

## State Legislative Brief

### KARNATAKA

#### The Karnataka Prevention of Slaughter and Preservation of Cattle Ordinance, 2020

##### Key Features

- The Ordinance prohibits: (i) the slaughter of cows, bulls, and bullocks of all ages, and buffaloes up to the age of 13 years, and (ii) sale, purchase, and disposal of these animals for slaughter. It also restricts intra-state and inter-state transport of these animals for slaughter.
- If the competent authority has a reason to believe that an offence under the Ordinance has been or is likely to be committed, they can inspect, and seize the cattle, and premises (including vehicles) used or intended to be used for offence.
- The seized cattle and premises may be confiscated by the Sub-Divisional Magistrate irrespective of the status of prosecution. Upon conviction, the cattle and premises will be forfeited to the state government.

##### Key Issues and Analysis

- There are several areas where provisions of the Ordinance may not be reasonable or appropriate. These include: (a) provisions regarding confiscation and forfeiture of cattle, vehicles, and premises; (b) procedure for search and seizure which do not have adequate safeguards; and (c) disposal of premises pending trial of an offence.
- Restriction on the transport of cattle within the state may increase the compliance burden by requiring permits for undertaking routine activities related to livestock rearing.
- A complete prohibition on slaughter may create a burden of maintaining unproductive animals. This could impact the viability of cattle rearing.

**The Ordinance was promulgated on January 5, 2021. It replaces the Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964. A Bill with similar provisions was passed by the Legislative Assembly in December 2020 and is pending for consideration by the Legislative Council.**

The Directive Principles of the State Policy under the Constitution provide that the state shall endeavour to organise agriculture and animal husbandry on modern and scientific lines, take steps to improve breeds and prohibit the slaughter of cows, calves, and other milch and draught cattle.<sup>1</sup> More than 20 states have passed laws restricting the slaughter of cattle (cows, bulls, and bullocks) and buffaloes to various degrees. For instance, while Chhattisgarh completely prohibits the slaughter of cattle and buffaloes, Tamil Nadu allows slaughter of cattle and buffaloes which are: (i) above the age of 10 years and are unfit for breeding or work, or (ii) are incapacitated permanently.<sup>2,3</sup> Annexure I compares the laws enacted by some states.

The extent of the prohibition under these state laws has also been guided by Supreme Court judgements over time. Earlier state laws such as those in Madhya Pradesh (1949), Bihar (1955), and Uttar Pradesh (1955) completely prohibited the slaughter of cattle.<sup>4</sup> In 1958, while examining these three laws, the Supreme Court held that complete prohibition on slaughter of cattle infringed upon the fundamental right of practising trade and profession of butchers.<sup>4</sup> It held that while the complete prohibition on slaughter of cows was constitutionally valid, the ban on slaughter of bulls, bullocks, and buffaloes can only be up to a certain age, or be based on their usefulness (for milk, draught, or reproduction).<sup>4</sup> In 1964, Karnataka enacted a law banning the slaughter of cows of all ages, and that of bulls, bullocks, and buffaloes up to the age of 12 years.<sup>5</sup> In 1994, Gujarat passed an amendment law to prohibit the slaughter of bulls and bullocks of all ages.<sup>6</sup> In contrast with the earlier judgements, in 2005, a seven-judge constitutional bench of the Supreme Court upheld the complete prohibition on slaughter of bulls and bullocks under the 1994 Gujarat amendment law.<sup>6</sup> In recent years, states such as Chhattisgarh (2004), Madhya Pradesh (2004), Maharashtra (2015), and Haryana (2015) have also prohibited the slaughter of bulls and bullocks of all ages.<sup>7,8,9,10</sup>

In 2010, Karnataka passed a law to replace the 1964 Act and completely prohibit the slaughter of bulls and bullocks. However, the law did not get the Governor's assent. The Karnataka Prevention of Slaughter and Preservation of Cattle Ordinance, 2020 was promulgated on January 5, 2021.<sup>11</sup> It replaces the Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964. A Bill with similar provisions was passed by the Karnataka Legislative Assembly in December 2020 and is pending in the Legislative Council.<sup>12</sup>

## Key Features

- **Prohibition on slaughter:** The Ordinance prohibits slaughter of: (i) cows, bulls, and bullocks of all ages, and (ii) buffaloes up to the age of 13 years (Table 1). The 1964 Act permitted slaughter of bulls, bullocks, and buffaloes if they are permanently incapacitated for breeding, draught, or giving milk due to injury, deformity, or any other cause, irrespective of age. The Ordinance removes the grounds of incapacitation for permitting slaughter. Further, under both 1964 Act and the Ordinance, the prohibition will not apply in case an animal: (i) is operated upon for vaccine lymph, serum, or for any research purposes, or (ii) suffers from contagious or dangerous diseases, or an incurable disease. The Ordinance also adds that the prohibition will not apply if slaughter is necessary in the interest of public health.

