopholes and provide equal standards of protection. It may include in India the incorporation of the Wildlife Protection Act, the PCA and the applicable sections of the Environment Protection Act into a single statute framework, which would simultaneously operate both conservation and welfare purposes and aims.

3.2 Institutional Integration

It is the nature of fragmentation that defines both animal rights and environmental governance that must be eliminated through institutional reforms. This is to ensure that governments come up with inter-agency coordination institutions, which will integrate the ministries, scientific organisations and civil society organisations like national councils on animal welfare and biodiversity. Such mechanisms are meant to be strong enough to create combined policies, resources distribution, and control execution. Besides, they may reinforce their implementation by establishing special courts or tribunals and animal welfare so as to ensure that the legal norms are upheld at all times.

3.2 Enhancing Global Partnership

Considering that most animal rights and other environmental issues are transboundary, such as wildlife trafficking, the need to maintain migratory species, and habitat loss due to climate change, the enhancement of international cooperation is essential. The implementation of the proposed Universal Declaration on Animal Welfare would help in the provision of normative bases on which global action can be achieved and further enhancement of coordination between the Convention on Biological Diversity (CBD) and the Convention on International Trade in Endangered Species (CITES) and others multilateral environmental agreements would help to ensure that animal welfare issues are systematically incorporated into international biodiversity governance [30]. International funding mechanisms in the form of capacity-building programmes to developing countries should focus on strengthening

the legal framework, enforcement capacity, and scientific research of animal welfare and conservation.

3.2 Community-Based and Rights-Based Approaches

The community-based and rights-based approaches are two approaches that cope with the problem of corruption. Successful incorporation of animal rights in environmental policy should involve the local people, especially in areas where human beings and animals conflict. Community-based conservation schemes, by enabling the local people to engage in the management of the wildlife and experience the outcomes of the conservation efforts, have proved to be effective in reducing the conflict and facilitating co-existence [31]. Right-based approaches should be included in these models, which appreciate the rights of communities and animals, so that conservation plans do not unfairly impose strain on vulnerable groups and do not undermine animal welfare.

4. CONCLUSION

Animal rights, as one of the elements of the environmental policy, is not only a door to heaven that is wanted to be opened, but an ecological and moral need. As proposed in this paper, SDG 15 could only be achieved by putting into place a holistic approach that recognises the intrinsic value of non-human animals, and animal welfare and ecosystem health are interdependent and, thus, require the holistic legal systems that seek to address the existing gap between reproduction and protection. Despite the awareness of international laws such as the CBD and CITES, country and regional laws that clearly lay out the animal sentence and animal rights need backing, as witnessed in the European Union, New Zealand and a few Latin American nations.

A particularly educative case of that is the experience offered by India, where all three protections under the constitution, law, and legal innovation all contributed to the process toward the target of an integration of animal rights and ecological protection. The historic Supreme Court ruling of the 7th of November goes down as a turning point since the interconnectedness of animal rights and environmental sustainability is being recognized and a new approach to the two is feasible [32]. However, whether the utterances of the judiciary and the rules of legislation can be effectively transformed to policy outcomes also relies on whether the institution will be reformed, and whether the enforcement is followed and the commitment to politics.

SDG 15 will entail a thorough legal regime whereby animal rights constitute the core of the environmental policy. This framework ought to entail the sentence of animals being enforced in constitutions, harmonisation of legislation schemes, organisational alignment, stronger international partnership, societal engagement and adaptive administration being evidence-based. Only through a holistic approach is the international community likely to be capable of preserving, rehabilitating, and ensuring sustainable utilisation of the terrestrial ecosystems and also safeguarding the lives and well-being of non-human living creatures on which the terrestrial ecosystems depend.

The way toward that integration is non-linear and easy, as it requires the dismantling of the fundamentally anthropocentric worldviews, the eradication of the conflict between the demands of conservation and the welfare needs, and the capacity

to regulate effectively by using the institutional and scientific means. The stakes, which include the lives of millions of species, the well-being of the ecosystems, and the moral status of humankind as a whole, are high and should be addressed with bold actions. As the world community approaches the deadline of 2030 on the topic of the Sustainable Development Goals, it appears that the animal rights approach to environmental policy is not only an ethical issue, but also a practical concern, one of the determinants of what legacy will be left to be inherited by the heirs of the Planet by the generation to come.

