



Short Article

Protection and Management of Stray Animals: Need to recognize Right to Life of Humans and Non-humans under Article 21

Utkarsh Seth¹

¹Assistant Professor, Khalsa College of Law, Amritsar

Published on: March 30, 2022

Page No.: 102 – 113

Manuscript No.: 2022/LWLR/30102

Editors: Tulika Singh, Mohd Rameez Raza

Cite as: Utkarsh Seth, Protection and Management of Stray Animals: Need to recognize Right to Life of Humans and Non-humans under Article 21 (2022) 1(3) LKO. L. REV. 102

Find here: <https://www.lucknowlawreview.org/utkarsh-seth>

Abstract: *The problem of stray animals is very prominent in India which is hindering the right to life of human beings. The recognition of the right to life of non-human animals will have two benefits; firstly, the residential localities, roads, and highways will be stray animals free which would ultimately reduce accidents, noise pollution, filth in public places making India a better place to live. Secondly, it will reduce the cases of human cruelty towards non-humans, the establishment of kennels or animal pounds will provide a definite place to live where there is sufficient availability of food, water, and medical facilities. The only need of the hour is that Government should come up with such a piece of legislation that would provide a mechanism to protect and manage the stray population.*

Keywords: *Humans, Non-human animals, Right to Life, Stray Animals.*

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1. Introduction

It is every government's prime responsibility to act in such a way that would provide maximum benefit to maximum people through its policies. The framers of the Indian Constitution endeavored their best to protect and preserve the basic human rights by designing Part III and IV of the Constitution. In this way, Article 21¹ holds utmost importance in the protection of human rights. This Article basically confers two rights *i.e.*, right to life and right to personal liberty which can only be curtailed in special circumstances as per the procedure established by law. The protection of Article 21 is available to any individual, who suffers from any disability (whether it is man-made or natural) irrespective of his nationality, sex, race, caste, creed or age. The liberal tendency of Indian Judiciary has influenced the mode of interpreting the matters enshrined in Part III of the Constitution dealing with the concept of fundamental rights, particularly, Article 21.

“Article 21 is a declaration of deep faith and belief in human rights.”² It is a qualitative concept making life worth living. The right to life guaranteed to the citizen would become meaningless in case state is not able to provide even this minimum facility.³ Where governmental policies lack effective preservation of fundamental rights, it is the judiciary that protects individual interests by giving twisted meanings to the law so that it can be effectuated without violating fundamental rights. Many times, when taking *suo moto* cognizance of cases, the higher judiciary has played the role of a whistleblower, a protector, and an upholder of constitutional didactics to deliver justice to the deprived groups in order to ensure that the great constitutional framers' vision of creating a new social order in a society of multiple cultures, ethics, and languages does not go in vain and is modestly deciphered and respected by everyone, so that every individual secures an equal opportunity to learn, grow and lead a dignified life. A great transformation has been brought by the Judges of Supreme and High Courts towards the protection the right to life of individuals by expanding its horizons, after hearing the traumatic experiences of people.

Following the same approach, a very fascinating rather magnanimous approach of Judiciary has been noticed in the landmark *Animal Welfare Board of India v. A. Nagaraj*⁴ case where “the Supreme Court *inter alia* extended to animals Article 21 (the right to life) of the Indian Constitution, conferring the right to live a life of intrinsic worth, honour, and dignity with the aim of preventing animals from arbitrarily and unlawfully being deprived

¹ Constitution of India 1950, art. 21

² Durga Das Basu, *Commentary on the Constitution of India* (Vol-3, 8th edn., LexisNexis Butterworths Wadhwa 2008) 3103

³ Nayan Joshi, *Joshi's Law Relating to Human Rights* (2nd edn, Kamal Publishers 2020) 84

⁴ *Animal Welfare Board of India v A. Nagaraj* AIR 2014 SCW 3327

of their rights.”⁵ This extended grant of the right to life to non-human animals, despite the fact that this right is not a fundamental right, is a remarkable step taken by the Indian Judiciary on the road to recognition of the rights of animals.

