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**IN THE SUPREME COURT OF INDIA
EXTRA ORDINARY APPELLATE JURISDICTION**

VIKRAM NATH; J., SANDEEP MEHTA; J.

SPECIAL LEAVE PETITION (C) No (s).13374-13375 of 2025; NOVEMBER 26, 2025

NEW DELHI NATURE SOCIETY THROUGH VERHAEN KHANNA

versus

DIRECTOR HOTRICULTURE DDA & ORS.

Wild Life (Protection) Act, 1972 - Central Zoo Authority (CZA) - Translocation of Captive Animals - IUCN Guidelines - Central Empowered Committee (CEC) - A.N. Jha Deer Park - Supreme Court acknowledged that the Deer Park suffered from chronic managerial deficiencies and persistent non-compliance with statutory standards, leading to an exponential increase in the deer population, far exceeding the carrying capacity of the 10.97-acre enclosure- The DDA's lack of requisite capacity and the risks of overcrowding (stress, weakened immunity, disease) made scientific population management through regulated translocation "indispensable" for the welfare of the deer- noted the serious and prima facie credible allegations made by the petitioner-Society regarding gross irregularities in the translocation of 261 deer already undertaken to Rajasthan- These violations included- i. Transporting vulnerable categories (pregnant females, juveniles, antlered males); ii. Severe overcrowding in vehicles, such as 40 deer and a fawn in one truck; iii. Absence of veterinary assistance, sedation, food, or water during long journeys; iv. Lack of pre-translocation genetic screening, tagging/identification, tranquilisation protocols, veterinary fitness certification, or behavioural acclimatisation; v. No scientific assessment of the recipient sanctuaries' carrying capacity, predator-prey dynamics (the reserves are tiger-bearing), or habitat suitability; vi. No post-release tracking mechanisms (telemetry collars/radio chips) were used. [Paras 17-21]

Principles of environmental protection and humane treatment of wildlife- Directions- Articles 48A, 51A(g), and 21 of the Constitution- Supreme Court gave following directions- i. Supreme Court directed the Central Empowered Committee (CEC), working under the Environment (Protection) Act, 1986, to conduct two comprehensive, on-ground surveys and file detailed reports within eight weeks; ii. To enumerate the present deer population, ecological carrying capacity, veterinary infrastructure, and the maximum number of deer that can be sustainably and humanely maintained; iii. To inspect Ramgarh Vishdhari Tiger Reserve and Mukundra Hills Tiger Reserve in Rajasthan, and report on the number of deer surviving, habitat suitability, predation risks, and compliance with CZA and IUCN Guidelines; iv. The CEC shall prepare a comprehensive roadmap for any future translocation, ensuring strict conformity with statutory and IUCN Guidelines, covering methodology, tagging, transportation, and post-release monitoring; v. Directed DDA to refrain from organising or permitting any commercial events, private parties, or non-conservation-related gatherings within the Deer Park premises or its surrounding buffer zones, and instead develop educational outreach programmes; vi. The DDA must place a report on record detailing the past and present status of the land formerly designated for deer enclosures, including the "unexplained reduction of more than 20 acres". [Para 18-23]

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For Respondent(s): Ms. Aishwariya Bhati, A.S.G. Ms. Shrey Jain, Adv. Mr. Jagdish Chandra Solanki, Adv. Mr. Gurmeet Singh Makker, AOR Ms. Ruchi Kohli, Sr. Adv. Mr. Piyush Beriwal, Adv. Ms. Chitrangda Rastravara, Adv. Mr. Pratyush Srivastava, Adv. Ms. Ritika Singhal, Adv. Ms. Ritika Prasad, Adv. Mr. Nitin Mishra, AOR Ms. Mitali Gupta, Adv. Mr. Hargun Singh Kalra, Adv.

ORDER

Mehta, J.