References

- [1] United Nations. (2015). Transforming our world: The 2030 Agenda for Sustainable Development (A/RES/70/1). United Nations General Assembly.
- [2] Favre, D. (2010). Living property: A new status for animals within the legal system. *Marquette Law Review*, 93(3), 1021–1070.
- [3] Singer, P. (1975). *Animal liberation: A new ethics for our treatment of animals*. HarperCollins.
- [4] Nussbaum, M. C. (2006). *Frontiers of justice: Disability, nationality, species membership*. Harvard University Press.
- [5] Convention on Biological Diversity. (1992, June 5). United Nations Treaty Series, 1760, 79
- [6] Convention on Biological Diversity. (2022). Kunming-Montreal Global Biodiversity Framework (CBD/COP/15/L.25). CBD Secretariat.
- [7] Harrop, S. R. (2011). Climate change, conservation, and the place for wild animal welfare in international law. *Journal of Environmental Law*, 23(3), 441–462. <https://doi.org/10.1093/jel/eqr019>
- [8] CITES. (2022). Resolution Conf. 10.21 (Rev. CoP19): Transport of live specimens. CITES Secretariat.
- [9] Wyatt, T. (2013). *Wildlife trafficking: A deconstruction of the crime, the victims, and the offenders*. Palgrave Macmillan.
- [10] United Nations Office on Drugs and Crime. (2020). *World wildlife crime report 2020: Trafficking in protected species*. UNODC.
- [11] Peters, A. (2021). Animals in international law. In A. Peters (Ed.), *Studies in global animal law* (pp. 11–30). Springer. https://doi.org/10.1007/978-3-662-60756-5_2.

- [12] Treaty on the Functioning of the European Union (consolidated version). (2012, October 26). Official Journal of the European Union, C 326, 47–390. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12012E/TXT:en:PDF>
- [13] European Commission. (2020). EU biodiversity strategy for 2030: Bringing nature back into our lives (COM/2020/380). European Commission.
- [14] Animal Welfare Act 1999. (1999). New Zealand Legislation.
- [15] Te Awa Tupua (Whanganui River Claims Settlement) Act 2017. (2017). New Zealand Legislation.
- [16] Constitution of Ecuador. (2008). National Assembly of Ecuador.
- [17] Constitutional Court of Colombia. (2017). Sentencia T-622/16. Bogotá, Colombia.
- [18] Supreme Court of Colombia. (2020). STC-16544. Bogotá, Colombia.
- [19] Constitution of India. (1950). Government of India.
- [20] Rosencranz, A., & Lele, S. (2008). Supreme Court and India's forests. *Economic and Political Weekly*, 43(5), 11–14.
- [21] Wildlife Protection Act, 1972. (1972). Ministry of Environment, Forest and Climate Change.
- [22] Prevention of Cruelty to Animals Act, 1960. (1960). Ministry of Environment, Forest and Climate Change.
- [23] Animal Welfare Board of India v. Nagaraja, 7 SCC 547 (Supreme Court of India, 2014).
- [24] Centre for Environment Law, WWF-I v. Union of India, 8 SCC 234 (Supreme Court of India, 2013).
- [25] Safi, M. (2023). India's Supreme Court and the evolving jurisprudence of animal rights. *Journal of Indian Law and Society*, 14(2), 45–72.
- [26] Trouwborst, A. (2015). Global large carnivore conservation and international law. *Biodiversity and Conservation*, 24(7), 1567–1588. <https://doi.org/10.1007/s10531-015-0894-8>
- [27] Nurse, A. (2015). *Policing wildlife: Perspectives on the enforcement of wildlife legislation*. Palgrave Macmillan.

- [28] Wallach, A. D., Bekoff, M., Batavia, C., Nelson, M. P., & Ramp, D. (2018). Summoning compassion to address the challenges of conservation. *Conservation Biology*, 32(6), 1255–1265. <https://doi.org/10.1111/cobi.13126>
- [29] Ministry of Environment, Forest and Climate Change. (2021). Annual report 2020–2021. Government of India.
- [30] Bowman, M., Davies, P., & Redgwell, C. (2010). *Lyster's international wildlife law* (2nd ed.). Cambridge University Press.
- [31] Berkes, F. (2004). Rethinking community-based conservation. *Conservation Biology*, 18(3), 621–630. <https://doi.org/10.1111/j.1523-1739.2004.00077.x>
- [32] In re: City hounded by strays, kids pay price, WP(C) No. 5/2025 (Supreme Court of India, 2025).

Open Access This chapter is licensed under the terms of the Creative Commons Attribution-NonCommercial 4.0 International License (<http://creativecommons.org/licenses/by-nc/4.0/>), which permits any noncommercial use, sharing, adaptation, distribution and reproduction in any medium or format, as long as you give appropriate credit to the original author(s) and the source, provide a link to the Creative Commons license and indicate if changes were made.

The images or other third party material in this chapter are included in the chapter's Creative Commons license, unless indicated otherwise in a credit line to the material. If material is not included in the chapter's Creative Commons license and your intended use is not permitted by statutory regulation or exceeds the permitted use, you will need to obtain permission directly from the copyright holder.