On one hand, the need to recognize the non-human rights of animals, particularly stray animals, is required and significant to make a man’s life more peaceful and comfortable, which is the root of Article 21. Unreasonable interference into the lives of human beings affects public health and tranquility, which is responsible for the infringement of an individual’s right to live a peaceful life. In *Bandhua Mukti Morcha v. Union of India*⁶, it has been held that living a life does not mean mere existence, the circumstances under which one is living must be healthy and viable, making life purposeful, complete, and worthwhile, “*these are the minimum requirements which must exist in order to enable a person to live with dignity*”.⁷ Deforestation and industrialization has reduced land for animals and as a result they have encroached into residential localities. Nuisance caused by stray animals in public places stand out as a big impediment to human beings in their right live a peaceful life which is a clear-cut violation of right to life under Article 21 of the Indian Constitution. Incompetency of the authorities to tackle nuisance caused by stray animals is a major reason for humans’ insensitivity towards animals.

On the other hand, the problem of rising stray population is infringing the right to life of other animals as well, whether stray or domestic. Majority opinion is that animals do not possess any rights but in fact, they too have the right to life, alike human beings and it is our fundamental duty to have compassion towards them and let them live their lives freely as contemplated under Article 51(A)(g)⁸. The Indian government has always been considerate about animal welfare but lack of legislation to protect, manage and confine stray animals up to a limited area is the need of the hour. The main focus of this paper is to highlight the following two aspects.

- (i) The need for preserving and securing right to live a peaceful life of human beings by protecting them from the unwanted nuisance caused by stray animals which hinders their overall growth.
- (ii) The need for recognizing the humanly rights of nonhuman animals especially the strays which are a matter of trouble for the society with their mere existence.

⁵ Sonia Shad, ‘Indian High Court recognizes Nonhuman animals as Legal Entities’ (*Non-human Rights Blog*, 10 July 2019) <<https://www.nonhumanrights.org//blog/punjab-haryana-animal-rights/>> accessed on 10 December 2021

⁶ *Bandhua Mukti Morcha v Union of India* AIR 1984 SC 802

⁷ Palok Basu, *Law Relating to Protection of Human Rights* (2nd edn. reprint, Modern Law Publications 2010) 14

⁸ Constitution of India, art. 51(A)(g)

Firstly, the stray population has become the reason for unwanted nuisance due to continuous barking, filth, road accidents, attacking human beings, and the spread of infectious diseases, taking the lives of many. *Secondly*, as living beings, they face cruelty from humans for the sake of their entertainment, have no definite space to live due to deforestation, have no food to eat and clean water to drink, and no optimum medical facility in case of any injury or ailment. Thus, both humans and non-human animals deserve to have their right to live a peaceful life in an environment compatible with their needs secured.

It has been discovered that there is no specific set of legislation in India, as well as in any other foreign state, providing for protection and management of stray animals, preserving the right to life of both humans and non-humans. Culling of stray animals is not the key to solving this problem. With this paper, the author hopes to draw the attention of policymakers to the need for legislation that allows humans and non-humans to co-exist peacefully. By doing so, we can demonstrate to the rest of the world that the concept of a welfare state does not only apply to humans but to non-humans as well.

2. Aspects of Right to Life Associated with Human Beings

Article 21 is not a panacea for all problems associated with life. The Apex Court cautioned against the misuse of Article 21 by the Courts' and said that, "*judiciary was not in a position to provide solution to each and every problem, although human ingenuity would not be lacking to give it some kind of shape or semblance of a legal or constitutional right*".⁹ Despite this fact, the Judiciary has always attempted its best to answer all questions posed before it which are related to the right to life. Multiple rights of human beings introduced by Judiciary which are associated with the right to life enshrined in Article 21 related to theme are briefly discussed as under:

- **Right to Live in Clean Surroundings:** In the land where Clean India Movement has been launched by the government, the land is still filled with everyday filth caused by the stray population and the lack of governmental machinery to manage them, resulting in the violation of an individual's right to live in clean surroundings. In *Virender Gaur v. State of Haryana*¹⁰, it has been held that, a hygienic environment to live in is an integral facet of right to a healthy life.
- **Right against Noise Pollution:** The Supreme Court has recognized that noise constitutes a real and present danger to people's health. Peaceful living in one's home is a fundamental right and an essential part of the

⁹ Narender Kumar, *Constitution Law of India* (10th edn. reprint, Allahabad Law Agency 2019) 347

¹⁰ *Virender Gaur v State of Haryana* (1995) 2 SCC 577

right to life. “Noise generated up to unpleasant or obnoxious levels violate the rights of people to a peaceful, comfortable and pollution-free life guaranteed by article of the Constitution.”¹¹

