
ANIMAL ABUSE IN THE EGG INDUSTRIES IN INDIA: A LEGAL AND SOCIO-ECONOMIC ANALYSIS

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ABSTRACT

Animal cruelty and abuse in the egg industry is one of the serious yet often overlooked issues in India. The rapid growth of the poultry industry has led to an increase in egg production, making it the 2nd largest egg-producing country in the world. However, with the use of various economical and cost-friendly methods of raising poultry, such as battery cages, overstocking, beak trimming, and inadequate veterinary care, has led to the increased concerns about animal welfare. These practices are a clear violation of the humane treatment of animals. They are in contravention of existing laws such as Section 325 of the Bharatiya Nyaya Sanhita¹ and the Prevention of Cruelty to Animals Act, 1960². Studies about the conditions of poultry farms have shown that egg-laying hens are kept in extremely confined cages, providing each hen with less than an A4-sized piece of paper, which results in extreme pain and suffering to the hens. This research paper aims to look into the issue of animal abuse in India's egg industries through a legal and socio-economic perspective. It aims to analyse the historical background of poultry farming in India, review the existing literature on animal welfare, examine the existing legislation and case law, and examine the challenges in enforcement. The study also proposes reformative measures, suggestions, and practical recommendations for improving animal welfare standards in egg production.

This research paper has found that India has an existing legal framework for animal welfare; however, due to poor enforcement and due to the lack of stringent measures, animal abuse in India's egg production sector persists under the economic pressure on egg producers. The research has found that stronger legislation and enforcement measures regarding animal welfare in India's egg production sector are necessary to prevent animal abuse.

Keywords: *Animal Cruelty, Poultry Industry in India, Egg Production, Battery Cage System, Animal Welfare Laws, Prevention of Cruelty to Animals Act, 1960.*

¹ The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023), s. 325.

² The Prevention of Cruelty to Animals Act, 1960 (Act 59 of 1960).

I. INTRODUCTION

India is known for its rich and diverse culture, but it is disheartening to see that animal welfare has been disregarded. In recent times, with population growth and greater urbanisation, animals raised for human consumption have been exposed to intensive farming methods that emphasise productivity over animal welfare. Among all animal farming industries, the egg-laying industry is among the most debated.

Currently, India ranks among the top egg-producing countries in the world and grows at the annual rate of 8-10%³. However, as the egg-laying industry grows, intensive confinement systems like battery cages have become common in India, where the hens are kept in small wire-mesh cages for most of their lives.

These cages cause serious constraints to the natural activities of hens like wing flapping, nesting, dust bathing, and walking, which leads to injuries, weak bones, feather loss, and mental stress. Other than these issues, hens also suffer from the problem of forced moulting, high-intensity production, lack of cleanliness, and many more⁴. Despite the legal provisions, enforcement is lacking, and the majority of egg production practices still use a caged system. This research paper aims to cover the legal, social, and other aspects of animal cruelty in egg production in India. This is not only an ethical concern but also a legal one. According to the **Prevention of Cruelty to Animals Act, 1960**⁵, confining an animal in a cage that does not permit reasonable movement is a cruelty. Animal welfare organizations and researchers have expressed serious concerns over these practices. Investigations into poultry farms have found that the cages are overcrowded and not well maintained, and the birds are not given proper medical care.

II. HISTORICAL BACKGROUND

The poultry industry has seen a remarkable change over the past few decades. In the early 1950s, poultry farming in India was practiced on a limited scale by farmers in rural areas, in which chickens were kept in an open environment and allowed to roam freely. In those years, there was no measure to prevent disease, so to avoid its spread, birds were sold before the winter season.

³ Ricky Thaper, “The expanding landscape of India’s poultry sector,” The Poultry Site, 22 January, 2024, <https://www.thepoultrysite.com> (Accessed on Feb.03, 2026).

⁴ Why Vegan? Animal Agriculture in India, available at: <https://helpanimalsindia.org/news/library/why-vegan-animal-agriculture-in-india> (Accessed on Mar.01, 2026).

⁵ *Supra* note 2 at 1.

Further, there were no artificial incubation facilities; as a result, most of the chicks needed to be transported from the hatcheries in other countries, like US, but the vast majority arrived in very poor conditions due to the long transfer times, which led to an increase in the mortality rate⁶.

However, for the intensification of poultry farming, India has gradually moved from backyard systems to commercial and industrial systems. As a result, battery cages were introduced during the latter half of the 20th century to increase production efficiency, improve hygiene, and reduce costs by keeping thousands of hens in a confined area. India had emerged as a leading egg producer by the early 2000s. But this has given rise to many concerns regarding animal welfare. Studies and investigations have revealed that hens are confined to very small spaces, smaller than a sheet of A4 paper, and are not allowed to perform their natural behaviours⁷.