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I. INTRODUCTION

1. The controversy in the instant case centres around the proposed translocation of hundreds of deer from the A.N. Jha Deer Park in Hauz Khas, New Delhi¹, an urban green sanctuary for captive deer, to different wildlife sanctuaries/Tiger reserves in the State of Rajasthan as well as within New Delhi. The translocation sought to be undertaken ostensibly on the pretext of overcrowding, is alleged to be in contravention of the norms established by the Central Zoo Authority, Ministry of Environment, Forest & Climate Change, Government of India², guidelines framed under the Wild Life (Protection) Act, 1972, as well as the International Union for Conservation of Nature Guidelines for Reintroductions and Other Conservation Translocations.³

2. The Petitioner-New Delhi Nature Society⁴ filed a public interest litigation Writ Petition⁵ before the High Court of Delhi⁶, challenging the proposal for translocation of the deer mooted by the authorities, which came to be disposed of *vide* order dated 19th July, 2024. A subsequent application⁷ seeking the recall of the order dated 19th July, 2024, was dismissed by the High Court *vide* order dated 24th January, 2025. These two orders form the subject matter of challenge in the present special leave petitions.

3. We now turn to the facts underlying the present proceedings, the submissions advanced by the parties, and the issues that emerge, to determine whether the

¹ Hereinafter, being referred to as 'Deer Park'.

² Hereinafter, being referred to as 'Central Zoo Authority'.

³ Hereinafter, being referred to as 'ICUN Guidelines'.

⁴ Hereinafter, being referred to as 'petitioner-Society'.

⁵ Writ Petition (C) No. 12275 of 2023.

⁶ Hereinafter, being referred to as 'High Court'.

⁷ CM Application No. 49658 of 2024.

intervention of this Court is warranted and whether any corrective or consequential directions, are required.

II. BACKGROUND OF THE CASE

4. In 1968, the Delhi Development Authority⁸ established the Deer Park, namely, Aditya Nath Jha Deer Park (commonly called AN Jha Deer Park), within the larger green expanse of Hauz Khas Park, South Delhi. The total green area measures approximately 142.30 hectares, of which 10.26 acres were originally earmarked for the deer enclosure, subsequently increased to 10.97 acres by the year 2021. In 1968, the DDA introduced a population of chital/spotted deer (*Axis axis*) brought from the State of Uttarakhand, making the Deer Park, apart from the Delhi Zoo (*a.k.a.* National Zoological Park, New Delhi), the only urban setting in the capital city where the public could view spotted deer in a semi-natural environment. Over the years, the Deer Park has evolved into a significant ecological and recreational space, attracting not only visitors but also a variety of small mammals, birds, reptiles, insects, and nocturnal species. It also has specific sections for ducks and rabbits' enclosures. The Deer Park, along with adjacent public parks, makes up one of the largest lush green areas in the capital city, for which it is given the name of the 'lungs of Delhi.'

5. The DDA operated the Deer Park under a license issued by the Central Zoo Authority, a statutory body constituted under the Wild Life (Protection) Act, 1972 and functioning under the Ministry of Environment, Forest and Climate Change.⁹ The Central Zoo Authority is tasked with enforcing standards for the upkeep, veterinary care, and management of captive animals as outlined in the National Zoo Policy, 1998 and the Zoo Rules, 2009. In 2014, the Central Zoo Authority cancelled DDA's license due to persistent mismanagement and non-compliance with the Zoo guidelines. The licence was reinstated only upon DDA's assurance that it would adopt corrective measures, including population control of deer, regular veterinary checks, and the segregation of males and females to prevent inbreeding.

6. Despite such assurances, the Evaluation Reports of the Deer Park of 2014-2022 indicate continued non-compliance with the applicable guidelines and rules. The Central Zoo Authority, in its evaluation report, noted multiple violations, including the failure to contain the deer population despite repeated advisories regarding sterilisation and enclosure management. By 2021, DDA had only one curator and one retired veterinary officer assigned to monitor animal health. Although the Central Zoo Authority granted interim extensions, the last valid licence expired in 2021. While DDA applied for a renewal, it concurrently informed the Central Zoo Authority of its decision to close the Deer Park and sought approval for the translocation of the entire deer population to Rajasthan and Asola Bhatti Wild Life Sanctuary, Delhi. On 19th May, 2022, the DDA wrote a letter to the Chief Wild Life Warden, Rajasthan¹⁰, requesting to accept the translocation of approximately 550 spotted deer to a designated sanctuary in Rajasthan, citing administrative incapacity to manage the growing population of deer. The CWLWR *vide* letter dated 27th May, 2022, conveyed assent to the request made by the DDA for the translocation of approximately 550 spotted deer from the A.N. Jha Deer Park, New Delhi, to designated national parks or wildlife sanctuaries in Rajasthan. The Rajasthan Wild Life Department, prior to final approval, forwarded a checklist of mandatory conditions to DDA,

⁸ Hereinafter referred to as 'DDA'.

