

IN THE SUPREME COURT OF INDIA

CIVIL ORIGINAL JURISDICTION

PUBLIC INTEREST LITIGATION

CIVIL WRIT PETITION NO.....of 2020

(Under Article 32 Of The Constitution Of India)

IN THE MATTER OF

Ms Sangeeta Dogra J2/36 B DDA Flats Near Tara

Apartment Alaknanda Kalkaji, Delhi-18

PETITIONER**VERSUS**

1	Central Zoo Authority through its Member Secretary Pt. Deendayal Antyodaya Bhawan, CGO Complex, Lodhi Road, New Delhi - 110 003	RESPONDENT 1
----------	--	---------------------

IN THE SUPREME COURT OF INDIA

CIVIL ORIGINAL JURISDICTION

PUBLIC INTEREST LITIGATION

CIVIL WRIT PETITION NO.....of 2020

(Under Article 32 of the Constitution Of India)

A petition under article 32 of the constitution of India praying for a writ of mandamus or any other appropriate writs seeking issuance of specific guidelines and/or directions in respect to wild animals confined in zoological parks of the entire country in the states.

To:**The Hon'ble the Chief Justice of India and the Hon'ble****Companion Judges of the Supreme Court of India****This Humble Petition of the Petitioner Above named****MOST RESPECTFULLY SHOWETH:**

1. That, Petitioner is a Citizen of India, from Defense Family, by Profession Business Analyst , is a follower of Global Citizen Concept, Ex-NCC Cadet with A Certification , Trained Taekwondo Fighter, have helped school and less fortunate children learn martial arts pro-bono. have represented State Of Rajasthan for Table Tennis from the year 1996-1998, petitioner has never sort any funds from any form and does research with her own salary.

- i. Name Sangeeta Dogra D/o Col K R Dogra
 - ii. Complete Postal Address J2/36B, 4th Floor, DDA Flats Alaknanda, Kalkaji Tara Apartment South Delhi 110019
 - iii. Email ID: sangeeta4wildlife@gmail.com
 - iv. Phone No : 9871452327
 - v. Documents Regarding Personal Identification : 795659595841, A True Copy of Aadhar card annexed hereto and marked as **Annexure P1**
 - vi. Occupation: Business Analyst with Multinational Organization Located in Noida
 - vii. Annual Income -7 Lakh Rs.
 - viii. Copy Of Pan Card: a True Copy of Pan Card is annexed hereto and marked as (**Annexure P2**)
- b) That, petitioner declares and undertakes that petitioner has no civil, criminal and revenue litigation pending against her.
- c) That, the petitioner herein before filling the present petition, had contacted several times highlighting zoo issues before the concerned authorities however this was not treated urgency to upkeep the zoo facilities.
- d) That, matter is already in the knowledge of the respondents and therefore no representation is required in this matter.
- e) That, petitioner has filed an affidavit that there is no personal gain, private motive or oblique reason in filling the present petition from **Q**

- f) That petitioner understands that in the course of hearing of this petition the court may require any security to be furnished towards costs or any other charges and the petition shall comply with such requirement, the petitioner has understood that the petitioner has means to pay the costs, if any imposed by the court.
2. That, petitioner is a animals rights activist from 15 years as individual contributor, as Animals Rights enthusiast with an intent to policy making based research specifically against Wildlife trade and Wildlife habitat destruction and Environmental issues, Petitioner is a individual contributor for the cause only through her Salary and earnings.
3. That Petitioner has filed petition in the past for the Zoo matter while drafting this petition as well, and have filed petitions before honourable High Court of Delhi At New Delhi and Before Honorable Supreme Court of India :
- a) That petitioner had filed petition about zoo animals concerns a recent attack which was reported through media on 10 September 2019 that a Tiger attacked a Zoo keeper in Delhi Zoo, whereas this was Tiger who was beaten up and his canine were broken, and many animals canine are broken, Tiger organs and meat is very lucrative for wrong doer in International Black Market for various reasons. Rejoinder has been filed in W.P.(CRL) 2983/2019 NDOH 28.07.2020, for submitting fabricated, forged documents in counter affidavit by Respondents Petitioner has filed Cr.PC 340 application highlighting the forgery of documents submitted before the Honourable High Court of Delhi.

- b) That there is another Tiger Bittu in Delhi Zoo who is confined from 6 Years in Delhi Zoo as his teeth are also broken and Administration has submitted forged documents on the PM grievance management system and Petition is filed as connected manner as W.P.(CRL) 372/2020 before Honourable Delhi High Court and have forged documents in this regard as well.
- c) That, petitioner while researching about Zoo issue which came as an emergency travelled all Zoos of India and learnt several irregularities, during recent visit to Delhi Zoo on 27.02.2020, noticed there is Contempt of Honourable Delhi High Court Order in W.P.(C) 1772/2007 & NGT Orders & Honourable High Court and NGT Orders in O.A.NO 82/2013 Vide Order dated 23.04.2013 trees are choked and concretized in Delhi Zoo, Zoo which is also a Habitat of Wild Animals and instead planting New Trees it's made disastrous, Zoo are meant for Breeding conservation to void extinction of extinct Animals and animals are not coming on estrous due to hormonal imbalance as per reports issued by Indian Veterinarian Research Institute, as depressed animals will never be able to breed and its trending in all the zoo of our Country, and it is essential that the concrete placed across the tree base should be immediately removed to distance 1000mm all across and natural ground should be exposed the tree to thrive and provide suitable environment.
- d) That, Diary No 8408/2020 Dated 27.02.2020 was filed before the Honourable Supreme Court of India against illegal Wildlife Trade and Hunting of animals for their flesh, hides and bones which is currently pending for submission after curing defects however the Corona-Virus Issue out broke and listing of the matter is awaited
4. That, Wild animals apart from Wild Forest area also resides in zoo, which are

meant for breeding conservation, in the current scenario that zoo are not added in the essential services list and there are several violation made by Central Zoo Authority in this regard, Central Zoo authority has failed to comply to notify it to government of India to add zoo services in essential services List. Zoo animals are dependent on food and water on administration across country.

