



ANIMAL WELFARE BOARD OF INDIA

**REPORT ON EVALUATION OF APPLICATIONS
FOR REGISTRATION OF CAPTIVE
ELEPHANTS FOR PERFORMANCE IN JAIPUR**

DECEMBER 2017 – MARCH 2018

INDEX

SI No.	Topic	Page No.
I.	Inspection Details	3
II.	Introduction	4
III.	Executive Summary	5 - 7
IV.	Observations and Interpretations	8 - 87
	1. Legal Compliance and Interpretations	08 - 47
	2. Observations on Elephants and Interpretations	48 - 77
	3. Laboratory Investigations and Interpretations	78 - 84
	4. General Observations and Interpretations	85 - 87
V.	Summary of Findings and Interpretations	88 - 91
VI.	Conclusions	92 - 94
VII.	Recommendations	95 - 96
VIII.	Annexures	97 -

I. INSPECTION DETAILS

Evaluation Authorised by:

The Animal Welfare Board of India (AWBI), through letter No 9-1/ 2017-18/ PCA, dated 8 November 2017 and 15 December 2017 (**Annexure-1**).

Evaluation Period:

December 2017 to March 2018

Locations:

Hathi Gaon (Elephant Village) near Amber (Amer) Fort and private sheds in Jaipur.

AWBI-Authorised Inspectors

- Ms Suparna Baksi Ganguly, Wildlife Rescue and Rehabilitation Centre
- Dr Manilal Valliyate, People for the Ethical Treatment of Animals, India
- Ms Janani Krishnamurthy, Kodaikanal Society for Protection and Care of Animals
- Dr Naresh Saxena, Senior Veterinary Officer, Department of Animal Husbandry, Government of Rajasthan
- Dr Arvind Mathur, Senior Veterinary Officer, Zoo Jaipur, Forest Department, Government of Rajasthan

Officials Who Facilitated the Inspection

- Mr GV Reddy, Additional Principal Chief Conservator of Forests (WL) & Chief Wildlife Warden, Government of Rajasthan
- Mr Sudarshan Sharma, Deputy Conservator of Forests (Wildlife), Zoo, Government of Rajasthan
- Mr Vijay Prakash, Assistant Conservator of Forests (Wildlife), Zoo, Government of Rajasthan

Relevant Acts, Rules and Guidelines

- The Wildlife (Protection) Act, 1972
- The Declaration of Wild Life Stock Rules, 2003
- The Prevention of Cruelty to Animals (PCA) Act, 1960
- The Performing Animals (Registration) Rules, 2001
- Guidelines for the Care and Management of Captive Elephants, issued by Project Elephant of the Ministry of Environment, Forests and Climate Change (MoEF&CC)

II. INTRODUCTION

The Forest Department of the Government of Rajasthan vide circular no 4(9) Forests/2008, dated 19 March 2010 mandated that for any use of elephants in any film, serial, advertisement, function, sport, event, exhibition, mela or for any other performance (which would include rides at Amber Fort), the owner must apply for registration from the Animal Welfare Board of India (AWBI) under the Performing Animals (Registration) Rules (PARR), 2001 (as amended in 2002).

In the matter of *The Society for Prevention of Cruelty to Animals (SPCA) v State of Kerala & ors* (WP(C) No 10424 of 2014), the Honourable High Court of Kerala – in its order dated 9 December 2014 – it was mandated that elephants used for rides must be registered under the Performing Animals (Registration) Rules, 2001. Moreover, in a Judgment dated 28 September 2015, in the matter of *VK Venkitachalam v State of Kerala & Ors* (WP(C) No 22682 of 2010), the same Court established that, where an elephant is exhibited or trained for entertainment where the public is admitted by sale of tickets, such performing elephants have to be mandatorily registered under the 2001 Rules. Additionally, the Secretary, Animal Welfare Board of India – shall ensure that the owner/caretaker of all performing elephants are compulsorily registered under the 2001 Rules, upon failure of which appropriate action be taken under the 2001 Rules. A Bombay High Court Judgment, dated 27 September 1977, in the case of the *Commissioner of Income Tax v Godavaridevi Saraf* held that, once a decision is made by any of India's High Courts and there is no contrary decision that can be made by another High Court on the same issue – as in the above two orders issued by the High Court of Kerala – the judgment is binding for all administrative authorities and tribunals in the country.

The pro forma set forth by AWBI for registration of captive elephants includes a total of 25 parameters to evaluate the eligibility of owners and animals. The Wildlife (Protection) Act, 1972, The Prevention of Cruelty to Animals Act, 1960, Performing Animals (Registration) Rules, 2001 and Guidelines for the Care and Management of Captive Elephants, issued by Project Elephant of the MoEF&CC in 2008 are the guiding documents for registration purposes.

AWBI received 103 applications from the custodians of captive elephants in Jaipur for registering their elephants under PARR, 2001 in October 2017. AWBI issued authorisation letters to evaluate these applications and to assess the welfare of the applicants' elephants, in November and December 2017.

The authorised team from AWBI inspected the elephants, evaluated the working conditions, upkeep, maintenance and housing conditions provided to these elephants and scrutinised the legal documents for each animal, in December 2017 and January 2018. The team recorded the observations along with supporting photographs and interpreted them in veterinary and legal terms. The AWBI inspectors also took the help of a reputed veterinary laboratory in Gurugram, Haryana for conducting basic haematology on blood samples collected from 91 elephants and that of Kerala Veterinary and Animal Sciences University for screening the same individual elephants for tuberculosis.

The AWBI inspectors also consulted a few leading senior lawyers with expertise in wildlife protection laws, to interpret the provisions of Wildlife (Protection) Act, 1972, the Rules framed thereunder and the guidelines on captive elephants. The legal interpretations made in this report are based on these expert consultations.

III. EXECUTIVE SUMMARY

The captive elephants were inspected at Hathi Gaon and private elephant sheds nearby Hathi Gaon through multiple visits made by inspectors of the AWBI in December 2017 and January 2018. The application forms and supporting documents received from the AWBI and the additional documents received from the custodians of the elephants and the Rajasthan Forest Department (RFD) were also scrutinised during the field visits. The housing conditions, feeding practices and working conditions of the elephants were also assessed during the visits.

While assessing the health and welfare of the elephants, blood and serum samples were collected for routine Complete Blood Count (CBC) and for screening the elephants for Tuberculosis. Out of 103 elephants, blood and serum samples could be collected only from 91 elephants, as others were not trained in such veterinary procedures and did not cooperate.

Though most of the applications stated that the elephants were tested for tuberculosis (TB), no custodian could produce a laboratory test result to justify their claim. On behalf of AWBI, the DPP® VetTB Assay for Elephants- a single-use immuno-chromatographic, rapid test for the detection of antibodies to Mycobacterium tuberculosis and Mycobacterium bovis in serum, plasma or whole blood from elephants- were procured from Chembio Diagnostic Systems. INC. USA. Upon request, veterinary colleges under the Kerala Veterinary and Animal Sciences University authorised officials from the Department of Veterinary Epidemiology and Preventive Medicine and Department of Veterinary Microbiology to conduct the tests using the DPP® VetTB Assay for Elephants, read and interpret the results. A reputed veterinary laboratory in Gurugram, Haryana conducted the tests for CBC.

The key observations and interpretations after scrutiny of 103 applications & supporting documents, field evaluations and laboratory investigations are concluded below:

- As per the Counter Affidavit filed by the Rajasthan Forest Department in W.P(C) No. 743 of 2014 (“Wildlife Rescue and Rehabilitation Centre and Ors. versus Union of India and Ors.”), there were 132 privately owned captive elephants in Rajasthan in January 2015. In January 2016, the official database showed the population as 110 captive elephants. In October 2017, details of 103 captive elephants were sent to AWBI for registration under PARR, 2001. As per the postmortem reports shared with the AWBI team, four elephants died during the period June 2017 to November 2017.
- Out of 103 applications, one elephant named Sundarkali (AWBI Application No. 3 and Ride No.38) died in October 2017.
- Out of 102 applications, matters related to legal compliance of keeping and using 53 elephants are pending before the magistrate court in Jaipur and hence the matter is sub-judice for these 53 elephants.
- Out of 102 elephants, the legitimacy of Ownership Certificates (OC), transfer of possession and the custody of remaining 49 elephants is also in question, based on the interpretations of Wildlife (Protection) Act, 1972, the Rules framed thereunder, the guidelines of MoEF&CC and the evaluation parameters set by the AWBI.

- Out of 103 applications, 48 elephants seem to have been issued illegitimate OCs by the RFD as they mention “source of purchase” and “present market value” of the elephant. Both these citations indicate the commercial value of an elephant, which is prohibited under the law. Several OCs issued by the RFD are in addition to the old OCs issued to a previous custodian by another State’s Forest Department, thereby contradicting the provisions of Wildlife (Protection) Act, 1972. It is also pertinent to note that, out of the 48 OCs issued by the Rajasthan Forest Department, a few were issued prior to the notification of The Declaration of Wild Life Stock Rules, 2003, an amnesty scheme by the central government with a timeframe of 180 days. The remaining majority of OCs have been issued 7-14 years after the 2003 amnesty scheme, questioning the legitimacy of these OCs.
- Out of 102 applications, 19 captive elephants were observed to be blind, either unilaterally (right or left eye) or bilaterally (both eyes), rendering them unfit for any work, as the safety of the elephants and people around them are at high risk if such wild animals are used for any purpose, including joy rides.
- Out of 91 elephants screened for TB, a disease which is transferable to humans by elephants, 10 elephants were found to be positive for TB. Blood or serum samples could not be collected from 12 elephants as the animals were not cooperating. These remaining 11 elephants (1 dead) have to be subject to TB screening before deciding whether they qualify for registering under PARR, 2001.
- 100% elephants suffer from various foot problems including overgrown toenails with cracks, deformation, discoloration, overgrown cuticle around nails and in the interdigital space, dry and cracking and thin, uneven and bruised footpads, etc.
- Out of 102 elephants, the tusks of 47 elephants have been cut and the custodians could not produce any document regarding permission taken from the Forest Department before doing so, which is in apparent violation of the Wildlife Protection Act, 1972 and MoEF&CC guidelines, raising suspicion that the tusks entered the trade of illegal wildlife articles. With one pair of cut ivory from each elephant weighing at least, 0.5 to 1 kg, the estimated weight of total ivory from 47 elephants, with no legal accounts, is estimated to be approximately 25 - 50 kg.
- Out of the 103 applications, more than 28 elephants were found to be above the age of 50 years.
- Many elephants were observed to display stereotypical behavior such as repetitive swaying and head-bobbing ranging from moderate to intense, indicative of extreme mental distress and deterioration.
- Since the load limit prescribed by MoEF&CC in its guidelines do not allow even the tallest elephants to carry load weighing more than 200 kgs on a hilly terrain, rides at Amber fort cannot be permitted. As per the field evaluations conducted, the weight of the howdah, safety gears and one mahout alone weigh around 200 kg.
- As per the prescribed load limits recommended by MoEF&CC for an elephant of a particular height, out of 102 applications only 49 elephants can offer rides on plane terrains with one rider in addition to a mahout and only 43 elephants can offer rides on plane terrains with two riders at a time, excluding the mahout. However, 24 elephants out

of 49 under this category do not qualify other criteria set by the AWBI for registration under PARR, 2001.

- Out of the above mentioned 49 elephants, only 25 elephants can be registered with the AWBI for offering rides on plane terrains with a restriction on the number of riders, provided, the validity of their OC is confirmed by the RFD and efforts are taken by the custodians of these elephants to improve their welfare conditions. Out of the 25 elephants eligible to be used for rides on plane terrains, 10 can carry only one rider excluding the mahout and only 15 can carry two riders, excluding the mahout. Moreover, a set of tranquilizing equipment with essential drugs for meeting emergencies must be made available at the elephant village, along with an assurance of availability of expert veterinarians for its use.
- The illegal presence of 3 juvenile sub-adult elephants, who are not a part of the application submitted to the AWBI, indicate rampant violation of wildlife protection laws.

The report concludes with the following recommendations:

- Based on the compilation of observations and its interpretations as per important legal provisions, guidelines of MoEF&CC and parameters set by AWBI in its application form, none of the 102 elephants qualifies all the criteria set for registration with the AWBI under PARR, 2001. No elephants can be registered for offering rides at Amer Fort due to the load restrictions mandated by the MoEF&CC's guidelines and other provisions of the law.
- If the RFD could establish the validity of the OC of 25 elephants and improve their welfare, these 25 elephants may be given registration under PARR, 2001 for offering rides only on plane terrains, provided, load restrictions as per the MoEF&CC's guidelines are strictly followed and availability of tranquilizing equipment and veterinary expert to deal with animal emergencies are ensured.
- In order to protect public health and the welfare of 10 elephants who were tested positive for TB tests, these animals maybe seized and quarantined immediately and be provided with immediate veterinary care. It is also important that all the elephants in Jaipur who are not screened by the AWBI for TB must be subjected to TB testing immediately.
- Elephant Champa (AWBI Application no 59; Ride No. 84) who is presently suffering from malnourishment, severe wounds all over the body, foot ailments etc. needs to be immediately seized and rehabilitated to a reputable elephant-care center, where she should live on soft ground, unchained and receive the much needed veterinary care and a nutritious diet.
- An inquiry needs to be conducted into the current practice of cutting tusks without taking necessary permission from the forest department and into why there are two elephant calves in private custody in Jaipur, in rampant violation of wildlife protection laws. Additionally, the accurate number of captive elephant population in Rajasthan also needs to be ascertained.

IV. OBSERVATIONS AND INTERPRETATIONS

1. LEGAL COMPLIANCE AND INTERPRETATIONS

A. Mandatory Legal Requirements

An expert legal opinion from renowned senior advocates, interpreting wildlife laws applicable to captive elephants in India, is enclosed as **Annexure-2**.

Name of the Act/Rule/ Guideline	Purpose	Section/ Rule/ Point	Relevant part	Interpretation
i. Microchipping				
Guidelines for care and management of captive elephants (GCMCE)	Microchipping	Point 1 under 'Ownership Certificate'	<i>All States / UTs would carry out a fresh survey of the captive elephants in their territory within a period of six months and report the number to the Ministry. All the captive elephants shall be microchipped for which chips have been provided in adequate numbers to the states /UTs. Fresh ownership certificate should be issued in the form annexed for a period of five years and should be renewed every five years in case there is no violation of the norms to be followed.</i>	Microchipping is necessary for identification of the elephant.
Declaration of Wild Life Stock Rules (DWSR), 2003	Microchipping	Rule 11(3)	<i>The certificate of ownership shall contain the facsimile of the identification mark and in case of live animals the identification number of the transponder (microchip) implanted shall be mentioned in the certificate.</i>	Microchipping is necessary for identification of the elephant.
ii. Declaration of an Elephant				
Wildlife (Protection) Act (WPA), 1972	Declarations	Section 40 (1)	<i>Every person having at the commencement of this Act the control, custody, or possession of any captive animal specified in Sch. I or Part 11 of Sch. 11, or any uncured trophy derived from such animal or salted or dried skin of such animal or the musk of a musk deer or the horn of a rhinoceros, shall, within thirty days from the commencement of this Act, declare to the Chief Wildlife-Warden or</i>	Declaration is the first process for legal custody of a captive elephant.

