



2025:DHC:8170



\$~J

\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

% *Judgment pronounced on: 16.09.2025*

+ **W.P.(C) 9350/2025 and CM APPLs.39564/2025, 44484/2025, 44511/2025, 46954/2025, 47384/2025, 48673/2025 & 50602/2025**

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS PETA  
INDIA .....Petitioner

Through: Mr. Rajshekhar Rao, Sr. Advocate  
along with Ms. Pritha Srikumar,  
Ms. Arunima Kedia, Ms. Meghna  
Sharma, Ms. Saumya Sinha and  
Mr. W. Wasin, Advocates.

versus

THE COMMITTEE FOR CONTROL AND SUPERVISION OF  
EXPERIMENTS ON ANIMALS CCSEA, MINISTRY OF  
FISHERIES, ANIMAL HUSBANDRY AND DAIRYING,  
GOVERNMENT OF INDIA THROUGH ITS CHAIRMAN & ANR.

.....Respondents

Through: Mr. Rajesh Gogna, CGSC along with  
Mr. Shivam Tiwari, Ms. Priya,  
Ms. Robina and Mr. Anubhav Tyagi  
(GP), Advocates.

Mr. Vivek Kohli, Sr. Advocate along  
with Mr. S. Santanam Swaminadhin,  
Mr. Kartik Malhotra, Mr. A. Mandal,  
Ms. Vasudha Chadha, Advocates for  
R-2.

**CORAM:**  
**HON'BLE MR. JUSTICE SACHIN DATTA**

### **JUDGMENT**

1. The present petition has been filed by the petitioner seeking the



following prayers:

*“a. Issue a writ of mandamus to Respondent No. 1 to revoke the licenses and registrations granted to Respondent No. 2 to breed or use animals and to permanently shut down the facility;*

*b. Issue appropriate directions for rehabilitation of the animals currently housed at the facility of Respondent No. 2;*

*c. Award costs of this petition; and*

*e. Pass such further or other orders as this Hon'ble Court may deem fit and proper in the circumstances of the case”.*

2. The petitioner is a reputed animal welfare organisation registered under Section 25 of the Companies Act, 1956, that works extensively towards the prevention of animal suffering/exploitation. Respondent no.1/The Committee for Control and Supervision of Experiments on Animal (CCSEA), Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, is a Committee constituted under Section 15(1) of the Prevention of Cruelty to Animals Act, 1960 (hereinafter referred as “PCA Act”) for the purpose of controlling and supervising experimentation on animals and has the power to regulate its own procedure in relation to the performance of its duties; respondent no.2/Palamur Biosciences Pvt. Ltd., is a Preclinical Contract Research Organisation which operates an integrated research facility capable of conducting extensive research involving both large and small animals, including beagle dogs, mini pigs etc. and, is registered with the respondent no.1, and also holds approvals/ certification from various other bodies.

3. The factual background, as canvassed by the petitioner is that it received information which allegedly documented/reported abuse and neglect of animals while carrying out experimentation and treatment of



beagles used for breeding at the facility of respondent no.2. The petitioner reported the same on 10.06.2025 to the respondent no.1, and various other concerned authorities. The petitioner sought initiation of appropriate action against the respondent no.2, including revocation of its registration and permission to breed and experiment on animals and, the rehabilitation of the surviving animals.

4. Consequently, a Multi-Disciplinary Expert Committee, authorized by the respondent no.1, comprising of members from CCSEA/respondent no.1, the Animal Welfare Board of India, the Institutional Animal Ethics Committee, and Humane Worlds for Animals India Foundation was constituted to conduct an inspection of the facility of respondent no.2 located at Karvena (Village) Bhoothpur (Mandal) Mahabubnagar-District-509001, Telangana. The said Committee conducted inspections on 11.06.2025 and 12.06.2025 and thereafter submitted a report on 17.06.2025, recording observations which corroborated the information in receipt of the petitioner viz. the acts of cruelty and regulatory lapses by respondent no.2, and recommended a detailed Micro Audit of the respondent no.2 facility. The relevant portion of the said report reads as under: -

***“X. Discussion***

*The comprehensive inspection of PBPL highlights systemic failures at multiple levels of its operations to uphold animal ethics and welfare as per CCSEA guidelines. PBPL's approach to animal research demonstrates an operational model that prioritizes experimental output over welfare, compliance, and ethical responsibility. Despite its extensive use of dogs, non-human primates, pigs, and other species, PBPL has failed to implement even the most basic standards of care mandated by CCSEA.*

*Housing conditions were consistently found to be overcrowded, barren, and inadequate, leading to significant welfare concerns such as elevated stress, noise, poor body condition, and heightened risk of infectious diseases. Essential aspects such as environmental enrichment, social interaction, and*



*proper bedding were either entirely absent or grossly insufficient across all species. The breeding facilities were particularly concerning, with overproduction of animals resulting in unauthorized repurposing of experimental spaces as stock rooms, unscreened animal transfers, and potential biosecurity risks.*

*Veterinary care infrastructure was deeply inadequate. The facility maintained minimal medical supplies, lacked essential analgesics, sedatives, and anaesthetics, and failed to maintain proper treatment records. Notably, no protocol was in place to manage anxiety, fear, or distress-an essential component of humane animal care. Painful and invasive procedures, such as those performed on monkeys involving surgical implantation, were conducted using only analgesics post procedure, with animals physically restrained without sedatives. Similarly, dogs euthanised at the conclusion of research were not sedated before the administration of thiopentone sodium. These practices reflect glaring omissions in veterinary planning and a disregard for psychological well-being.*