Animal welfare organisations and legal activists have taken up this cause and started campaigning against it. This has led to a number of petitions being filed in Indian courts seeking stricter animal welfare regulations.

III. LITERATURE REVIEW

Several researchers, activists, and organisations have researched the issue of animal cruelty in the egg industry. Their studies show the extent of abuse in these industries. The researchers have highlighted the problems of overcrowded battery cages, male chicks culling, osteoporosis, starvation for a period to induce forced moult, poor hygiene, sexual violence, and lack of veterinary care. The studies have shown that animals are not “**something**” but are “**someone**”, and are like human beings, able to feel pain and happiness, just as humans can.

Further, the existing research work has shown that although there are laws for the protection of animals, loopholes in those laws, such as weak penalty system and the poor enforcement, have led to continued cruelty in the egg industry.

Overall, the existing literature suggests that certain reformative measures and stronger enforcement mechanisms are necessary to improve animal welfare in these industries.

⁶ Dr. Marco A. Hernández, “Evolution of cages and facilities for laying hens,” Veterinaria Digital, April 06, 2020, <https://www.veterinariadigital.com/en/articulos/evolution-of-cages-and-facilities-for-laying-hens/> (Accessed on Feb.03, 2026).

⁷ Pashudhan Praharee, “Battery cages ban in India & egg production in furnished cages,” Pashudhan Praharee, February 24, 2021, <https://www.pashudhanpraharee.com/battery-cages-ban-in-india-egg-production-in-furnished-cages/> (Accessed on Feb.03, 2026).

IV. OBJECTIVES OF THE STUDY

- To study the extent of animal abuse in the egg industries in India.
- To study and analyse the existing legal framework for animal welfare and to identify the loopholes in it.
- To study the problems and the challenges behind the abuse in these industries.
- To suggest certain reformative measures to overcome the abuse in the egg industry.

V. RESEARCH QUESTIONS

- What forms of animal cruelty occur in the poultry sector in India?
- Do the current egg industry practices violate animal welfare laws?
- Are the current laws, like the **Prevention of Cruelty to Animals Act, 1960**⁸, effective enough to regulate the cruel practices in these industries?
- What measures are necessary to ensure humane treatment of egg-laying hens?

VI. RESEARCH METHODOLOGY

The research methodology adopted to study animal cruelty in the Indian egg industry is doctrinal and qualitative. The research paper has been done by analysing statutes, case law, regulations, and the established legal principles. Further, the research has also been done by analysing the secondary sources of data, including academic journals, research papers, publications by animal welfare organisations, and data from government websites. Besides, an analytical and descriptive approach has also been used to study about the conditions in the egg industry and to evaluate them in light of existing legal provisions.

VII. DISCUSSIONS

ANIMAL ABUSE IN EGG INDUSTRIES

- 1) **Battery cages** - One of the first problems in the egg industry is the use of battery cages. This provides for intensive confinement systems, where hens are placed in tiny cages with barely enough space for movement, including about 5-11 birds per cage. Hens require about 72 sq inches to stand comfortably and about 291 square inches to flap their

⁸ *Supra* note 2 at 1.

wings. As a result, these conditions often lead to extreme overcrowding, prevent natural behaviours like dust-bathing and wing flapping, cause chronic stress, lead to feather loss, and result in injuries⁹. At Mulpuri Group's layer farm, the second largest producer of eggs in India, nine hens were packed into a single cage, and whenever a worker reached a hand into a cage, the hens panicked and became visibly distressed. Moreover, at Sri Lakshmi Narasimha's farm which used thousands of chickens at the time of production, wounded hens were documented with skin and eye infection, swollen body parts, and hair loss. Further, farmers leave the dead bodies in the cages, forcing the rest of the traumatised birds to co-exist with the carcasses. Approximately 18,00,00,000 hands are kept in the conditions in India¹⁰.

- 2) **Physical Mutilation (Debeaking)** - this involves Beak Trimmings as hens live in a very small confined space. So, to prevent them from cannibalism due to frustration in crowded conditions and to reduce feed costs, their sensitive beaks are often cut off with the hot blade or laser without anaesthesia which causes acute and chronic pain. This mutilation causes a lot of difficulty in swallowing and grasping. At Skylark's hatchery, near Hyderabad in Telangana, which is one of the largest poultry producers in India, it was found that machines are used which melt the beaks through a heating system¹¹.
- 3) **Male Chick Culling** - As male chicks(roosters) cannot lay eggs and are layer breeds - good for egg production and not from Broiler breeds - known for meat production, due to which billions are killed shortly after hatching through different methods like grinding(maceration), gassing or suffocation. About 200 million chicks are killed every year in India. Most of the rejected chicks are killed, and some of the unwanted ones are also sold to most of the private contractors who sell these to small poultry farms to be reared for meat, who suffer too as they are often transported in very cramped conditions, without food or water, across several states¹².
- 4) **Forced Moulting** - This involves complete starvation of about 14 days straight, which may also include 1-2 days of water deprivation and a decrease in daylight hours to induce

⁹ Sameeha Fatima, "Egg Industry in India," Mercy For Animals, November 5, 2022, <https://mercyforanimals.in/blog/egg-industry-in-india/> (Accessed on Feb. 08. 2026).