			<i>the authorised officer the number and description of animal, or article of the foregoing description under his control, custody or possession and the place where such animal or article is kept.</i>	
DWSR, 2003	Procedure for filing applications	Rule 4 (1)	<i>An application to the Chief Wildlife Warden or the officer authorized by the State Government in this regard shall be presented in the Form annexed to these rules by the applicant either in person or by an agent or by duly authorized legal practitioner or sent by registered post addressed to the Chief Wild Life Warden or the officer authorized by the Sate Government in this regard of the concerned State or the Union territory.</i>	DWSR, 2003 was the last opportunity given by central government for declaring undeclared elephants in captivity.
DWSR, 2003	Procedure for filing applications	Rule 4(2)	<i>The application under sub rule (1) shall be presented in four complete sets within a period of one hundred and eighty day from the date of publication of these rules.</i>	180 days period (18 April to 18 October 2003) was allowed for declaration.
DWSR, 2003	Decision on applications	Rule 8(1)	<i>The Chief Wild Life Warden or the officer authorized by the State Government in this regard shall verify the facts mentioned in the application and make such inquiry as maybe required.</i>	Decision on applications based on an inquiry made by CWLW.
DWSR, 2003	Decision on applications	Rule 8(2)	<i>The Chief Wild Life Warden shall, as far as possible, decide the application within six months of the date of its presentation and communicate the same to the applicant in writing under his own signature by registered post</i>	Within 6 months, CWLW to decide on the application.
GCMCE	Declaration	Point 2 under 'Ownership Certificate'	<i>Illegal elephants i.e those which have not been declared under the declaration of the Wild life Stock Rules 2003 or are found without valid documents will be confiscated.</i>	Elephant not declared will be confiscated.

iii. Inquiry and Preparation of Inventory				
WPA, 1972	Inquiry and preparation of inventories	Section 41(1)	<i>On receipt of a declaration made under sec.40, the Chief Wildlife Warden or the authorised officer may, after such notice, in such manner and at such time as may be prescribed, (a) enter upon the premises of a person referred to in Sec.40; (b) make inquiries and prepare inventories of animal articles, trophies, uncured trophies, salted and dried skins, and captive animals specified in Sch. I and Part 11 of Sch. 11 and found thereon; and (c) affix upon the animals, animal articles, trophies of uncured trophies, identification marks in such manner as may be prescribed.</i>	Inquiries to be done and inventories to be prepared by CWLW after declaration.
DWSR, 2003	Inquiry by the Chief Wild Life Warden or Authorized Officer	Rule 10(1)	The Chief Wild Life Warden or the officer authorized by the State Government in this regard shall conduct a detailed inquiry and take all actions as provided in section 41 of the Act.	As above.
iv. Issue of Ownership Certificate				
WPA, 1972 and Wild Life (Protection) Amendment Act, 2002	Certificate of ownership (OC)	Section 42	<i>The Chief Wildlife Warden may, for the purposes of Sec. 40, issue a certificate of ownership in such form, as may be prescribed, to any person who, in his opinion, is in lawful possession of any wild animal or any animal article, trophy, or uncured trophy, and may, where possible, mark, in the prescribed manner, such animal article, trophy or uncured trophy for the purposes of Identification.</i> <i>Provided that before issuing the certificate of ownership in respect of any captive animal, the Chief Wild Life Warden shall ensure that the applicant has adequate facilities for housing, maintenance and upkeep of the animal.</i>	Ownership Certificate is issued by CWLW when facilities for housing, maintenance and upkeep are found to be adequate.
DWSR, 2003	Certificate of ownership	Rule 11(1)	<i>The Chief Wild Life Warden shall provide a certificate of ownership</i>	Ownership Certificate only

			<i>to the applicant whose claim is found valid.</i>	upon fulfilment of Rule 8 & 10 of DWSR.
GCMCE	Certificate of ownership for a calf born in captivity	Point 3 under 'Ownership Certificate'	<i>It would be mandatory for the owners to declare in writing in advance to the nearest Divisional Forest Officer or to the authorized officer by the state government of the pregnancy of the female elephants in order to get fresh ownership certificate of the calf. The certificate would be issued to the calves of the legal cows only after physically ascertaining that they are genuine offspring or after getting the DNA test done.</i>	Ownership Certificate can be issued to a calf born in captivity to legal cows.
v. Transfer of Custody and Transport of Elephant				
WPA, 1972	Transfer of Custody and transport	Section 40(2)	<i>No person shall, after the commencement of this Act, acquire, receive, keep in his control, custody or possession, sell, offer for sale, or otherwise transfer or transport any animal specified in Sch. 1 or Part 11 of Sch. 11, any uncured trophy or meat derived from such animal, or the salted or dried skin of such animal or the musk of a deer or the horn of a rhinoceros, except with the previous permission in writing of the Chief Wildlife Warden or the authorised officer.</i>	Transfer of custody of elephant only with written permission of CWLW, and transport of elephants only after NOC and Transport Permit are issued by respective CWLWs.
Wild Life (Protection) Amendment Act, 2002	Regulation of transfer of animal, etc.	Section 43(1)	<i>No person having in his possession captive animal, animal article, trophy or uncured trophy in respect of which he has a certificate of ownership shall transfer by way of sale or offer for sale or by any other mode of consideration of present market nature, such animal or article or trophy or uncured trophy.</i>	No transfer of elephants by way of sale or offer for sale is permitted.
The Wild Life (Protection) Amendment Act, 1991	Restriction on transportation of wild life	Section 48-A	<i>No person shall accept any wild animal (other than vermin), or any animal article, or any specified plant or part of derivative thereof, for transportation except after exercising due care to ascertain</i>	Transportation Permission from CWLW is a pre-requisite for

			<i>that permission from Chief Wildlife Warden or any other officer authorised by the State Government in this behalf has been obtained for such transportation.</i>	transportation of an elephant.
GCMCE	Transportation of elephant	Point 1 under 'Transportation of Elephants'	<i>For transportation of elephants, necessary permission from CWLW or any officer authorized by the government in this behalf shall be obtained as per section 48-A of the WP Act 1972.</i>	As above
GCMCE	Health certificate	Point 2 under 'Transportation of Elephants'	<i>A valid health certificate from a veterinary doctor to the effect that the elephant is fit to travel by road or rail, as the case may be, and is not showing any sign of infectious or contagious disease shall be obtained.</i>	A health certificate is a pre-requisite for issue of Transport Permit
GCMCE	Health certificate	Point 3 under 'Transportation of Elephants'	<i>In the absence of such certificate, CWLW shall not give permission for transport.</i>	As above
GCMCE	Destination & Period of transport	Point 4 under 'Transportation of Elephants'	<i>Permission, if any, should be given for transport to a particular destination and for a fixed period. It would be incumbent for the owner to bring back the elephant to the place of residence within this period.</i>	The destination & period for transport will be fixed by CWLW.
GCMCE	No objection Certificate from CWLW	Point 5 under 'Transportation of Elephants'	<i>Before the issue of transport permit, CWLW or the authority issuing the permit would obtain no objection from the CWLW of the state where it is to be transported about the availability of the adequate housing facility at the place where it is to be kept.</i>	NOC from CWLW of the State where the elephant is transported is a pre-requisite for issuing Transport Permit.
GCMCE	Reporting	Point 6 under 'Transportation of Elephants'	<i>It will be mandatory for the owner to inform the CWLW of the state within 30 days where it has been transported.</i>	The arrival of the elephant in the state has to be reported to CWLW within 30 days.

GCMCE	Restriction on transport	Point 7 under 'Transportation of Elephants'	<i>Except for return journey, no permission for the further onward transport of the elephant to other states will be given by the CWLW of the state where it is in transit.</i>	CWLW where the elephant is in transit cannot give permission for any further journey other than return.
GCMCE	Action if no valid transport certificate	Point 8 under 'Transportation of Elephants'	<i>In case any captive elephant is found in any state without valid transport certificate, it is liable for confiscation.</i>	Elephant without valid transport certificate is liable for confiscation.
vi. Permissible Work Load of Elephant				
GCMCE	Restriction of load on elephants	Point under 'Work Load of Elephant'	<i>(a) The scale of load including gears, riders and materials for the elephant shall be as follow: Height of elephant & Load: Below 1.50 m - Not to be used for carrying load; 1.50 m to 1.80 m - Not exceeding 150 kg (to carry only fodder and trainer); 1.81 m to 2.25 m - Not exceeding 200 kg; 2.26 m to 2.55 m - Not exceeding 300 kg; Above 2.55 m - Not exceeding 400 kg (b) The load scale shall be reduced by 50% in hilly or other difficult terrain.</i>	Permissible limit for an elephant of over 2.55 m height in a hilly terrain is, 200 kg.
vii. AWBI Application Process				
Application for Registration of Elephants as Performing Animals in Safari Rides, Processions, and Other Such Events	Responsibility on the part of custodians of elephants	Declaration: a) to k)	<i>a) This application has to be processed for permission and registration of performing animals. Until the permission is issued, performance/ exhibition/ ride with performing animals will not be undertaken.</i>	No animals to be used for rides until AWBI issues permission.
viii. Cutting Tusk				
WPA, 1972	Trade of tusk/ ivory	Section 39(1) (c) and 40(1) of WPA, 1972	<i>Ivory imported into India and an article made from such ivory in respect of which any offence against this Act or any rule or order made thereunder has been committed.</i>	Trade of tusk/ ivory is prohibited

WPA, 1972	Declaration of tusk/ ivory	Section 40(1) of WPA, 1972, Rule 4(1), 4(2), 8(1) and 8(2) of DSWR, 2003 and Point 2 under 'Ownership Certificate' of GCMCE.	<i>As above</i>	Possession of tusk/ ivory to be declared.
GCMCE	Procedure for cutting tusks	Points under 'Cutting Tusks'	<p><i>(a)The owner of the tusker shall apply for permission of the Chief Wildlife Warden or the officer authorized by him in this behalf, for cutting or shaping the tusk through a letter sent by registered post, including the location where it will be done and the name of the competent person who would perform the operation at least one month in advance</i></p> <p><i>(b)The Chief Wildlife Warden shall issue the permission within three weeks to carry out the operation in the presence of an officer not below the rank of Forest Range Officer or Forest Veterinary Officer or Assistant Forest Veterinary Officer as instructed by the Chief Wildlife Warden;</i></p> <p><i>(c)The authorized officer shall report to the Chief Wildlife Warden, the details of the cut portion such as, length and weight of the tusk;</i></p> <p><i>(d)In case permission is not granted, the owner shall be intimated of the reason for rejecting the request in writing;</i></p> <p><i>(e)The Chief Wildlife Warden, based on a written request with the details shall issue permit to the owner for keeping the cut tusks in accordance with the provisions of the Act.</i></p>	Written permission to be taken from forest department to cut the tusks of an elephant

B. Compliance to Legal Requirements

The elephants in Jaipur known by their Ride Numbers. Document provided by Rajasthan Forests Department with Ride Numbers is enclosed as **Annexure-3**.

i. First Information Report Filed by Forest Department For Illegal Custody of Elephants in Jaipur

AWBI received 103 applications for registration of elephants for joy rides and for other performances under PARR, 2001. As per the records provided by Rajasthan Forest Department (RFD), First Information Reports have been filed against custodians of 61 captive elephants in Jaipur, for not having a valid Ownership Certificate to prove their legal rights in order to keep the custody of these animals. Out of 61 against whom FIRs have been filed, 52 custodians have applied for registration with AWBI. A case regarding this is pending before the Additional Civil Court and Metropolitan Magistrate, Amer, Jaipur. A copy of list of custodians against whom Rajasthan Forest Department have filed an FIR for keeping illegal custody of elephants without necessary documents, including Ownership Certificate mandated under Wildlife (Protection) Act, 1972 is enclosed as **Annexure-4**.

The list of AWBI applicants, against whom an FIR has been filed and a Court matter is pending, is as follows:

SI No.	AWBI Application No	RFD Ride No.	Microchip No	Name of the Owner	Father/ Wife's Name	Elephant's Name
1	1	65	00064DEBDE7	Shahid Khan	Shabbir khan	Anar
2	2	11	961001000002451	Shahid Khan	Shabbir khan	Jaimala
3	9	134	961001000005145	Shoaib Ali	Salim Khan	Sundarkali
4	10	117	00064E6E0F	Madeena Begum	W/O Late Saleem	Laxmi
5	11	112	00065866D5	Sameer Khan	Shabbir khan	Chanda
6	13	31	961001000005378	Saddik Khan	Azim khan	Anamika
7	14	97	00065907DE	Mohammad Arif	Shabbir Khan	Monimala
8	15	109	961001000005674	Ateek Khan	Rasheed Khan	Rani/Tami
9	22	24	961001000006011	Arshad Ali	Ishak Ali	Rukmini
10	23	25	961001000004251	Wazid Khan	Abdul Rashid	Golapi
11	24	88	958000000707867	Wazid Khan	Abdul Rashid	Gulab Kali
12	25	NA	0006A29323	Wazid Khan	Abdul Rashid	Sonu
13	26	35	961001000002987	Ayub Khan	Abdul Rashib	Maina
14	27	41	000647CBB8	Madeena Begum	Saleem	Dilruba
15	28	113	961001000001968	Mohammed Jahid	Mohammed Sabir	Padma
16	29	27	961001000004783	Mohammed Javed	Mohammed Sabir	Rongmala

17	30	122	00064E6489	Kaniz Begum	Abdul Wahid	Roopkali (Rupkali)
18	31	132	00065912CC	Farhaan	Abdul Wahid	Kusum Mala
19	33	126	961001000004214	Irfan Ali	Ikram Ali	Golapi
20	34	96	000658FD9B	Saleem khan	Sher Khan	Shobha (Bhobha)
21	36	130	0006B71ECB	Salman Khan	Salim Khan	Luxmi
22	37	133	0006EFDB91	Saleem Khan	Shar Khan	Bonmala
23	38	116	961001000004495	Sohail Khan	Salim Khan	Phoolwanti
24	41	102	961001000002874	Jibran khan	Shabbir Khan	Sampa
25	42	125	00064E08AA	Jibran khan	Shabbir Khan	Luxmi
26	45	110	961001000005931	Shafiq Khan	Shabbir Khan	Birli
27	46	92	000647CABE	Wajid khan	Majeed Khan	Jaitara
28	47	93	0006A283B8	Wajid khan	Majeed Khan	Anno
29	49	131	961001000005936	Shafiq Khan	Shabbir Khan	Chanchal
30	51	73	00065955A5	Abdul Jameel	Abdul Hameed	Rajkali
31	52	74	0006595D40	Hamid Hussain	Babu Khan	Champa
32	53	43	961001000004070	Ateek Khan	Rasheed Khan	Rangdoi
33	54	100	000658FASF	Rahim Ali	Sayyed Ali	Gouri
34	55	128	961001000005349	Saleem Khan	Babu Khan	Joymala
35	57	98	000647A8D6	Rajendra Kumar Sharma	Badri Narayan Sharma	Hanumat (Manumati)
36	59	84	00065906B5	Rajendra Kumar Sharma	Badri Narayan Sharma	Champa
37	62	2	0006AZA852	Abdul Aziz	Abdul Rashid	Ramkali
38	63	57	961001000003672	Saddik Khan	Azim Khan	Laksami
39	64	30	961001000005526	Latif Aalam	Sher Khan	Bhogwati
40	70	120	961001000006038	Ummerdeen	Lallu Khan	Joya
41	71	95	961001000003168	Ummerdeen	Lallu Khan	Munni
42	72	17	961001000005823	Imran	Ummerdeen	Rangmala
43	73	129	961001000002961	Irfan Khan	Mohd. Faruk	Lakshmi
44	75	99	000658EEC5	Naemuddeen	Munne Khan	Rani
45	76	127	958000000719239	Riyajuddin	Munne Khan	Champa
46	77	107	00064DF07D	Nazar Mohammed	Munne Khan	Savetri
47	78	106	961001000005769	Nazar Mohammed	Munne Khan	Champa
48	87	127	961001000003424	Rashid Khan	Faiyaz Khan	Chameli
49	99	105	000658F77D	Saleem Khan	Shar Khan	Champa (Chanchal)
50	101	115	000647BBDC	Firoj Khan	Shahid Khan	Pinki
51	102	111	961001000004498	Abdul Aziz	Abdul Rashid	Joymoti
52	103	94	000658F57D	Saddik Khan	Azim Khan	Shanti

A copy of the Ownership Certificates of these 52 elephants are enclosed as **Annexure-5**.

