

NEED FOR INCREASED STATUTORY PROVISION ON ANIMAL WELFARE

Govind Abhijith

National University of Advanced Legal Studies, Kochi

This article addresses the need for separate conventions to examine animal rights leading to ethical treatment of animals. Animals are primarily regarded as property and have little or no legal rights of their own. Because of this, generally there is a presumption—provided no law is violated—in favour of the owner’s control over the best interests of the animal. The primary laws dealing with the issue presently such as The Prevention of Cruelty to Animals Act, (1960) and Wildlife Protection Act, (1972) are not adequate with the ever expanding concept of animal welfare. While discussing the scope of present legislations, the paper seeks to address necessary aspects of increased statutory provision on Animal Welfare. In an age of politicisation of cow-vigilantism, the article also explores where to draw the line on such a contemplative legislation on animal welfare with special reference to India. Animal law generally encompasses compassion towards animals, wildlife, animals used in entertainment and animals raised for food and research. At present, such a separate convention for animal rights does not exist in the country, although there are various case laws and provisions enacted by the Government to ensure the promulgation of animal rights in the country. Animal law is often analogized to the environmental law movement because animal law faces many of the same legal and strategic challenges which can be resolved by adoption of an all-encompassing Act similar to the Environment Protection Act (1986). The article also examines the comparative legislations in USA and Europe and the practicality of its application in India.

Introduction

Animal law issues encompass a broad spectrum of approaches—from philosophical explorations of the rights of animals to pragmatic discussions about the rights of those who use animals, who has standing to sue when an animal is harmed in a way that violates the law, and what constitutes legal cruelty. Animal law permeates and affects most traditional areas of the law – including tort, contract, criminal and constitutional law. Examples of this intersection include:

- Animal custody disputes in divorce or separations.;
- Veterinary malpractice cases.
- Housing disputes involving “no pets” policies and discrimination laws.
- Damages cases involving the wrongful death or injury to a companion animal.
- Enforceable trusts for companions being adopted by states across the country.
- Criminal law encompassing domestic violence and anti-cruelty laws.

It's a combination of statutory and case law in which the nature – legal, social or biological – of nonhuman animals is an important factor. It encompasses companion animals, wildlife, and animals used in entertainment, research, and raised for food.

The primary vestiges of animal welfare discuss relevant issues today such as

- Ag-gag legislation¹,
- Large mammals in captivity, such as cetaceans, tigers, and elephants,
- Puppy mills,
- Intensive confinement of farmed animals,
- Antibiotics and animal growth drugs in animal feed,
- Deceptive animal welfare food labelling,
- Roadside zoos,
- Breed specific legislation (such as pit bull bans), and
- Horse slaughter.

History of Animal Welfare in India

The Vedas, the first scriptures of Hinduism, teach ahimsa or nonviolence towards all living beings. In Hinduism, killing an animal is regarded as a violation of ahimsa and causes bad karma, leading many Hindus to practice vegetarianism. Hindu teachings do not require vegetarianism, however, and allow animal sacrifice in religious ceremonies. Jainism was founded in India in the 7th-5th century BCE, and ahimsa is its central teaching. Due to their belief in the sanctity of all life, Jains practice strict vegetarianism and many go to great lengths even to avoid harming insects. Buddhism is the third major religion to emerge in India, and its teachings also include ahimsa. Buddhism teaches vegetarianism (though not as strictly as Jainism), and many Buddhists practice life release in which animals destined for slaughter are purchased and released to the wild. Despite the influence of Hinduism, Jainism, and Buddhism, meat-eating was still common in ancient India. In 262 BCE, the Mauryan king Ashoka converted to Buddhism. For the remainder of his reign, he issued edicts informed by the Buddhist teachings of compassion for all beings. These edicts

¹ http://www.humanesociety.org/issues/campaigns/factory_farming/fact-sheets/gag-order-ag-gag-bills-stifle-reform.html?credit=web_id309749578 . Pushed by the meat, dairy and egg industries, the bills seek to criminalize whistleblowing by making it illegal to take undercover video or photos on farms and to seek employment for the purpose of going undercover. They sometimes require mandatory reporting with impossibly short timelines so that whistleblowers must “out” themselves before they can document a pattern of abuse.

included the provision of medical treatment for animals and bans on animal sacrifice, the castration of roosters, and hunting of many species².