⁹ Hereinafter referred to as "MoEF&CC."

¹⁰ Hereinafter referred to as "CWLWR".

outlining procedural and welfare safeguards to be followed during the animal transfer. These conditions *inter alia* included a prohibition on the transfer of pregnant, recently bred, aged, or infirm animals as well as mandatory adherence to the Guidelines for the Establishment and Scientific Management of Zoos in India, 2008. The Department, further, directed that the transportation of deer be timed to minimize climate-induced stress on the animals, particularly avoiding peak summer periods.

7. After consideration of the translocation proposal by the Technical Committee, Central Zoo Authority *vide* order dated 8th June, 2023, issued under Section 38H(6) of the Wild Life Act, cancelled the recognition of A.N. Jha Deer Park, Hauz Khas, New Delhi, citing persistent non-compliance with zoo management norms, failure to control deer population, and expiry of the licence in August, 2021. After evaluating the DDA's proposal and confirming the translocation of approximately 600 spotted deer, the Central Zoo Authority directed that the animals be released into natural habitats in Rajasthan and Delhi in a 70:30 ratio (70% in Rajasthan sanctuaries/reserves and 30% in Asola Bhatti Wild Life Sanctuary in the National Capital Territory of Delhi), in accordance with IUCN guidelines.

8. Aggrieved by the decision of the Central Zoo Authority dated 8th June, 2023, cancelling the recognition of Deer Park and approving the translocation of approximately 600 spotted deer to Rajasthan and Asola Bhatti Wild Life Sanctuary, Delhi, the petitioner-Society, which is an NGO working on the promotion of nature awareness and conservation in Delhi, filed a public interest litigation *via* Writ Petition (C) No. 12275 of 2023 before the High Court of Delhi under Article 226 of the Constitution, contending *inter alia* that the concerned authorities cancelled the license in gross violation of Section 38H(4)¹¹ and (6)¹² of the Wild Life (Protection) Act, particularly, as the order failed to record reasons in writing for cancellation of the licence. It was further alleged that the CWLWR, and the Department of Forest and Wildlife, Government of NCT of Delhi, had failed to comply with mandatory conditions prescribed by the Central Zoo Authority and the IUCN Guidelines for translocation of captive wildlife. The petition, filed in public interest, sought the following reliefs:

“(a) Direct the Respondent DDA to ensure strict compliance with the CZA and IUCN guidelines during the translocation of the deer;

(b) Direct the Respondents not to translocate pregnant animals, newly bred young calves, or antlered animals in velvet, and to ensure that only animals in good health are transported;

(c) Direct the Respondents not to release the animals in areas where they may become prey, such as the Asola Sanctuary;

(d) Direct the DDA to retain the animals that cannot be translocated within the Deer Park area and not to close down the Park.”

9. During the course of hearing of the writ petition before the High Court, the petitioner-Society pointed out that around 80 deer had already been moved without adherence to the 2014 IUCN Guidelines, which prohibit the translocation of vulnerable categories like

¹¹ **Section 38H(4):** No recognition to a zoo shall be granted unless the Authority, having due regard to the interests of protection and conservation of wild life, and such standards, norms and other matters as may be prescribed, is satisfied that recognition should be granted.