- a) That, central Zoo authority issued a circular and got back on back foot by not taking any precautionary, constitutional and legal steps or to make efforts for the facilitation of services, recently reportedly they have opened a slaughterhouse in the Delhi Zoo Premises, which is not even a half a kilometer from Honorable Supreme Court Premises and Ram Manohar Lohiya Hospital is nearby where Corona Patients gets treated the live slaughter of animals within the zoo is highly questionable if any sick animals is infected and is slaughtered this may spread epidemic further also slaughterhouse cannot be should be within the city area for a reason there are external vendors, procurement of animals is also a serious question, are these stray animals in the city which are captured or the animals within zoo are getting slaughtered.
 - b) That similarly most of the zoo's in country administration are suffering as the food is limited stock Central Zoo authority did not take steps in time to not let animals not endure this painful situation.
5. That, if these animals are released in wild forest either they will be killed in territorial fights or they will get poached by poachers. As on 31.03.2020, in Pilibhit Tiger Reserve 18 Kgs meat of Hog deer has been confiscated which was wrapped in banana leaf, in an another incident meat of Monitor lizard and Civet Cat was confiscated by Nagpur Wildlife Officials, Wildlife Protection Act 1972

is the most abused act as the punishment is very low and easy.

6. That, it is submitted that on 5 March 2020 a death was reported in Hyderabad, The first confirmed case of coronavirus in Hyderabad prompted the city's Nehru Zoological Park authorities to consider the screening of captive animals, The veterinary team of the zoo held a meeting earlier this week and discussed the possibility of collecting samples from the animals and sending them to the Centre for Cellular and Molecular Biology (CCMB) LaCONES in Hyderabad for tests. CZA moved not even an inch.
7. That, On 20 March 2020 death of total of 7 vulture and owl as reported due to Bird flu, CZA (central zoo authority) moved not even an inch or started to take any action, repeatedly CZA has proved themselves as incompetent to handle veterinarian upkeep and management, as per the functioning of Statutory Body moreover they have no compliance /quality check data either available with them.
8. That, it is submitted that zoo are meant for captive breeding and Wildlife Conservation, hence it is important that veterinarian care and medical equipment's shall be increased, there are hospitals in the zoo however there are no medical equipment here Government has allotted huge funds to upkeep hospital Veterinarian but the upkeep is as bad and worst , hospital looks like haunted place, a video graphic tour of the zoo may provide more clarity in this regard
9. That, this is submitted on 06.04.2020 Petitioner marked an email at 8am in the morning, to Wildlife Section of Ministry Environment Forest and Climate Change, post which a casual circular was issued in the afternoon, however circular had only directions nothing which is substantial, management and

monitoring is very poor by CZA.

10. That it is also submitted United Nation Bio-Diversity Chief also has instructed to give extra care towards wildlife trade and meat and ban it, as Diary No 8408-2020 dated 27.02.2020, Red Lynx Confederation vs Union of India, petition is pending for listing Before the Honorable Supreme Court of India, which extensively discusses hence for the sake of brevity not mentioned with this current Application .

QUESTION OF LAW:-

1. Whether Zoo across India can be added in essential services list for any emergency that arrives in near future?
2. Whether having slaughterhouse in the premises is a legal option and step?
3. Whether cattle supply which require crossing interstate borders shall be opened for incoming supplies only to zoo?
4. Whether Non-Medical unskilled staff is enough to handle this pandemic for endangered species?
5. Whether 1 or 2 medical staff is capable to manage 1000 animals all round the clock?
6. If Coronavirus is a problem or Human attitude towards wild animals meat consumption of sick animals disease on which no research is ever conducted?
7. Whether a strict/special guideline be framed/issued for offenders who are still hunting and consuming wild animals meat e.g. recent Nagpur(Maharashtra)

and Pilibhit (Uttar Pradesh) cases, to mark an example of preventive measures also as suggested by UN Biodiversity Chief?

GROUND:-

That, as per the provision under Wildlife Protection act 1972 u/s 38(J) such provision can be made permanent to exempt zoo animals from any such emergencies/ exigencies across country.

MAIN PRAYER

In light of the facts and circumstances of this case, the Petitioners pray before this Hon'ble Court as under:

1. Directions to be issued to Government of India through its secretary to add Zoo animals, medical management, food and diet supplies as essential services across country and allow transportation weekly for storage AND/OR;
2. Directions to be issued to Central Zoo Authority to immediately close down Slaughterhouse opened within any of the Zoo Premises across Country AND/OR
3. To handover the charge of Central Zoo Authority to Indian Veterinarian Association till the pandemic is completely over. AND/OR
4. Advisory to be issued to Indian Veterinarian Association to form a team of Wildlife Veterinarian, Parasitology, Medicine expert, and pathologist with in house pathology equipment's and medical gears to be arranged in each and every zoo hospital, along with a Disaster management expert as part of team, AND/OR
5. Directions to be issued to separate pregnant animals in an isolation area and waste bio crushers to facilitate for carnivores waste manage. AND/OR
6. Court may pass any other order/direction for the Human-animal co-existence during this pandemic crisis.

AND FOR THIS ACT OF KINDNESS, THE PETITIONER AS IN DUTY
BOUND SHALL EVER BE GRATEFUL

Sangeeta Dogra

(PETITIONER-IN-PERSON)

J2/36 B DDA Flats ,

Near Tara Apartment Alaknanda Kalkaji, Delhi-18

Ph: 9871452327