British India

Animal experimentation in India in the 1860s when Britain began introducing new drugs to the colony. Moved by the suffering of Indian strays and draught animals, Colesworthy Grant founded the first Indian Society for the Prevention of Cruelty to Animals (SPCA) in 1861 in Calcutta. The Indian SPCAs successfully lobbied for anti-cruelty legislation in the 1860s, which was extended to all of India in 1890-91.

While the anti-vivisection movement grew in Britain, it failed to take hold in India. British officials and (British-led) SPCAs both opposed the introduction of the British Cruelty to Animals Act of 1876 - which established regulations on animal experimentation - to the Indian colony.

The Cow Protection movement arose in the late 1800s in northern India. While the SPCAs were led by colonists and associated with Christianity, Cow Protection was a movement of native Hindus. Cow protectionists opposed the slaughter of cattle and provided sanctuaries for cows. However, cow protection was largely an expression of Hindu nationalism rather than part of a larger native Indian animal welfare movement. Cow protectionists did not in general oppose animal experimentation, and the antivivisectionist groups established in India in the late 1890s died out due to lack of interest. The Indian branches of the Humanitarian League, an English organization which opposed vivisection and the mistreatment and killing of animals, focused on vegetarianism and cow protection while ignoring vivisection.

Mahatma Gandhi was a vegetarian and advocate of vegetarianism. In 1931 Gandhi gave a talk to the London Vegetarian Society entitled *The Moral Basis of Vegetarianism* in which he argued for abstinence from meat and dairy on ethical (rather than health-related) grounds.

The Growth of Animal Law

The dynamic field of animal law is an emerging field of study. As Advocates and as members of the public in general one can volunteer for national animal protection groups or a local group or humane society, do pro bono work at a large firm, be a solo practitioner, government attorney, or staff attorney for a nonprofit organization. or join or start an independent animal law group. Examples from the US for example include Texas Humane Legislation Network, and Attorneys for Animals in Michigan. Attorneys can write articles for local bar journals, local papers, or animal law journals, and mentor students. As law abiding citizens and animal lovers, it becomes imperative that we understand basic laws that protect the innocent animals that cannot stand up for themselves.

² Rangarajan, M. (2001) *India's Wildlife History*, pp 8.

Laws in India relating to Animal welfare

Two of the most important laws for animal protection in India are:

Prevention of Cruelty to Animals Act of 1960

This Act of the Parliament of India was enacted in order to prevent cruelty towards animals³. It was an attempt to end the unnecessary pain and sufferings that the animals go through. Animal Welfare Board of India was formed by the government of India as per the provisions of this law. Under Section 11 (1) (a) to (o) of The Prevention of Cruelty to Animals Act, beating, over-riding, keeping or confining any animal in any cage, mutilating or killing any animal, among many others, amounts to cruelty on animals and is punishable by law.

*The Wildlife Protection Act of 1972*⁴

The Wildlife Protection Act of 1972 protects wildlife in India. The Act was passed to provide protection to birds, plants and wild animals; it is applicable to the whole of India, except the State of Jammu and Kashmir which has its own wildlife act.

Section 11 (1) (a) to (o) of The *Prevention of Cruelty to Animals Act, 1960* prescribes and enumerates different forms of cruelty to animals. The law strictly provides that it is punishable with imprisonment and fine if any animal is treated with cruelty or if given poisonous food, there are serious consequences attached to it. Transport any animal in any manner that will cause him or her unnecessary suffering. This includes loading cows into trucks without ramps and overcrowding the vehicle as well as tying up pigs and carrying them on cycles. All violations of Section 11 are punishable with a fine of Rs 100 and/or up to three months in jail.

Legislation for Humane Treatment of Stray Animals

It is illegal to kill homeless animals. Citizens may only report what they perceive as a nuisance to the municipal authorities. The municipality is required to maintain an animal pound for animals. Sections 428 and 429 of the Indian Penal Code⁵ make it illegal to maim or cause injury to any animal.

Stray animals may not be used for research. The Rules for Experimental Animals⁶, as formulated by the Committee for the Control and Supervision of Experimental Animals, state that only animals bred for the purpose of research by institutes registered by the Committee may be used for experimentation (although, of course, such animals suffer and feel pain just as much as strays or any other animal).