¹² **Section 38H (6):** The Authority may, for reasons to be recorded by it, suspend or cancel any recognition granted under sub-section (4): Provided that no such suspension or cancellation shall be made except after giving the person operating the zoo a reasonable opportunity of being heard.

pregnant or antlered deer. *Vide* order dated 6th December, 2023, the High Court granted a stay on the translocation of the deer, with the following observations:

“5. This Court is of the *prima facie* view that at least fifty (50) deers as originally envisaged should be retained so that small children of this city get to see them. The respondents may also consider relocating the excess population of deers in forests and green areas of Delhi. This Court is further of the *prima facie* view that as Rajasthan has too many leopards, not many deers may survive the relocation. x-x-x

8. Till further orders, there shall be a stay of translocation of deers from A.N. Jha Deer Park, Hauz Khas, New Delhi.”

10. The High Court *vide* Order dated 19th July, 2024, disposed of the above writ petition, while taking into consideration an Additional Affidavit filed by the DDA on 18th July, 2024. The Affidavit stated that, as a policy decision approved by the Vice Chairman of DDA and endorsed by the Lieutenant Governor of Delhi, about two dozen deer would be retained at the Deer Park, subject to the renewal of its mini-zoo status by the Central Zoo Authority. The DDA would approach the Central Zoo Authority for requisite approvals, while the remaining deer could be relocated to forest areas in neighbouring states. The affidavit also highlighted concerns around Delhi’s limited carrying capacity and the risks of poaching if deer were relocated within the city. In view of the DDA’s willingness to abide by the guidelines, the High Court allowed the DDA to resume the translocation process in accordance with the terms stated in the affidavit and disposed of the matter accordingly. The relevant paragraphs of the order are extracted hereinbelow:

“3. Learned counsel for DDA, has today in Court, handed over an additional affidavit dated 18th July 2024, wherein it has been averred as under: -

“III. That pursuant to the Orders passed by this Hon'ble Court in this case, the matter has been examined by DDA. The Vice Chairman, DDA being the competent authority has approved the proposal of retaining some deer in the A.N. Jha Mini Zoo at Hauz Khas, New Delhi (the Deer Park) after taking necessary approvals from the Central Zoo Authority (CZA) vide File No. HORT/PC/0020/ 2020/DHSE/O/o DY.DIR(HORT. DIV-IV) (Computer No.7673) # Note 92. It has been approved that as a policy decision in supersession of earlier decisions on the subject, the DDA would retain some deer in the Deer Park and for that purpose, DDA shall move the CZA for the necessary approvals and compliance would be made as per the requirements of CZA guidelines. This matter has also stands verbally discussed with the Hon'ble Lieutenant Governor, Delhi / Chairman, DDA and the Hon'ble LG has also agreed to the proposal. IV. That in these circumstances, it is submitted that the DDA will retain about two dozen of deer in the Deer Park subject to the renewal of recognition of mini zoo status of A.N. Jha Mini Zoo by the CZA. The remaining deer can be transferred to neighbouring states forest areas as per the earlier decision on the subject. DDA shall accordingly move the necessary proposal before the CZA for approval and renewal of recognition.

V. That it is respectfully submitted that subject to above, this Hon'ble Court may allow to resume translocation of deer so that overcrowding of deer may be managed at A.N. Jha Mini Zoo at Hauz Khas, New Delhi.”

4. Learned counsel for the petitioner is satisfied with the additional affidavit dated 18th July 2024 filed by the DDA.

5. Keeping in view the aforesaid additional affidavit dated 18th July 2024 as well as the consent of learned counsel for the petitioner, the present writ petition is disposed of in accordance with paragraphs III, IV and V of the said affidavit. It is clarified that DDA is at liberty to act in accordance with the said additional affidavit.”

11. Following the disposal of the writ petition on 19th July, 2024, an application¹³ was filed seeking the recall of the above order on the ground that the petitioner-Society's lawyer had conveyed its consent without informing the petitioner-Society. However, the High Court, after examining the entire record, found no justifiable grounds to recall its earlier order and accordingly *vide* Order dated 24th January, 2025, dismissed the recall application. Consequently, in light of this dismissal, the High Court also held that no further orders were necessary in the connected application seeking stay.¹⁴

12. The aforesaid orders dated 19th July, 2024, and 24th January, 2024 passed by the High Court in Writ Petition (C) No. 12275 of 2023, are subject matter of challenge in the present special leave petitions.