*The animal record-keeping system at PBPL is virtually non-functional, with key regulatory documentation either missing or grossly insufficient. Without breeding records, reuse data, health histories, or procedural logs, PBPL operates in opaque conditions that obstruct regulatory oversight. The deliberate non-cooperation during inspection - notably the failure to provide CCTV footage from critical areas - raises serious questions about transparency and intent.*

*The inspection also uncovered troubling deviations from approved euthanasia protocols. Animals were euthanised without sedation, relying solely on physical restraint-a practice incompatible with ethical norms of humane care. The high euthanasia rate suggests an unsustainable use pattern where large numbers of animals are systematically killed after experimental use, with limited rehabilitation or rehoming efforts.*

## **XI. Conclusion**

*The operational deficiencies observed at PBPL are not isolated incidents but indicative of entrenched structural, procedural, and ethical failures. The scale and severity of noncompliance documented during the inspection raise significant concerns regarding the facility's adherence to established standards of animal welfare and regulatory accountability.*

*The situation demands urgent attention-particularly with respect to the removal and rehabilitation of animals to prevent further pain, distress, or suffering. The findings also call for a critical review of the facility's registration and breeding licence, in view of the serious and repeated*



*deviations from prescribed norms. A detailed micro-audit of PBPL's Institutional Animal Ethics Committee (IAEC) is imperative, including a comprehensive reconciliation of records relating to breeding, procurement, experimentation, reuse, rehabilitation, transfer, euthanasia, and disposal. Such scrutiny is essential to evaluate compliance with approved protocols and to verify the accuracy and integrity of reported data."*

5. The counter affidavits filed on behalf of the respondent nos. 1 and 2 *inter-alia* discloses that consequent to the inspection report dated 17.06.2025 submitted by the multidisciplinary committee, the respondent no.1 issued a show cause notice dated 25.06.2025 under Section 19 of the PCA Act to the respondent no.2 and in terms of Section 18 of the PCA Act constituted a second inspection team for conducting a micro audit at the facility of respondent no.2. Subsequently, the second inspection team conducted audits at the facility of respondent no.2 between 28.06.2025 and 29.06.2025 and submitted a comprehensive report on 10.07.2025.
6. In the meantime (prior to submission of the comprehensive report dated 10.07.2025 by the second inspection team), the present petition was preferred before this Court *inter-alia* seeking to direct the respondent no.1 to revoke the licenses and registrations granted to respondent no.2 to breed or use animals and to permanently shut down the said facility.
7. The case of the petitioner before this Court is that, despite a detailed inspection of the said facility being undertaken by respondent no.1, resulting in categorical findings in the inspection report dated 17.06.2025 as regards mismanagement and failure to adhere to applicable norms and recommendation for immediate rehabilitation of the animals housed at the facility of the respondent no.2, respondent no.1 failed to address the violation of animals' rights and regulatory non-compliances taking place at



the hands of the respondent no.2 at its facility.

8. Considering the averments made in the present petition, this Court *vide* order dated 08.07.2025 directed respondent no.1 to conduct a fresh inspection along with a representative of the petitioner and restrained the respondent no.2 from procuring/housing any new animals at its facility till the aforesaid exercise is being conducted. The relevant portion of the said order reads as under:

“.....

*13. Accordingly, the respondent no.1 is directed to take immediate steps to ensure that the necessary remedial steps are taken, and measures put in place for providing veterinary treatment, proper handling of animals and also to prevent proliferation of practices such as euthanasia, treatment without sedatives, etc. Adequate arrangement is also required to be placed for proper habitat of the animals.*

*14. For the aforesaid purpose, let an inspection be conducted by the respondent no.1 along with representatives of the petitioner to identify the areas of concern. Let the same be done within one week. Let requisite steps be taken within a period of two weeks thereafter. Let a Status Report be filed within four weeks from today.*

*15. Till the aforesaid exercise is conducted, the respondent no.2 is restrained from procuring/ housing any new animals at its facility.”*

9. However, respondent no.2 preferred two applications before this Court in the present proceedings [CM APPL.41110/2025 and CM APPL.41112/2025] seeking modification and recall of the aforesaid directions in the order dated 08.07.2025, and in particular paragraph 14 thereof, apprehending that permitting a representative of the petitioner to accompany inspecting authority to the facility of respondent no.2 would tantamount to allowing an adversarial and non-regulatory party, access to sensitive research areas with potential likelihood of misuse of such access.

10. An application [CM APPL.41783/2025] was also filed by the





respondent no.1 seeking modification of the aforementioned order, in particular paragraph 14 thereof, averring that joint inspection with a private third-party (i) is contrary to the statutory mechanism under the PCA Act, which vests inspection and enforcement powers exclusively with respondent no.1 and its authorized personnel/s (ii) undermines statutory confidentiality, risks procedural irregularity and compromises the regulatory neutrality intended by law.