**Table 1: Comparison of the prohibition on slaughter and other activities**

Provision	1964 Act	2020 Ordinance
<b>Slaughter of cows</b>	Prohibited	Prohibited
<b>Slaughter of bulls and bullocks</b>	Prohibited up to the age of 12 years	Prohibited
<b>Slaughter of buffaloes</b>	Prohibited up to the age of 12 years	Prohibited up to the age of 13 years
<b>Slaughter allowed if an animal is incapacitated</b>	Yes	No provision
<b>Transport of animals whose slaughter is prohibited</b>	Transport outside the state restricted	Transport within as well as outside the state restricted, except for bona fide agricultural or animal husbandry purposes: (i) within the state, in the manner prescribed by the state or central government, (ii) outside the state, after getting a permit from the competent authority, and in the manner prescribed by the central government
<b>Purchase, sale, or disposal of animals whose slaughter is prohibited</b>	Prohibited	Prohibited
<b>Offences and penalties</b>	Contravention of any provisions of the Act is punishable with imprisonment up to six months, or fine up to Rs 1,000, or both.	<ul style="list-style-type: none"> <li>▪ Violation of the prohibition on slaughter punishable with imprisonment between three and seven years, or fine between Rs 50,000 and five lakh rupees per cattle, or both;</li> <li>▪ Contravention of any other provisions is punishable with imprisonment between three and five years, or fine between Rs 50,000 and five lakh rupees, or both</li> </ul>

- **Powers for inspection, search, and seizure:** The 1964 Act empowered the competent authority (to be notified) to enter and inspect any premises if there is a reason to believe that an offence has been committed under the Act or is likely to be committed. The Ordinance retains this provision and also empowers the competent authority (includes police officer not below the rank of sub-inspector) to seize cattle/buffaloes, premises (also includes vehicles), and materials used or intended to be used for the commission of offence. The authority is required to report the seizure to the Sub-Divisional Magistrate (SDM) for confiscation.
- **Confiscation and forfeiture of cattle, materials, and premises:** The confiscated cattle/buffalo will be handed over to a care institution established under the Ordinance. It will not be handed over to the accused or sold in the public auction under any circumstances. If the SDM is satisfied that an offence has been committed or was intended to be committed, he may order confiscation of seized materials and premises. Confiscation can happen irrespective of whether a prosecution is instituted or not. However, no such order can be made without giving the accused person an opportunity to be heard. Appeals against the confiscation may be filed within 30 days of such order in the Court of Sessions. If the SDM allows the release of seized materials and premises, pending the disposal of criminal proceedings, the accused person will be required to produce a bank guarantee equal to the value of such materials and premises.
- Where the SDM in his opinion feels that it is expedient in the public interest, he may sell the confiscated premises through public auction. If the order of confiscation is annulled by the Appellate court, the proceeds from the sale of the confiscated premises will be provided to the owner of the premises. Expenses of the auction and other incidental expenses will be deducted from the proceeds.
- If the accused is convicted, the court is required to forfeit the confiscated cattle/buffalo, vehicle, premises, and materials to the state government.

## PART B: KEY ISSUES AND ANALYSIS

### Powers of search, seizure, and confiscation

Ordinance:  
Clause 8,  
Clause 14

The Ordinance empowers the competent authority to seize cattle/buffalo, premises (includes vessels and vehicles), and materials used or intended to be used for commission of an offence. The officer may seize if he has a reason to believe that an offence under the Ordinance has been committed or is likely to be committed. The officer is required to report such seizure without any unreasonable delay before the Sub-Divisional Magistrate (SDM) for confiscation. If the SDM is satisfied that the offence has been committed or was intended to be committed, he may order the confiscation of seized materials and premises. The confiscated cattle/buffalo will be handed over to a care institution and will not be handed over to the accused or sold in a public auction in any circumstances. SDM may order sale of the premises if he believes that it is expedient in the public interest. If the accused is convicted, the court is required to forfeit the confiscated cattle/buffalo, premises, and materials to the state government. These provisions raise some issues discussed below.