III. PROCEEDINGS BEFORE THIS COURT

13. During the pendency of these petitions, this Court, taking into consideration the gravity of the matter and the fact that a total of 261 deer were translocated to Rajasthan, directed the Central Zoo Authority to visit the locations where 261 deer have already been transferred and ascertain the present condition of the said deer. The relevant paragraphs of the order are reproduced hereinbelow:

“We are informed that so far 261 deers have been shifted to Rajasthan. The learned counsel appearing for the petitioner makes a grievance that many of these deers are no longer surviving. We direct a team of officers of the Central Zoo Authority (the second respondent) to immediately visit the place or places where the 261 deers have been transferred. They shall ascertain the present condition of the said deers.

The officers of the Central Zoo Authority will give an advance notice of their visits to the petitioner so that a representative of the petitioner can remain present.

A report to be submitted by the Central Zoo Authority about the condition of the deers within a period of two weeks from today. A copy of the report shall be furnished to the learned counsel appearing for the petitioner. **In the event it is found that either the deers are not surviving or they are in bad condition, we grant liberty to the petitioner to move this Court by filing an appropriate application.** x-x-x

In the meanwhile, we direct the Delhi Development Authority and the Central Zoo Authority (the first and the second respondents respectively) to consider the suggestion made in paragraph 11 of the application made by the petitioner at Annexure P-10 and file a response to the same within a period of six weeks from today.”

14. In pursuance of this order, the DDA, through its authorised officer, has filed a short affidavit. In the said affidavit, the DDA has submitted that:

i) It has no objection to the relocation of the remaining deer from the A.N. Jha Deer Park to any suitable location, including the proposed Deer Park at Noida, subject to obtaining prior approval and directions from the Central Zoo Authority, which is a mandatory prerequisite for any translocation of captive animals. Letters seeking such approval and clarification were sent to the Central Zoo Authority on 30th May, 2025 and 8th July, 2025, respectively.

ii) The decision to translocate the deer was prompted by overpopulation in the Deer Park, which was causing strain on available resources and affecting the health and wellbeing of the animals. A total of 261 deer have been translocated to forest areas in Rajasthan using the BOMA method, an internationally recognised technique for safe

¹³ *Supra* note 7.

¹⁴ The Application, seeking stay, is CM Application No. 48098 of 2024.

wildlife capture and relocation. This process was undertaken with the assistance of the Rajasthan Forest Department and a senior veterinary expert, ensuring compliance with the guidelines issued by the Central Zoo Authority and IUCN Guidelines.

iii) The DDA further submitted that the remaining deer population in the park continues to receive routine veterinary care, including regular deworming and provision of daily rations and green fodder as per the recommendations of the Central Zoo Authority. It was reiterated that no deer has been translocated to the Asola Bhatti Wild Life Sanctuary, Delhi thus far, and that the DDA has acted strictly in accordance with applicable legal and regulatory framework, prioritising both animal welfare and ecological balance.

15. In pursuance of the liberty granted by this Court *vide* order dated 16th May, 2025, the petitioner-Society has filed an application¹⁵ seeking directions in view of alarming findings during the Court-permitted field survey of the deer translocation project from A.N. Jha Deer Park, Hauz Khas, Delhi to Mukundara Hills Tiger Reserve (Rajasthan) and Ramgarh Vishdhari Tiger Reserve (Rajasthan). In its application for direction, the petitioner-Society has submitted that:

i) The petitioner-Society was permitted to join the Central Zoo Authority in its post-translocation field inspections at A.N. Jha Deer Park, Mukundara Hills Tiger Reserve (Rajasthan) and Ramgarh Vishdhari Tiger Reserve (Rajasthan). Based on the field observations, the petitioner-Society avers that serious discrepancies exist between the number of deer stated to have been translocated and the number actually sighted. Of the 100 deer claimed to be translocated to Ramgarh Vishdhari Tiger Reserve (Rajasthan), only 60-62 were seen, and of the 161 said to be sent to Mukundara Hills Tiger Reserve (Rajasthan), only 52-53 were visible. Further, there were no visible tags or chips on any deer, making it impossible to ascertain their origin or to conduct post-release monitoring.