- Right to Health: Stray animals who receive no or little medical aid spread infectious diseases such as rabies, canine influenza, cat scratch disease, mad cow disease, monkey-b virus, etc. to human beings, which is an infringement of individual’s right to health.
- Right to Freedom from Fear and Threat: “In the freedom of free movement and right to life and liberty guaranteed to a citizen under Articles 19 (1)(d) and 21 of the Constitution of India, it is implicit that they should be free from fear and threat to life inasmuch as the life under fear and threat of death will be no life at all and in cases of imminent threat to the freedom of free movement or right to life and personal liberty.”¹² Fear of getting attacked by ferocious stray dogs, cows, bulls, monkeys, etc. is one of its constituent.
- Right to Live in Peaceful Environment: An important attribute of the right to life is to live in an atmosphere that is congenial to human existence, making life worth living in a peaceful manner without any outer interference or harm by any human or animal. The relationship between human beings and animals is somewhat perplexing. Some consider animals their real friends, and some are threatened by their mere existence. However, when this relationship is neither congenial nor useful, it becomes an unwanted, unnecessary interference and burden on both the states and their residents.

An annoyance to the public at large is caused by unconfined or free-ranging animals, commonly known as stray animals, that have been abandoned by their owners or have never been owned, living on the streets, surviving on anything that is loosely available on the roads. On the other hand, ferocious and wild animals that are kept as pets in homes, endangering the lives and disturbing the peace of the common public, cause nuisance to humans, which may be in the form of continuous barking of dogs, snatching of eatables and other valuables by monkeys, following vehicles on the roads, littering in the narrow city streets or even the fear of getting bitten by them.

¹¹ M.P. Jain, *Indian Constitutional Law* (8th edn., LexisNexis Butterworths Wadhwa Nagpur 2018) 1230

¹² L.M. Singhvi, *Jagdish Swarup Constitution of India* (Vol-1, 2nd edn., Modern Law Publications 2008) 947

The nuisance caused by animals in the lives of human beings affects their personality in many ways. Freedom from stray cattle and animals in urban areas is a right under Article 21.¹³ The level of nuisance caused by stray animals is a major impediment to live a peaceful life. Its ill effects upon people's lives are as under:

1. Repeated interference in the peaceful atmosphere of a home at day time.
2. Perpetual disturbance of sleep.
3. Filthy surroundings.
4. Loss and damage to public as well as private property.
5. Effect on communication or speech interference.
6. Effect on hearing or deafness.
7. Physiological or Psychological Effects.

3. Aspects of Right to Life of Nonhumans

The Earth is the common inheritance of all living beings, including humans and animals. Nobody has the right to annihilate or drive away animals from their territory or natural habitat. India is a land of composite cultures. This subcontinent preaches the doctrine of non-violence (*Abimsa*) through Lord Mahavira, Lord Buddha, and Mahatma Gandhi. The doctrine of Ahimsa is the basis of respect for all living creatures. In Hinduism, it is believed that trees, even the leaves of the trees, the flowers, and their petals, too, have a life of their own, and God resides in them. Despite this belief, the condition of animals in India is dreadful. Through various mythological and folklore stories, we find a connection between God and different animals, being their friend, a story teller and mostly as a vehicle which is why people venerate them as Demigods.

Jainism stands on the pillars of non-violence, compassion, and equality, *i.e.*, "*Samtabha*" for all living beings. As it is believed that, all living entities are equal and have potential to attain solace *i.e.*, "*Nirvana*". Therefore, they should be given equal importance.

In Buddhism, Lord Buddha has suggested, those who are cruel or violent towards animals will suffer the same cruelty in their other life. At present, there are two contrasting viewpoints prevalent in Buddhist society, one of which suggests that Lord Buddha himself has taken pork or mushrooms as his last meal. The Buddha was historically criticized for this apparent inconsistency by Jain philosophers, who argued that it was hypocritical

¹³ Durga Das Basu (n 2), at 3121

for the Buddha to prohibit killing animals and occupations that involve killing animals but not prohibit the very practices that fuel those occupations and require that animals be killed.¹⁴ Referring to early Buddhist teachings as a matter of reference, the precept “not to kill or harm” includes animals within its moral concern, but this is a matter of dispute in today’s world.