¹⁰ Peta India, "What's Wrong With Eating Eggs and Chicken Flesh? (2018).

¹¹ *Id.* at 10.

¹² *Ibid.*

a “ forced moult ” which restarts their laying cycle. This whole process causes significant physical weakness and stress. At Sakku Group’s egg farm, the eyewitness witnessed a group of 40-week-old chickens undergoing “forced moulting”¹³.

- 5) **“Spent Hens”** - After 1-2 years, when production drops, hens are considered “spent” and are thus sent to slaughter.
- 6) **High- Intensity Production-** India is one of the largest egg-producing countries in the world, and to meet the high demand for eggs, hens are bred to lay about 300+ eggs per year, compared to the 12 - 15 eggs their wild ancestors used to lay. This unnaturally high rate causes several reproductive, strain-related and diseases-related problems¹⁴.
- 7) **Osteoporosis** - Increased egg production leads to depleting of calcium content from hens’ bones, ultimately leading to brittle bones and the development of avian osteoporosis. Further, the inability to exercise in cages worsens and exacerbates the condition. Studies have found that hens in cages make only about 72 stepping motions per hour, compared to 208 times for uncaged birds¹⁵.
- 8) **Fatty Liver Hemorrhagic Syndrome(FLHS)** - It involves excessive deposits of fat in the abdomen and liver of a hen; as a result, the liver softens and becomes damaged. Hens on a high-energy diet are most frequently affected by FLHS. Further, if the fat gets oxidised, it may even lead to rupture of blood vessels, resulting in massive bleeding and even death. About 40% of the deaths occur due to FLHS syndrome only¹⁶.
- 9) **Air Pollution** - Faeces of hens in intensive barns emit high ammonia that damages the respiratory system of hens and affects local air quality. The overcrowded cages are put one over the other and the litter is collected in large amounts underneath the cages and is disposed of every few weeks. It’s very common to see hens suffering from feather loss, abrasions, and skin infections due to high concentrations of ammonia in the air. Further,

¹³ *Supra* note 9 at 5.

¹⁴ Intensive Poultry Farming, *available at*: <https://www.bwcindia.org/web/awareness/learnabout/Eggs.htm> (Last modified Apr. 03. 2024).

¹⁵ Humane Society International, “An HSI Report: The Welfare of Animals in the Egg Industry”, 5 (2011).

¹⁶ Biswajit Dutta, Shubhankee Bhuyan, *et.al.*, “ First report of fatty liver haemorrhagic syndrome (FLHS) in layer chicken population of Assam”, 9(6) International Journal of Advanced Biochemistry Research 429 (2025).

the veterinary care provided to the hens is also of a very small amount and sick hens are left to die¹⁷.

- 10) **Water and soil contamination** - Industrial egg farms generate massive amounts of manure. It leads to high levels of nitrates, sulphates, and total dissolved solids (TDS) in the surrounding groundwater. The range of nitrates should be less than 45 milligrams per litre, and TDS should be 500. However, in a poultry farm in India, nitrate ranged from 60-171, and TDS from 753-1150 and sulphates, which should have been below 200, went up to 286¹⁸.
- 11) **Forced to endure Sexual violence** - The eggs industries doesn't let hens to mate naturally; instead, workers assault the male chickens to force them to produce semen. Further, workers don't even wear gloves when they extract semen and when they inject hens with that semen using the same syringe and then return back to the waste- encrusted enclosures¹⁹.
- 12) **Denies the opportunity to Incubate and Raise** - Eggs are incubated in large mechanical incubators, barring hens from naturally incubating their young ones, which interferes with the chicks' development. In some instances, the mechanical incubators have also reached such high temperatures that the organs protrude out of the chicks' bodies²⁰.
- 13) In comparison with India, other foreign states like the European Union, although it has banned battery cages since 2012, have introduced many cage free-systems. However, cage-free will never mean cruelty-free. Hens which are not even caged in cramped conditions are unable to carry out many of their most natural behaviours, and the new cages are only as cruel as their battery counterparts, offering each individual only around as much space as an A4 sheet of paper to live in²¹.

¹⁷ Cruel and illegal practices in the egg industry exposed, *available at*: <https://animalequality.in/news/2023/11/29/cruel-and-illegal-practices-in-the-egg-industry-exposed/> (Accessed on Feb. 11. 2026).