Apparent Legal Violations:

SI No	AWB I Application No.	RFD Ride No.	Observations, Interpretations and Reference to Laws
1	1	65	<ul style="list-style-type: none"> • OC issued in 2007 after the expiry of 2003 central government amnesty scheme, in the name of owner of Western Circus, a resident of West Bengal by Jharkhand Forest Department (FD) (See IV.1.A.ii, iii and iv) • Order of inquiry by RFD (See IV.1.A.ii and iii) • ‘Transport Permit (TP)’ reported to be issued by Uttar Pradesh FD and RFD. (Ideally to be issued by Jharkhand FD. See IV.1.A.v.) • No ‘No Objection Certificate (NOC)’ to take elephant to Jaipur (Ideally to be issued by RFD. See IV.1.A.v.) • No transfer of possession vetted by RFD and Jharkhand FD. (See IV.1.A.v.)
2	2	11	<ul style="list-style-type: none"> • OC issued by Assam FD before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort by Dept. of Archaeology and Museums (Only to be done by AWBI under PARR, 2001) • No ‘Transport Permit (TP)’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
3	9	134	<ul style="list-style-type: none"> • OC issued by Assam FD after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • TP reported to be issued by Bihar FD on 18-09-2013 for the period 17.09.2013 to 10.10.2013 (Ideally to be issued by Assam FD. See IV.1.A.v.) • ‘NOC’ 05-04-2013 by Rajasthan FD (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
4	10	117	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2004, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
5	11	112	<ul style="list-style-type: none"> • OC issued by Assam FD to Moonlight Circus in 2010, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv)

			<ul style="list-style-type: none"> • The OC states that the Elephant was purchased from a person in Guwahati, Assam. The Sale of elephants for present market purpose is Illegal. (See IV.1.A.v) • The Andhra Pradesh FD issued a TP on 30.05.2013 for the period 02.06.2013 to 12.06.2013 (Ideally to be issued by Assam FD. See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
6	13	31	<ul style="list-style-type: none"> • OC issued by Assam FD after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP on 11.10.2010 for the period 13.10.2010 to 11.11.2010 (Ideally to be issued by Assam FD. See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
7	14	97	<ul style="list-style-type: none"> • OC issued by Assam FD in 2007, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 20.05.2013 for the period 20.05.2013 to 18.06.2013 (Ideally to be issued by Assam FD. See IV.1.A.v) • NOC issued by the Rajasthan FD on 12.03.2013 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
8	15	109	<ul style="list-style-type: none"> • OC issued by Arunachal Pradesh FD before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort by Dept. of Archaeology and Museums Department (Only to be done by AWBI under PARR, 2001) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
9	22	24	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
10	23	25	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv)

			<ul style="list-style-type: none"> • The Bihar FD issued a TP on 12.10.2007 for the period 12.10.2007 to 22.10.2007 (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
11	24	88	<ul style="list-style-type: none"> • OC issued by Delhi FD in 2007, after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Delhi FD issued a TP on 29.08.2012 for the period 30.08.2012 to 29.09.2012 (See IV.1.A.v) • 'NOC' issued by Rajasthan FD on 24.08.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
12	25	NA	<ul style="list-style-type: none"> • A Provisional OC issued in 2001 by Bihar FD to Rajmahal Circus before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Madhya Pradesh FD issued a TP on 17.10.2011 for the period 17.10.2011 to 19.10.2011 (Ideally to be issued by Bihar FD. See IV.1.A.v) • 'NOC' by Rajasthan FD- not dated (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
13	26	35	<ul style="list-style-type: none"> • OC issued by Assam FD in 2007, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 08.06.2007 for the period 08.06.2007 to 28.06.2007 (Ideally to be issued by Assam FD. See IV.1.A.v) • The Rajasthan FD informed the Archelogy and Museum Department on 16.07.2008, that they do not have the authority to allow elephants for rides (Only to be done by AWBI under PARR, 2001) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
14	27	41	<ul style="list-style-type: none"> • A Provisional OC issued by Bihar FD in 1999, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
15	28	113	<ul style="list-style-type: none"> • OC issued by Assam FD in 2004, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v)

			<ul style="list-style-type: none"> • No legal document to prove transfer of possession (See IV.1.A.v)
16	29	27	<ul style="list-style-type: none"> • OC issued by Assam FD in January 2003 before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 18.09.2013 for the period 17.09.2013 to 10.10.2013 (Ideally to be issued by Assam FD. See IV.1.A.v) • ‘NOC’ issued by the Rajasthan FD on 09.04.2013 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
17	30	122	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
18	31	132	<ul style="list-style-type: none"> • OC issued by Uttar Pradesh FD in 2007, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • ‘NOC’ issued by the Rajasthan FD on 21.11.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
19	33	126	<ul style="list-style-type: none"> • OC issued by Assam FD in 2004, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Assam FD issued a TP on 20.11.2004 (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
20	34	96	<ul style="list-style-type: none"> • OC issued by Maharashtra FD in 1999, to a Partner in New Grand Circus before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Karnataka FD issued a TP on 19.12.2003 to transport the Elephant to Uttar Pradesh for the period 12.12.2003 to 26.12.2003 (Ideally to be issued by Maharashtra FD. See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
21	36	130	<ul style="list-style-type: none"> • OC issued by Bihar FD in 1999, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv)

			<ul style="list-style-type: none"> • The Punjab FD issued a TP on 31.10.2012, valid up to 30.11.2012 (Ideally to be issued by Bihar FD. See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
22	37	133	<ul style="list-style-type: none"> • OC issued by Assam FD in 2013, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Assam FD issued a TP on 26.04.2013 to move the Elephant to Rajasthan for a period of 3 years (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
23	38	116	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP on 04.05.2005, valid up to 13.05.2005 (Ideally to be issued by Assam FD. See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
24	41	102	<ul style="list-style-type: none"> • OC issued by Assam FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 13.04.2007 for the period 13.04.2007 to 26.04.2007 (Ideally to be issued by Assam FD. See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
25	42	125	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 27.07.2007 (Only to be done by AWBI under PARR, 2001) • The Bihar FD issued a TP on 13.08.2007 for the period 13.08.2007 to 28.08.2007 (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
26	45	110	<ul style="list-style-type: none"> • OC issued by Assam FD in April 2003, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv)

			<ul style="list-style-type: none"> • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 11.07.2005 (Only to be done by AWBI under PARR, 2001) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
27	46	92	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2002, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 04.10.2004 (Only to be done by AWBI under PARR, 2001) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
28	47	93	<ul style="list-style-type: none"> • A Provisional OC issued by Bihar FD in 2001, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Haryana FD issued a TP on 28.10.2011 for the period 02.11.2011 to 06.11.2011 (Ideally to be issued by Bihar FD. See IV.1.A.v) • Rajasthan FD issued a 'NOC' on 28.11.2011 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
29	49	131	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP in February 2013 (Ideally to be issued by Assam FD) (See IV.1.A.v) • 'NOC' issued by Rajasthan FD on 29.09.2011 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
30	51	73	<ul style="list-style-type: none"> • OC issued by Uttar Pradesh FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP on 07.02.2011 and 18.03.2011 (See IV.1.A.v) • 'NOC' issued by Rajasthan FD on 11.02.2011 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
31	52	74	<ul style="list-style-type: none"> • OC issued by Uttar Pradesh FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v)

			<ul style="list-style-type: none"> • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
32	53	43	<ul style="list-style-type: none"> • OC issued by Assam FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 22.04.2009 (Only to be done by AWBI under PARR, 2001) • The Assam FD issued a TP on 07.02.2007 for Transport of the Elephant from Assam to Bihar. (See IV.1.A.v) • The Bihar FD issued a TP on 21.06.2007 for the period 21.06.2007 to 11.07.2007 (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
33	54	100	<ul style="list-style-type: none"> • OC issued by Maharashtra FD in 1999, to a Partner in New Grand Circus, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Karnataka FD issued a TP on 12.02.2003 for the period 12.02.2003 to 26.12.2003 to transport the Elephant from Karnataka to Uttar Pradesh (Ideally to be issued by Maharashtra FD. See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
34	55	128	<ul style="list-style-type: none"> • OC issued by Assam FD in 2006, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP in September 2012 for the period 25.09.2012 to 10.10.2012 (Ideally to be issued by Assam FD) (See IV.1.A.v) • 'NOC' issued by the Rajasthan FD on 02.01.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
35	57	98	<ul style="list-style-type: none"> • OC issued by Arunachal Pradesh FD in 2002, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Elephant was purchased from a person on 26.06.2002. The Sale of Elephants or offer for sale is Illegal (See IV.1.A.v) • The Arunachal Pradesh FD issued a TP on 08.07.2002 for a period of 30 days from Arunachal Pradesh till Bihar (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)

36	59	84	<ul style="list-style-type: none"> • OC issued by Uttar Pradesh FD in 2007, after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 06.08.2012 (Only to be done by AWBI under PARR, 2001) • The Uttar Pradesh FD issued a TP on 29.05.2012, 04.06.2012, 29.06.2012 and 30.07.2012 (See IV.1.A.v) • NOC' issued on 23.07.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
37	62	2	<ul style="list-style-type: none"> • OC issued by Uttar Pradesh FD in 1998, to Rajmahal Circus, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Uttar Pradesh FD issued a TP on 22.04.2013 for the period 18.04.2013 to 24.04.2013 (See IV.1.A.v) • 'NOC' by Rajasthan FD dated 07.09.2012 (See IV.1.A.v) • Reported to CWLW, Rajasthan on 20.05.2013 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
38	63	57	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 15.11.2006 for the period 17.11.2006 to 16.12.2006 (Ideally to be issued by Assam FD. See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
39	64	30	<ul style="list-style-type: none"> • A Provisional OC was issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Assam FD issued a TP on 12.10.2010 valid up to 11.11.2010 from Assam to Haryana (See IV.1.A.v) • The Haryana FD issued a TP on 30.04.2012 for the period 05.05.2012 to 04.06.2012 from Haryana to Rajasthan (Ideally to be issued by Assam FD. See IV.1.A.v) • 'NOC' issued by Rajasthan FD on 16.05.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
40	70	120	<ul style="list-style-type: none"> • OC issued by Assam FD in 2006 after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Assam FD issued a TP on 11.08.2006 valid up to 10.09.2006 from Assam till Bihar (See IV.1.A.v)

			<ul style="list-style-type: none"> • Bihar FD issued an ‘NOC’ on 19.07.2006 (See IV.1.A.v) • The Bihar FD issued a TP on 30.12.2006 for the period 30.12.2006 to 15.01.2007 from Bihar to Rajasthan (Ideally to be issued by Assam FD. See IV.1.A.v) • No ‘NOC’ from Rajasthan FD (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
41	71	95	<ul style="list-style-type: none"> • OC issued by Delhi FD in 2010 after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Delhi FD issued a TP on 14.09.2012 for the period 15.09.2012 to 14.10.2012 (See IV.1.A.v) • ‘NOC’ issued by the Rajasthan FD on 07.09.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
42	72	17	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP on 08.12.2011 for the period 09.12.2011 to 30.12.2011 (Ideally to be issued by Assam FD. See IV.1.A.v) • ‘NOC’ by Rajasthan FD on 10.01.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
43	73	129	<ul style="list-style-type: none"> • OC issued by Assam FD in January 2003, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
44	75	99	<ul style="list-style-type: none"> • No OC (See IV.1.A.ii, iii. and iv) • No ‘Transport Permit’ (See IV.1.A.v) • No ‘NOC’ (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
45	76	127	<ul style="list-style-type: none"> • OC issued by Delhi FD in 2010, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Delhi FD wrote to the Rajasthan FD on 23.02.2011 asking for a ‘NOC’ • Rajasthan FD issued a ‘NOC’ on 07.09.2012 (See IV.1.A.v) • The Delhi FD issued a TP on 14.09.2012 for the period 15.09.2012 to 14.10.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)

46	77	107	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2004, after the expiry of 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Bihar FD issued a TP for the period 01.07.2012 to 10.07.12 (See IV.1.A.v) • Rajasthan FD issued an 'NOC' on 19.06.2012 (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
47	78	106	<ul style="list-style-type: none"> • OC issued by Assam FD in 2001, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
48	87	123	<ul style="list-style-type: none"> • OC issued by Assam FD in 2005, after the expiry of the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • The Assam FD issued a TP on 06.05.2005 valid up to 19.06.2005 from Assam to Uttar Pradesh. (See IV.1.A.v) • The Uttar Pradesh FD issued a TP on 24.11.2006 for the period 25.11.2006 to 13.12.2006 from Uttar Pradesh to Rajasthan (Ideally to be issued by Assam FD. See IV.1.A.v) • Permission to use elephant for rides at Amber fort given by Dept. of Archaeology and Museums on 22.02.2007 (Only to be done by AWBI under PARR, 2001) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
49	99	105	<ul style="list-style-type: none"> • OC issued by Bihar FD in 2000, before the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
50	101	115	<ul style="list-style-type: none"> • OC issued in 1996 by Assam FD (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v) • No legal document to prove transfer of possession (See IV.1.A.v)
51	102	111	<ul style="list-style-type: none"> • OC issued by Assam FD in 2004, after the 2003 amnesty scheme (See IV.1.A.ii, iii. and iv) • No 'Transport Permit' (See IV.1.A.v) • No 'NOC' (See IV.1.A.v)