In various Hadis of Islam, the killing of animals for pleasure is deprecated.¹⁵ Equally, the mutilation of animals is decried in Islam.¹⁶ The views of Christianity are a bit skeptical on the rights of animals. Hence, killing and experimenting on animals is permitted.

There are approximately thirty-five million stray animals in India whose main food source is scraps and rubbish left by people.¹⁷ The most revered animal amongst all in India is the cow, which is regarded as our mother, but once it becomes infertile or stops producing milk in bulk quantity, the dairy farmers leave it to live at the mercy of others. As a result, it strolls around the roads, eats garbage, attacks children and the elderly, gets wounded in road accidents, faces human insensitiveness, and finally, dies on the roads due to ailing health or in search of food. The same is the case with stray dogs, cats, pigs, and monkeys. Like human beings, animals too possess basic rights which ought to be recognized. Therefore, through this article the following non-human animal rights, which should be included under the aegis of Article 21 are proposed in furtherance of protecting non-human animal rights in India.

- Right to Shelter: State governments are sponsoring shelter homes, Pinjrapoles, but they are a drop in the ocean and are insufficient to meet the needs of the hour. The shelter houses mainly provide space for the captured stray animals only for their vaccination and sterilization, and that too for a very limited period of time. Once the animal recovers, it is again released on the same road from where it was captured. This is a clear-cut violation of an animal’s right to shelter.
- Right to Food and Clean Water: As the streets are filled with garbage thrown by the residents, having no source of food, the stray animals are forced to eat garbage, and, in this order, they litter everywhere. The

¹⁴ Bronwyn Finnigan, ‘Buddhism and Animal Ethics’ (2017) 12(7) *Philosophy Compass* 1-12

¹⁵ Alpana Poddar, *Lal’s Encyclopaedia on Environment Protection and Pollution Laws* (Vol.1, 5th edn., Delhi Law House 2009) 1530

¹⁶ *Ibid*

¹⁷ ‘Feeding stray animals during COVID lockdown in India’ (*Animal Sandus*, 2021) <<http://www.animalsandus.com.au/2021/02/03/feeding-stray-animals-during-covid-lockdown-in-india>> accessed 11 December 2021

non-availability and no facility for clean drinking water is another cause of the ferociousness of stray animals, which results in rising cases of animal attack.

- **Right to Medical Assistance:** Though the Prevention of Cruelty to Animals Act¹⁸ provides for medical assistance to animals but there are numerous stray animals strolling on the roads who are suffering from infectious diseases, whose bones and other limbs are broken, who need urgent medical care due to the attacks of other animals or sometimes due to human attacks too but there is a lack of machinery, man power, resources and awareness which ultimately aggravates their misery.
- **Right to Reproduction:** The Animal Birth Control (Dogs) Rules¹⁹ are made for the sterilization and immunisation of dogs. These rules provide for the establishment of dog pounds where the captured dogs are to be kept, but for a limited time, and after that, they will be released in the same area where they have been captured. Sterilisation of a dog is not the key to muting its voice. It will still keep the roads and streets filthy. The fear of attack and actual attack will still be there. The sterilization programmes are effective in controlling the stray population but on the other hand, it will result in the complete vanish of the community of various stray breeds which is an infringement of their Right to Reproduction. The extinction of any animal should not be the purpose of any legislation. Rather, authorities should be provided with a framework that enables the protection, preservation, and proper management of such animals through state-sponsored activities with the additional help of private agencies.
- **Right to Die with Dignity:** “The Supreme Court and other different Courts have extended and revised the scope of Article 21 of the Indian Constitution by making the right of cremation with dignity inseparable from the right to life in different decisions and have repetitively recognised the need to give equitable care to a dead body (human corpse) after death and doing so with proper dignity.”²⁰ Similarly, the researcher is of the view that, the right to decent burial of the remnants of dead stray animals shall also be preserved.
- **Right against Abandonment:** It is the duty of human beings to provide shelter to livestock that have served all their lives, their master. All animals must be assured a right against abandonment by their master till the end of their lives. Policymakers are required to prepare such a policy that provides a livestock

¹⁸ Prevention of Cruelty to Animals Act 1960

¹⁹ Animal Birth Control (Dogs) Rules 2001

²⁰ Md. Hasnain Raza, ‘COVID-19 and Right to Decent burial: An Analysis’ (*Latest Laws*, 2021) <<https://www.latestlaws.com/articles/covid-19-and-right-to-decent-burial-an-analysis>> accessed 11 December 2021

allowance to all dairy farmers so that they do not abandon their cattle after they cease to be a milch cattle and, they would not roam around streets in order to find their master, food, water or shelter.