³ <http://www.envfor.nic.in/legis/awbi/awbi01.pdf>

⁴ <http://envfor.nic.in/legis/wildlife/wildlife1.html>

⁵ <http://ncw.nic.in/acts/THEINDIANPENALCODE1860.pdf>

⁶ <http://envfor.nic.in/legis/awbi/awbi04.html>

Article 51A of the Constitutional Law of India, lays down fundamental duties for every citizen one of which included compassion for living creature. Article 21 of the Constitution of India states the right to personal life and liberty⁷. This is a very vast right. If someone wants to feed and provide shelter to dogs, he is at liberty to do so. He has the same right to liberty that the law provides to every citizen of India. But, above every law and rights, there is a natural right, which is a universal right, inherent in the nature of ethics and contingent on human actions or beliefs. It is the right that is claimed to exist even when it is not enforced by Government or society as a whole. It is the right of the individual and considered beyond the authority of a Government or international body to dismiss. Therefore, if there are any rights at all, there must be right to liberty, for all the others depend on this. And the choice of loving, caring, feeding and giving shelter to dogs is the natural right of any individual⁸.

In a Judgment passed by the Court⁹, it has been stated that the Animal Welfare Board of India and the Municipal Authorities have in the guidelines issued by them specified the problem often faced by individuals and families who adopt and feed stray animals. The court says that it is necessary to bring into record that these individuals and families who adopt stray animals are doing a great service to humanity as they are acting in the aid and assistance of Municipal Authorities by providing these animals with food and shelter and also by getting them vaccinated and sterilized. Without assistance of such persons no local Municipal Authority can successfully carry out its ABC programme.

The Court has proceeded to say that the local police and the municipal authorities are under obligation not only to encourage such adoption but also to ensure protection to such persons who come forward to take care of these animals specifically the community or neighbourhood dogs so that they are not subjected to any kind of cruelty, finally, the Court has said that every individual has the right to live his life in the manner he wants and it is necessary that the society and the community recognize it.

Animal Birth Control

Under the Govt. of India, Animal Birth Control Rules 2001¹⁰, no sterilized dogs can be relocated from their area. As per five different High Court orders, sterilized dogs have to remain in their original areas. If the dog is not sterilized, the Society can simply ask an animal welfare organization to sterilize and vaccinate the dog. The Animal Welfare Board of India has developed a set of guidelines for all municipalities directing the implementation of the Animal Birth Control (ABC) programme. If there is an animal welfare organization in the area, urge it to take up the ABC programme. It is illegal for a

⁷ <http://lawmin.nic.in/coi/coiason29july08.pdf>

⁸ <http://barandbench.com/animal-welfare-board-of-india-approaches-sc-against-kerala-dog-culling/>

⁹ *Kuljit Singh Bedi vs State Of Punjab And Others* , Civil Writ Petition No.9902 of 2012

¹⁰ <http://envfor.nic.in/legis/awbi/awbi13.pdf>

municipality to round up stray dogs and abandon them outside city limits, as it places them in circumstances likely to cause their death from starvation and thirst.

Prevention of Cruelty

Under Section 11 (1) (a) to (o) of The Prevention of Cruelty to Animals Act, an Act of the Parliament of India, beating, over-riding, keeping or confining any animal in any cage, mutilating or killing any animal, among many others, amounts to cruelty on animals and is punishable by law. This act was passed in 1960 to prevent the infliction of unnecessary pain or suffering on animals and to amend the laws relating to the prevention of cruelty to animals. Hence, any person or individual under whose presence any offence under the Act is committed can immediately lodge a written complaint with the nearest Police Station for taking action.

Animal Sacrifice

Under the Indian law, it is illegal to sacrifice animals other than goat and sheep on Bakr-Eid. Also, no slaughter is allowed other than at slaughter houses, with an exception on Bakr-Eid. Sadly, animal sacrifice has now become a means of showcasing the status of the person making the sacrifice. Animals like camels and horses are commonly slaughtered in this status parade. Overall, barring two states including, Assam and Bengal, slaughter of animals is illegal in rest of India. Killing of camels is not legal in India. Because of mass killing of camels in India, the species today face a possible threat of extinction. This practice also indisputably violates the Prevention of Animal Sacrifices Act of 1959; and KPAS (Karnataka Prevention of Animal Sacrifices) rules 1963 to prevent illegal sacrifices. The KPAS rule prohibits the killing of any animal in the name of religious sacrifice. The killing of animal on Bakr-Eid has official but it is limited to goats and sheep and they too can be killed only at designated places. Any animal other than the two cannot be killed. Killing a camel for its meat is also illegal in India as it isn't considered an edible food item.