			<ul style="list-style-type: none"> No legal document to prove transfer of possession (See IV.1.A.v)
52	103	94	<ul style="list-style-type: none"> OC issued by Nagaland in 2000 (See IV.1.A.ii, iii. and iv) TP for the Elephant to be transported to Rajasthan was issued in 2000 by Nagaland (See IV.1.A.v) No 'NOC' (See IV.1.A.v) No legal document to prove transfer of possession (See IV.1.A.v)

ii. Validity of Ownership Certificate (OC) Issued by the Rajasthan Forest Department and Validity of Other Documents

Out of the 103 applications received by AWBI, 48 captive elephants have Ownership Certificate issued by RFD. The details are as follows:

Sl No.	AW BI Appl ication No.	RFD ride No.	Microchip No.	Name of the Owner	Father/ Wife's Name	Elephant's Name	OC: Date of Issue/ Renewal
1	4	76	0006592126	Savir (Shabir) Khan	Lal Khan	Santi (Bhanti)	18.07.2017
2	7	89	961001000005 056	Moham med Salim	Abdul Hakim	Bulbul	18.07.2017
3	8	72	000647D169	Islam Ali	Moham mad Ali	Lakkimala	15.07.2004/ 10.03.2015
4	19	83	961001000001 952	Sakina	Kayum Khan	Chanchal (Chanchali)	18.07.2017
5	21	82	961001000002 439	Sakina	Kayum Khan	Rongmol (Rangoli)	18.07.2017
6	35	71	000647DAAE	Shakhat Ali	Ikram Ali	Myna	15.07.2004 10.03.2015
7	39	70	000647946C	Umaradr aj	Kayum Khan	Rohini	18.07.2017
8	40	59	000647D83D	Irfan Mansuri	Umar Ddin	Champakali	18.07.2017
9	43	81	000652C1AA	Husna Bano	Abdul Rashid	Gomati (Maumati)	15.07.2004 10.03.2015
10	48	55	0006596414	Shafiq Khan	Shabbir Khan	Majani (Jai Moti)	15.07.2004 10.03.2015
11	50	22	00065930A5	Khurshe d	Shabbir Khan	Pavan Mala	15.07.2004 10.03.2015
12	60	90	000652B23D	Manoj Gupta	Yogesh Gupta	Rangmala	18.07.2017

13	65	21	0006584C6D	Irfan Mansuri	Umar Ddin	Champa	18.07.2017
14	67	58	0006590681	Ummerdeen	Lallu Khan	Bijili	18.07.2017
15	68	85	000647B1EA	Imran Mansuri	Ummerdeen	Banti (Bonti)	18.07.2017
16	80	78	000658F9EB	Wazid Khan	Munne Khan	Jathra	18.07.2017
17	81	80	0006591302	Mohammad Tofif	Abdul Hakeem	Fulmala	18.07.2017
18	82	18	000659194C	Munne Khan	Mehmood Khan	Rupa	18.07.2017
19	85	33	0006590ADA	Ifthekhar Ali	Ikram Ali	Maniki	18.07.2017
20	91	53	000647D9D2	Ayub Khan	Abdul Rashid	Jhomati	15.07.2004 10.03.2015
21	92	52	00065901BF	Ayub Khan	Abdul Rashid	Champakali	15.07.2004 10.03.2015
22	93	36	000647D6F9	Abdul Aziz	Abdul Rashid	Madani	15.07.2004 10.03.2015
23	94	39	0006590412	Saddik Khan	Azim Khan	Maniki	18.07.2017
24	95	87	961001000004791	Wasid Khan	Siddiq Khan	Phoolkali (Fulmala)	18.07.2017
25	96	63	0006594862	Abid Khan	Shabbir Khan	Jayantikali	18.07.2017
26	97	44	0006590B99	Saddik Khan	Azim Khan	Malti	18.07.2017
27	98	14	0006591D69	Rafeek Khan	Mohammad Ajij	Bobby	25.10.2002 10.03.2015
28	100	68	000659097E	Ariph Khan	Kayam Khan	Champa	18.07.2017
29	5	1	000647C5CC	Arshad Ali	Lshaq Ali	Anarkali	10.07.2000 10.03.2015
30	6	7	000647DBD5	Vahid Khan	Alam Khan	Chanchal	25.10.2002 10.03.2015
31	12	9	0006590FA9	Wazid Khan	Majeed Khan	Chanchal	31.10.2002 10.03.2015
32	16	48	000652A313	Ismile	Kayum Khan	Moti	25.10.2002 10.03.2015
33	17	77	0006590B49	Rashi Gupta	Shri Ram Gupta	Anarkali	25.10.2002 10.03.2015
34	18	49	000647B150	Rashi Gupta	Ram Gupta	Laxmi	25.02.2002 10.03.2015
35	20	75	00064EDF2E	Sakina	Kayum Khan	Champa (Gulabkali)	27.09.2000 10.03.2015
36	32	20	00064F0737	Aalam	Sher Khan	Rajrani	20.12.2002 10.03.2015

37	44	4	00065911CA	Husna Bano	Abdul Rashid	Rashit	17.10.2003 10.03.2015
38	56	56	0006595F0A	Amina Begum	Ummerdeen	Laxmi	26.09.2000 10.03.2015
39	69	64	00065915E7	Amina Begum	Ummerdeen	Chanchal	26.09.2000 10.03.2015
40	74	10	00064F293D	Mahendra Kumar Sharma	Badri Narain Sharma	Radha	25.10.2002 10.03.2015
41	79	23	000647CE93	Munna Khan	Mohammad Khan	Chanchal	10.07.2000 10.03.2015
42	83	15	0006590E56	Iqram Ali	Wazir Ali	Gulab Kali	10.07.2000 10.03.2015
43	84	13	000652C634	Mohammed Ebrhim	Haji Ishaq Khan	Maruti	25.10.2002 10.03.2015
44	86	79	000647D86C	Rashid Khan	Faiyaz Khan	Rajmangal	19.12.2002 10.03.2015
45	88	62	0006590CAD3	Shahid Khan	Babu Khan	Rekha (Bulbul)	19.12.2002 10.03.2015
46	89	16	000647BCD4	Shahid Khan	Shabbir Khan	Rani (Gulabkali)	17.10.2003 10.03.2015
47	90	51	0006591AE0	Abdul Aziz	Abdul Rashid	Laxmi	31.10.2002 10.03.2015
48	3	NA	000652B757	Iqbal Jhan	Ishaq Ali	Sundarkali	Died 10.07.2000 10.03.2015

A copy of the Ownership Certificates of these 48 elephants are enclosed as **Annexure-6**.

Apparent Legal Violations

AWB I Application No.	RF D ride No.	Microchip No.	Elephant's Name	Ownership Certificate mentions "Present market value"	Ownership Certificate mentions "Source of purchase"
4	76	0006592126	Santi/Bhanti	Yes	Yes
7	89	961001000005056	Bulbul	Yes	Yes
8	72	000647D169	Lakkimala	Yes	-
19	83	961001000001952	Chanchal/ Chanchali	Yes	Yes
21	82	961001000002439	Rongmola/ Rangoli	Yes	Yes
35	71	000647DAAE	Myna	Yes	-
39	70	000647946C	Rohini	Yes	Yes
40	59	000647D83D	Champakali	Yes	Yes
43	81	000652C1AA	Gomati/ Maumati	Yes	-

48	55	0006596414	Majani/ Jai Moti	Yes	-
50	22	00065930A5	Pavan Mala	Yes	-
60	90	000652B23D	Rangmala	Yes	Yes
65	21	0006584C6D	Champa	Yes	Yes
67	58	0006590681	Bijili	Yes	Yes
68	85	000647B1EA	Banti/Bonti	Yes	Yes
80	78	000658F9EB	Jathra	Yes	Yes
81	80	0006591302	Fulmala	Yes	Yes
82	18	000659194C	Rupa	Yes	Yes
85	33	0006590ADA	Maniki	Yes	Yes
91	53	000647D9D2	Jhomati	Yes	-
92	52	00065901BF	Champakali	Yes	-
93	36	000647D6F9	Madani	Yes	-
94	39	0006590412	Maniki	Yes	Yes
95	87	961001000004791	Phoolkali/ Fulmala	Yes	Yes
96	63	0006594862	Jayantikali	Yes	Yes
97	44	0006590B99	Malti	Yes	Yes
98	14	0006591D69	Bobby	Yes	-
100	68	000659097E	Champa	Yes	Yes
5	1	000647C5CC	Anarkali	Yes	-
6	7	000647DBD5	Chanchal	Yes	-
12	9	0006590FA9	Chanchal	Yes	-
16	48	0000652A313	Moti	Yes	-
17	77	0006590B49	Anarkali	Yes	-
18	49	000647B150	Laxmi	Yes	-
20	75	00064EDF2E	Champa/ Gulabkali	Yes	-
32	20	00064F0737	Rajrani	Yes	-
44	4	00065911CA	Rashit	Yes	-
56	56	0006595F0A	Laxmi	Yes	-
69	64	00065915E7	Chanchal	Yes	-
74	10	00064F293D	Radha	Yes	-
79	23	000647CE93	Chanchal	Yes	-
83	15	0006590E56	Gulab Kali	Yes	-
84	13	000652C634	Maruti	Yes	-
86	79	000647D86C	Rajmangal	Yes	-
88	62	0006590CAD3	Rekha/ Bulbul	Yes	-
89	16	000647BCD4	Rani/ Gulabkali	Yes	-
90	51	0006591AE0	Laxmi	Yes	-
3	NA	000652B757	Sundarkali	Yes	-

Interpretations:

- **“Source of purchase”:** The Ownership Certificate mentions the name of a purchaser, meaning thereby that someone else owned the elephant previously and its possession by the present owner is prima facie in violation of Section 43 of the Wildlife Protection Act, 1972 that prohibits transfer of any captive animal by way of sale. Consequently, no new/second Ownership Certificate could have been issued to the present custodian legally.

It will not make any difference as to whether the seller/ or the person from whom the elephant has been purchased either had an Ownership Certificate or did not have an Ownership Certificate. In both the situations, the present Ownership Certificate, issued to a person who has purchased an elephant, is rendered invalid and non-est.

- **“Present market value”:** As per Section 43(1) of the Wildlife (Protection), Amendment Act, 2002, no transfer of elephants by way of sale or offer for sale is permitted. It states that, “No person having in his possession any captive animal, animal article, trophy or uncured trophy in respect of which he has a certificate of ownership shall transfer by way of sale or offer for sale or by any other mode of consideration of present market nature, such animal or article or trophy or uncured trophy.” By mentioning the “Present market value” in the Ownership Certificate, it has been indicated that the elephant has a commercial “value” and can be transferred through by way of sale or offer for sale and hence, it violates the provisions of the Wildlife (Protection) Act, 1972.
- **Ownership Certificates issued by State Govt. post 2003:** These Ownership Certificates, whether original or renewed, were issued post-2003. Therefore, all captive elephants ought to have been declared to the Chief Wildlife Warden either under Section 40 at the time of commencement of the Act (i.e. within 30 days from 9 September 1972) or under Section 40A pursuant to the Wildlife Stock Rules, 2003 (i.e. within a period of 180 days from the date of publication of Rules being 18 April 2003). Any captive elephant which has not been declared after 2003, is the property of the government and there is no provision of law under which any Ownership Certificate could have been issued to any person after 2003.

The Government of Rajasthan, therefore, could not have issued any Ownership Certificate to any person after the year 2003 and any Ownership Certificate issued to any person thereafter is invalid, illegal and is without any sanction of law. The afore said position is further established by the fact that in the year 2012, the Central Government had rejected the request of the Govt. of Kerala to extend the time limit for declaration of animals under the Declaration of Wild Life Stock Rules, 2003 beyond 180 days.

In fact, the Government of Kerala issued an order (G.O.(Rt.) No. 84/2016/F&WLD) on 26 February which gives Kerala’s Chief Wildlife Warden an opportunity to allow people to declare 289 captive elephants in the state who are apparently under illegal custody and to issue them with an OC. However, the Hon’ble Supreme court vide its Order dated 4 May 2016 passed in W.P(C) No. 743 of 2014 (“Wildlife Rescue and Rehabilitation Centre and Ors. Versus Union of India and Ors.”) directed that, “the State Government shall not issue any ownership certificate to any of the persons in possession of elephants.If any ownership certificate has been issued in the meantime, the same shall be withdrawn subject to the final verdict of the Court.”

AWB I Application No.	RFD Ride No.	Observations, Interpretations and Reference to Law
4	76	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No Transport Permit (TP) (See IV.1.A.v) • No ‘No Objection Certificate’ (NOC) (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
7	89	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Delhi and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
8	72	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).

19	83	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
21	82	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
35	71	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
39	70	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was

		<p>transferred to the present custodian by way of sale (See IV.1.A.iv and v)</p> <ul style="list-style-type: none"> • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
40	59	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
43	81	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
48	55	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) <p>Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).</p>
50	22	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv)

		<ul style="list-style-type: none"> • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
60	90	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 8 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Uttar Pradesh and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
65	21	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
67	58	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was

		<p>transferred to the present custodian by way of sale (See IV.1.A.iv and v)</p> <ul style="list-style-type: none"> • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant “purchased” from Andaman & Nicobar and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
68	85	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
80	78	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Bihar and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
81	80	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was

		<p>transferred to the present custodian by way of sale (See IV.1.A.iv and v)</p> <ul style="list-style-type: none"> • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
82	18	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
85	33	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
91	53	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v)

		<ul style="list-style-type: none"> • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
92	52	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
93	36	<ul style="list-style-type: none"> • OC issued in 2004 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
94	39	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 14.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
95	87	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was

		<p>transferred to the present custodian by way of sale (See IV.1.A.iv and v)</p> <ul style="list-style-type: none"> • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from New Delhi and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 14.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
96	63	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from New Delhi and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 14.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
97	44	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Nagaland and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 14.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
98	14	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v)

		<ul style="list-style-type: none"> • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
100	68	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • “Source of purchase” indicates that the elephant was previously owned by someone and that, the custody of the elephant was transferred to the present custodian by way of sale (See IV.1.A.iv and v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
5	1	<ul style="list-style-type: none"> • OC issued in 2017, 14 years after 2003 amnesty scheme (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • Elephant received from Assam and no document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
6	7	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
12	9	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v)

		<ul style="list-style-type: none"> • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
16	48	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
17	77	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
18	49	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 17.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
20	75	<ul style="list-style-type: none"> • OC issued in 2000 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).

32	20	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
44	4	<ul style="list-style-type: none"> • OC issued in 2003 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
56	56	<ul style="list-style-type: none"> • OC issued in 2000 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
69	64	<ul style="list-style-type: none"> • OC issued in 2000 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
74	10	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v)

		<ul style="list-style-type: none"> • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
79	23	<ul style="list-style-type: none"> • OC issued in 2000 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
83	15	<ul style="list-style-type: none"> • OC issued in 2000 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
84	13	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
86	79	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).