4. Constitutional Perspective on Non-Human Rights

India as a state always thrives to promote the prosperity and well-being of its subjects. In this way, the framers of the Constitution incorporated Part III as Fundamental Rights and a few provisions as non-justiciable rights in Part IV, named as “Directive Principles of State Policy” which act as a guiding star for the government to look after the socio-economic interests of the people. The State is expected to apply these principles while making laws. Through “harmonious construction” of the provisions enshrined under both parts of the Constitution, public, and individual interests shall be endeavored to justify. All the fundamental rights are granted to human beings just to make life worth living, but the Constitution is silent upon the fundamental rights of non-human animals. Those provisions which are relevant to understand the theme of this article are discussed below:

Article 47²¹ states that;

“Duty of State to raise the level of nutrition and the standard of living and to improve public health: The State shall have regard to the raising of the level of nutrition and the standard of living of its people and the improvement of public health as among its primary duties and, in particular, the State shall endeavour to bring about prohibition of the consumption except for medicinal purposes of intoxicating drinks and of drugs which are injurious to health.”

In a society where there are no standards of hygiene to be maintained in localities, where roads are littered with the filth of stray animals, and where residents face ongoing nuisance from barking dogs and the snatching of articles by monkeys, it is difficult to see how the goal of providing a standard of living and further improvement of public health can be met.

Further Article 48-A²² states;

“Protection and improvement of environment and safeguarding of forests and wild life: The State shall endeavour to protect and improve the environment and to safeguard the forests and wild life of the country.”

This directive contemplates the protection and improvement of the environment aiming to provide a pollution-free environment. Pollution, be it air, water, or noise, is a menace to society. If it is permitted to go

²¹ Constitution of India, art. 47

²² Constitution of India, art. 48-A

unabated, there will be a serious health hazard to the human community. There is no doubt that noise in today's world is one of the major pollutants. Noise becomes objectionable if it exceeds the tolerable limit. We have Supreme Court rulings on providing guidelines for using loud speakers²³ but no directives have been issued by the Apex Court to relieve citizens from the unnecessary barking of stray dogs in residential localities, which also amounts to the degradation of the environment violating their right to live in pollution-free environment.

Article 51-A(g)²⁴ states;

“To protect and improve the natural environment including forests, lakes, rivers and wild life, and to have compassion for all living creatures.”

“By enacting Clause (g) in Article 51-A and giving it the status of fundamental duty, one of the objects sought to be achieved by Parliament is to ensure that the spirit and message of Article 48 and 48A are honored as a fundamental duty of every citizen.”²⁵ Under the purview of human rights, right to life and liberty, pollution free air and water is guaranteed by our Constitution under Articles 21, 48-A and 51-A(g).²⁶ In *A. Nagaraj case*,²⁷ the Court ruled that bulls are not performing animals which could be used for conducting bullock cart races or *Jallikattu* as they are not anatomically designed for such performances. In January 2016, the Central Government issued a notification to nullify the Supreme Court's rulings in the above case, and it was provided that where the custom of any community or there is any ritual in any particular Indian region, the bulls might continue to be exhibited or trained as performing animals, at events such as, *Jallikattu* in Tamil Nadu, etc. The notification was challenged in *Compassion Unlimited Plus Action v. Union of India*,²⁸ where Apex Court while staying a notification held that *Jallikattu* and other forms of animal racing cause useless trouble, pain and stress to the bulls. The notification was also held violative of various provisions of Prevention of Cruelty to Animals Act²⁹ and Article 51-A(g) and (h)³⁰ of the Indian Constitution.