11. In view of the aforesaid applications, with consent of the parties to the present proceedings, *vide* order dated 17.07.2025 paragraph 14 of the order dated 08.07.2025 was modified and a Local Commissioner was appointed by this Court to act as an observer during the said inspection. The order dated 17.07.2025 reads as under: -

*“1. With the consent of the parties, the directions contained in paragraph-14 of the order dated 08.07.2025 are modified inasmuch as the inspection as directed to be conducted thereunder shall now be conducted by the respondent no.1 along with Dr. S. G. Rama Chandran, Chief Scientist, Indian Institute of Science (IISc), Bangalore.*

*2. The expenses to enable Dr. S. G. Rama Chandran to participate in the inspection shall be borne by the respondent no.1. Let the inspection be carried out within a period of one week. Let the inspection be video-graphed and kept in a sealed cover.*

*3. The respondent no.1, as also Dr. S. G. Rama Chandran are directed to file a report as to the outcome of the inspection within a period of two weeks after the date of inspection.*

*4. Let a status report be also filed by the respondent no.1 as to the action taken pursuant to the areas of concern, if any, identified during the inspection.*

*5. Dr. S. G. Rama Chandran is directed to join the proceedings virtually on the next date of hearing.*

*6. It is further directed that Ms. Shradha Deshmukh, Advocate is appointed as a Local Commissioner to act as an observer during the*



*inspection. Let a report be also filed by the said Local Commissioner before the next date of hearing. The Local Commissioner shall be paid fees of Rs. 1 lakh, to be borne by the petitioner.*

*7. The rest of the directions contained in the order dated 08.07.2025 shall continue to operate.”*

12. In terms of the aforesaid orders, an inspection was conducted by Dr. S.K Dutta, Member Secretary of respondent no.1 and Dr. S.G. Rama Chandran, Chief Scientist, Indian Institute of Science (IISc), Bangalore. Consequently, a report dated 24.07.2025 has been placed on record and perused by this Court.

13. It transpires that although an inspection was conducted in the aftermath of the aforesaid orders dated 08.07.2025 and 17.07.2025, the Local Commissioner appointed *vide* order dated 17.07.2025 did not participate therein, in view of the circumstances narrated in the report dated 01.08.2025, filed by the Local Commissioner. The same *inter alia* states as under:

“.....

*6. In response, an email was received on 24.07.2024 from Ms. Saumya Sinha, Counsel for the Petitioner, marking a copy to the CPCEA-MEF, Mr. Rammurthy, Dr. SK Dutta, Mr. SG Ramachandra, Ms. Pritha Srikumar and Mr. Sulabh Rewari, wherein it was stated that the Petitioner had orally mentioned the matter on 21.07.2025 before the Hon'ble High Court in the presence of Respondent No. 1's counsel and Dr Tyagi, seeking alteration to the attendees of the inspection. It was also stated that upon mentioning, the Hon'ble High Court had directed that an Application for the said relief be filed by the Petitioner. The email noted that a copy of the said Application had been served upon CCSEA and the same was to be listed before the Hon'ble High Court in a day or so. A copy of the Application seeking Modification of the Order dated 17.07.2025 was also enclosed alongwith the said Email, where objections were raised regarding the impartiality of the Sr. Scientist to conduct the said inspection.*

*7. Furthermore, the said e-mail stated that the Petitioner had been kept*





out of the loop in relation to the said inspection despite the fact that CCSEA had vide its letter dated 22.07.2025 asked the Petitioner to coordinate with the Court Commissioner in relation to the inspection. Accordingly, a request was made by the Counsel for the Petitioner to defer the inspection until further orders were passed by the Hon'ble High Court. A copy of the Email dated 24.07.2025 received from the Petitioner along with its enclosed attachments is attached herewith as ANNEXURE A-5.

8. Having been made aware of the pendency of the Application before the Hon'ble High Court, which as per the statement of the Petitioner, was filed pursuant to the direction given by the Hon'ble High Court on an oral mentioning, and where a challenge had been made to the independence of the Sr. Scientist who was to conduct the very inspection, I felt it appropriate that the inspection be deferred until a decision was taken by the Hon'ble High Court in relation to the same.

9. Accordingly, I addressed an email on 24.07.2025 to both the parties, stating that it would be appropriate to await the decision of the Hon'ble High Court and conduct the inspection subject to the directions, if any, passed by the Hon'ble High Court with respect to the Application. I requested both the parties to keep me informed regarding the outcome of the said Application so that the next date of the inspection could be scheduled with the mutual consent of the parties. A copy of the email dated 24.07.2025 is attached herewith as ANNEXURE A-6. ....”

14. The petitioner, by way of an application bearing CM No. 44484/2025 has, *inter-alia*, averred that Dr. S. G. Rama Chandran (who was directed to conduct the inspection in terms of directions contained in the order dated 17.07.2025) has a ‘conflict of interest’ since (i), as per the official records he has been serving as the Chief Research Scientist since 1991 at the Central Animal Facility, Indian Institute of Science, Bangalore, which itself is an animal experimentation facility, and as such is focused on ‘animal use’ as compared to welfare (ii) *vide* notification dated 16.01.2025 Dr. S. G. Rama Chandran was notified as a member of respondent no.1 Core Committee itself.

15. Learned senior counsel on behalf of the petitioner also submits that in



contradiction to the findings rendered in an earlier inspection conducted on 11.06.2025 and 12.06.2025 at the same facility by the Multi-Disciplinary Committee, the third inspection report placed before this Court virtually gives a clean chit to the respondent no.2.