88	62	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 31.12.2017 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
89	16	<ul style="list-style-type: none"> • OC issued in 2003 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
90	51	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
3	NA	<ul style="list-style-type: none"> • OC issued in 2002 (See IV.1.A. ii, iii and iv) • OC state “present market value” of the animal as 10 lakh INR (See IV.1.A.v) • No TP (See IV.1.A.v) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession (See IV.1.A.v) • Last entry in the movement and work register is 15.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).

iii. **Validity of Ownership Certificate Issued by Other States and Validity of Other Documents**

Sl. No	AWBI Application No	RFD Ride No	Microchip No	Owner's Name	Father/Wife's Name	Name of the Elephant	OC: Date of Issue	State
1	61	34	0006A27ACA	Abdul Aziz	Abdul Rashid	Chanchal	28.11.2002	Bihar
2	66	104	0006594549	Ummerdeen	Lallu Khan	Basantmala	18.05.2001	Andaman & Nicobar
3	58	91	000647EA34	Rajendra Kumar Sharma	Badri Narayan Sharma	Rangmala	08.07.1994	Assam

A copy of the Ownership Certificates of these 3 elephants are enclosed as **Annexure-7**.

Apparent Legal Violations

Sl No	AWBI Application No.	RFD Ride No.	Observations, Interpretations and Reference to Law
1	61	34	<ul style="list-style-type: none"> Provisional OC by Bihar FD in 2002 to Great Apollo Circus. TP by Haryana in 2012 (See IV.1.A.v) NOC by Rajasthan in 2012, to keep elephant in Rajasthan only for 5 years under the custody of Abdul Aziz (See IV.1.A.v) No document legally vetting the transfer of possession by both Bihar and Rajasthan (See IV.1.A.v) Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
2	66	104	<ul style="list-style-type: none"> Transfer of OC from Andaman Nicobar Island from Andamans Timber Industries Ltd to Umerdeen Manzoori, Rajasthan in 2001 (See IV.1.A. ii, iii and iv) Andaman & Nicobar Island issued permission to purchase the animal in 2001. TP issued by Andaman & Nicobar Island in 2001 to transport the elephant to Rajasthan. No 'No Objection Certificate' (NOC) (See IV.1.A.v)

			<ul style="list-style-type: none"> • No document legally vetting the transfer of possession by both Andaman & Nicobar and Rajasthan (See IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).
3	58	91	<ul style="list-style-type: none"> • Ownership Certificate (OC) issued by Assam FD in 1995 to Sri Fulchen Doley. • TP by Assam in 2000 (See IV.1.A.v) • Permission to use elephant for ride by Rajasthan Archaeology and Museum Department in 2004 (Only to be done by AWBI under PARR, 2001) • No NOC (See IV.1.A.v) • No document legally vetting the transfer of possession by both Assam and Rajasthan (IV.1.A.v) • Last entry in the movement and work register is 16.1.2018 (day of inspection) in violation of declaration under AWBI application (See IV.1.A.vii).

iv. Legal Compliance of Keeping Custody of Captive Elephants with Only ‘Provisional Ownership Certificate’

- Ride No. 34 (AWBI No. 61): Provisional OC by Bihar in 2002 to Great Apollo Circus.
- Ride No. 30 (AWBI No. 64): A Provisional OC was issued by Assam FD in 2005
- Ride No. 93 (AWBI No. 47)- A Provisional OC issued by Bihar FD in 2001
- Ride No. 41 (AWBI No. 27): A Provisional OC issued by Bihar FD in 1999
- AWBI Application No. 25: A Provisional OC issued in 2001 by Bihar FD to Rajmahal Circus

Interpretation: A provisional Ownership Certificate has no legal validity under the Wildlife (Protection) Act, 1972.

v. Legal Compliance Keeping Custody of Elephants Who Originally Belongs to Circuses

- Ride No 34 (AWBI No. 61): OC issued in the name of Great Apollo Circus
- Ride No 65 (AWBI No.1): OC issued in the name of Western circus
- Ride No. 112 (AWBI No. 11): OC issued in the name of Moonlight Circus
- Ride No. NA (AWBI No. 25): OC issued in the name of Rajmahal Circus
- Ride No. 96 (AWBI No.34): OC issued in the name of New Grand Circus
- Ride No. 100 (AWBI No. 54): OC issued in the name of New Grand Circus
- Ride No. 2 (AWBI No.62): OC issued in the name of Rajmahal Circus

Interpretation: A circular issued to all chief wildlife wardens of the states and union territories on 3 July 2014 by the Project Elephant Division of the MoEF&CC recognised the plight of elephants in circuses and stated that their treatment was not humane and the conditions of their upkeep were often deplorable and inadequate. The circular also stated that

with the help of due process of the law, these animals should be seized and housed in elephant camps or rehabilitation centres. Project Elephant Division also offered assurance that it will provide financial assistance to establish facilities for the lifetime care of these elephants.

A copy of the circular issued by Project Elephant Division of MoEF&CC regarding rescue and rehabilitation of abused captive elephants in circuses is enclosed as **Annexure-8**.

2. OBSERVATIONS ON ELEPHANTS AND INTERPRETATIONS

A. Observations on Individual Elephants

AW BI Application No	RFD Ride No	Name, age (as in 2017 as per OC) and Sex of the Elephant	Observations
1	65	Anar, 29 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Hyperkeratosis of the skin on the feet and ankles • Body condition score is average (on a scale of 1 to 11 as per Asian Elephant Body Condition Index developed by Dr. V. Krishnamurthy, Dr. C. Wemmer, and John Lehnhardt) • Height: 7.5 feet
2	11	Jaimala, 41 years, Female	<ul style="list-style-type: none"> • Fresh deep wound on forehead • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn and hole on right ear • Tusks: Cut • Body condition score is average • Height: 7 feet
3	NA	Sundarkal, 58 years, Female	<ul style="list-style-type: none"> • Animal died
4	76	Santi, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Body condition score is average • Height: 8.5 feet

5	1	Anarkali, 51 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Right eye: Keratitis (inflammation of cornea) and partial blindness • Left elbow: Cold swelling • Body condition score is average • Height: 8.7 feet
6	7	Chanchal, 49 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Swelling on right thigh • Eye: Discharge from left eye • Body condition score is average • Height: 8 feet
7	89	Bulbul, 51 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Discharge from right eye • Wound on left hind leg near fetlock, covered with black material • Body condition score is average • Height: 8.9 feet
8	72	Lakkimala , 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 8 feet
9	134	Sundarkali , 41 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Eye: Right eye discharge • Healed wounds on lower abdomen • Dermatitis around the base of the tail and anus • Body condition score is average • Height: 8.5 feet
10	117	Laxmi, 38 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8.1 feet
11	112	Chanda, 29 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 8 feet
12	9	Chanchal, 61 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Left eye corneal opacity, cataract and discharge • Tusks: Cut • Right ear: Holes • Body condition score is average • Height: 9.2 feet
13	31	Anamika, 51 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Discharge from left eye • Edematous swelling on the upper trunk • Wound on left foreleg above knee, covered by black material

			<ul style="list-style-type: none"> • Body condition score is average • Height: 7.5 feet
14	97	Monimala, 43 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Healed wounds on body • Body condition score is average • Height: 8 feet
15	109	Tami, 35 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Small wound & scar on right thigh • Body condition score is average • Height: 8.2 feet
16	48	Moti, 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Keratitis right eye and corneal opacity • Body condition score is average • Height: 7 feet
17	77	Anarkali, 35 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: Holes on both ears • Body condition score is average • Height: 7 feet
18	49	Laxmi, 47 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Tusks: Cut • Swelling left shoulder • Body condition score is average • Height: 8.4 feet
19	83	Chanchal, 51 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Keratitis of right eye and corneal opacity • Tusks: Cut • Ears: Torn and hole in right • Healed wounds on body • Body condition score is average • Height: 8.2 feet
20	75	Champa, 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eyes: Discharge in left eye • Healed wounds on body • Body condition score is average • Height: 8 feet
21	82	Rangmola, 40 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eyes: Discharge from both eyes • Tusks: Cut • Wound covered with black material on right thigh • Body condition score is average • Height: 7.7 feet
22	24	Rukmini, 49 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn

			<ul style="list-style-type: none"> • Body condition score is average • Height: 7 feet
23	25	Golapi, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ears: Torn and have holes • Tusks: Cut • Body condition score is average • Height: 8.2 feet
24	88	Gulab Kali, 54 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8.5 feet
25	NA	Sonu, 22 years, Male	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Bull elephant in musth • Ear: 1 big hole in right ear, small holes left ear • Body condition score is average • Height: 9.2 feet • Both forelegs tied together and hind legs with chain
26	35	Maina, 25 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Eye: Protrusion of third eyelid, white patches on cornea • Body condition score is average

			<ul style="list-style-type: none"> • Height: 8.3 feet
27	41	Dilruba, 53 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8.5 feet
28	113	Padma, 55 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads - Nails missing • Tusk: Cut • Big hole on lower medial aspect of the trunk • Body condition score is average • Height: 7.1 feet
29	27	Rongmala, 49 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8.5 feet
30	122	Roopkali, 39 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Holes in both ears • Body condition score is average • Height: 8.5 feet
31	132	Kusum Mala, 43	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration

		years, Female	<ul style="list-style-type: none"> - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Right eye- corneal opacity and cataract • Wound on right foreleg fetlock region, covered with black material • Small swelling on right hind leg, near sole • Body condition score is average • Height: 7.5 feet
32	20	Rajrani, 56 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Keratitis and corneal opacity in right eye • Body condition score is average • Height: 8.4 feet
33	126	Golapi, 53 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8 feet
34	96	Shobaha, 40 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: v-shaped notch on upper left year, hole right ear • Tusks: Cut • Body condition score is average • Height: 9 feet
35	71	Myna, 34 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads

			<ul style="list-style-type: none"> • Body condition score is average • Height: 8.1 feet
36	130	Laxmi, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Cold swelling on right maxilla • Dermatitis left hip area • Body condition score is average • Height: 6.8 feet
37	133	Bonmala, 54 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 7.7 feet
38	116	Phoolwanti, 29 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: V-shaped notch on right ear, hole in left ear • Tusks: Cut • Body condition score is average • Height: 8.8 feet
39	70	Rohini, 49 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: V-shaped notch on left ear • Swelling on left elbow • Body condition score is average • Height: 8.5 feet
40	59	Champakali, 41	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration

		years, Female	<ul style="list-style-type: none"> - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: right ear torn • Body condition score is average • Height: 8.5 feet
41	102	Sampa, 47 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 8 feet
42	125	Laxmi, 47 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Wound on forehead • Dermatitis on forehead • Body condition score is average • Height: 8 feet
43	81	Gomati, 33 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8 feet
44	4	Rashit, 40 years, Male	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: Holes in both ears • Healed wounds on body • Body condition score is average • Height: 9.4 feet

45	110	Birli, 46 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Swelling on wither • Body condition score is average • Height: 8.10 feet
46	92	Jaitara, 45 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8.7 feet
47	93	Anno, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Eye: Left eye keratitis and corneal opacity • Mild dermatitis on base of tail and around anus • Body condition score is average • Height: 8.10 feet
48	55	Majani, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Corneal opacity and blind by right eye • Healed wounds on body • Body condition score is average • Height: 8.5 feet
49	131	Chanchal, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Eye: Keratitis right eye- partial blindness • Tusks: Cut • Body condition score is average • Height: 8.3 feet
50	22	Pavan Mala, 45 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Left eye keratitis and corneal opacity • Tusks: Cut • Body condition score is average • Height: 7.5 feet
51	73	Rajkali, 59 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Eye: discharge from left eye • Healed wound on body • Body condition score is average • Height: 8 feet
52	74	Champa, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Healed wounds on body and scar on forehead • Tusks: Cut and metal ring is fixed • Body condition score is average • Height: 8.5 feet
53	43	Rangdoi, 19 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Swelling on left hind leg thigh region • Tusks: Cut • Body condition score is average

			<ul style="list-style-type: none"> • Height: 8.4 feet
54	100	Gouri, 46 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Wound on right elbow • Body condition score is average • Height: 8.5 feet
55	128	Joymala, 36 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Healed wound on body • Body condition score is average • Height: 7.7 feet
56	56	Laxmi, 46 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 8 feet
57	98	Hanumati 33 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: torn • Body condition score is average • Height: 8.5 feet
58	91	Rangmala, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Eye: Right eye- cataract • Ear: Torn • Unclean valval and hind leg area & white salt deposits indicative of urinary tract infection/ disease • Body condition score is average • Height: 7.9 feet
59	84	Champa, 45 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Big open severe wound on left shoulder, swelling on right forehead, wound near right eye and lacerated wound near base of the tail • Eyes: Watery discharge from both eyes • Body condition very poor. Malnourished, weak and thin. • Height: 8.5 feet
60	90	Rangmala, 36 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 7.6 feet
61	34	Chanchal, 35 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8.4 feet
62	2	Ramkali, 34 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads

			<ul style="list-style-type: none"> • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8 feet
63	57	Lakshmi, 37 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 9.2 feet
64	30	Bhogwati, 49 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eyes: Corneal opacity of both eyes and partial blindness • Body condition score is average • Height: 7.2 feet
65	21	Champa, 47 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: 5 holes in left ear • Wound on right hind leg near stifle joint • Body condition score is average • Height: 8.5 feet
66	104	Basantmal a, 50 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ears: Torn • Body condition score is average • Height: 7.10 feet

67	58	Bijli, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Body condition score is average • Height: 8.3 feet
68	85	Banti, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: Torn • Body condition score is average • Height: 8.26 feet
69	64	Chanchal, 53 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Wound on forehead covered with black material • Body condition score is average • Height: 8 feet
70	120	Joya, 41 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 7.9 feet
71	95	Munni, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eyes: discharge from both eyes

			<ul style="list-style-type: none"> • Healed wounds on body • White salt deposits and dermatitis on hind legs • Body condition score is average • Height: 8.02 feet
72	17	Rangmala, 53 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks (horizontal and vertical), deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 7.7 feet
73	129	Lakshmi, 54 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: Swelling near the base of both the ears • Body condition score is average • Height: 8.4 feet
74	10	Radha, 39 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Swelling on both hip area and a huge swelling left stifle joint • Body condition score is average • Height: 8.10 feet
75	99	Rani, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Body condition score is average • Height: 8.5 feet

76	127	Champa, 45 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Body condition score is average • Height: 8 feet
77	107	Savetri, 23 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ear: torn • Body condition score is average • Height: 8.3 feet
78	106	Champa, 36 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: right eye- keratitis and partial blindness; left eye- cataract and painful inflammation with discharge • Body condition score is average • Height: 8.3 feet
79	23	Chanchal, 58 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Wounds on both high legs near fetlock region covered with black material • Body condition score is average • Height: 8.9 feet
80	78	Jaithra, 41 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Ear: Torn • Body condition score is average • Height: 8 feet
81	80	Fulmala, 57 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Discharge in left eye • Two small swellings on right shoulder • Body condition score is average • Height: 7.2 feet
82	18	Rupa, 51 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn and have holes • Eye: Fresh superficial wound near right eye • Capped elbow- left foreleg • Healed wounds on all over body • Body condition score is average • Height: 8.10 feet
83	15	Gulabkali, 56 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Fresh long wound on lower trunk • Body condition score is average • Height: 8.5 feet
84	13	Maruti, 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Suspected fungal infestation on left face behind eye • Capped elbow- right foreleg • Dermatitis on legs

