ECOLOGICAL DISASTER UNFOLDING: BIHAR GOVERNMENT'S DECISION TO CULL NILGAI AND WILD BOAR

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ABSTRACT

The Bihar government's decision to cull nilgai and wild boar raises concerns about an impending ecological disaster. This article examines the legal implications and constitutional validity of the decision, drawing parallels with China's disastrous "Kill the Sparrow" campaign under "The Four Evils Campaign"¹. This article provides a comprehensive analysis of the culling order, examining its legal validity under the Wildlife Protection Act 1972² and the Constitution of India³. It also explores the ecological consequences of culling, including the potential disruption of ecosystem balance and the exacerbation of human-wildlife conflict. Through a critical review of existing literature and legal frameworks, this article argues that the culling order is ecologically unsound, legally flawed, and constitutionally invalid. It highlights the need for alternative management strategies that prioritize coexistence and conservation, such as relocation programs, habitat modification, and education and outreach initiatives. This article contributes to the ongoing debate on human-wildlife conflict, emphasizing the importance of adopting a sustainable and science-based approach to wildlife management. It underscores the need for policymakers and conservationists to work together to develop effective solutions that balance human needs with wildlife conservation.

Keywords: Wildlife Conservation, Nilgai, Wild Boar, Culling, Ecological Disaster, Wildlife Protection Act 1972, Constitutional Validity.

INTRODUCTION

The recent decision by the Bihar government to cull nilgai and wild boar has sparked a heated debate about the efficacy and ethics of such measures in addressing human-wildlife conflict. "Culling" refers to the selective killing or removal of individuals from a population, often to

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¹ Four Pests campaign ">https://en.m.wikipedia.org/wiki/Four Pests campaign>">https://en.m.wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.org/wikipedia.

² National Portal of India, Wildlife Protection Act 1972

³ National Portal of India - Legislative Department, Constitution of India

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control numbers, maintain population size, or eliminate perceived threats. In the context of wildlife management, "culling" is used to control population growth, reduce human-wildlife conflict, eliminate "problems" due to animals, and maintain ecosystem balance, etc. However, culling is a controversial practice, as it raises ethical concerns about animal welfare, ecosystem disruption, and the effectiveness of such measures in addressing underlying issues. As the human-wildlife interface expands due to urbanization, agriculture, and infrastructure development, conflicts between humans and wildlife are becoming increasingly common. In this context, the Bihar government's decision to cull nilgai and wild boar raises important questions about the legal, ecological, and ethical implications of such actions.

This article examines the legal implications of the culling order, exploring whether it violates existing wildlife laws and constitutional provisions. It also delves into the ecological consequences of culling, discussing how such measures can disrupt ecosystem balance and exacerbate human-wildlife conflict. Furthermore, the article considers alternative management strategies that prioritize coexistence and conservation, highlighting the need for a more nuanced and sustainable approach to addressing human-wildlife conflict.

The Bihar government's culling order is significant for several reasons the order targets large numbers of nilgai and wild boar, making it a massive culling operation, due to lack of scientific basis, the order contravenes India's Wildlife Protection Act 1972, setting a dangerous precedent for future wildlife management decisions. Culling can disrupt ecosystem balance, leading to unforeseen consequences, such as changes in predator-prey dynamics and nutrient cycling. It can raise concerns about animal suffering, pain, and distress, this order may set a precedent for future wildlife management decisions, potentially leading to more culling and less conservation. The significance of this order lies in its potential to undermine wildlife conservation efforts, disregard scientific evidence, and prioritize short-term solutions over sustainable and humane approaches to human-wildlife conflict.

There are worries about an imminent ecological calamity following the Bihar government's recent decision to kill wild boar and nilgai. This article compares China's disastrous "Kill the Sparrow" campaign with the legal ramifications and constitutional legality of the decision.