#### Whether provisions of confiscation and forfeiture under the Ordinance are reasonable

Under the Ordinance, movable properties such as cattle/buffalo, vehicles, and immovable properties such as premises, used or intended to be used for the commission of such offence, may be confiscated. These will be forfeited to the state government upon conviction of the accused. The question is whether requiring confiscation and forfeiture of properties such as premises and vehicles, and cattle/buffalo is reasonable.

Typically, the rationale for the confiscation or forfeiture of property under a law include: (i) such property being accumulated using the proceeds of the crime, and (ii) recovering ill gains or dues from the offender.<sup>13,14</sup> Hence, laws dealing with offences such as money laundering, black money, or tax evasion provide for confiscation of property of the accused.<sup>15,16</sup> The Unlawful Activities (Prevention) Act, 1967 defines property intended to be used for terrorism as proceeds of terrorism and hence requires forfeiture of such property.<sup>17</sup> The question is whether offences under the Ordinance belong to similar categories of offences and hence require confiscation and forfeiture. Note that other state laws dealing with cattle slaughter do not contain such provisions for confiscation or forfeiture of premises. Laws in some states such as Rajasthan and Haryana provide for confiscation of vehicles.<sup>18,19</sup>

Note that, there may be situations where confiscated vehicles or premises are not owned by the perpetrators but are instead rented. An offence may have been committed without the knowledge of the original owner. The confiscation will lead to the dispossession of the owner from the property, which would be forfeited to the state government upon conviction. Hence, a further question is whether it will be reasonable to permanently deprive the owner of his property when he may not have any role in the commission of the offence.

The Ordinance states that confiscated cattle/buffalo will be handed over to the care institution and will not be handed over to the accused “under any circumstances”. There is no provision for the return of confiscated cattle/buffalo pending trial. It is not clear what the term “under any circumstances” entails. This could lead to deprivation of the accused from their source of livelihood for an indefinite period. Note that cattle/buffalo may be seized based on suspicion by the police officer. Laws preventing cattle slaughter in states such as Rajasthan and Maharashtra specify that the seized cattle will be under the custody of the care institution pending disposal of the case.<sup>20,21</sup>

#### Whether the procedure for search and seizure is appropriate

A police officer or competent authority can conduct search, and seize cattle/buffalo, vehicle, and premises on the basis of suspicion. The police officer is required to report the seizure to the Sub-Divisional Magistrate who is a member of the executive. No judicial oversight is required for taking such actions. Unlike many existing laws, other procedural safeguards have not been specified in the Ordinance. This raises a question whether the procedure for search and seizure under the Ordinance is appropriate.

For instance, the Code of Criminal Procedures, 1973 (CrPC) requires a search warrant issued by the Court for a police officer to undertake the search.<sup>22</sup> Search without a warrant may be undertaken by a police officer where he has reasons to believe that such a search is required without undue delay.<sup>23</sup> However, the officer must record the grounds of his belief for such action and specify the cause of the search.<sup>23</sup> A copy of this record is to be sent to the judicial magistrate.<sup>23</sup> Further, for undertaking searches, the officer is required to call upon two or independent and respectable inhabitants of the locality.<sup>24</sup> Search is to be conducted in their presence, and list of any seizure required to be signed by these witnesses.<sup>24</sup> The Supreme Court had observed that as search is a process exceedingly arbitrary in character, stringent statutory conditions have been imposed on the exercise of such power under the CrPC.<sup>25</sup> The Immoral Traffic Prevention Act, 1956, which allows search without a warrant, also requires the officer to record the grounds in writing and call upon two or more witnesses to attend the search.<sup>26</sup> Further, laws such as the Immoral Traffic Prevention Act, 1956 and the laws preventing cattle slaughter in Rajasthan and Maharashtra require observance of procedures under CrPC for search or inspection of

a place or seizure by a police officer.<sup>27,28</sup> Unlike these laws, no reference to the CrPC has been provided under the Ordinance.