			<ul style="list-style-type: none"> • Body condition score is average • Height: 8.9 feet
85	33	Maniki, 52 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8.11 feet
86	79	Rajmangal , 40 years, Male	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Ears: Holes present • Body condition score is average • Height: 9.10 feet
87	123	Chameli, 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 7.9 feet
88	62	Bulbul/Re kha, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Dermatitis on right hip and back • Body condition score is average • Height: 8.5 feet
89	16	Rani/ Gulabkali, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking

			<ul style="list-style-type: none"> - Thin, uneven and bruised foot pads • Eye: Right eye- keratitis and blindness • Ear: Dermatitis on both ear pinna • Body condition score is average • Height: 7.6 feet
90	51	Laxmi, 46 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Right eye- keratitis and cataract • Ears: Torn • Body condition score is average • Height: 8.5 feet
91	53	Jhomati, 46 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Tusks: Cut • Body condition score is average • Height: 8.5 feet
92	52	Champakali, 48 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: Torn • Dermatitis on left and right stifle and hip region • Body condition score is average • Height: 9 feet
93	36	Madani, 44 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Dermatitis on back • Body condition score is average • Height: 8.5 feet

94	39	Maniki, 47 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Body condition score is average • Height: 8.5 feet
95	87	Phoolkali, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Swelling on wither • Body condition score is average • Height: 8.5 feet
96	63	Jayantikali, 42 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Left one cut • Body condition score is average • Height: 8.5 feet
97	44	Malti, 42 years, Female	<ul style="list-style-type: none"> • The animal highly nervous/ anxious • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Ear: V-shaped notch and torn • Body condition score is average • Height: Approximately 8 feet
98	14	Bobby, 55 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Deformed right hind leg, near fetlock

			<ul style="list-style-type: none"> • Body condition score is average • Height: 8.5 feet
99	105	Champa, 33 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: left eye- corneal opacity and no vision; right eye- discharge and partial vision • Abscess and wound on left hind leg concealed with black material • Body condition score is average • Height: 7.8 feet
100	68	Champa, 37 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Eye: Left eye- opacity and blindness • Tusks: Cut • Body condition score is average • Height: 8.1 feet
101	115	Pinki, 33 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads • Tusks: Cut • Eye: Left eye- discharge, corneal opacity and cataract • Body condition score is average • Height: 7.11 feet
102	111	Joymoti, 30 years, Female	<ul style="list-style-type: none"> • Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads - Wound on one nail • Wound on forehead concealed with black material • Body condition score is average • Height: 8.11 feet

103	94	Shanti, 46 years, Female	<ul style="list-style-type: none"> ● Foot: <ul style="list-style-type: none"> - Toenails are overgrown with cracks, deformation, and discoloration - Cuticle around nails and in the interdigital space overgrown, dry and cracking - Thin, uneven and bruised foot pads ● Huge swelling on left side of the face near eye ● Body condition score is average ● Height: 8.7 feet
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The photographs of individual elephants with observations are enclosed as **Annexure-9**.

Interpretations:

- **Elephant Champa (AWBI Application no 59; Ride No. 84):** Elephant Champa, who is currently under the custody of Mr. Rajendra Kumar Sharma is suffering tremendously from open severe wounds all over the body, possibly caused by use of iron ankus (rods with a sharp metal hook on one end) to restrain and force her to work, in spite of her poor health. She is also suffering from chronic foot ailments and is highly malnourished, weak and thin. Use of Champa for work is causing further deterioration of her health and is significantly compromising her welfare. The Rajasthan Forest Department may seriously consider, seizing and rehabilitating this elephant immediately for apparent violation of Section 42 of the Wildlife (Protection) Act, 1972 (because of inadequate upkeep and maintenance) and 2008 guidelines of MoEF&CC. At the rehabilitation/elephant-care center she should live on soft ground, be unchained and receive the much needed veterinary care and nutritious diet to recuperate and return to good health.
- **Foot problems and inadequate foot care:** All the 103 elephants examined in Jaipur by the AWBI inspection team have overgrown toenails, to an extent that many of them are forced to bear the weight of their massive body. It is unnatural for an elephant's toenails to bear weight as this can cause serious complications, including painful trauma to the nail and surrounding tissues followed by secondary infections, death of nail tissues, and lameness. Deformation and discoloration of nails were also observed in elephants. The footpad in almost all elephants were found to be thin, uneven and bruised which indicates the hot and hard pavement where these animals work. These elephants' cuticles were also overgrown around the nails and in the interdigital space. Overgrown cuticles occur more commonly in elephants whose feet are exposed to chronic irritation, such as unsanitary conditions. Some regions of cuticle were dry and cracking which creates conditions that result in the harboring and proliferation of bacteria in the skin. This is of particular concern for these elephants due to the fact that they are kept chained in one place and often have to stand in their own feces and urine for hours every day.

These elephants also have severely calloused and hyperkeratinized skin around ankles most likely from chaining practices and chronic exposure to irritants in urine and feces without proper skin care. Several toenails appeared to have structural deformities typical of chronic overgrowth of the nail, including ridging, cranial extension of the nails along the floor and horizontal extension of the nails such that they impinge upon the interdigital space. Several of the nails of the hind limbs have areas of discoloration and a mangled, rough appearance consistent with chronic infection. These apparent lack of adequate foot

care coupled with unsanitary conditions puts these elephants at risk of serious and painful foot infections, trauma to the toenails, and stress on surrounding and underlying tissues.

The scientific community is well aware of the deleterious effects that intensive chaining practices, housing on concrete, forcing excessive exercise on hard substrates, and lack of regular foot care can have on a captive elephant's health. These elephants should be provided with veterinary care for their existing ailments, an intensive daily observation, regular foot care program and proper nutrition.

- **Eye problems:** 19 out of 103 elephants examined have chronic eye problems ranging from keratitis (inflammation of the cornea of the eye) to cataract (a medical condition in which the lens of the eye becomes progressively opaque, resulting in blurred vision). A scientific paper regarding a survey administered to veterinarians from Asian elephant range countries titled '*Elephant (*Elephas maximus*) Health and Management in Asia: Variations in Veterinary Perspectives*' by David Miller, Bradford Jackson, Heidi S. Riddle, Christopher Stremme, Dennis Schmitt, and Thaddeus Miller points out that, 60–79% of eye disease is reported for Indian elephants. The scientific paper is enclosed as **Annexure-10**.

Keratitis usually proceeds from a mechanical injury and an infected and/or inflamed cornea can cause many elephants to go blind. Cataract arises from many causes, such as an injury to another part of the eye. Cataracts affect mainly old elephants but malnutrition can cause cataracts at any age. Too much exposure to direct sunlight (or other strong light) as is the environmental condition in case of Jaipur can also cause cataract. Cataracts cause opacity and the elephant will become progressively blind. It is dangerous to use any elephant with partial/ complete/ unilateral/ bilateral blindness for any performance or rides, as the clinical condition itself makes the animal highly nervous and anxious forcing him or her to react to even an unexpected minor stimuli, thereby putting the life of the mahouts and tourists into danger.

The following elephants were observed to be blind or partially blind and unfit for any work:

AWBI Application No	Ride No	Microchip No	Elephant's Name	Partially Blind/ Unilaterally Blind/ Bilaterally Blind
5	1	000647C5CC	Anarkali	Unilateral/ Partial blindness
12	9	0006590FA9	Chanchal	Unilateral blindness
16	48	0000652A313	Moti	Unilateral blindness
19	83	961001000001952	Chanchal (Chanchali)	Unilateral blindness
26	35	961001000002987	Maina	Unilateral partial blindness
31	132	00065912CC	Kusum Mala	Unilateral blindness
32	20	00064F0737	Rajrani	Unilateral blindness
47	93	0006A283B8	Anno	Unilateral blindness
48	55	00F9406596414	Majani (Jai Moti)	Unilateral blindness
49	131	961001000005936	Chanchal	Unilateral blindness

50	22	00065930A5	Pavan Mala	Unilateral blindness
58	91	000647EA34	Rangmala	Unilateral blindness
64	30	9610010000055 26	Bhogwati	Partial bilateral blindness
78	106	9610010000057 69	Champa	Bilateral blindness
89	16	000647BCD4	Rani (Gulabkali)	Unilateral blindness
90	51	0006591AE0	Laxmi	Unilateral blindness
99	105	000658F77D	Champa (Chanchal)	Bilateral blindness
100	68	000659097E	Champa	Unilateral blindness
101	115	000647BBDC	Pinki	Unilateral blindness

- **Cutting tusk:** Out of the 103 elephants, the tusks of 47 were found to be cut. However, the custodians of all 46 elephants couldn't produce any documents to prove that the tusks were cut with necessary permission from the Rajasthan Forest Department in compliance of Wildlife (Protection) Act, 1972, The Declaration of Wild Life Stock Rules, 2003 and the 2008 'Guidelines for care and management of captive elephants' issued by Ministry of Environment, Forest and Climate Change.

In all 47 animals, the tusks showed lateral wear and tear possibly because of coming in contact with the hard concrete floor when they lie-down and get up, and also have a transverse cut, which is man-made. With pair of cut ivory from each elephant weighing around at least 0.5 to 1 kg, the estimated weight of total ivory which has no legal accounts here is approximately 25 - 50 kg.

Below are the list of captive elephants whose tusk are cut without the written permission of the Rajasthan Forest Department.

AWBI Applicati on No	Ride No	Microchip No	Name of the elephant	Tusks-Cut
2	11	961001000002451	Jaimala	Yes
10	117	00064E6E0F	Laxmi	Yes
12	9	0006590FA9	Chanchal	Yes
17	77	0006590B49	Anarkali	Yes
18	49	000647B150	Laxmi	Yes
19	83	961001000001952	Chanchal (Chanchali)	Yes
21	82	961001000002439	Rongmola (Rangoli)	Yes
23	25	961001000004251	Golapi	Yes
24	88	958000000707867	Gulab Kali	Yes
26	35	961001000002987	Maina	Yes
27	41	000647CBB8	Dilruba	Yes
28	113	961001000001968	Padma	Yes
33	126	961001000004214	Golapi	Yes
34	96	000658FD9B	Shobha (Bhobha)	Yes
37	133	0006EFDB91	Bonmala	Yes
38	116	961001000004495	Phoolwanti	Yes
43	81	000652C1AA	Gomati (Maumati)	Yes
44	4	00065911CA	Rashit	Yes
45	110	961001000005931	Birli	Yes

46	92	000647CABE	Jaitara	Yes
47	93	0006A283B8	Anno	Yes
49	131	961001000005936	Chanchal	Yes
50	22	00065930A5	Pavan Mala	Yes
51	73	00065955A5	Rajkali	Yes
52	74	0006595D40	Champa	Yes
53	43	961001000004070	Rangdoi	Yes
55	128	961001000005349	Joy mala	Yes
57	98	000647A8D6	Hanumati (Manumati)	Yes
60	90	000652B23D	Rangmala	Yes
61	34	0006A27ACA	Chanchal	Yes
62	2	0006AZA852	Ramkali	Yes
63	57	961001000003672	Laksami	Yes
68	85	000647B1EA	Bonti	Yes
69	64	00065915E7	Chanchal	Yes
70	120	961001000006038	Joya	Yes
73	129	961001000002961	Lakshmi	Yes
77	107	00064DF07D	Savetri	Yes
79	23	000647CE93	Chanchal	Yes
85	33	0006590ADA	Maniki	Yes
86	79	000647D86C	Rajmangal	Yes
87	123	961001000003424	Chameli	Yes
91	53	000647D9D2	Jhomati	Yes
94	39	0006590412	Maniki	Yes
96	63	0006594862	Jayantikali	Yes
98	14	0006591D9	Bobby	Yes
100	68	000659097E	Champa	Yes
101	115	000647BBDC	Pinki	Yes

- **Swellings and wounds:** Many elephants were observed to have multiple swellings of various sizes on different parts of the body. These swellings could be abscesses resulting from being forced to lie down on concrete floor or cancerous growth. It was also observed that, the wounds on many elephants were deliberately hidden with black material. The wounds on legs, particularly on the posterior aspect of the hind legs are results of constant tethering with chain or abrasive ropes. The deep wounds on the forehead found in few elephants indicates that, they are caused by use of iron ankus to induce pain, to control and restrain the elephants while at work or in public places. Use of iron ankus is a violation of the 2010 order of the Rajasthan High Court which has banned its use.
- **Gender of the elephants:** Out of the 103 elephants, three are bulls (AWBI No 25/ Ride No NA; AWBI 44/ Ride No.4; AWBI No. 86/ Ride No.79) and remaining are cow elephants. Musth (a period of heightened sexual urge, which can make captive bull elephants aggressive from frustration) in bull elephants. Out of 100 cow elephants, elephant no 44 (ride no), by the name Malti was found to be extremely nervous and anxious and has the history of running amok in July 2017. Following a complaint, the Rajasthan Forest Department, upon learning from an American tourist that Malti used for rides at Amber Fort was mercilessly beaten, had issued a show cause notice to the elephant's custodian. According to the notice, the investigation conducted by the Regional Forest Officer (RFO) revealed that the elephant was not adequately fed, leading her to go

after a banana, eventually attacking another elephant (No 97) and breaking a boom barrier. The notice further pointed out that the photograph taken by the tourist clearly shows the elephant being beaten or threatened. According to the notice, failing to provide adequate food and threatening or beating a wild animal – are covered under the category of “cruelty”, as per the 2008 “Guidelines for Care and Management of Captive Elephants” issued by the Ministry of Environment, Forest and Climate Change. The 29 June notice asked the custodian of the elephant to submit the vaccination, disease, and treatment records; movement, feeding, and work registers; and all the other records to the office of the DFO within five days, along with an explanation. However, the custodian was later allowed to use the said elephant for rides. The Jaipur police also registered a First Information Report against unidentified men under Sections 429 and 289 of the Indian Penal Code for mistreating the elephant and putting public safety at risk and the matter is under trial. For circuses- which are equivalent to performances like rides- the Central Zoo Authority has mandated that such establishments must procure a set of tranquilizing equipment with essential drugs for meeting emergencies, particularly when they have a bull elephant which is coming into musth. Such provisions are not available either at Amber Fort or elephant village.

- **Age of the elephants:** Out of 103 applications, more than 28 elephants were found to be above 50 years of age. Though were not part of the applications under PARR, 2001, it is pertinent to note the illegal presence of 3 juvenile sub-adult elephants- Suman (Microchip no. 0007195FB9), Gouri (Microchip No. 000659140E) and Bebi Muskan (Microchip No. 0006590281)- in private custody, in Jaipur, in rampant violation of wildlife protection laws. As per the 2008 Guidelines for care and management of captive elephants issued by Ministry of Environment, Forests and Climate Change, an elephant shall normally be allowed to retire from its work on attaining an age of 65 years.
- **Height of the animals and suitability for rides:** Out of 103 applications, only 49 have height ranging from 2.26 meter to 2.55 meter and only 43 elephants have height more than 2.55 meter. As per the 2008 Guidelines for care and management of captive elephants issued by Ministry of Environment, Forests and Climate Change the load allowed, including howdah, gears and riders and an analysis of the present situation is as follows.