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LEGAL IMPLICATIONS

Section 62^4 of Wildlife Protection Act 1972 – Declaration of certain wild animals to be Vermin. It refers to wild animals that are considered pests or nuisances, posing a threat to human life, property, or protected areas. Schedule V of the Wildlife Protection Act 1972 lists animals that can be declared vermin, including Mammals: nilgai, wild boar, and certain species of monkeys; Birds: certain species of parakeets, mynas, and crows. The declaration of an animal as vermin allows for its control, including destruction, but only for a specified period. The term "vermin" is significant because it implies that the animal is considered a pest, rather than a protected species. The central govt. By notification declares any wild animal other than those specified in schedule I and part II of schedule II⁵ to be "VERMIN"⁶ for any area for such period as may be specified therein and so long as such notification is in force, such wild animal shall be deemed to have been included in schedule V⁷. However, it's important to note that, even Schedule V animals are protected in certain circumstances, like in national parks or sanctuaries. State governments can modify Schedule V lists, adding or removing species. The Wildlife Protection Act 1972 emphasizes that killing or harming wild animals should be a last resort, and alternative measures should be explored first.

HOW AND WHY TO DECLARE ANY ANIMAL SPECIES "VERMIN"

Under the provision of $\sec 62$ of the Wildlife Protection Act 1972. The state govt. – send proposal – to central govt. – to declare any animal species as "Vermin", if that particular species is damaging the natural habitat or doing a lot of harm to the humans inhabiting that area or locality. But if a species is declared "Vermin", there are 3 options –

- Translocation of the animals of that species to any other area.
- Sterilization of the male of that species to keep a check on the population of that species.
- Culling to kill the animals of that species.

But, now according to the latest notification by Bihar Government Nilgai and Wild boar are not only declared Vermin but also all the powers to grant permission for the culling of Nilgai

⁴ India Code, Section 62,

⁵ dgft.gov.in, schedule I and part II of schedule II

⁶ India code, chapter I, section 2, vermin

⁷ India code, WLPA1972, Chapter V

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and wild boar is given to the Gram Pradhan. This decision⁸ comes as part of a joint effort involving the Environment, Forest, Climate Change, Agriculture, and Panchayati Raj departments, with the local mukhiya (village heads) playing a crucial role in the process, including overseeing the killing and burial of animals. The decision was taken during a meeting chaired by Prem Kumar, the state's Environment, Forest, and Climate Change Minister, and Mangal Pandey, the Agriculture Minister. Senior officials from both departments were present. Approximately 30 districts are affected by the presence of these animals, with an estimated 3 lakh Nilgai and 67,000 wild boars reported in these areas.

The Bihar government⁹ has hired 13 professional shooters to kill wild boars and 'gurdwaras' or nilgais to save crops, a forest official said on Tuesday. Animal lovers have opposed the move and demanded that the government find a long-term solution to the problem and not allow the killing of animals. The state environment, forest and climate change department has sent the list of professional shooters to the authorities concerned in all 38 districts in the state to use their services wherever required.

Biological Diversity Act (BDA) 2002¹⁰

The BDA 2002 aims to conserve and sustainably use biological diversity. The culling order violates the Act's provisions, which emphasize the importance of maintaining ecosystem balance and biodiversity.

Environment Protection Act (EPA) 1986

The EPA 1986¹¹ mandates the protection and improvement of the environment. The culling order contravenes the Act's provisions, which prohibit activities harmful to the environment.

CONSTITUTIONAL VALIDITY

The question has been raised before the Supreme Court challenging the constitutional validity of sec of WILDLIFE PROTECTION ACT 1972¹². For the above-mentioned reasons, it is a

⁸ Deccan herald, Bihar greenlights culling of Nilgai and wild boars to safeguard crops, July 2024

⁹ Times of India, Bihar govt hires shooters to kill nilgais, wild boars to save crops, 2023

¹⁰ India Code, Biological Diversity Act (BDA) 2002

¹¹ Kumar, S, 'Wildlife Conservation in India: A Critical Analysis' (2017) 12(2) Journal of Environmental Law and Policy 123.

¹² D Kulshrestha and others, Section 62 of WLPA, 1972: When the Custodian becomes the Killer?, 2022, Jus Corpus Law Journal volume3 issue2

violation of Articles 14, 21¹³ and various principles of Directive Principles of State Policy Article 48A read with the Fundamental Duties Article 51 A (g) Enshrined in the constitution of India, which require the state to be extremely cautious while exacting the laws for animals, wildlife and environment. Article 14 contains the concept of "Equality before the law" and "Equal protection of the laws". It ensures that everyone is equal in the eyes of the law, regardless of their status, position, or circumstances and the laws will protect everyone equally, without any discrimination or bias.