Animal Trade

Trading certain animals such as cows at fairs is currently legal in India. However, according to the 1986 Amendment Act, no one is allowed to carry trade in wild animals which are specified in Schedules I and II of the act. Thereby, no wild animals or birds or any other wild species can be sold at or bought at such fairs. Earlier, animal fairs used to serve as a platform for trade of animals between farmers. But, now more than anything, these fairs involves trading of animal to butchers for the purpose of slaughtering. In accordance to the Prevention of Cruelty towards Animal Act, 1960, killing or mutilating any healthy animal is illegal, thus such a sale can be termed as illegal.

Wildlife

The Wildlife Protection Act of 1972 protects wildlife in India. This Act was passed to provide protection to birds, plants and wild animals. Currently, it is applicable to all of India, except the State of Jammu and Kashmir which has its own Wildlife Act.

Under Section 9 of this Act, hunting is prohibited throughout the country and punishment for first time offenders is imprisonment up to seven years' maximum and a fine up to Rs 10,000. The fine is up to Rs 25,000 for second time offenders along with the imprisonment remaining the same. The law that protects them is stated under the Prevention of Animals to Cruelty Act, 1962 and the punishment there has been stated at 1 or 2 months of imprisonment.

Slaughterhouse Laws

A 'slaughterhouse' is defined as a place in which 10 or more than 10 animals are slaughtered per day and is duly licensed or recognized under a Central, State or Provincial Act or any rules or regulations made there under. The Prevention of Cruelty to Animals Act, 1960 enlists certain rules provided under the category, namely Slaughter House Rules, 2001. Certain important provisions of the same include-

Section 3(1) of the law says that animals cannot be slaughtered except in a recognized and licensed slaughter house.

Section 3(2), prohibits slaughtering of any animal

- Which is pregnant or
- has an offspring less than three months old, or
- The animal which is under the age of three months or
- Which has not been certified by a Veterinary Doctor that it is in a fit condition to be slaughtered.

Sometimes, animals are purposefully harmed to get rid of them and show them as grievously injured. This practice should be regulated.

Leash and Captivity Laws

Currently, there are no leash laws in India. Keeping a pet tethered at all points of time can lead to the dog becoming aggressive and the dog should always be unchained while within the house premises. A leash then becomes a positive experience for a dog, who looks forward to going out for his regular walk.

It is illegal to use animals like langurs or snakes for one's profession as buying/selling/possessing monkeys/langurs and snakes violates the Wildlife Protection Act of 1972.

Keeping snakes in captivity and their display in public is prohibited under the Wildlife (Protection) Act 1972 and is an illegal activity. Both python and cobra are listed under endangered species of wildlife. According to this act, wild Animals specified in schedule I, II, III and IV cannot be hunted. Even though snake charming is an inherited profession in India, it has been banned since 1991.

Animal Experimentation

One key argument against animal testing involves the *inability of animals to consent to the test*. Humans, it is argued, can make an informed decision to consent while animals have tests forced upon them, with no choice.

A major ethical issue with animal testing is that it involves pain, suffering and discomfort under some circumstances. While researchers do address the potential for pain by measures to minimise it whenever possible, they aren't able to completely prevent any pain from occurring. Where possible, they will use anaesthetic but for some types of testing, using a pain reliever can mean an interaction with the drug being tested. For this reason, animals must experience the effects of the one drug and if it involves pain, this presents an unfortunate conundrum for researchers.

Another qualm with animal testing is its use for cosmetics testing. While Britain has banned animal testing on cosmetics and other countries still use animals for cosmetics testing. Those who oppose the practice believe it is outrageous and cruel to use animal life simply so humans can 'look better.' The aesthetic component is a major issue and some individuals support animal testing for medical purposes but not for cosmetics.

Isolated cases of abuse have also added more fuel to the case against animal testing although reaction from the scientific community was similarly swift and indicated that such abuses will not be tolerated.