¹⁸ People for Animals (PFA), "Harsh realities of poultry farms in India," People For Animals, <https://www.peopleforanimalsindia.org/articles/details/197> (Accessed on Feb. 12. 2026).

¹⁹ *Supra* note 10 at 5.

²⁰ *Ibid*.

²¹ Imogen Allen, "Cracking Open the Truth Inside India's Egg Farms," Animal Equality United Kingdom, 01 February 2024, <https://animalequality.org.uk/blog/cracking-open-the-truth-inside-indias-egg-farms/> (Accessed on Feb. 15. 2026).

- 14) The Bureau of Indian Standards, which is the most outdated and unscientific body in India, recommended 450sq cm. Poultry in India have followed this vicious measurement, which is not at all practical for a hen, even when she is resting, and has become the reason why the hens need antibiotics all the time and why the people who eat chicken get ill so often²².
- 15) **Lack of Cleanliness** - heavy spider webs, house fly infestation, undisposed manure, and odour from manure indicate poor hygiene and thus attract parasites, lice, and mites, causing skin and intestinal infections. Outbreaks of bacterial, fungal, viral and communicable diseases like Pox, Coryza, Avian Influenza, and Aspergillosis become inevitable²³.

VIII. LEGAL FRAMEWORK

1) Constitutional Provisions

- **Articles 51A(g) - (Fundamental Duties)** - It provides for protection and improvement of the natural environment, that includes rivers, lakes, forests, and the wildlife and to have compassion for all the living creatures²⁴.
 - **Article 21- (Fundamental Rights)- Right to life** - It states that no person shall be deprived of his life or personal liberty except according to the procedure established by law²⁵. In the landmark case of *Animal Welfare Board of India v A. Nagaraja & Ors*, the Supreme Court of India expanded the scope of Article 21 and held that every species has a right to life and security. Article 21 of the Constitution not only protects the right to life of humans but the word life also includes all forms of life, including animal life²⁶.
- 2) **The Bharatiya Nyaya Sanhita, 2023, (Section 325)** - It provides that whoever commits any mischief by killing, poisoning, maiming or rendering any animal as useless shall be

²² *Supra* note 18 at 7.

²³ *Ibid*.

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

²⁵ The Constitution of India, art. 21.

²⁶ (2014) 7 SCC 547.

given punishment for imprisonment which may extend upto 5 years and maybe of either description, or with fine, or both.²⁷.

3) **Prevention Of Cruelty To Animals Act, 1960**²⁸ -

- **Section 3 - Duties of person having charge of animals** - It provides that it is the duty of every person having charge of any animal to take all the necessary and reasonable measures in order to ensure the well-being of such animal and to prevent any unnecessary pain or suffering²⁹.
- **Section 4 - Establishment of Animal Welfare Board of India** - It is for animal welfare and to protect animals from unnecessary suffering or pain³⁰.
- **Section 9 - Functions of the Board**³¹
 1. To keep enforcement of the laws and provide recommendations to the central government on the amendments that would prevent cruelty to animals, particularly when they are transferred from one place to another, or when they are kept in captivity or confinement.
 2. To take steps for providing veterinary assistance to animals and to guide the government regarding medical needs and support for animals and animal hospitals.
 3. To encourage by providing financial assistance, establishing various rescue homes, and animal shelters for animals and birds when they become old and useless or when they need protection.
 4. Spreading awareness and knowledge about the welfare of animals and humane treatment to them by means of posters, books, lectures, and cinematographic exhibitions.
- **Section 11 Categories of Animal Cruelty**³² -
 1. Beating, kicking, abusing, overloading, tormenting, and causing any unnecessary pain or suffering.
 2. Wilfully and unreasonably administering any harmful medicine or injurious drug or any injurious substance to any animal.
 3. Keeping and confining any animal in a cage or any container which does not measure sufficiently in length, breadth or height as to allow any animal to move freely.

²⁷ *Supra* note 1, s.325.

²⁸ *Supra* note 2 at 1.

²⁹ *Id.*, s. 3.

³⁰ *Id.*, s. 4.

³¹ *Id.*, s. 9.

³² *Id.*, s. 11.

4. Transferring or transporting any animal in a vehicle that causes unnecessary pain and suffering.
5. Being the owner and not providing the animal with enough food, drink, or shelter.
6. Without any reasonable cause, abandoning any animal in circumstances which will lead to suffering or pain by reason of starvation or thirst.