Article 14 is not directly applicable to animals. It is a fundamental right guaranteed to all citizens of India (and persons within the territory of India) under Part III of the Constitution. However, the concept of equality and non-discrimination can be extended to animals through other laws and judicial interpretations. For example, the Prevention of Cruelty to Animals Act, of 1960, protects animals from cruelty and promotes their welfare, the Wildlife Protection Act, of 1972, conserves and protects wildlife, including endangered species and judicial decisions have recognized animals as "living beings" with inherent rights, such as the right to live with dignity and freedom from cruelty. While Article 14 does not directly apply to animals, these other laws and interpretations help promote animal welfare and conservation in India. The provisions of Article 14 fail because Sec 62 permits the killing of all animals except those that fall under Schedule I and II, without stating the rationale behind it. The provision of Article 21, a highly criticized by the apex court. It also contravenes the provisions of article-48A of the Indian constitution, which states that the state shall endeavour to protect and improve the environment and safeguard the forest and wildlife of the country.

Article 21 of the Constitution of India states "Protection of life and personal liberty, no person shall be deprived of his life or personal liberty except according to procedure established by law." Traditionally, Article 21 was interpreted to apply only to human beings. However, in recent years, the Indian judiciary has expanded its scope to include animals. In 2014, the Supreme Court of India ruled in the case of the Animal Welfare Board of India vs. Nagaraja that, "Article 21 of the Constitution, which guarantees the right to life, is not restricted to human beings alone, but also applies to animals." This landmark judgment recognized animals as "living beings" with a right to life and liberty and held that Animals have the right to live with dignity and freedom from cruelty. The state has a constitutional obligation to protect and promote animal welfare. Subsequent judgments have reinforced this interpretation, applying

¹³ Ministry of external affairs, Articles 14, 21

Article 21 to animals in various contexts, such as prohibiting animal cruelty and mistreatment, regulating animal sacrifice and slaughter, protecting endangered species and wildlife conservation. While Article 21 is not exclusively an animal rights provision, its application to animals reflects a growing recognition of their inherent rights and dignity in Indian jurisprudence.

Article 14 (Right To Equality)¹⁴

The culling order violates Article 14, which ensures equal protection under the law, including for animals. The order discriminates against nilgai and wild boar, targeting them for killing.

Article 21 (Right To Life)¹⁵

The culling order infringes upon Article 21, which protects the life and liberty of all living beings, including animals. The order sanctions the killing of nilgai and wild boar, violating their right to life.

Article 48(A)¹⁶

Protection and improvement of the environment and safeguarding of forests and wildlife The State shall endeavour to protect and improve the environment and to safeguard the forests and wildlife of the country.

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This article is a directive principle, which means it is a guideline for the government to follow while making laws and policies. It emphasizes the importance of Environmental protection, Forest conservation, and Wildlife preservation. The key aspects of Article 48A are 1. Protection and improvement of the environment: The state should strive to prevent pollution, conserve natural resources, and promote sustainable development. 2. Safeguarding of forests: The state should protect and preserve forests, which are essential for maintaining biodiversity, preventing soil erosion, and regulating the climate. 3. Safeguarding of wildlife: The state should conserve and protect wildlife, including endangered species, and their habitats.

¹⁴ <u>A Singh, Article 14: Right to Equality, Legal service India E-journal</u>

¹⁵ Ministry of external affairs, Article 21

¹⁶ Indian National Bar Association, Article 48(A)

Article 51(A) (G) (Fundamental Duties)¹⁷

The culling order contravenes Article 51A (g), which directs citizens to protect and improve the natural environment, including wildlife. The order promotes harm to the environment and wildlife.

MISUSE OF SECTION 62 OF THE WILDLIFE PROTECTION ACT 1972

If Section 62 of the WILDLIFE PROTECTION ACT 1972 is misused as a blanket permission to kill animals, it can lead to unauthorized and indiscriminate killing of wildlife, including endangered species, loss of biodiversity, ecosystem disruption, habitat degradation, ecological imbalance, disruption of predator-prey dynamics leading to population surges of other species and abuse of power, bribery, and poaching.