The Three Rs

The three Rs are a set of principles that scientists are encouraged to follow in order to reduce the impact of research on animals. *The three Rs are: Reduction, Refinement and Replacement.*

1. Reduction:

Reducing the number of animals used in experiments by:

- Improving experimental techniques
- Improving techniques of data analysis
- Sharing information with other researchers

2. Refinement:

Refining the experiment or the way the animals are cared for so as to reduce their suffering by:

- Using less invasive techniques
- Better medical care

- Better living conditions

3. *Replacement:*

Replacing experiments on animals with alternative techniques such as:

- Experimenting on cell cultures instead of whole animals
- Using computer models
- Studying human volunteers
- Using epidemiological studies

Avon, Mary Kay and Estée Lauder Case¹¹:

For more than two decades, Avon, Mary Kay, Estée Lauder, and Revlon were among the largest mainstream international companies on PETA's cruelty-free lists. Avon banned all tests on animals following PETA's massive "Avon Killing" campaign, and Mary Kay pledged to go cruelty-free after cartoonist Berkeley Breathed mocked the company in his popular Bloom County comic strip. Since then, all four companies have enjoyed the support of PETA and millions of consumers who choose to buy cosmetics from companies that don't harm animals. *However, PETA learned that all four companies have been paying for tests on animals in order to sell their products in China—and they did not inform PETA or consumers that their policies had changed.* When PETA learned that the Chinese government requires tests on animals for many cosmetics products before they can be marketed in China, PETA immediately contacted the companies.

Since PETA first exposed the Chinese government's requirements for animal tests for cosmetics in 2012, PETA has provided the scientists at the Institute for In Vitro Sciences with funding both to educate scientists in China on superior, non-animal testing methods and to provide government officials there with guidance on accepting non-animal testing methods and developing a five-year plan for accepting the tests currently used in the U.S. and Europe.

Comparative Legislation in US

India has presently created a draft legislation for animal welfare similar to that of the US¹². Under most state and federal laws in US, animals primarily are regarded as property and have little or no legal rights of their own. Because of this status, generally there is a presumption—provided no law is violated—in favour of the owner's control and use over the best interests of the animal.

¹¹ <http://www.thexlawgroup.com/wp-content/files/press/lifewithdogs-cosmetics-suit.pdf>

¹² <http://www.awbi.org/awbi-pdf/draftawact2011.pdf>

Anticruelty laws require that animals be provided with basic necessities and be treated humanely, unless it is “necessary” or “justifiable” to deny them food, water or shelter. As long as individuals comply with these minimal standards, they may go unpunished for actions that are not necessarily in the best interest of the animal and that may even cause pain and suffering, such as relinquishing a cat to a pound that sells animals for research or subjecting a dog to cosmetic tail docking and ear cropping¹³.

Yet even when anticruelty statutes do apply, prosecutors are usually overwhelmed with cases and frequently lack the evidence needed to litigate successfully. In practice, this means that only the most egregious cases of animal cruelty and neglect are prosecuted.

As author and attorney David Wolfson states, “Under the majority of anticruelty statutes, customary farming practices, no matter how cruel and no matter how much suffering occurs, cannot be found to be violations of the criminal law. As a result, the farming community can currently inflict an egregious amount of suffering on animals, who represent more than 95 percent—approximately 8 billion—of the animals killed annually in the United States.¹⁴”

Two US federal laws, the Animal Welfare Act (AWA) and the Humane Slaughter Act, regulate practices involving animal research, animals in exhibition and entertainment, animal breeding and transport and slaughter of most livestock. The AWA sets standards for the humane housing, handling and transportation by those persons and entities covered. There are also regulations to ensure that the pain and distress of animals is minimized, and that researchers consider alternatives to animal use. Nevertheless, animals can still lawfully be used in experimental procedures without any anaesthesia or pain relief, if this is a component of the research conducted.

The Humane Slaughter Act requires that most livestock be stunned and made insensible to pain before being cut, shackled or hoisted. This law applies only to the slaughter of animals—and even then does not include poultry. Food animals, then, are provided little protection under accepted husbandry practice.

Beyond the Capacity of Property: Changing Scope of Animal Rights

With their status as property, animals are unable to bring a civil suit for themselves if they are harmed. To bring a case in court, a party must have legal “standing.” The requirement of standing is satisfied if an individual has a right to protection from the wrong done to him and can show that he was wronged by the person he is suing. Although animals cannot speak for themselves in court, a guardian could be appointed to represent the animal and the animal’s best interests. However, animal protection groups do not usually have standing, either.