4) The Prevention Of Cruelty To Animals (Egg Laying Hens Rules, 2023)³³ -

- It provided that the floor space per bird shall not be less than 550 cm².
- There should be reasonable space for the laying hens, and each enclosure shall accommodate a minimum of 6 to 8 birds, that allow hens to flap their wings, stand up, to access food and water, and to turn around, and engage in other movements.
- Prohibits feeding of laying hens with the remains of dead chicks.
- Prohibits the withdrawal of feed to induce moulting.
- Bans the use of antimicrobial growth promoters.
- Provides deployment of registered veterinarians to provide veterinary care.
- Provides the use of euthanasia for male chicks.
- Provide selling of the spent laying hens to the licensed slaughter houses or to a registered trader, and transport and slaughter shall be in accordance with the laws.

Case laws

1) *Animal Welfare Board of India(AWBI) v. A. Nagaraja & Ors. (2014)*³⁴ -

In this case, the Supreme Court of India gave a landmark judgement and banned the use of bulls in entertainment activities like Jallikattu and bullock cart races. The court held that the such practices are cruel in nature and violate the **Prevention of Cruelty to Animals Act, 1960**³⁵. The Supreme Court held that animals possess intrinsic dignity and the right to live without unnecessary pain and suffering. The court in this case broadly interpreted the Article 21 of the Indian Constitution and stated that it not only includes human beings but also animals. Further, it also incorporated the globally recognised freedom for animals i.e The “**five freedoms**” for animals into Indian law, including freedom from hunger, thirst, fear, distress, and physical discomfort.

³³ The Prevention of Cruelty to Animals (Egg Laying Hens Rules), February 27, 2023.

³⁴ *Supra* note 26 at 9.

³⁵ *Supra* note 2 at 1.

2) *Abdulkadar Mohammad Azam Sheikh v State of Gujarat(2011)*³⁶ -

In this landmark case, the Gujarat High Court delivered a significant judgement regarding the right of birds/animals. The court held that the act of keeping birds/animals in small cages violates their natural right to freedom and the Prevention of Cruelty to Animals Act, 1960, especially when their wings are clipped or their tails are cut. The court held that birds have a fundamental right to live freely in the open sky and air, and it emphasised that there should be no pain or suffering to any animal or bird through human beings. Moreover, in *Muhammadbhai Jalalbhai Serasiya v. State of Gujarat*³⁷, the court held that keeping birds in cages would amount to their illegal confinement.

3) *S.Kannan v. The Commissioner of Police (2014)*³⁸ -

The Supreme Court in this case dismissed a petition seeking permission to conduct a cockfight as a part of a temple festival in Madurai. The court held that all living creatures, including birds, have a natural right to coexist with humans and to live without being intentionally tortured or injured. The court held that it violated section 11 of the **PCA Act, 1960**³⁹ and invoked article 51A(g) of the Indian Constitution, which provides that every citizen should have compassion for all living creatures.

4) *People for Animals(PFA) v. MD Mohazzim & Anr(2015)*⁴⁰ -

This case concerns the seizure of the birds and animals from MD Mohazzim, who was involved in illegal bird trading. The birds were found in very cramped conditions in about 28 overcrowded cages. The main issue arose when the lower court allowed the birds to be returned back to the owner on an interim basis, treating them as the respondent's property. However, PFA challenged it by arguing that returning the birds to their captor would perpetuate cruelty. So, the high court in this case held that human beings have no right to keep birds in small cages for any personal or business use, and that all birds have a fundamental right to live with dignity. Thus, it cancelled the superdari granted to the trader and ordered the birds to remain at the Sanjay Gandhi Animal Care Centre for their welfare.

³⁶ Special Criminal Application No. 1635, 1636 and 1670 of 2010).

³⁷ 2015 JX (Guj) 378.

³⁸ 2014 Supreme(Mad) 953.

³⁹ *Supra* note 2 at 1.

⁴⁰ 2015 SCC OnLine Del 9508.

5) Gauri Maulekhi Judgement

In *Gauri Maulekhi v. State of Uttarakhand*(2018)⁴¹, the Uttarakhand High Court banned the use of battery cages for housing poultry in the state with immediate effect. But, the Supreme Court in a case through Special Leave Petition titled *Dev Bhumi Poultry Operators Welfare Society v. Gauri Maulekhi & Ors.*⁴², ordered a stay on it. One of the arguments made by the petitioner in the stay application was the right to livelihood of the poultry farmers; thus, such a ban could not be imposed. However, recently, in the matter related to the slaughter of birds at the Ghazipur Murga Mandi, a similar argument was rejected by the Delhi High Court, which observed that the court cannot permit anything which is contrary to law.