### Whether it is appropriate to dispose of premises pending trial of an offence

The Ordinance provides that the Sub-Divisional Magistrate (SDM) may order the sale of the confiscated premises (including vehicles) through a public auction if he believes that it is expedient in the public interest. Judicial authorisation is not required for ordering either confiscation or sale of premises. However, the aggrieved person may appeal to Sessions Judge against a confiscation order. The question is whether it is appropriate to dispose of premises pending trial.

If the accused appeals successfully against the order of confiscation and the premises has been sold in the auction in the meantime, the accused will only be eligible to receive proceeds from the auction. This may lead to a loss of value for the accused. He will also be permanently deprived of the ownership of the premises. Sale of premises may happen even before the accused has been convicted by any Court for the offence. The Prevention of Money Laundering Act, 2002 (PMLA) allows for the confiscation of property that may be proceeds of crime. However, if the court eventually finds that confiscated property is not involved in crime, the property is returned to the entitled person.<sup>29</sup> Sale of premises pending trial may not leave scope for such recourse even if the accused person is subsequently acquitted by the court.

A further question is whether an SDM should be empowered to take such an action. Typically, confiscation and disposal of property require the authorisation of a judge. For instance, under the CrPC, the property can be disposed of pending trial but requires an order from the court.<sup>30</sup> Similarly, PMLA requires authorisation from a Judicial Magistrate for attaching a property.<sup>31</sup>

### Restriction on the transport of animals within the state

Ordinance:  
Clause 5

The Ordinance prohibits the transport of cattle/buffalo within the state for slaughter. Transport of cattle/buffalo for bona fide agricultural or animal husbandry purposes in the manner prescribed by the state or central government will not be an offence under this provision. Note that some states such as MP and GJ have similar provisions where a permit is needed for transport within the state and a fee is to be paid.<sup>32,33</sup> Transport of animals within the state can encompass a variety of routine activities. For instance, animals may have to be taken out daily for grazing in fields within the village, or medical check-ups and procedures to the veterinary hospitals in the block. Inter-district transportation may occur when a person: (i) sells the surplus animal, or (ii) relocates animals during drought. A permit may be required for transporting animals for these purposes. This may increase the compliance burden for undertaking routine activities related to livestock rearing.

### Prevention of slaughter and viability of livestock rearing

Ordinance:  
Clause 3

The Ordinance prohibits the slaughter of cows, bulls, and bullocks of all ages, and that of buffaloes up to the age of 13 years. The Ordinance also removes the provision for the slaughter of permanently incapacitated cattle/buffalo. Such a ban on slaughter may create a burden of maintaining unproductive animals, and consequently, impact the viability of the rearing of these animals.

In India, most farmers have small landholdings.<sup>34</sup> Rearing of livestock provides for optimising output from limited land and other resources of production and thus supplementing income for farmers.<sup>34,35</sup> Utility of cattle and buffaloes differ based on gender as well as breed. While male members provide for draught power in fields and operation of carts, female members provide for income through milk. Farmers also earn from the selling the surplus progeny that these animals reproduce. They may also earn from selling less useful cattle for slaughter. Their dung and urine can be used for preparing manure and biogas and cooking fuel, providing for input to agriculture and household. Cattle are broadly classified among exotic/crossbred and indigenous/non-descript. The average milk yield of buffaloes (3.29 kg per day in Karnataka) and exotic/crossbred cattle (6.67 kg per day) are higher as compared to indigenous/non-descript cattle (2.36 kg per day).<sup>36</sup>

It may be argued that the pattern of rearing of these animals is guided by their utility. This is reflected in the substantial difference in the male and female members in the livestock population and how the population has moved. As can be seen in Table 2, between 2012 and 2019, the number of females of exotic/crossbred cattle and buffalo have increased at a higher rate than the females of indigenous/non-descript cattle at both Karnataka and India level.<sup>37,38</sup> During this period, the male population across all three categories has substantially declined at both Karnataka and India level. This could be due to the declining use of these animals for draught work (as tractors become more ubiquitous) or that overall value provided by these animals is declining. The Department of Animal Husbandry of the central government (2018-19) had observed that farmers are not willing to maintain bullocks for agriculture or any other draught work and male calves have become a liability for them.<sup>35</sup> As of 2019, male to female ratio in Karnataka is: (i) 1:30 for exotic/crossbred cattle, (ii) 1:1.6 for indigenous/non-descript cattle, and (iii) 1:17 for buffalo. Thus, the male population is substantially lower as compared to the female population despite an equal probability of birth. The pre-selection of sex in cattle/buffalo reproduction

using artificial techniques in still not widely prevalent in India.<sup>35,39</sup> Export of live animals is insignificant. Hence, such a decline in the male population suggests that males are either slaughtered or abandoned.