16. Evidently, till date three inspections have been conducted in respect of the facility of the respondent no.2: -

- i. Multi-Disciplinary Committee constituted by respondent no.1 conducted an inspection on 11.06.2025 and 12.06.2025, and thereafter submitted its inspection report on 17.06.2025 (hereinafter referred as “the first inspection”).
- ii. Micro Audit /second inspection committee constituted by the respondent no.1 conducted inspection between 28.06.2025 and 29.06.2025, and thereafter submitted an inspection report dated 10.07.2025 (hereinafter referred as “*the second inspection*”).
- iii. Inspection conducted by a committee constituted pursuant to the direction passed by this Court *vide* order dated 17.07.2025 in the present proceedings, which submitted a report dated 24.07.2025 (hereinafter referred as “*the third inspection*”).

17. The stark contrast between the findings rendered in the latest inspection report submitted by respondent no.1 and Dr. S. G. Rama Chandran (pursuant to order dated 17.07.2025) *vis-a-vis* the earlier inspections has been encapsulated in the following chart submitted by the learned senior counsel on behalf of the petitioner:



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated																
Overcrowding of animals	<p>Notes the number of dogs to be 1169 and approved capacity to be 1000 (73 dogs for rehab). Observes that the number of animals exceeds CCSEA-approved limits, with multiple species present without adequate disclosure or accurate record keeping. [WP, pg. 183, 187]</p> <p>The report notes that facility had initially denied the presence of sheep [WP, pg. 193].</p> <table border="1"><tr><td>Dogs</td><td>1169</td></tr><tr><td>Minipigs</td><td>14</td></tr></table>	Dogs	1169	Minipigs	14	<p>Notes the number of dogs to be 1050 dogs for breeding &amp; experiments + 73 rehab dogs = 1123 total; and the approved capacity to be 1000 for breeding &amp; experiment and 550 for rehabilitation [RI's Counter, pg. 233].</p> <table border="1"><tr><td>Dogs</td><td>1123</td></tr><tr><td>Minipigs</td><td>16</td></tr><tr><td>Non-human primates (Monkeys)</td><td>20</td></tr><tr><td>Mix breed pigs</td><td>14</td></tr><tr><td>Sheep</td><td>11</td></tr><tr><td>Cattle</td><td>12</td></tr></table>	Dogs	1123	Minipigs	16	Non-human primates (Monkeys)	20	Mix breed pigs	14	Sheep	11	Cattle	12	<p>Notes approved number of dogs to be 1550 dogs. This includes 1000 dogs for Experimentation and 550 dogs for Breeding. The total number of dogs housed in the facility at the time of inspection was 1,442 (1369 in breeding and experimentation + 73 for rehab). [pg. 1]</p> <p>Notes that no overcrowding was observed</p> <p><b>Note:</b> there are 369 more dogs than the approved limit of 1000, indicating breeding dogs housed in experimental units. [pg. 2].</p> <p><b>Note:</b> The number of dogs has increased by 319 since the Micro Audited report dated 28.06.2025 – 29.06.2025. There was an</p>	Rule 4, 5 and 8 (a) of the Breeding of and Experiments on Animals Rules, 1998
Dogs	1169																			
Minipigs	14																			
Dogs	1123																			
Minipigs	16																			
Non-human primates (Monkeys)	20																			
Mix breed pigs	14																			
Sheep	11																			
Cattle	12																			

Area of assessment	First Inspection (11.06.2025-12.06.2025)		Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated				
	Non-human primates	17	<u>Notes that no census records of all species are available as prescribed by CCSEA. [RI's Counter, pg. 239]</u>  <u>Note:</u> The number of dogs has decreased by 46 in about 2 weeks	interim order restraining the facility from procuring new animals.					
	Mix breed pigs	13		<table><tr><td>Dogs</td><td>1442</td></tr><tr><td>Minipigs</td><td>No data</td></tr></table>		Dogs	1442	Minipigs	No data
Dogs	1442								
Minipigs	No data								
	Sheep	7		<table><tr><td>Non human primates (Monkeys)</td><td>No data</td></tr><tr><td>Mix breed pigs</td><td>No data</td></tr></table>		Non human primates (Monkeys)	No data	Mix breed pigs	No data
Non human primates (Monkeys)	No data								
Mix breed pigs	No data								
	Cattle	12	<table><tr><td>Sheep</td><td>No data</td></tr><tr><td>Cattle</td><td>No data</td></tr></table>	Sheep	No data	Cattle	No data		
Sheep	No data								
Cattle	No data								
Notes absence of census records. States internal excel sheet referred to by staff but not made available [Pg. 185, WP]									
			<u>Recommends that the facility should 'decongest' the rooms [pg.8]</u>  <u>Note:</u> The Report records admission by the facility that dogs have been injured due to fighting/ aggression which points towards overcrowding- The photos on pages [136, 139, 140, 143, 157, 158, 159, 160, 162, 164, 167, and 168] document bite/scratch wounds that are acknowledged to be						