The photographs of the howdah and the safety gears and their average weight is enclosed in **Annexure-11**.

Terms and Conditions set by MoEF&CC			Working Conditions in Jaipur			Whether qualify for using for rides	
Height of the elephant	Load restrictions	Condition for hilly terrain	No of elephants under different height category	Weight of howdah and safety gears	Average body weight of a mahout	For hilly terrain	For plane terrain
Below 1.50 m (4.92 ft)	Not to be used for carrying load;	The load scale shall be reduced	0	125 kg	75 kg	Do not qualify	Do not qualify

		by 50% in hilly or other difficult terrain					
1.50 m to 1.80 m (4.92- 5.90 ft)	Not exceedi ng 150 kg (to carry only fodder and trainer)	As above 75 kg	0	125 kg	75 kg	Do not qualify as load of gear and mahout exceeds the weight limit	Do not qualify as load of gear exceeds the weight limits
1.81 m to 2.25 m (5.93- 7.38 ft)	Not exceedi ng 200 kg	As above 100 kg	10	125 kg	75 kg	As above	As above
2.26 m to 2.55 m (7.41- 8.36 ft)	Not exceedi ng 300 kg	As above 150 kg	49	125 kg	75 kg	As above	Only one rider
Above 2.55 m (8.36 ft)	Not exceedi ng 400 kg	As above 200 kg	43	125 kg	75 kg	Do not qualify as load of gear and mahout is equal to the maximu m weight limits	Only two riders

Interpretations:

- **No elephants can be used for used for offering rides on hilly terrain:** Out of 103 applications, no elephant, even the tallest elephant with height above 2.55 m, would qualify for offering tourist rides at Amer fort because of the weight/ load restrictions on hilly terrain, as mandated by 2008 MoEF&CC guidelines.
- **Load restrictions on elephants on plane terrain:**

Category not qualified for offering rides also on plane terrain	No of elephants	Ride Nos.
1.81 m to 2.25 m (5.93- 7.38 ft)	10	Ride No. 115, 80, 104, 30, 130, 113, 24, 77, 48 and 11

Rides qualified for plane as per weight restrictions	No of elephants	No. of rider permitted	Ride Nos.
2.26 m to 2.55 m (7.41-8.36 ft)	49	1	Ride No. 111, 68, 105, 44, 16, 123, 33, 18, 78, 106, 107, 127, 10, 17, 95, 120, 64, 85, 58, 90, 91, 56, 128, 73, 22, 93, 110, 2, 125, 102, 71, 126, 132, 109, 35, 25, 82, 75, 83, 97, 131, 31, 112, 117, 72, 7, 65, 81, 133
Above 2.55 m (8.36 ft)	43	2	Ride No. 100, 94, 14, 63, 87, 39, 36, 52, 53, 51, 62, 79, 13, 15, 23, 99, 129, 21, 57, 1, 76, 34, 84, 98, 43, 74, 55, 92, 4, 59, 20, 116, 96, 70, 122, 27, 41, 88, 49, 9, 134 and 89 and AWBI application no.25

3. LABORATORY INVESTIGATIONS AND INTERPRETATIONS

A. Test for Tuberculosis

To the question in the AWBI application form, ‘whether the animals are screened for TB (Enclose report)’, majority of the applicants answered ‘yes’. However, none of the applicant could produce the result of screening or the proof of the tests done in the form of a report. Since testing of captive elephants for TB is a mandatory requirement for AWBI to consider prior to giving registration to captive elephants under PARR, 2001, AWBI inspectors decided to collect the necessary clinical samples for screening the elephants for TB.

It is also pertinent to note that, during June 2017 to November 2017, four captive elephants in Jaipur died. The post-mortem reports indicates that all the four elephants were showing serious gross lesions involving the respiratory system, including trachea and lungs.

- The post-mortem report of Luxmi (Ride no. 69) dated 2 June 2017 states that, “Both lungs were oedematous. On searching suppuration were present in lung alveoli. The trachea was also filled with pus.” The veterinary experts who conducted the post-mortem opined that, the elephant Luxmi died due to “Asphysisia resulting from suppurative pneumonitis”.
- The post-mortem report on elephant Gulabi (Ride no. 40) dated 15 July 2017 stated that, “Tracheal mm was reddish with frothy exudate. Both lungs were highly congested, haemorrhagic & oedematous”. The veterinary experts opined that elephant Gulabi died due to “septicaemia”.
- The post-mortem report on elephant Sunderkali (Ride no. 38), dated 2 November 2017 stated that, “The mm of trachea was congested with frothy blood mixed fluid. Both lungs were oedematous, slightly congested.” The veterinary experts who conducted the post-mortem opined that, elephant Sunderkali died “due to multiple organ failure, due to senility and old age of the elephant.”
- The post-mortem report on elephant Gulabi (Ride no. 60), dated 17 November 2017 stated that, “The mm of the trachea was congested & filled with frothy blood tinged fluid. Both lungs were oedematous & congested”. The veterinary experts who conducted the post-mortem opined that, elephant Gulabi died “due to shock resulting from impaction of colon with sand and worms.”

All four post-mortem reports are enclosed as **Annexure-12**.

Serum and whole blood samples were collected from 91 out of 103 elephants for conducting Tuberculosis (TB) tests and basic haematology. The remaining animals, except the one who died, were non-cooperative and hence the samples could not be taken. Chembio DPP® VetTB Assay developed by Chembio Diagnostic System INC for elephants was procured and used for the tests. The kit is a single-use immuno-chromatographic, rapid test for the detection of antibodies to Mycobacterium tuberculosis and Mycobacterium bovis in serum, plasma or whole blood from elephants. The test is used as an aid in the diagnosis of TB in conjunction with other diagnostic methods.

DPP VetTB Assay for elephants is USDA (United States Department of Agriculture)-Approved. Catalogue for Chembio DPP® VetTB Assay kits is enclosed as **Annexure-13**.

Upon request by the AWBI inspection team, the tests were done, read and interpreted by Department of Veterinary Epidemiology and Preventive Medicine and Department of Veterinary Microbiology of College of Veterinary and Animal Sciences, under Kerala Veterinary and Animal Sciences University (KVASU).

The laboratory investigation report received from KVASU is enclosed as **Annexure-14**.

The summary of TB test results are as follows:

AWBI Application No	Ride No	Microchip No	Elephant's Name	Results
1	65	00064DEBDE7	Anar	REACTIVE
2	11	961001000002451	Jaimala	NON-REACTIVE
3	NA	000652B757	Sundarkali	TEST NOT DONE
4	76	0006592126	Santi (Bhanti)	REACTIVE
5	1	000647C5CC	Anarkali	NON-REACTIVE
6	7	000647DBD5	Chanchal	NON-REACTIVE
7	89	961001000005056	Bulbul	NON-REACTIVE
8	72	000647D169	Lakkimala	NON-REACTIVE
9	134	961001000005145	Sundarkali	NON-REACTIVE
10	117	00064E6E0F	Laxmi	NON-REACTIVE
11	112	00065866D5	Chanda	NON-REACTIVE
12	9	0006590FA9	Chanchal	NON-REACTIVE
13	31	961001000005378	Anamika	NON-REACTIVE
14	97	00065907DE	Monimala	NON-REACTIVE
15	109	961001000005674	Rami Tami	NON-REACTIVE
16	48	0000652A313	Moti	NON-REACTIVE
17	77	0006590B49	Anarkali	NON-REACTIVE
18	49	000647B150	Laxmi	NON-REACTIVE
19	83	961001000001952	Chanchal (Chanchali)	NON-REACTIVE
20	75	00064EDF2E	Champa (Gulabkali)	NON-REACTIVE
21	82	961001000002439	Rongmola (Rangoli)	NON-REACTIVE
22	24	961001000006011	Rukmini	NON-REACTIVE
23	25	961001000004251	Golapi	NON-REACTIVE
24	88	958000000707867	Gulab Kali	TEST NOT DONE
25	NA	0006A29323	Sonu	NON-REACTIVE
26	35	961001000002987	Maina	NON-REACTIVE
27	41	000647CBB8	Dilruba	NON-REACTIVE
28	113	961001000001968	Padma	REACTIVE
29	27	961001000004783	Rongmala	NON-REACTIVE
30	122	00064E6489	Roopkali (Rupkali)	NON-REACTIVE
31	132	00065912CC	Kusum Mala	TEST NOT DONE
32	20	00064F0737	Rajrani	NON-REACTIVE
33	126	961001000004214	Golapi	NON-REACTIVE
34	96	000658FD9B	Shobha (Bhobha)	NON-REACTIVE
35	71	000647DAAE	Myna	REACTIVE

36	130	0006B71ECB	Luxmi	NON-REACTIVE
37	133	0006EFDB91	Bonmala	REACTIVE
38	116	961001000004495	Phoolwanti	NON-REACTIVE
39	70	000647946C	Rohini	TEST NOT DONE
40	59	000647D83D	Champakali	NON-REACTIVE
41	102	961001000002874	Sampa	NON-REACTIVE
42	125	00064E08AA	Luxmi	NON-REACTIVE
43	81	000652C1AA	Gomati (Maumati)	NON-REACTIVE
44	4	00065911CA	Rashit	TEST NOT DONE
45	110	961001000005931	Birli	REACTIVE
46	92	000647CABE	Jaitara	NON-REACTIVE
47	93	0006A283B8	Anno	NON-REACTIVE
48	55	0006596414	Majani (Jai Moti)	REACTIVE
49	131	961001000005936	Chanchal	NON-REACTIVE
50	22	00065930A5	Pavan Mala	TEST NOT DONE
51	73	00065955A5	Rajkali	REACTIVE
52	74	0006595D40	Champa	NON-REACTIVE
53	43	961001000004070	Rangdoi	NON-REACTIVE
54	100	000658FASF	Gouri	NON-REACTIVE
55	128	961001000005349	Joymala	NON-REACTIVE
56	56	0006595F0A	Laxmi	NON-REACTIVE
57	98	000647A8D6	Hanumati (Manumati)	NON-REACTIVE
58	91	000647EA34	Rangmala	NON-REACTIVE
59	84	00065906B5	Champa	TEST NOT DONE
60	90	000652B23D	Rangmala	NON-REACTIVE
61	34	0006A27ACA	Chanchal	NON-REACTIVE
62	2	0006AZA852	Ramkali	NON-REACTIVE
63	57	961001000003672	Laksami	NON-REACTIVE
64	30	961001000005526	Bhogwati	NON-REACTIVE
65	21	0006584C6D	Champa	NON-REACTIVE
66	104	0006594549	Basantmala	NON-REACTIVE
67	58	0006590681	Bijili	NON-REACTIVE
68	85	000647B1EA	Bonti	NON-REACTIVE
69	64	00065915E7	Chanchal	REACTIVE
70	120	961001000006038	Joya	NON-REACTIVE
71	95	961001000003168	Munni	NON-REACTIVE
72	17	961001000005823	Rangmala	NON-REACTIVE
73	129	961001000002961	Lakshmi	TEST NOT DONE
74	10	00064F293D	Radha	TEST NOT DONE
75	99	000658EEC5	Rani	REACTIVE
76	127	958000000719239	Champa	NON-REACTIVE
77	107	00064DF07D	Savetri	NON-REACTIVE
78	106	961001000005769	Champa	TEST NOT DONE
79	23	000647CE93	Chanchal	NON-REACTIVE
80	78	000658F9EB	Jathra	TEST NOT DONE
81	80	0006591302	Fulmala	NON-REACTIVE
82	18	000659194C	Rupa	NON-REACTIVE
83	15	0006590E56	Gulab kali	NON-REACTIVE
84	13	000652C634	Maruti	NON-REACTIVE

85	33	0006590ADA	Maniki	NON-REACTIVE
86	79	000647D86C	Rajmangal	NON-REACTIVE
87	123	961001000003424	Chameli	NON-REACTIVE
88	62	0006590CAD3	Bulbul (Rekha)	NON-REACTIVE
89	16	000647BCD4	Rani (Gulabkali)	NON-REACTIVE
90	51	0006591AE0	Laxmi	NON-REACTIVE
91	53	000647D9D2	Jhomati	NON-REACTIVE
92	52	00065901BF	Champakali	NON-REACTIVE
93	36	000647D6F9	Madani	TEST NOT DONE
94	39	0006590412	Maniki	NON-REACTIVE
95	87	961001000004791	Phoolkali (Fulmala)	NON-REACTIVE
96	63	0006594862	Jayantikali	NON-REACTIVE
97	44	0006590B99	Malti	NON-REACTIVE
98	14	0006591D9	Bobby	NON-REACTIVE
99	105	000658F77D	Champa (Chanchal)	NON-REACTIVE
100	68	000659097E	Champa	NON-REACTIVE
101	115	000647BBDC	Pinki	NON-REACTIVE
102	111	961001000004498	Joymoti	NON-REACTIVE
103	94	000658F57D	Shanti	NON-REACTIVE

Interpretations:

Elephants can carry human tuberculosis (TB), a bacterial disease that is the leading infectious cause of human deaths worldwide and responsible for a global pandemic. TB is also a widespread and deadly problem among captive elephants in the India. This Apparently fatal zoonotic disease can spread through the air, which puts anyone near an infected animal—elephant and human alike—at risk of transmission.

A 2012 scientific paper titled, ‘*Serodiagnosis of Tuberculosis in Asian Elephants (Elephas maximus) in Southern India: A Latent Class Analysis*’ by Shalu Verma-Kumar , David Abraham , Nandini Dendukuri, Jacob Varghese Cheeran, Raman Sukumar and Kithiganahalli Narayanaswamy Balaji concludes that, “Our results provide evidence for high prevalence of asymptomatic *M. tuberculosis* infection in Asian elephants in a captive Indian setting.” A copy of the paper is enclosed as **Annexure-15**.

Elephants in Jaipur are particularly at risk of contracting TB because of routine transport within the city and routine interactions with tourists that may expose them to infected humans or elephants and because of stress factors, including painful restraining methods, extreme confinement, variable water quality, an inconsistent food supply, and poor nutrition.

By failing to require testing for captive elephants in Jaipur and failing to bar apparently infectious elephants from use for performance and public contact, the state government is endangering animal welfare and public health.

B. Basic Blood Tests

Serum and whole blood samples were collected from 91 out of 103 elephants for conducting basic haematology.

The laboratory investigation reports for individual elephants are enclosed as **Annexure-16**.

Interpretations:

- **Eosinophilia:** Eosinophilia is an increase in the number of eosinophils in the blood. Out of 91 elephants, blood picture of 71 animals shows eosinophilia indicative of internal parasitic infestation. The post-mortem report of elephant Gulabi (Ride no. 60), dated 17 November 2017 which states that, the animal died “due to shock resulting from impaction of colon with sand and worms,” reinforces this finding.
- **Neutropenia:** Out of 91 elephants, 62 elephants are showing neutropenia, which is the presence of abnormally few neutrophils in the blood, leading to increased susceptibility to infection.