IX. PROBLEMS & CHALLENGES

- 1) **Economic Reasons** - As India is the second largest egg producing country in the world. So, in order to meet the increasing demand for the egg production the industry prioritises the cost efficiency which leads to systematic and often illegal abuse. Key economic drivers of cruelty are:
 - **Battery Cage Cost-Effectiveness:** Battery cages are more economical than the cage-free systems. Battery cages allow a large number of hens in just the size of an A4 size sheet of paper. However, the cage-free facilities require a lot of land, as well as are very labour-intensive as they pose challenges in feeding, watering, vaccination, medication, and the management of hens in the cage-free facilities. The high cost of production, lack of training, difficulty in monitoring and record keeping, a higher incidence of unclean and broken eggs, and the problems like disease outbreaks makes the cage-free facility a little less acceptable to producers.
 - **Culling of Male Chicks and Debeaking for Space Management:** As chicks are useless, they are killed in millions by very cruel measures, and to prevent hens from fighting and injuring each other and to save feeding and medical costs, workers cut off their beaks with the hot blade without anaesthesia⁴³.

⁴¹ Writ Petition (PIL) No. 198 of 2016.

⁴² Transfer Petition(s) (Civil) No(s). 1791/2017.

⁴³ Jaydip Rokade, Abhijeet Champati, et.al., "The cage-free egg sector: perspectives of Indian poultry producers," National Library of Medicine, August 07, 2024, <https://pmc.ncbi.nlm.nih.gov/articles/PMC11335667/>(Accessed on Feb. 20. 2026).

- 2) **Lack of Awareness** - the main reason for the poor popularity of cage-free systems in India is the lack of public and farmer awareness. There are very few cage-free farms on a commercial level compared to the conventional battery cages. Further, there is an unorganised Indian market for cage-free systems, a lack of technical information, and the absence of government initiatives⁴⁴.
- 3) **Weak implementation and enforcement of laws**- There is a lack of coordination among various government agencies like the police, municipal corporations and the local authorities. As multiple authorities need to act together, this has led to a gap in the enforcement mechanism. Further, there are overburdened and underfunded agencies, government bodies, and animal welfare organisations that are responsible for enforcement, often lack sufficient funding and resources. The Animal Welfare Board of India often fails to monitor effectively and to regulate the implementation of animal welfare laws due to budget constraints and staff shortages⁴⁵.
- 4) **Inconsistent Legal Actions**- Although there is a legal framework and provisions for animal welfare, the judicial process in cases that involve animal cruelty is often very slow. Moreover, the absence of specialised courts and officers to handle animal-related offences leads to delays and undermines the deterrent effect of the law⁴⁶.
- 5) **Outdated Penalties**- The Penalties under the Prevention of Cruelty to Animals Act, 1960, are very low. Under its Section 11, fines for first-time cruelty are only between ₹10 - ₹50, and ₹25 - ₹100 for subsequent offences committed within three years of previous offence. These penalties were established decades ago and fail to serve as a deterrent in the current economic context.

X. REFORMATIVE MEASURES & SUGGESTIONS

1) Alternatives to Battery Cages -

⁴⁴ *Id.*, at 43.

⁴⁵ Madhvi Sudan and Dr. Savita Nayyar, "Challenges In Enforcement Of Animal Welfare Laws: A Regional Study Of India," 09 International Journal Of Novel Research And Development (IJNRD) 589 (2024).

⁴⁶ *Ibid.*

- **Enriched cages** - These cages are more modified and are specially designed with improvements to address the concerns associated with conventional battery cages. Hens housed in these cages are provided with proper dust bathing areas, private nesting areas, and scratchpads.
- **Free Run Housing System** - This is a complete cage-free alternative, and in these systems, birds are housed in a large bun without cages. These systems feature dust bathing, litter flooring, private nesting areas, perches, and automated communal feeding systems as well.
- **Free Range Housing System** - this system is a type of a free-run housing system that also provides the birds with outdoor access when the climate is suitable⁴⁷.

2) Increasing awareness and addressing the challenges in the cage-free sectors -

The first measure that can be taken is increased awareness about the ill-treatment of egg-laying hens in the battery cages among consumers, and to promote the cage-free sectors among both the poultry farmers and the consumers. This can be done through various public advertisements, posters in the markets, social media platforms, educational videos about poultry farming & by many more measures.

The following are the initiatives that can be taken to address the challenges in the cage-free sectors:

- Increased governmental financial support for cage-free production in the form of schemes, incentives, low-interest loans, and subsidies and support from other parties, such as banks, poultry associations and established poultry players.
- Employing more trained staff and modern facilities to provide on-site training for producers and increasing the technical support through training programmes, guides, manuals and sharing technological advancements to improve management practices.
- Better farm management practices, such as the use of the nest boxes to prevent the problem of unclean and broken eggs, better litter management to prevent disease outbreaks, and better housing and nutrition.
- Certification and labelling standards for the cage-free systems⁴⁸.