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
			injuries resulting from aggression during socialization.	
Wash-out period & Reuse of animals for experiments	Wash out period of one month is being followed, which is contrary to the 3 month norm prescribed by CCSEA. CCSEA permission is required for reuse of animals [WP, 188]. Records are not available.	Mentions that the committee accessed the SOPs for reuse of animals and biochemistry reports for reused animals, however contents of the said reports and findings basis the said report are not recorded [R1's Counter, pg. 239].	No specific findings.	Paragraph B.i.6, of the CPCSEA Guidelines, 2020
Housing conditions	Observes that the housing conditions are not proper or compliant with CCSEA guidelines, which require proper bedding, environmental enrichment, cleaning of the kennels, humidity control and facilities for socialisation for dogs (CPCSEA Guidelines, 2015). [WP, pg. 189 -190]	Notes that humidity and temperature control and ventilation requires some improvement and recommends installation of an HVAC [R1's Counter, pg. 236]. Further, notes that some kennels are damaged [R1's Counter, pg. 237]. Notes that cattle are house in temporary shed. [R1's Counter, pg. 237] It further notes that the frequency of cleaning needs to be increased in the kennels [R1's Counter, pg. 239]. Recommends several changes to the manner of housing of the animals, including improper flooring and lack of bedding, thereby indicating that these	The Report notes that the space available in the kennels is compliant with CCSEA Guidelines. [pg. 1] Recommends improvement in the housing conditions including humidity control, soft bedding [pg. 8].	Rule 7(b), 7 (g) Breeding of and Experiments on Animals Rules, 1998  Paragraphs 11, 15 and 16, 20, 22 CPCSEA Guidelines, 2015  Principle 5, CPCSEA Guidelines, 2007

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		facilities do not currently exist [R1's Counter, pg. 240-242].		
Mixing of experimental and breeding dog housing units	Dogs from the breeding units were found to be in experimental units due to insufficient space, raising concerns of contamination risks as the dogs in the breeding facility are not screened for diseases [WP, pg. 191].	No specific findings.	Recommends separation of the experimental section from the breeding units [pg. 8].	
Environmental enrichment for all species	No environmental enrichment was provided except few plastic bones – no toys, stimulation objects, or opportunities for social interaction [WP, pg. 189]. No dedicated outdoor enclosures for non-human primates. No environmental enrichment for pigs; complete absence of social interaction for sheep. Lack of outdoor access and meaningful enrichment across species [WP, pg. 190].	Notes that most species are housed singly but can see each other through the cages. Does not record availability of any environmental enrichment [R1's Counter, pg. 238]. Recommends environmental enrichment to be provided scrupulously for all species as per the specie-specific requirements to improve the social behaviour and cognitive development of animals [R1's Counter, pg. 241].	Notes provision of enrichment articles in all cages and play areas with respect to dogs and minipigs [pg. 2, 5].  <b>Note:</b> The toys are in the form of plastic bones that provide no mental stimulation. There is no provision for dogs to exercise normal foraging behaviour.  No information has been included with respect to monkeys, the video shows lack of any enrichment or bedding in their cages. Recommendations for improvement have been made in this behalf [pg. 7].  <b>Note:</b> The Inspection video does not show presence of toys inside the dog cages	Para 17 and 18 of CCSEA Guidelines 2015





2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
Noise Control	Constant noise from barking of animals created an environment with dangerously high noise levels, indicative of widespread stress and discomfort among the animals [WP, pg. 189].	At pg. 237, it is noted that all rooms are constructed with cement concrete and are noise free, except the dog housing facilities. However, at pg. 238, it is noted that minipigs are separated from dogs only by temporary metal sheets and the facility is not sound proof.	No specific findings.  Note: Inspection video shows inspectors wearing ear-muffs, probably because of the extreme noise.	Para 15 (d) of the CCSEA Guidelines, 2015
Bodily/ health conditions of animals	Dogs observed in poor body conditions including several exhibiting cherry eye. Minipigs and cows also observed in poor bodily conditions. Absence of medical records. [WP, pg. 195]	The report states that treatment records were verified and two sample records are produced at Annexure 3 of the report. 3 sample 'Animal Clinical Notes' are produced as Annexure 8 to the report. All 3 animals are reported to have the exact same noting on the exact same dates, indicating potential fabrication of reports [R1's Counter, pgs. 300 - 302] It observes overall health status of dogs to be satisfactory. Some dogs were found alopecic or with "cherry eye". Notes that treatment is being provided. Observes pigs, minipigs, cows and sheep to be generally in healthy conditions [R1's Counter, pg. 234].	Cherry eye condition was observed in 3 dogs at the time of inspection. Notes that these dogs would undergo surgery soon. Notes that the facility has recorded 30 cases of cherry eye so far. [pg. 6]  In the inspection video, the monkeys can be seen to be scared/anxious and recoiling away from humans.	Para 2, 5 of the CPCSEA Guidelines 2015  Principle 5, CPCSEA Guidelines, 2007