ii) The application highlights critical violations in the process of transportation and release. Several deer were transported in overcrowded trucks, including an instance on 3rd November, 2023, when 40 deer and a fawn were stuffed into one vehicle. No photographic record or documentation of vehicle dimensions or welfare compliance was submitted by DDA. The deer endured long journeys without veterinary assistance, sedation, food, or water. The petitioner-Society contends that many deer perished due to stress, starvation, or predation post-release, a claim further substantiated by findings of scattered bones and a rope tied to a deer bone¹⁶, suggesting use of deer as live bait in predator-inhabited zones.

iii) The petitioner-Society specifically points out that contrary to express assurances in the DDA's affidavit dated 30th October, 2023, pregnant female deer and juvenile deer were translocated. The officials not only failed to identify and segregate vulnerable animals, but also translocated them, including the juveniles being transported with 40 adults in a single truck. These acts constitute contempt of this Court's previous orders and breach of guidelines issued by the Central Zoo Authority and the IUCN Guidelines.

iv) The application further alleges that the reserves to which the deer were translocated lacked basic ecological support, such as grasslands or shrubs for grazing. Google Maps analysis and on-site inspection revealed that vegetation was sparse and water sprinklers, though claimed in reports, were not operational. No habitat suitability study appears to have been conducted prior to translocation, violating fundamental prerequisites laid down

¹⁵ Interlocutory Application No. 164887 of 2025.

¹⁶ Annexure 1 of the Application.

under the guidelines. The Central Zoo Authority's claims that no tigers existed in the reserves were refuted by government data and newspaper reports showing the presence of multiple tigers in Mukundara Hills Tiger Reserve (Rajasthan) and Ramgarh Vishdhari Tiger Reserve (Rajasthan), thus directly endangering the deer.

v) Turning to the Deer Park itself, the application alleges gross mismanagement and possible corruption. While the Central Zoo Authority report claims that 393 deer were housed in the park as of May, 2025, petitioner-Society's on-ground investigation showed only 70-80 deer visible at feeding time. Moreover, the food provided per day amounted to only 260 kg (green fodder and grain), which suffices for merely 84 deer, assuming a minimum requirement of 3 kg per deer per day. This discrepancy, the petitioner-Society argues, either reflects mass starvation or falsified deer counts for inflated funding. Additionally, basic facilities such as water troughs were empty, with only one out of four having water, and the grains therein were fermenting, raising fears of deaths from *enterotoxaemia*. vi) Lastly, the application criticises the Central Zoo Authority field survey as perfunctory, opaque, and dismissive of the petitioner-Society's right to participate in the said survey. The leadership of the survey team excluded representatives of the petitioner-Society from meetings, refused to share documents, and appeared to rubber-stamp the narrative advanced by the respondents.

In light of the grave irregularities, statutory violations, and acts of cruelty disclosed in the present application, the petitioner-Society respectfully prayed that this Court may be pleased to grant: (i) a permanent stay on further translocation of deer; (ii) a third-party wildlife expert survey of A.N. Jha Park; (iii) restoration and safety measures for already translocated deer; (iv) penal action against erring officials; and (v) an investigation into financial and administrative irregularities.

IV. DISCUSSION AND ANALYSIS

16. We have given our thoughtful consideration to the submissions advanced at the bar and have gone through the impugned orders. With the assistance of learned counsel for the parties, we have also perused the pleadings, affidavits, and material placed on record.

17. The material placed on record reveals that the A.N. Jha Deer Park, despite its historical and ecological significance, has for several years suffered from chronic managerial deficiencies. The repeated extensions granted by the Central Zoo Authority and the warnings issued from time to time demonstrate that the Deer Park was operating far below statutory standards prescribed under the Wild Life (Protection) Act, 1972; the National Zoo Policy, 1998; and the Guidelines for the Establishment and Scientific Management of Zoos in India, 2008. The Evaluation Reports of 2014-2022 underscores persistent noncompliance relating to enclosure maintenance, veterinary infrastructure, record-keeping, population control, and habitat enrichment. The absence of adequate segregation, sterilisation, and monitoring mechanisms inevitably led to an exponential increase in the deer population, far exceeding the carrying capacity of the 10.97-acre enclosure. In such circumstances, the need for scientific population management through regulated translocation was not only foreseeable but also indispensable for the health, welfare, and sustainability of the deer population.