**Table 2: Cattle and Buffalo population in Karnataka and India**

	2012		2019		% change		Male to Female Ratio (2019)
	Male	Female	Male	Female	Male	Female	
<b>Karnataka</b>							
<b>Exotic/Crossbred</b>	2,05,182	27,07,335	1,25,646	37,82,516	-39%	40%	1:30
<b>Indigenous/Non-Descript</b>	27,71,874	38,32,093	17,51,771	28,09,071	-37%	-27%	1:1.6
<b>Buffaloes</b>	3,60,374	31,10,131	1,62,092	28,22,468	-55%	-9%	1:17
<b>India</b>							
<b>Exotic/Crossbred</b>	59,71,350	3,37,60,460	36,10,759	4,77,45,646	-40%	41%	1:13
<b>Indigenous/Non-Descript</b>	6,19,48,522	8,92,23,773	4,39,41,167	9,81,65,299	-29%	10%	1:2.2
<b>Buffaloes</b>	1,61,03,047	9,25,99,075	92,83,137	10,05,68,541	-42%	9%	1:11

Source: 19<sup>th</sup> and 20<sup>th</sup> Livestock Census; PRS.

While these numbers suggest a trend towards a decrease in the desirability of rearing male cattle, the Ordinance prohibits the slaughter of this category of animals irrespective of their age and utility. This may create a burden for farmers to incur the costs of maintaining undesired animals thereby hurting the profitability of rearing. This may in turn discourage farmers from rearing these animals. This may also lead to an increase in the incidence of abandoning of these animals.

## Annexure I: Comparison of state laws preventing cattle slaughter

**Table 3: Comparison of the restriction on slaughter of cattle and buffaloes under various state laws**

State	Year of Enactment	Last amended	Cow	Bulls and bullocks	Buffaloes	Requirement of certificate for slaughter
Andhra Pradesh	1977	-	Prohibited	Slaughter of male calves prohibited	Slaughter of calves prohibited	Certificate required for slaughter, not to be issued if the animal is or likely to be useful for breeding, agricultural operations, or giving milk
Chhattisgarh	2004	2011	Prohibited	Prohibited	Prohibited	-
Gujarat	1954	2017	Prohibited	Prohibited	Certificate required for slaughter	Certificate for slaughter not to be issued if the animal is or likely to be useful for breeding, agricultural operations, or giving milk
Haryana	2015	-	Prohibited	Prohibited	Not covered	-
Karnataka	2020	-	Prohibited	Prohibited	Up to the age of 13 years	Certificate required for the slaughter of buffaloes of age above 13 years
Madhya Pradesh	2004	2010	Prohibited	Prohibited	Not covered	-
Maharashtra	1976	2015	Prohibited	Prohibited	Not covered	-
Odisha	1967	-	Prohibited	Up to the age of 14 years	Not covered	Certificate required for the slaughter of bulls and bullocks, to be issued only if the animal is above 14 years of age, or is permanently incapacitated
Rajasthan	1995	-	Prohibited	Prohibited	Not covered	-
Tamil Nadu	1958	-	Up to the age of 10 years	Up to the age of 10 years	Up to the age of 10 years	Certificate required for slaughter, to be issued only if the animal is above 10 years of age and is unfit for work and breeding, or is permanently incapacitated
Uttar Pradesh	1955	2020	Prohibited	Prohibited	Not covered	-

Sources: Respective State Laws; PRS.

<sup>1</sup> Article 48, the Constitution of India.

<sup>2</sup> Section 4, [The Chhattisgarh Agricultural Cattle Preservation Act, 2004](#).

<sup>3</sup> Section 4, The Tamil Nadu Animal Preservation Act, 1958.

<sup>4</sup> [Mohd. Hanif Quareshi and Others vs the State of Bihar](#), Supreme Court of India, April 23, 1958.

<sup>5</sup> [The Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964](#).