If gram pradhan (village heads) are given the power to grant permission to kill blue bull (nilgai) and wild boar, it can lead to uninformed decisions due to a lack of expertise and knowledge about wildlife management and ecology, local conflicts, personal vendettas, land disputes, and political influences affecting decisions, unregulated killing, leading to population decline or local extinctions, community conflicts, pitting farmers against conservationists, creating social unrest.

THE DEVASTATING EFFECTS ON THE ENVIRONMENT COULD BE AS A RESULT OF THIS DECISION: Research and Juridical Sciences

- 1. Loss Of Ecosystem Services: Decline of pollinators, seed dispersers, and nutrient cycles.
- 2. Soil Degradation: Reduced soil fertility, increased erosion, and decreased water tables.
- 3. Climate Change: Disruption of carbon cycles, increased greenhouse gas emissions.
- 4. Decreased Biodiversity: Loss of species, reduced ecological resilience.

It's crucial to ensure that wildlife management decisions are made by experts, with a scientific and conservation-oriented approach, to prevent such devastating consequences.

¹⁷ Ministry of external affairs, Article 51 (A)(g)

A CASE STUDY: KILL THE SPARROW CAMPAIGN (1958-1961)

The Four Evils campaign¹⁸ was one of the first actions taken in the Great Leap Forward¹⁹ in China²⁰ from 1958 to 1962. Authorities targeted four "pests" for elimination: rats²¹, flies²², mosquitoes²³, and sparrows²⁴. The extermination of sparrows – also known as the Smash Sparrows campaign to eliminate sparrows resulted in severe ecological²⁵ imbalance, being one of the causes of the Great Chinese Famine²⁶ of 1959–1961. In 1960 the campaign against sparrows ended, and bed bugs²⁷ became an official target.

The "Kill the Sparrow"²⁸ campaign was a disastrous ecological initiative launched by Mao Zedong during the Great Leap Forward. Mao declared sparrows as pests, believing they consumed grain seeds and ordered citizens to kill them to increase food production.

Consequences:

- The widespread killing of sparrows led to a surge in insect populations, which devastated crops.
- Grain production plummeted, contributing to the Great Chinese Famine (1959-1961), which killed an estimated 20-45 million people.

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• The campaign highlighted the dangers of unchecked government control and the importance of ecological balance.

This campaign serves as a cautionary tale about the importance of scientific understanding and environmental conservation, and its relevance can be seen in the context of the Bihar government's decision to cull nilgai and wild boar.

ALTERNATIVE TO CULLING AND EFFECTIVE CONSERVATION STRATEGIES

The Bihar government's decision to cull nilgai and wild boar has raised concerns about an

¹⁸ Four Pests campaign ">https://en.m.wikipedia.org/wiki/Four Pests campaign</ap>

¹⁹ https://en.m.wikipedia.org/wiki/Great_Leap_Forward

²⁰ https://en.m.wikipedia.org/wiki/People%27s_Republic_of_China

²¹ https://en.m.wikipedia.org/wiki/Rat

²² https://en.m.wikipedia.org/wiki/Fly

²³ https://en.m.wikipedia.org/wiki/Mosquito

²⁴ https://en.m.wikipedia.org/wiki/Old_World_sparrow

²⁵ https://en.m.wikipedia.org/wiki/Ecological

²⁶ https://en.m.wikipedia.org/wiki/Great_Chinese_Famine

²⁷ <u>https://en.m.wikipedia.org/wiki/Cimex</u>

²⁸ Yang, G, Mao's War against Nature: Politics and the Environment in Revolutionary China (Cambridge University Press 2015).

impending ecological disaster. Instead of culling, alternative management strategies could be explored, such as relocation program for nilgai, habitat modification and restoration, wildlife corridors and connectivity, compensation schemes for farmers, education and outreach programs, extensive research for such crops which repels nilgai and wild boars and is of economic importance and give major returns to the farmers. Domestication trials should be conducted for nilgai to mitigate farmer-nilgai conflict.

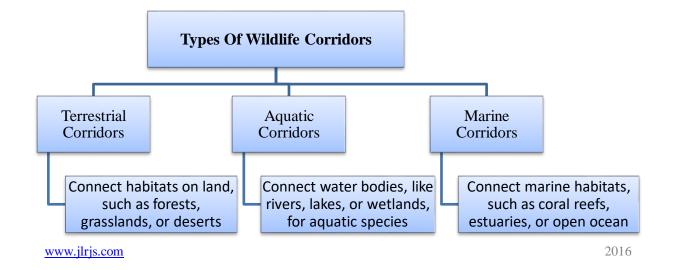
Considering the nilgai's status as an indigenous species of India, a relocation program could be explored as an alternative to culling. This program could involve identifying suitable habitats within India for relocation, collaborating with neighbouring countries for transboundary relocation, ensuring the nilgai's safety and well-being during relocation, and monitoring and adapting the relocation program as needed.