18. It is equally evident that the DDA lacked the requisite logistical and veterinary preparedness/capacity to manage a population that fluctuated between 350 to 600 deer over the past decade. The Deer Park's spatial limitations and the scarcity of foraging resources meant that natural behaviours, such as browsing, territoriality, and herd structuring, could not be accommodated within the confined enclosure. Overcrowding in

captive ungulate species is known to heighten stress, weaken immunity, and precipitate outbreaks of disease. The insufficiency of fodder, irregular water supply, and dearth of veterinary supervision, as reflected from the petitioner-Society's assertions and supported by field reports/observations, raise serious concerns about the welfare of the remaining population. In these circumstances, continued retention of entirety of the remaining population of deer at the Deer Park would be contrary to the very principles of animal welfare enshrined under domestic laws and international conservation protocols.

19. At the same time, the submissions and fieldsurvey based averments made by the petitioner Society regarding irregularities in the translocation already undertaken cannot be lightly brushed aside. **Allegations that vulnerable categories of deer, including pregnant females, juveniles, and antlered males, were transported; that overcrowding occurred inside vehicles; that postrelease monitoring mechanisms were inadequate; and that the chosen release sites lacked assured habitat suitability, are all matters that strike at the core of scientific translocation practice. The IUCN Guidelines emphasize that any relocation of captive wildlife must be supported by ecological feasibility studies, veterinary screening, tagging or identification processes, and structured postrelease surveillance.** These safeguards appear, *prima facie*, to have been applied in a perfunctory or incomplete manner, thereby undermining the legitimacy of the exercise and the welfare of the animals involved.

20. It is evident from the record that the translocation protocol and best practices incorporated in the guidelines issued by the Central Zoo Authority and IUCN Guidelines were not adhered to during the translocation of deer from Deer Park to Ramgarh Vishdhari Tiger Reserve and Mukundra Hills Tiger Reserve in the State of Rajasthan. There is no documentary evidence of pre-translocation genetic screening, tagging, tranquilisation protocols, veterinary fitness certification, or behavioural acclimatisation, all of which are internationally recognised preconditions for release. Notably, no scientific assessment was carried out with respect to the carrying capacity of the recipient sanctuaries in Rajasthan, the predator-prey dynamics, or the impact of introducing semi-captive deer into those ecosystems. The translocated deer, many of whom were zoo-bred, and some reportedly pregnant or juvenile, were moved to tiger-bearing sanctuaries, without any indication of whether they possessed the necessary survival skills or ecological fitness. Photographic and field evidence brought on record by the petitioner-Society points to a distressing pattern of negligence. Deer were allegedly loaded into overcrowded trucks, sometimes in groups as large as 40-50, without proper ventilation, padding, or segregation. In one instance, a blue rope used to tie the limbs of a deer was reportedly recovered from the relocation site, raising serious concerns about the use of force and the absence of ethical handling procedures. Moreover, no tracking mechanisms such as telemetry collars, radio chips, or post-release surveys were done to monitor the well-being or survival of the released animals. Without such data, it is not possible to determine how many deer survived the journey or successfully adapted to their new environments.

21. Given the competing claims and the absence of a verified factual foundation regarding (i) the actual number of deer presently in the Deer Park, (ii) the number of deer translocated and surviving at the release sites, and (iii) the ecological viability of further translocation of deer, this Court is of the view that an independent, scientifically-grounded assessment is essential before any further steps can be permitted. In our opinion, the **Central Empowered Committee (CEC)**, constituted by this Court [now working under a Statute, namely, Environment (Protection) Act, 1986] vested with expertise in forest-wildlife governance, is best placed to undertake such an evaluation. A comprehensive assessment is required not only to ascertain compliance with statutory norms but also to

restore confidence in the decision-making process and ensure that any future translocation conforms strictly to the ethical, ecological, and legal standards binding upon all agencies.