²³ *Appa Rao v Government of Tamil Nadu* [1995] AIHC 4168

²⁴ Constitution of India, art. 51-A(g)

²⁵ *Durga Das Basu*, 4221

²⁶ *Charan Lal Sabu v Union of India* AIR 1990 SC 1480

²⁷ *A. Nagaraj* (n 4)

²⁸ *Compassion Unlimited Plus Action v Union of India* Writ Petition (Civil) No.24 of 2016

²⁹ Prevention of Cruelty to Animals Act 1960

³⁰ Constitution of India, art. 51-A(h)

5. Why the grant of Right to Life to Non-humans is Required: A Conclusion

India, being a welfare state has recognized the concept of Animal Welfare which is evidently visible in the Constitutional provisions and legislations like Prevention of Cruelty to Animals Act. The Animal Rights debate is of novel origin and while recognizing animal rights we may not afford the violation of human rights that is why, the recognition of Animal Welfare concept is more feasible. It is the Indian Judiciary which has gone a step further and has recognized the right to life of non-humans.

Not only Indian, but also Pakistani Judges, are very kind and gracious towards the recognition of non-human rights. Justice Athar Minallah, Chief Justice of the Islamabad High Court in the case *Islamabad Wildlife Management Board through its Chairman v. Metropolitan Corporation Islamabad through its Mayor & 4 others*³¹ has held that, “like humans, animals also have natural rights which ought to be recognized. It is a right of each animal to live in an environment that meets the latter’s behavioural, social and physiological needs”. The case before the Court was threefold, involving an elephant held in solitary confinement at a zoo, a rescued bear who had been forced to dance and perform tricks, and the killing of stray dogs.³² Despite at times anthropocentric framing, the ruling unequivocally recognizes that animals have legal rights and is highly critical of humanity’s treatment of wild animals in particular.³³ But it seems that the views of the Pakistani government and its judiciary are not in consonance with each other as no regard has been given to this judgment bypassing the cruel order of killing the stray dogs.

The grant of Right to life to non-human animals especially stray animals is essential and twofold. *Firstly*, being a living creature, they too possess basic rights which are required for their survival and when they will be able to roam freely in areas without human transgression, where they can freely express their selves without any fear or threat of human cruelty, where food and water is available; then there will be no reason left to them to cause nuisance. *Secondly*, when all residential localities, thoroughfares will be stray nuisance free, human beings will be able to live a peaceful life and they can focus on their growth. The Preamble of the Universal Declaration of Human Rights dreamt of a world where all human beings shall live with freedom from fear. It

³¹ *Islamabad Wildlife Management Board through its Chairman v. Metropolitan Corporation Islamabad through its Mayor & 4 others* W.P-1155-2019

³² Nicole Pallotta, ‘Islamabad High Court Holds that Animals have Legal Rights’ (*ALDF*, 2020) <<https://aldf.org/article/islamabad-high-court-holds-that-animals-have-legal-rights>> accessed 11 December 2021

³³ *Ibid*

is presumed that freedom from fear includes not only the fear of war, nuclear attacks, mass destruction but attack of stray animals as well.

5.1. Suggestions to Tackle this Menace

The government should initiate campaigns to raise public knowledge of human and non-human animal rights. In every five kilometres, dog kennels or animal pounds, such as Pinjrapoles must be built for keeping cows, buffaloes, and bulls, are urgently needed to provide optimum benefit to the animals and citizens alike. With the creation of dog kennels and animal pounds, activists and local care givers who feed stray dogs on a daily basis can supply kibbles to the responsible authority, who would distribute them equitably among the captured dogs. The problem of stray animal population explosion is tarnishing India's image at global level. Almost all foreign tourists fell prey to stray animal attacks, there are people who even train animals just to disturb tourist so that they may fetch easy money to get rid of the animal. This is another instance how the humans' right to life is being affected by not recognizing 'non-human rights'.

In order to control this jeopardy, the Government of Punjab took a significant step forward by enacting the Model Punjab Municipal Corporation and Municipal (Registration, Proper Control of Stray Animals, and Compensation to Animal Attack Victims) Bylaws³⁴, but their efforts have been in vain because local authorities have yet to put them into effect. The Delhi Municipal Corporation has also implemented different strategies in order to combat this threat, but no significant results have yet been obtained. Such solutions shall be provided which facilitates quick implementation and ensure good results. This will protect the animals from unwanted attacks, accidents, diseases and also make the lives of human beings easy, clean, serene and peaceful.

³⁴ Model Punjab Municipal Corporation and Municipal (Registration, Proper Control of Stray Animals, and Compensation to Animal Attack Victims) Bylaws 2020