⁴⁷ Akshay Singh and Yatan Kwatra, "Waiting for Justice: A Critique on the Continuing Use of Battery Cages in India," Law School Policy Review, August 23, 2021, <https://lawschoolpolicyreview.com/2021/08/23/waiting-for-justice-a-critique-on-the-continuing-use-of-battery-cages-in-india/> (Accessed on Feb. 20, 2026).

3) Promotion of Ovo Sex Determination Technology - This technology helps to identify the sex of the embryos while they are inside the egg before hatching. This process prevents the culling of the male chicks and allows the male eggs to be diverted for other uses, such as feeding animals or for vaccine production. Currently, the industry promotes three primary technological approaches: Spectroscopy, Biochemical Testing, and LED innovation along with Genetic Markers. Countries like France and Germany are the first to favour this technology and have prohibited the killing of male chicks⁴⁹.

4) Strengthening of the Existing Legal Framework and Better Enforcement Mechanisms -

In order to protect the rights of animals, the current legal framework related to penalties needs to be changed and updated. The PCA Act, 1960 provides a maximum fine of only ₹100, which is very outdated. So, efforts should be made to make it up to the current economic context. Further, the law should be amended to categorise the offences into minor injury, major injury caused and death of the animal, and accordingly, the penalties should be increased up to the severity of the crime.

To improve enforcement of the laws, various measures can be taken, like establishment of specialised and fast-track courts for animal welfare to ensure speedy justice. Secondly, empowering the **Animal Welfare Board Of India** with greater funds and authority to actively act as an enforcement body rather than just an advisory body, and thirdly, establishing welfare mechanisms like Societies for the Prevention of Cruelty to Animals (SPCA) in each and every district, equipped with funding and trained personnel to manage local animal welfare.

5) Choosing Egg Alternatives -

As India has a very high demand for egg production and is one of the largest producers of eggs in the world, it has also become the reason for the continuation of cruelty in the egg industry. So, on the part of the consumer, certain egg alternatives can be used that will help to reduce the pressure for production in these industries and ultimately reduce the ill treatment of the animals. Some alternatives that can be incorporated, which are similar in protein level to eggs are:

⁴⁸ *Supra* note 43 at 13.

⁴⁹ New Investigation Shows How the Eggs and Meat Industry Cruelly Kills Chicks, *available at*: <https://www.petaindia.com/features/new-investigation-shows-how-the-egg-and-meat-industry-cruelly-kills-chicks/> (Accessed on Feb. 25, 2026).

- **Aquafaba** - It's the leftover liquid from cooking beans or legumes. It is also found in chickpeas or beans. It's a liquid with a consistency similar to that of raw egg whites.
- **Soy Lecithin**- It's a by-product of Soyabean oil production and has properties similar to eggs only.
- **Silken Tofu** - It is made up of soya milk, which is pressed into solid locks. It is also a source of protein just like eggs.
- **Arrowroot** - It's a South American tuber plant with high starch content. The starch is extracted from the roots in the form of powder or flour and serves as a great egg alternative⁵⁰.

XI. CONCLUSION

The egg industry in India produced about a range of 149 billion eggs as of 2024-25, thus, playing an important role in India's economy and the food supply. However, the problem of animal cruelty in these industries is very complex and requires urgent attention. Despite the existing legal framework and the provisions, cruelty continues to exist in these industries, including ranging from confinement in small spaces to killing the animals in a very cruel manner. Addressing the issue of animal cruelty in these industries requires a holistic approach that includes not only legal reforms but also social awareness. Strengthening animal welfare laws, imposing stricter penalties on offenders and improving the enforcement mechanisms are essential measures to overcome these issues. At the same time, encouraging cage-free systems and providing incentives to farmers for adopting better and humane practices can help to create a more ethical egg production system.

A truly progressive society is not measured by its economic growth only, but also by the compassion it shows towards the most vulnerable beings, like animals that silently sustain human life.

⁵⁰ Amey Deshmukh, "The dark realities of the egg industry," Animal Equality India, October 14, 2022, <https://animalequality.in/blog/the-dark-realities-of-the-egg-industry/> (Accessed on Mar. 01, 2026).