V. DIRECTIONS

22. In light of the foregoing discussion, and to ensure that the welfare of the deer population is secured in accordance with the statutory framework prevailing in India and internationally accepted conservation guidelines/norms, we issue the following directions:

A. The **Central Empowered Committee (CEC)** shall conduct an on-ground survey of A.N. Jha Deer Park and file a detailed report before this Court within eight weeks. The report shall specifically enumerate:

- i. the present population of deer in the Deer Park;
- ii. the ecological carrying capacity of the Deer Park, based on space, fodder availability, veterinary infrastructure, and enclosure design;
- iii. the maximum number of deer that can be sustainably and humanely maintained at the Deer Park; and
- iv. the surplus population, if any, that must be considered for translocation.

B. The **CEC** shall further undertake an inspection of the release sites, i.e., Ramgarh Vishdhari Tiger Reserve and Mukundra Hills Tiger Reserve in the State of Rajasthan and file a status report within eight weeks. The report shall specifically enumerate:

- i. the number of deer actually present and surviving;
- ii. habitat suitability, availability of forage and water, predation risks, and mitigation measures;
- iii. veterinary monitoring mechanisms and post-release protocols;
- iv. compliance with guidelines issued by the Central Zoo Authority and the IUCN Guidelines.

C. The **CEC** shall also prepare a comprehensive roadmap for any future translocation, detailing the scientific methodology, identification and tagging processes, procedural safeguards, transportation protocols, veterinary requirements, ecological feasibility studies, and post-release monitoring framework, in strict conformity with the domestic statutory regime and IUCN Guidelines.

D. All concerned authorities shall extend full cooperation to the **CEC**, ensuring timely support, information sharing, and access to necessary sites, required for implementing these directions. Any failure or delay in compliance shall invite appropriate action.

E. The DDA shall, within eight weeks, place on record a comprehensive report detailing the past and present status of land formerly designated for deer enclosures, including the unexplained reduction of more than 20 acres reported in the Evaluation Reports.

F. The DDA is directed to refrain from organizing, permitting, or facilitating any commercial events, private parties, or non-conservation related gatherings within the premises of the A.N. Jha Deer Park or its surrounding ecological buffer zones. The use of the said park for such purposes is inconsistent with its designation as an urban ecological zone and captive animal enclosure. Instead, DDA may develop and implement a non-commercial public outreach programme, which shall include periodic educational visits for school and college students, guided nature walks in collaboration with recognized

environmental NGOs, and biodiversity awareness campaigns, in order to foster a culture of ecological sensitivity and civic participation in conservation efforts.

G. Until further orders of this Court, no additional translocation of deer from A.N. Jha Deer Park shall be carried out by the respondents or any other authority.

VI. CONCLUSION

23. The aforesaid directions are being issued for securing the constitutional regime that governs environmental protection and the humane treatment of wildlife in this country. Articles 48A and 51A(g) of the Constitution of India embody a collective commitment to safeguard forests and wildlife and to act with compassion for all living beings, while Article 21 has been judicially recognized as encompassing the right to a clean and ecologically balanced environment. The concerns arising from overcrowding, resource constraints, and managerial lapses at the A.N. Jha Deer Park, coupled with questions regarding the scientific rigour of past translocation efforts, underscore that wildlife management cannot be approached as a matter of administrative convenience. It must be anchored in scientific assessment, ecological prudence, and fidelity to constitutional values.

24. The present controversy also reflects the broader pressures faced by urban ecological spaces, where the coexistence of wildlife and expanding human habitats demands heightened responsibility and foresight. The deer population at the Deer Park is a reminder that conservation is not merely the relocation of animals but an exercise in stewardship: preserving species, habitats, and the environmental ethos enshrined in our constitutional framework. The Court's intervention is therefore guided by the imperative that decisions affecting wildlife must reinforce the principles of dignity, ecological integrity, and intergenerational equity that lie at the heart of this Court's environmental jurisprudence.

25. List again on 17th March, 2026, for receiving the reports of the **Central Empowered Committee** and the DDA.

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