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		Unclear whether the sample records of the puppies were correlated with the records of their mothers to verify accuracy of records.		
Record keeping	Animal record-keeping system virtually non-functional with key documentation either missing or grossly insufficient. Critical documentation including consolidated animal inventories, veterinary treatment records, breeding logs, frequency in use of experiments, clinical conditions identified and care administered consistently absent, incomplete, or untraceable. [WP, pg. 196] CCTV footage was not provided. [WP, pg. 203]	Some of the records (Form A, C, D, veterinary treatment, breeding, procurement, SOPs, euthanasia records, training records, IAEC, morality, whelping, etc.) are maintained. Recommends maintenance of Form C records reflecting all large animal species. [R1's counter, pg. 239, 241] Recommends updating of Form A regularly and proper maintenance of Form C [R1's counter, pg. 241]. Recommends that CCTV placements be synchronised in every room. [R1's Counter, pg. 240 - 241]  Note: There is no specific observation on the maintenance of other important study-related records to indicate washout periods, re-use, frequency.	Does not discuss record keeping – however, refers to accessing the treatment records and breeding records of various animals on a sample basis. [See 1b, 1c, 2b, 3b, pg. 1-2, 5-6]	Para 27 of the CPCSEA Guidelines 2015  Rule 11 of the Breeding of and Experiments on Animals Rules, 1998



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
Veterinary care	Notes presence of only 2 veterinarians out of 4 assigned to 13 experimental facilities; and lack of essential medications such as sedatives, anaesthetics, etc., and inadequate medical inventory [WP, pg. 199-201]. Notes that veterinary care is available only between 9 am to 5:30 pm. [WP, pg. 202]	Notes 19 veterinarians providing services to all large animal species, and 4 working in the pathological department. The report observes their experience and expertise to be satisfactory [R1's counter, pg. 233]. Recommends that veterinary services be ensured during night hours and public holidays indicating they are currently not available. [R1's counter, pg. 241]	No specific findings.	Para 2, 5 of the CPCSEA Guidelines, 2015
Euthanasia	Euthanasia is administered without sedation [WP, pg. 199, 205].	SOPs of euthanasia/ anaesthesia verified. Notes that euthanasia is performed after sedation in achieved [R1's counter, pg. 240].	The facility is following a well-established SOP to euthanise the animals. However, they revised this SOP recently to use the sedative prior to the administration of Thiopentone. [pg. 5] <u>Note:</u> This SOP is dated 03.07.2025 [pg. 97]	Rule 9(ff), and 9(cc), Breeding of and Experiments on Animals Rules, 1998 Paragraphs 31 and 32, CPCSEA Guidelines, 2015
Quarantine protocols	Notes a complete absence of dedicated quarantine facilities across all housing units and individual cages within the shared housing rooms are used as	Separate quarantine facilities not provided for dogs, experimental rooms have dedicated separate isolation rooms for sick animals. Separate quarantine facilities are available for	No specific findings.	Paragraph 4 of CPCSEA Guidelines, 2015

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
	makeshift quarantine/ isolation spaces [WP, pg. 197-198]. This is a requirement under the CCSEA Guidelines, 2015.	pigs, minipigs, monkeys, sheep, goats. [R1's counter, pg. 235]		
Rehabilitation facilities	Notes that there are no proper housing facilities for animals being rehabilitated, notes that it appeared to be a makeshift arrangement, with an experimental room being repurposed without any meaningful changes [WP, pg. 194].	Recommends the dogs being currently rehabilitated in facilities like experimental facility to be rehabilitated in open areas. It also recommends possibilities of rehabilitation through adoption [R1's counter, pg. 242].	Recommends moving the 73 dogs to newly constructed spacious rehabilitation facility [pg. 7]. Has also suggested rehabilitation of all other animals as per CCSEA guidelines [pg. 8].  A small under construction rehabilitation facility is pictured at pg. 190	
Training	Notes rough handling practices, and raises concerns about staff training and supervision [WP, pg. 195].	Qualified veterinarian and technical/ supporting staff are available. All staff go yearly orientation, attend workshops/ conferences and undergo regular health checkup. [R1's counter, pg. 239]	The facility is conducting training on humane handling of animals annually. However, they have now decided to conduct training biannually. It was informed to the inspection team that this training is mandatory for all animal caretakers to ensure full compliance with animal welfare standard. [pg. 3]	Rule 7(d), 7(e) of Breeding of and Experiments on Animals Rules, 1998 Para 6 of the CPCSEA Guidelines, 2015
Overall assessment	<i>"The operational deficiencies observed at PBPL are not isolated incidents but indicative of entrenched structural, procedural, and ethical failures. The scale and</i>	<i>"The inspection team has observed no violation to the extent which leads to the adverse effect, pain, or suffering and does not compromise on ethics and welfare of the animals during the</i>	<i>"The inspection team did not observe any violation of CCSEA guidelines that significantly affect the animal care, welfare and use during the inspection. However, the inspection team noticed certain points</i>	