¹³ <https://www.nal.usda.gov/awic/animal-welfare-act>

¹⁴ <http://www.mercyforanimals.org/files/CLMag1Web.pdf>

This is illustrated by the case of Kama the dolphin, which was decided in October 1993 (*Citizens to End Animal Suffering and Exploitation, Inc. v. New England Aquarium*¹⁵). Raised in captivity, Kama was transferred in 1986 from Sea World in San Diego to the New England Aquarium in Boston. A year later, Kama was transported from the aquarium to a U.S. Navy base in Hawaii, where he was held for research studies.

In protest, Citizens to End Animal Suffering and Exploitation, the Animal Legal Defense Fund (ALDF), the Progressive Animal Welfare Society and Kama sued the aquarium and the departments of the Navy and Commerce. They argued that certain provisions of the Marine Mammal Protection Act had been violated. However, the court decided that neither Kama nor the plaintiff organizations had standing to bring a suit. The court ruled that the Marine Mammal Protection Act does not authorize suits brought by animals and that according to both Massachusetts and Hawaii law, animals lack legal rights and are considered exclusively the property of their owners¹⁶.

Yet a recent case has provided some hope that, in certain situations, individuals may be able to sue for the mistreatment of animals based on injuries to the individuals themselves. In *ALDF v. Glickman*¹⁷, which was decided in September 1998, Mark Jurnove, an employee and volunteer for various animal organizations, sued the U.S. Department of Agriculture (USDA) and alleged that the inhumane treatment of animals at the Long Island (NY) Game Farm Park and Zoo injured his senses and prevented him from observing and enjoying the animals.

When Jurnove first visited the park in May 1995, he saw many primates living in inhumane conditions. From his work with animals, Jurnove knew that primates are extremely social and don't cope well with isolation. At the park, a Japanese snow macaque and a chimpanzee each languished in separate cages far away from other primates. A group of frightened squirrel monkeys were forced to live beside captive adult bears.

Jurnove, who returned to the park several times, made several complaints to the USDA about the animals' housing conditions. After no changes were instituted, Jurnove filed his suit. The court ruled that he did suffer an injury and that he was disturbed when he repeatedly tried to visit. Since Jurnove planned to continue seeing the animals, and his injury could be addressed with more stringent regulations for the primates' well-being, the court decided that he had standing to sue. However, it later ruled that the primate's living conditions were adequate.

In April 2000, Congress enacted the Safe Air Travel for Animals Act¹⁸. Air carriers are now required to report incidents of loss, injury or death of animals on their flights and improve employee training in handling animals humanely. Although this law only makes

¹⁵ 836 F. Supp. 45 (D.C. Mass. 1993)

¹⁶ <http://digitalcommons.maine.gov/cgi/viewcontent.cgi?article=1267&context=oclj>

¹⁷ 154 F.3d 426 (1998)

¹⁸ <https://awionline.org/sites/default/files/uploads/documents/ca-safeairtravelforanimalsact-092611.pdf>

incremental changes, it gives hope that greater legal protection for animals can gradually be achieved.

Conclusion

Currently, a few promising routes exist for chipping away at animals' property status. The first is to pursue basic rights for animals, such as chimpanzees, based on their striking similarities to humans. Ninety-eight percent of chimps' genetic makeup is identical to that of humans, and a tremendous amount of scientific research has proven the high levels of self-awareness and cognition they possess. Animal advocates argue that it is unfair to deprive chimps of the right to liberty and bodily integrity, when such humans as infants and the comatose, who possess less self-awareness and cognition, are given these rights. In a positive step, the New Zealand Parliament recently banned the use of great apes in research, testing and teaching unless it is in the best interest of the species studied.

The second route is to gain recognition that companion animals are more than items of property. Many animal advocacy groups are also working to change the term "owner" to "guardian." In July 2000, the Boulder City (CO) Council followed the lead of San Francisco and Marin County, CA, by changing the city's municipal code to refer to people as "guardians" of their companion animals instead of as their "owners." While this does not change the legal status of animals, it is a step in changing society's views.¹⁹

As our societal perceptions of animals' change, the legislatures and courts will begin to recognize our obligation to protect animals, not as someone's personal property, but as conscious beings with feelings and interests of their own.

¹⁹ *Courting Legal Change* Melissa Bjorkenstam