HABITAT MODIFICATION AND RESTORATION

Modifying and restoring habitats can help reduce human-wildlife conflict and promote coexistence. This could involve creating wildlife-friendly agricultural practices, restoring degraded habitats and ecosystems, creating corridors and connectivity between habitats, etc.

Wildlife Corridors and Connectivity

Wildlife corridors are designated areas that connect isolated habitats, allowing animals to migrate, disperse, and interact with other populations. These corridors connect fragmented habitats, allow animals to migrate seasonally, disperse to new habitats, maintain genetic diversity, support nutrient cycling, seed dispersal, and predator-prey dynamics, help maintain healthy populations, reduce inbreeding, and increase species richness, reduce encounters between humans and wildlife, minimizing conflicts and promoting coexistence.



Various characteristics of effective wildlife corridors are habitat quality and connectivity, species-specific design, adequate width and length, minimal human disturbance, community engagement and management. By establishing and maintaining wildlife corridors, we can conserve biodiversity, support ecosystem resilience, promote ecological integrity enhance human-wildlife coexistence. Creating wildlife corridors and connectivity between habitats can help in reducing fragmentation and isolation, promoting gene flow and genetic diversity and enhancing ecosystem resilience and adaptability.

COMPENSATION SCHEMES FOR FARMERS

A well-designed compensation scheme for farmers can reduce human-wildlife conflict and promote coexistence and tolerance in several ways like compensating farmers for crop damage or livestock losses helps alleviate economic burdens, reducing resentment towards wildlife, by providing compensation, farmers are more likely to tolerate wildlife presence, rather than resorting to retaliatory measures, it can promote farming practices that minimize wildlife conflict, such as using wildlife-friendly crops or fencing, it can help farmers relocate or modify their land use, reducing the likelihood of human-wildlife encounters, it can also raise awareness about wildlife conservation and promote tolerance among farmers, fostering a culture of coexistence, it can empower local communities to develop and implement their own conservation initiatives, promoting collective responsibility, it can bring together farmers, conservation initiatives, promoting collaboration and shared solutions, it can help address farmers' livelihood concerns, reducing dependence on harmful practices that harm wildlife.

To ensure effectiveness, compensation schemes should be fair and transparent, prompt and reliable, tailored to local contexts, complemented by conservation efforts, monitored and evaluated. Education and outreach programs can help in raising awareness about the importance of conservation, promoting coexistence and tolerance, and encouraging sustainable practices and behaviours.

Extensive research²⁹ for such crops which repel Nilgai and Wild Boars are of economic importance and give major returns to the farmers.

The research done by an agricultural scientist of the Regional Research Centre Palamu District

²⁹ News18, kusum crop enemy of nilgai great demand of oil in market farmers will get high prices, 2024

says that the cultivation of Safflower (Kusum) will be beneficial for the farmers of the Nilgaiaffected region of Bihar because this flower is of great economic importance as its oil is of great commercial use and gives major returns to the farmers, and it repels the Nilgai. Thus, in turn, protecting the crops. And Indian government should promote such type of research programs extensively.

Sustainable farming practices and crop selection can help mitigate human-wildlife conflict while ensuring economic benefits for farmers. Here are some practical aspects of extensive research on crops that can replace nilgai and wild boar habitats, offering economic importance and major returns to farmers. These are

Crop selection: Identify crops that are unpalatable to nilgai and wild boar (e.g., citrus, mango, and pomegranate), high-yielding and profitable (e.g., soybean, sunflower, and sugarcane), resistant to pests and diseases, suitable for local climate and soil conditions.

Crop diversification: Promote diversification to reduce dependence on a single crop, making farming more resilient to wildlife damage and market fluctuations.

Intercropping: Plant multiple crops together to reduce habitat attractiveness to wildlife, increase biodiversity and ecosystem services, and improve soil health and fertility.