<sup>6</sup> [State of Gujarat vs Mirzapur Kureshi Kassab Jamat & Others](#), Supreme Court of India, October 26, 2005.

<sup>7</sup> [The Madhya Pradesh Govansh Vadh Pratishedh Adhiniyam, 2004](#).

<sup>8</sup> [The Chhattisgarh Agricultural Cattle Preservation Act, 2004](#).

<sup>9</sup> [The Maharashtra Animal Preservation \(Amendment\) Act, 1995 \(notified in 2015\)](#).

- <sup>10</sup> [The Haryana Gauvansh Sanrakshan and Guasamvardhan Act, 2015](#).
- <sup>11</sup> [The Karnataka Prevention of Slaughter and Preservation of Cattle Ordinance, 2020](#).
- <sup>12</sup> [The Karnataka Prevention of Slaughter and Preservation of Cattle Bill, 2020](#).
- <sup>13</sup> "Sentencing and Confiscation in Organised Crime", [Website of United Nations Office on Drugs and Crime](#), as accessed on January 13, 2021.
- <sup>14</sup> Section 163, [The Karnataka Land Revenue Act, 1964](#).
- <sup>15</sup> Chapter III: Attachment, Adjudication, and Confiscation, [The Prevention of Money Laundering Act, 2002](#).
- <sup>16</sup> Section 5, [The Prohibition of Benami property Transactions Act, 1988](#).
- <sup>17</sup> Section 24, [The Unlawful Activities \(Prevention\) Act, 1967](#).
- <sup>18</sup> Section 6A, [The Rajasthan Bovine Animal \(Prohibition of Slaughter and Regulation of Temporary Migration or Export\) Act, 1995](#).
- <sup>19</sup> Section 17, [The Haryana Gauvansh Sanrakshan and Gausamvardhan Act, 2015](#).
- <sup>20</sup> Section 7, [The Rajasthan Bovine Animal \(Prohibition of Slaughter and Regulation of Temporary Migration or Export\) Act, 1995](#).
- <sup>21</sup> Section 7, [The Maharashtra Animal Preservation \(Amendment\) Act, 1995](#).
- <sup>22</sup> Sections 93-105, [The Code of Criminal Procedures, 1973](#).
- <sup>23</sup> Section 165, [The Code of Criminal Procedures, 1973](#).
- <sup>24</sup> Section 100, [The Code of Criminal Procedures, 1973](#).
- <sup>25</sup> [State of Rajasthan vs Rehman](#), The Supreme Court of India, October 14, 1959.
- <sup>26</sup> Section 15, [The Immoral Traffic \(Prevention\) Act, 1956](#).
- <sup>27</sup> Section 12 (3), [The Rajasthan Bovine Animal \(Prohibition of Slaughter and Regulation of Temporary Migration or Export\) Act, 1995](#).
- <sup>28</sup> Section 7 (4), [The Maharashtra Animal Preservation \(Amendment\) Act, 1995](#).
- <sup>29</sup> Chapter III: Attachment, Adjudication, and Confiscation, [The Prevention of Money Laundering Act, 2002](#).
- <sup>30</sup> Sections 451-459, The Code of Criminal Procedures, 1973.
- <sup>31</sup> Chapter III: Attachment, Adjudication, and Confiscation, [The Prevention of Money Laundering Act, 2002](#).
- <sup>32</sup> Clause 3, [The Madhya Pradesh Govansh Vadh Pratishedh Rules, 2004](#).
- <sup>33</sup> Clause 4, [The Gujarat Animal Preservation \(Amendment\) Rules, 2017](#).
- <sup>34</sup> [Vision 2050](#), The Indian Grassland and Fodder Research Institute, The Indian Council of Agricultural Research.
- <sup>35</sup> [Annual Report 2018-19](#), The Department of Animal Husbandry, Government of India.
- <sup>36</sup> [Annual Basic Animal Husbandry Statistics 2019](#), The Department of Animal Husbandry, Government of India.
- <sup>37</sup> [19<sup>th</sup> Livestock Census](#), The Department of Animal Husbandry, Government of India.
- <sup>38</sup> [20<sup>th</sup> Livestock Census](#), The Department of Animal Husbandry, Government of India.
- <sup>39</sup> [Current Status, Scope and Constraints of Sexed Semen-An Indian Perspective](#), ICAR-National Dairy Research Institute, July 20, 2016.

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