2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
	severity of non-compliances documented during the inspection raise significant concerns regarding the facility's adherence to established standards of animal welfare and regulatory accountability. The situation demands urgent attention-particularly with respect to the removal and rehabilitation of animals to prevent further pain, distress, or suffering. The findings also call for a critical review of the facility's registration and breeding licence, in view of the serious and repeated deviations from prescribed norms. A detailed micro-audit of PBPL's Institutional Animal Ethics Committee (IAEC) is imperative, including a comprehensive reconciliation of records relating to breeding, procurement, experimentation, reuse, rehabilitation, transfer, euthanasia, and disposal. Such scrutiny is essential to evaluate	inspection and random examination of CCTV footages. However, the inspection team is of the opinion that there is scope of improvement as per the detailed suggestions mentioned below under sr. no. '2'. Further, it has been observed that the earlier team which inspected the facility on 11 <sup>th</sup> June, 2025 has given most of its observations/ recommendation on the basis of "unavailability of records" as the personnel in charge of the records custody/ archival were not present, as informed by the organization during visit of our inspection team members. The current inspection team members have accessed all the relevant record and offered their suggestions accordingly." [R1's counter, pg. 240].  "Suggestions for improvement: 1. Replace air coolers by HVAC and/or use the engineering control to maintain temperature and humidity in all large	during the inspection and recommends implementing them for better care.  Suggestions for improvement: 1. More environmental enrichment articles may be provided for dogs, monkeys and pigs, in addition to the existing toys/articles. 2. Few dog rooms have a dedicated play/run area for dogs, and a similar type of dedicated play area should be extended to all the dogs. 3. Dehumidifiers were installed in a few dog rooms to control the humidity. However, in a few rooms, the humidity was more than 70010. Hence, dehumidifiers need to be installed in those rooms also. Alternatively, the AHU/HVAC system may be modified to control the humidity. 4. Suggested to provide soft bedding for the newly born pups in the Whelping box. 5. The Facility has rehabilitated 73 dogs inside the main animal facility in a dedicated area (as per Section 3.1 of the Rehabilitation guidelines, 2020J. Suggested shifting them to the newly	

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
	compliance with approved protocols and to verify the accuracy and integrity of reported data." [WP, pg. 211]	animal rooms as per the guidelines of CCSEA. 2. Raised platform to be constructed for all dog kennels. 3. Adhere to space requirement guidelines for housing of dogs, pigs, mini pigs, monkeys, sheep, cattle and buffalo. 4. Hard Floor surface for all large animal species need to be user friendly for each species making it comfortable, safe and cleaning friendly. 5. Appropriate provision of suitable bedding needs to be provided in case of all species especially breeder dogs. 6. Appropriate nesting material should be provided to the newly delivered dog pups. 7. Sanitize/ sterilize the SS feeding bowls of dogs, pigs, mini pigs, monkey, sheep/goats on regular basis. 8. Environmental enrichment needs to be provided scrupulously for all species as per the species-specific requirements to engage the animals to	constructed spacious rehabilitation facility located adjacent to the main animal facility. 6. Advised to rehabilitate all the experimented dogs soon after completing three years of experimental period as per the CCSEA guidelines, and the report should be submitted to the CCSEA office regularly. 7. Apart from the dogs, the facility should explore the possibility of rehabilitation of other experimented large animals such as sheep, pigs and cattle in a dedicated facility/ building as per the Guidelines of CCSEA. 8. It has been observed that dogs are kept in enclosures for the breeding period. Though the space allotted for each dog is meeting the specification as per the Guidelines of CCSEA, however, to meet the requirement of Section 11(E) of the PCA ACT, 1960 "To provide reasonable space for movement for expression of behaviour", the establishment should ensure the following: i. Isolation of breeding unit from the other experimental units.	



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		<p>improve their social behaviour and cognitive development.</p> <p>9. To create new recreations exercise area for dogs scrupulously outside the facility.</p> <p>10. To create appropriate sized money runs for NHP's.</p> <p>11. Hoof surgery need to be planned for all pigs wherever hoofs are overgrown and create obstruction for standing/ walking.</p> <p>12. Clean/ wash the sheep regularly with mild soap and like warm water so that they are maintained clean and healthy.</p> <p>13. Training sessions need to be conducted for all newly recruited staff and regular CME for already working staff on regular basis highlighting the handling and welfare issues.</p> <p>14. Appropriate quantity of medicine inventory needs to be maintained with proper stock of essential medicines in each colony</p>	<p>ii. The breeding unit should have all such facilities as the enrichment area, pup whelping area, pup holding and growing area.</p> <p>iii. The experimental section should be separated from the breeding unit, and a clear-cut demarcation should be installed.</p> <p>iv. The dogs kept for the experiment for a longer period should be positively provided with enrichment and daily exercise till the completion of the study.</p> <p>v. The establishment should explore treatment of the dogs against any health issues, and euthanasia should be recommended in writing by the veterinarian as a last resort when the animal is not recovered.</p> <p>vi. While releasing the animals from the breeding unit, specifically dogs, the veterinary team should certify that each animal is fit for experimentation.</p> <p>vii. The establishment should decongest the rooms, and a run/play area should be provided for all the experimental animals." [pgs. 7-8]</p>	

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		<p>15. Emergency veterinary services to be ensured during night hours and public holidays.</p> <p>16. CCTV cameras to be installed in each of the large animal breeding, experimentation, corridors and rehabilitation room.</p> <p>17. Isolate experimental Mini pig facility from dog experimental facility to provide secure and stress-free environment which is free from the noise of dog barking.</p> <p>18. Breed only species approved by the CCSEA.</p> <p>19. Make arrangement for permanent cattle farm with cement concrete/ brick walls and flooring with slope and provision of proper Manger for stall feeding and watering.</p> <p>20. Update Form 'A' regularly with CCSEA to revise new species of animal added or new facility created.</p> <p>21. Currently Form 'C' of large animal species does not collectively reflect the census of all large animal species maintained by the organization.</p>		