Agroforestry: Integrate trees into farming systems to provide shade and habitat for beneficial wildlife, improve soil health reduce erosion and offer additional income streams (e.g., timber, fruits, and nuts).

Soil conservation: Implement practices like contour farming, terracing, and mulching to reduce soil erosion and improve fertility.

Irrigation management: Optimize irrigation systems to reduce water waste and minimize attractiveness to wildlife.

Farmers' training and capacity building: Educate farmers on wildlife-friendly farming practices, crop management and marketing, soil conservation and agroforestry.

Market access and support: Establish market links and provide support for farmers to sell their produce at competitive prices.

Monitoring and evaluation: Regularly monitor and assess the effectiveness of these practices

in reducing human-wildlife conflict and improving farmer livelihoods.

Some specific crops that can replace nilgai and wild boar habitats and offer economic benefits to farmers include –

Soybean: A high-yielding, profitable crop that is unpalatable to nilgai and wild boar.

Sunflower: A drought-tolerant crop that provides a high return on investment and is less attractive to wildlife.

Sugarcane: A high-yielding crop that is resistant to pests and diseases and can be used for ethanol production.

Citrus: A profitable crop that is unpalatable to nilgai and wild boar, and can be used for juice production.

Mango: A high-value fruit crop that is less attractive to wildlife and can be used for export. These crops can help reduce human-wildlife conflict while providing economic benefits to farmers, promoting sustainable agriculture and conservation practices.

Domestication trials³⁰ should be conducted for Nilgai to mitigate farmer Nilgai Conflict

Bihar is undertaking experiments to domesticate nilgai, a large antelope species, to alleviate the ongoing conflict between farmers and these animals. Nilgai has been causing significant crop damage, leading to farmer retaliation. By domesticating them, researchers hope to reduce crop destruction and provide farmers with potential economic benefits from nilgai milk, meat, and manure. While early observations suggest domestication is possible, further research is ongoing. This initiative comes after the state classified nilgai as vermin, resulting in the culling of thousands of these animals in recent years. Essentially, Bihar is trying to turn a pest into a potential resource.

By adopting these alternative management strategies, we can ensure the long-term survival of nilgai and wild boar, while maintaining ecosystem balance and promoting coexistence.

³⁰ A Gupta, Mongabay Series, Domestication trials in Bihar aim to mitigate farmer-nilgai conflict, 2024

RELOCATION PROGRAMMES FOR NILGAI AND WILD BOAR³¹

The government of M.P. has decided to capture and relocate³² these Nilgais to protected areas instead of killing them. This is an appreciable step taken by the govt. Of M.P.Ofhe state forest department has set up a special committee to evolve a strategy in this regard govt. M.P. has hired the consultants of South Africa and also hired helicopter Robinson 44 for this purpose. The government has decided to capture or rescue the nilgai and wild boars from the areas close to the periphery of the villages with the help of these helicopters Robinson 44 and relocate them to the forest reserves or National Park areas. This is commendable

CONCLUSION

The Bihar government's decision to cull nilgai and wild boar is a misguided attempt to address human-wildlife conflict. This article has demonstrated that the culling order is ecologically unsound, legally flawed, and constitutionally invalid. The campaign ignores the root causes of human-wildlife conflict, such as habitat loss and fragmentation, and instead targets vulnerable species. The "Kill the Sparrow" campaign in China serves as a stark reminder of the dangers of unchecked government control and the importance of ecological balance. Similarly, the culling of nilgai and wild boar in Bihar will have far-reaching and devastating consequences for the ecosystem. Instead of culling, the government should adopt a sustainable and science-based approach to wildlife management. This includes Habitat preservation and restoration, Wildlife corridors and connectivity, Compensation schemes for farmers, Education and outreach programs, Relocation programs for nilgai, extensive research on alternative crops that repel Nilgai or wild boar, and Extensive domestication trials of Nilgai.

By prioritizing coexistence and conservation, we can mitigate human-wildlife conflict and preserve the rich biodiversity of our planet. The Bihar government must reconsider its decision and work towards a more harmonious relationship between humans and wildlife.

³¹ ABP News, Madhya Pradesh forest department to use South Africa boma technique to catch nilgai and black buck, 2024

³² FIAPO, MP won't cull, plans to relocate nilgai,2016