References

1. The Bharatiya Nyaya Sanhita, 2023 (Act 45 of 2023).
2. The Constitution of India.
3. The Prevention of Cruelty to Animals Act, 1960 (Act 59 of 1960).
4. The Prevention of Cruelty to Animals (Egg Laying Hens Rules), February 27, 2023.
5. *Abdulkadar Mohammad Azam Sheikh v State of Gujarat*, Special Criminal Application No. 1635, 1636 and 1670 of 2010 (Guj. HC, May 12, 2011).
6. *Animal Welfare Board of India(AWBI) v. A. Nagaraja & Ors.* (2014) 7 SCC 547.
7. *Dev Bhumi Poultry Operators Welfare Society v. Gauri Maulekhi & Ors.*, Transfer Petition(s) (Civil) No(s). 1791/2017.
8. *Gauri Maulekhi v. State of Uttarakhand*, Writ Petition (PIL) No. 198 of 2016 (Uttarakhand HC, Aug. 14, 2018).
9. *Muhammadbhai Jalalbhai Serasiya v. State of Gujarat*, 2015 JX (Guj) 378.
10. *People for Animals(PFA) v. M D Mohazzim & Anr*, 2015 SCC OnLine Del 9508.
11. *S.Kannan v. The Commissioner of Police*, 2014 Supreme(Mad) 953.
12. Allen, Imogen. “*Cracking Open the Truth Inside India’s Egg Farms*,” Animal Equality United Kingdom, 01 February 2024, <https://animalequality.org.uk/blog/cracking-open-the-truth-inside-indias-egg-farms/>(Accessed on Feb. 15. 2026).
13. “*Cruel and illegal practices in the egg industry exposed*”, Animal Equality India, *available at:* <https://animalequality.in/news/2023/11/29/cruel-and-illegal-practices-in-the-egg-industry-exposed/>(Accessed on Feb. 11. 2026).
14. Deshmukh, Amey. “*The dark realities of the egg industry*,” Animal Equality India, October 14, 2022, <https://animalequality.in/blog/the-dark-realities-of-the-egg-industry/>(Accessed on Mar. 01, 2026).
15. Dutta, Biswajit and Shubhankee Bhuyan, et.al. “*First report of fatty liver haemorrhagic syndrome (FLHS) in layer chicken population of Assam*”, 9(6) International Journal of Advanced Biochemistry Research (2025).
16. Fatima, Sameeha. “*Egg Industry in India*,” Mercy For Animals, November 5, 2022, <https://mercyforanimals.in/blog/egg-industry-in-india/>(Accessed on Feb. 08. 2026).

17. Hernández, Marco A. “*Evolution of cages and facilities for laying hens,*” *Veterinaria Digital*,A,<https://www.veterinariadigital.com/en/articulos/evolution-of-cages-and-facilities-for-laying-hens/>(Accessed on Feb.03, 2026).
18. Humane Society International, “*An HSI Report: The Welfare of Animals in the Egg Industry*”, (2011).
19. “*Intensive Poultry Farming*”, Beauty Without Cruelty - India, *available at:* <https://www.bwcindia.org/web/awareness/learnabout/Eggs.htm>(Last modified Apr. 03. 2024).
20. “*New Investigation Shows How the Eggs and Meat Industry Cruelly Kills Chicks,*” Peta India, *available at:* <https://www.petaindia.com/features/new-investigation-shows-how-the-egg-and-meat-industry-cruelly-kills-chicks/>(Accessed on Feb. 25, 2026).
21. Pashudhan Praharee, “*Battery cages ban in India & egg production in furnished cages,*” Pashudhan Praharee, February 24, 2021, <https://www.pashudhanpraharee.com/battery-cages-ban-in-india-egg-production-in-furnished-cages/>(Accessed on Feb.03, 2026).
22. People for Animals (PFA), “*Harsh realities of poultry farms in India,*” People For Animals, <https://www.peopleforanimalsindia.org/articles/detals/197>(Accessed on Feb. 12. 2026).
23. Peta India, “*What’s Wrong With Eating Eggs and Chicken Flesh?*” (2018).
24. Rokade, Jaydip and Abhijeet Champati, et.al. “*The cage-free egg sector: perspectives of Indian poultry producers,*” National Library of Medicine, August 07, 2024, <https://pmc.ncbi.nlm.nih.gov/articles/PMC11335667/>(Accessed on Feb. 20. 2026).
25. Singh, Akshay and Yatan Kwatra. “*Waiting for Justice: A Critique on the Continuing Use of Battery Cages in India,*” Law School Policy Review, August 23, 2021, <https://lawschoolpolicyreview.com/2021/08/23/waiting-for-justice-a-critique-on-the-continuing-use-of-battery-cages-in-india/>(Accessed on Feb. 20, 2026).
26. Sudan, Madhvi and Dr. Savita Nayyar. “*Challenges In Enforcement Of Animal Welfare Laws: A Regional Study Of India,*” 09 International Journal Of Novel Research And Development (IJNRD) 589 (2024).
27. Thaper, Ricky. “*The expanding landscape of India’s poultry sector,*” The Poultry Site, 22 January, 2024, <https://www.thepoultrysite.com>(Accessed on Feb.03, 2026).

28. *“Why Vegan? Animal Agriculture in India”*, available at:
<https://helpanimalsindia.org/news/library/why-vegan-animal-agriculture-in-india>(Accessed on Mar. 01, 2026).