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		<p>Maintain form 'C' records as per the requirements of CCSEA so that collective census of all animal species will reflect on 1<sup>st</sup> day of each month at one go.</p> <p>...</p> <p>24. The grills of the Crates that carry the dogs have rust, which are required to be changed.</p> <p>25. Regular inspection of the organization should be conducted by the IAEC member and CCSEA Central Committee members to oversee the functioning of the facility as per the CCSEA requirements.</p> <p>26. All veterinarians and animal attendants are required to be trained regularly in animal husbandry practices particularly for cleaning, grooming and monitoring the health and well-being of the animals.</p> <p>27. Dehumidifiers may be installed for maintaining the humidity levels in the Dog experimentation/ breeding rooms or high air changes per hour may be implemented.</p>		

Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		<p>28. CCTV placements to be synchronized in every room.</p> <p>29. The flooring of the breeding rooms for dogs may be repaired.</p> <p>30. Separate quarantine areas to be provided for Pigs, Minipigs, Sheep and Goat. Separate isolation cages to be marked for them. Separate isolation cages to be marked for Monkeys also.</p> <p>31. Dogs currently rehabilitated in facilities like experimental facility, should be instead rehabilitated in open rehabilitation areas to provide them different and more comfortable ambience than the experimental areas. The establishment may like to see the possibility of rehabilitation of dogs through adoption as per the Guidelines of CCSEA.</p> <p>32. CCSEA need to nominate appropriate Nominees on this organization who has knowledge of the species maintained, who will be vigilant enough, guide the organization to upgrade the quality of research and welfare of animals and report any</p>		



2025:DHC:8170



Area of assessment	First Inspection (11.06.2025-12.06.2025)	Micro-Audit (28.06.2025-29.06.2025)	Inspection by Dr S. Ramachandra (24.07.2025)	Rules & Guidelines Violated
		violation timely to the office of CCSEA, New Delhi." [R1's counter, pg. 240-242]		

FILED THROUGH:

M/s Keystone Partners, Advocates and Solicitors  
Counsels for the Petitioner

18. During the course of proceedings, Mr. Vivek Kohli, learned senior counsel for the respondent no.2 submits that although the respondent no.2 facility conducts experiments in strict conformity with the terms of Licenses and the POCA Act and Rule framed thereunder, if there still exist certain shortcomings in the said facility, the respondent no.2 is committed to take requisite steps to overcome / rectify the same.

19. It is evident that the inspection conducted pursuant to order dated 17.07.2025 is mired in controversy inasmuch as (i) the same was conducted in the absence of the Local Commissioner appointed by this Court *vide* order dated 17.07.2025 (in view of the circumstances enumerated by the Local Commissioner in her affidavit); (ii) serious allegations have been made by the petitioner as regards 'conflict of interest' of Dr. S. G. Rama Chandran (who, along with the Local Commissioner, was entrusted with the task of inspection at the facility of the respondent no.2).

20. In the circumstances, it is directed that a fresh inspection be undertaken at the facility of the respondent no.2. The modalities for conduct of the inspection shall be as under:

i. The inspection team shall comprise of three members *viz.*:

(a) Dr. Arvind Ingle, Member of CCSEA;





(b) Dr. M. Jerald Mahesh Kumar, Principal Scientist CCMB, Hyderabad

(both being members of committee constituted by the respondent no.1 for conducting micro-audit on 28.06.2025 and 29.06.2025); and

(c) Ms. Shradha Deshmukh, Local Commissioner (appointed by this Court in the present proceedings *vide* order dated 17.07.2025).

- ii. The aforesaid Local Commissioner shall be entitled to take the assistance of a veterinarian who shall accompany the Local Commissioner during the inspection. The Local Commissioner shall ensure that the veterinarian neither has affiliation with the petitioner nor has any conflict of interest with either of the parties. The cost/s for the same shall be borne by the petitioner.
  - iii. The inspection shall be conducted as expeditiously as possible and in any event, within a period of three weeks from today. The Local Commissioner shall coordinate with the concerned parties and the other members of the Inspection team to fix the date and time for the aforesaid inspection.
  - iv. For the aforesaid exercise, the Local Commissioner shall be paid a sum of Rs.2 Lakhs by the petitioner (in addition to expenses and the fee/s directed to be paid to the Local Commissioner *vide* order dated 17.07.2025). The charges for the other members of the Inspection Committee (if any) shall be borne by the respondent no.1 and / or the respondent no.2.
21. Upon conclusion of the aforesaid exercise, the inspection report (together with recommendations, if any) shall be provided to the petitioner and the respondents. Upon receipt of the inspection report, the respondent



2025:DHC:8170



no.1 shall take cognizance of any deficiencies that may be revealed in the inspection report and shall take appropriate steps in accordance with law. The respondent no.2 shall also take immediate rectificatory steps as may be warranted in terms of the inspection report and/or directions issued by the respondent no.1. This Court acknowledges the fair stand of Mr. Vivek Kohli, learned senior counsel for the respondent no.2, that appropriate rectificatory steps (as may be required) shall be taken if any deficiencies are found during inspection.

22. The interim order dated 08.07.2025, whereby, the respondent no.2 was restrained from procuring / housing any new animals at its facility, shall stand vacated upon the aforesaid inspection being conducted.

23. Needless to say, the respondent no.1 shall continue to exercise its regulatory oversight in respect of the activities of the respondent no.2 to ensure that the said respondent is in compliance with all applicable rules and guidelines.

24. The petition is disposed of in the above terms. Pending applications also stand disposed of.

**SACHIN DATTA, J**

**SEPTEMBER 16, 2025**

*r, sl*