The elephants with eosinophilia and neutropenia are listed below. ‘NA’ indicates that, basic blood test is not done for that particular elephant.

AWBI Application No	Ride No	Microchip No	Elephant's Name	Interpretation of the Results	
				Eosinophilia	Neutropenia
1	65	00064DEBDE7	Anar	Yes	No
2	11	961001000002451	Jaimala	No	Yes
3	NA	000652B757	Sundarkali	NA	NA
4	76	0006592126	Santi (Bhanti)	Yes	Yes
5	1	000647C5CC	Anarkali	Yes	No
6	7	000647DBD5	Chanchal	Yes	No
7	89	961001000005056	Bulbul	Yes	Yes
8	72	000647D169	Lakkimala	Yes	No
9	134	961001000005145	Sundarkali	Yes	No
10	117	00064E6E0F	Laxmi	Yes	No
11	112	00065866D5	Chanda	No	Yes
12	9	0006590FA9	Chanchal	Yes	Yes
13	31	961001000005378	Anamika	Yes	No
14	97	00065907DE	Monimala	Yes	No
15	109	961001000005674	Rami Tami	Yes	No
16	48	0000652A313	Moti	No	No
17	77	0006590B49	Anarkali	Yes	Yes
18	49	000647B150	Laxmi	Yes	No
19	83	961001000001952	Chanchal (Chanchali)	Yes	No
20	75	00064EDF2E	Champa (Gulabkali)	Yes	Yes
21	82	961001000002439	Rongmola (Rangoli)	Yes	No
22	24	961001000006011	Rukmini	Yes	Yes
23	25	961001000004251	Golapi	No	No
24	88	958000000707867	Gulab Kali	NA	NA

25	NA	0006A29323	Sonu	Yes	Yes
26	35	961001000002987	Maina	No	Yes
27	41	000647CBB8	Dilruba	Yes	Yes
28	113	961001000001968	Padma	Yes	Yes
29	27	961001000004783	Rongmala	No	Yes
30	122	00064E6489	Roopkali (Rupkali)	Yes	Yes
31	132	00065912CC	Kusum Mala	NA	NA
32	20	00064F0737	Rajrani	Yes	Yes
33	126	961001000004214	Golapi	Yes	Yes
34	96	000658FD9B	Shobha (Bhobha)	Yes	No
35	71	000647DAAE	Myna	Yes	No
36	130	0006B71ECB	Luxmi	Yes	Yes
37	133	0006EFDB91	Bonmala	Yes	Yes
38	116	961001000004495	Phoolwanti	Yes	Yes
39	70	000647946C	Rohini	NA	NA
40	59	000647D83D	Champakali	Yes	Yes
41	102	961001000002874	Sampa	Yes	Yes
42	125	00064E08AA	Luxmi	Yes	Yes
43	81	000652C1AA	Gomati (Maumati)	Yes	Yes
44	4	00065911CA	Rashit	NA	NA
45	110	961001000005931	Birli	Yes	Yes
46	92	000647CABE	Jaitara	Yes	Yes
47	93	0006A283B8	Anno	Yes	Yes
48	55	0006596414	Majani (Jai Moti)	Yes	Yes
49	131	961001000005936	Chanchal	No	Yes
50	22	00065930A5	Pavan Mala	NA	NA
51	73	00065955A5	Rajkali	Yes	No
52	74	0006595D40	Champa	Yes	No
53	43	961001000004070	Rangdoi	Yes	No
54	100	000658FASF	Gouri	No	Yes
55	128	961001000005349	Joymala	Yes	Yes
56	56	0006595F0A	Laxmi	Yes	Yes
57	98	000647A8D6	Hanumati (Manumati)	Yes	No
58	91	000647EA34	Rangmala	Yes	Yes
59	84	00065906B5	Champa	NA	NA
60	90	000652B23D	Rangmala	Yes	Yes
61	34	0006A27ACA	Chanchal	No	Yes
62	2	0006AZA852	Ramkali	No	Yes
63	57	961001000003672	Laksami	Yes	Yes
64	30	961001000005526	Bhogwati	Yes	No
65	21	0006584C6D	Champa	Yes	Yes
66	104	0006594549	Basantmala	Yes	Yes
67	58	0006590681	Bijili	Yes	Yes
68	85	000647B1EA	Bonti	Yes	No
69	64	00065915E7	Chanchal	Yes	No
70	120	961001000006038	Joya	Yes	Yes
71	95	961001000003168	Munni	Yes	Yes
72	17	961001000005823	Rangmala	No	Yes
73	129	961001000002961	Lakshmi	NA	NA

74	10	00064F293D	Radha	NA	NA
75	99	000658EEC5	Rani	Yes	Yes
76	127	958000000719239	Champa	Yes	No
77	107	00064DF07D	Savetri	Yes	Yes
78	106	961001000005769	Champa	NA	NA
79	23	000647CE93	Chanchal	Yes	No
80	78	000658F9EB	Jathra	NA	NA
81	80	0006591302	Fulmala	No	Yes
82	18	000659194C	Rupa	Yes	No
83	15	0006590E56	Gulab kali	Yes	No
84	13	000652C634	Maruti	Yes	No
85	33	0006590ADA	Maniki	Yes	Yes
86	79	000647D86C	Rajmangal	Yes	Yes
87	123	961001000003424	Chameli	Yes	Yes
88	62	0006590CAD3	Bulbul (Rekha)	No	Yes
89	16	000647BCD4	Rani (Gulabkali)	No	Yes
90	51	0006591AE0	Laxmi	No	Yes
91	53	000647D9D2	Jhomati	No	Yes
92	52	00065901BF	Champakali	No	Yes
93	36	000647D6F9	Madani	NA	NA
94	39	0006590412	Maniki	No	Yes
95	87	961001000004791	Phoolkali (Fulmala)	Yes	No
96	63	0006594862	Jayantikali	No	Yes
97	44	0006590B99	Malti	Yes	Yes
98	14	0006591D9	Bobby	Yes	Yes
99	105	000658F77D	Champa (Chanchal)	Yes	Yes
100	68	000659097E	Champa	Yes	Yes
101	115	000647BBDC	Pinki	Yes	Yes
102	111	961001000004498	Joymoti	No	Yes
103	94	000658F57D	Shanti	Yes	Yes

4. GENERAL OBSERVATIONS AND INTERPRETATIONS

A. Housing Conditions

- As noted during the Inspection in Jaipur, the elephants were mostly housed in Hathi Gaon and a few were housed in
 - Private resorts
 - Homes with external sheds
 - Large godown or warehouse type of spaces and
 - Outdoors in enclosed areas with tin sheds
- Hathi Gaon housing sheds were all concrete in nature with cemented floors and an arrangement to tie the elephants by both forelegs and back. The sheds were devoid of any enrichment devices, had no water tanks, lacked in design to provide comfort to the animal by way of natural substrate, access to water, provision of sand or mud for play or bath. Even to lie down in this space is an effort for the animal.
- Many elephants were observed to display stereotyping behavior such as repetitive swaying and head-bobbing ranging from moderate to intense, indicative of extreme mental distress and deterioration. The scientific study ‘Social Life of Captive Asian Elephants (*Elephas maximus*) in Southern India: Implications for Elephant Welfare’ by Varadharajan Vanitha (Anbanathapuram Vahiara Charity (A.V.C.) College), Krishnamoorthy Thiyagesan (Anbanathapuram Vahiara Charity (A.V.C.) College) and Nagarajan Baskaran (Asian Nature Conservation Foundation) (**Annexure-17**) states that: “Asian elephants in the wild live in complex social societies; in captivity, however, management often occurs in solitary conditions, especially at the temples and private places of India. To investigate the effect of social isolation, this study assessed the social group sizes and the presence of stereotypies among 140 captive Asian elephants managed in 3 captive systems (private, temple, and forest department) in Tamil Nadu, India, between 2003 and 2005. The majority of the facilities in the private (82%) and temple (95%) systems held a single elephant without opportunity for social interaction. The forest department managed the elephants in significantly larger groups than the private and temple systems. Among the 3 systems, the proportion of elephants with stereotypies was the highest in temple (49%) followed by private system (26%) and the forest department facility (6%); this correlates with the social isolation trend observed in the 3 systems and suggests a possible link between social isolation and abnormal elephant behavior separate from other environmental factors.”
- The elephants housed in a resort were made to stand outdoors for viewing comfort of the resort guests and their general routine consisted of giving rides and standing in a defined area.
- The elephants housed in godowns, enclosed spaces and in constructed extension sheds of their custodians' homes were all chained by back and front legs, and made to stand long hours on concrete floors. None had access to drinking water or sand, mud or natural soil.

The photographs of the housing conditions of elephants are enclosed as **Annexure-18**.

B. Feeding Practices & Relevant Post-Mortem Findings

- The elephants were observed feeding on a dry fodder diet of sugarcane leaves and sugarcane stalks. No fresh fodder was observed in any of the 60-70 elephants visited by the AWBI inspectors. Some mahouts were lacing the dried fodder with a small bunch of greens consisting of local spinach and leaves. The green fodder was minimal in quantity and was an effort to mask the dryness of the fodder which was their staple diet.
- In some private homes where the elephants were housed, an evening meal of chapattis was being cooked to provide some additional ration for the elephants with approximately 5 kgs of wheat per elephant.
- With the current sugar and carbohydrate rich diet, the elephants were observed to be fatty with some suffering from obesity.
- A recent post-mortem report on death of an elephant Gulabi (Ride no. 60), in Jaipur reveal that the feed and fodder being offered are not only insufficient in nutrients but is also unnatural to the feeding habits of an elephant. The post-mortem report of elephant Gulabi dated 17 November 2017 stated that, ‘The stomach was found empty while colon was impacted with feeding material (impacted with sand and worms). On searching, the wall of the colon was congested with haemorrhage. The distal end to colon was collapsed’. The veterinary experts who conducted the post-mortem opined that, elephant Gulabi died “due to shock resulting from impaction of colon with sand and worms.”
- Lack of continuous free access to drinking water and adverse hot weather conditions in Jaipur are added risk factors and they only worsen the situation.

The photographs of feeding practices are enclosed as **Annexure-19**.

C. Working Conditions

- The elephants work from 7.30am to about 5.30/6pm. Later timings have also been noticed when there are additional visitors to Hathi Gaon for joy rides and the elephants are worked through the late evenings.
- The dry and hot climate is the reason for dehydration and dry skin condition of the elephants. The substrate used for walking is mostly 90% of urban-tarred roads and heavy traffic presence. Elephants endure tremendous stress and pain when forced to walk up and down on hot pavements in scorching temperatures while giving rides at tourist attractions such as Amber Fort.
- After the wait in the shadows of the Amer Fort walls, in the blistering heat, the elephants take tourists on joy rides up the steep incline of the fort roads. They are usually used for two rides per day, depending on the number of tourists and the season of the year.
- They walk back a distance of 5-7 kms to Hathi Gaon and other private locations for then giving private rides to batches of tourists.
- The elephants have practically no time or respite to feed properly. Bath is not given on a daily basis. Considering that an adult elephant needs to feed on 250 kgs of fodder and

ration per day, the same was absent since, the elephants are given neither the time or space to rest and graze, forage and feed. This is in direct contravention of the elephant's biology as in the wild where they feed and forage for more than 18 hours daily.

- The stress put on the animals also reflects in the mortality figures. Particularly death of 4 elephants in just 6 months (June 2017 to November 2017), is unusually high and can be attributed to faulty and dismal management conditions.

The photographs of working conditions of elephants in Jaipur are enclosed as **Annexure-20**.

D. Incorrect Declarations Made by the Applicants:

- All the 103 applicants requested for registration with AWBI had undertaken in the declaration of the application that, *“This application has to be processed for permission and registration of performing animals. Until the permission is issued, performance/ exhibition/ ride with performing animals will not be undertaken.”* However, at the time of inspection the Work Register and Movement Register maintained by all the 102 custodians (1 elephant is dead), as mandated by 2008 ‘Guidelines for Care and Management of Captive Elephants’ indicated that the elephants were still used for offering rides for tourists at Amber Fort and Hathi Gaon even on the date of inspections i.e. third week of January 2018. It is also being reported that elephants are continued to be used for rides till date, in violation of the declarations made in the AWBI application form.
- Most of the applications claimed that TB tests were done for their elephant. However, no applicants could produce any laboratory report with results to justify the claim. Death of 4 elephants during June 2017 to November 2017, with serious gross lesions of the respiratory system and 10 elephants being tested positive for TB during laboratory investigation facilitated by AWBI inspection team, indicate the urgent need for screening all captive elephants in Jaipur for TB, to protect the welfare of animals and the public health.
- Most of the applications claimed that routine faecal examination to check worm load is done. However, no applicant could produce any laboratory report with results to justify the claim. The treatment register of most of the applicants did mention the deworming drugs given, however no regular pattern of deworming could be observed.

V. SUMMARY OF FINDINGS AND INTERPRETATIONS

AWBI Application No	Ride No	Microchip No	Name of the elephant	Sub-judice (Yes/ No)	Whether OC, TP, NOC, Transfer of Possession, Cutting Tusk etc. are legally invalid (Invalid/ To be verified- TBV)	Whether physically fit or unfit (Blindness, disease conditions of foot, poor body condition, tusk cut, wounds etc.) (Fit/ Unfit/ Compromised Welfare-CW)	Test for TB (Positive, Negative or Not screened)	Whether qualified for offering rides at Amber Fort as per load limits (Yes/ No)	Whether qualified for offering rides on plane terrain as per load limits (0 = No rider, 1 = only 1 rider and 2 = 2 riders)	Whether the elephant and the custodian qualify for registration with AWBI for offering rides on plane terrain, with number of riders restricted (Yes/ No)
1	65	00064DEBDE7	Anar	Yes	Invalid	CW	Positive	No	1	No
2	11	961001000002451	Jaimala	Yes	Invalid	CW	Negative	No	0	No
3	NA	000652B757	Sundarkali							Died
4	76	0006592126	Santi/ Bhanti	No	Invalid/ TBV	CW	Positive	No	2	No
5	1	000647C5CC	Anarkali	No	Invalid/ TBV	Unfit	Negative	No	2	No
6	7	000647DBD5	Chanchal	No	Invalid/ TBV	CW	Negative	No	1	No
7	89	961001000005056	Bulbul	No	Invalid/ TBV	CW	Negative	No	2	Yes
8	72	000647D169	Lakkimala	No	Invalid/ TBV	CW	Negative	No	1	Yes
9	134	961001000005145	Sundarkali	Yes	Invalid	CW	Negative	No	2	No
10	117	00064E6E0F	Laxmi	Yes	Invalid	CW	Negative	No	1	No
11	112	00065866D5	Chanda	Yes	Invalid	CW	Negative	No	1	No
12	9	0006590FA9	Chanchal	No	Invalid/ TBV	Unfit	Negative	No	2	No
13	31	961001000005378	Anamika	Yes	Invalid	CW	Negative	No	1	No
14	97	00065907DE	Monimala	Yes	Invalid	CW	Negative	No	1	No
15	109	961001000005674	Rami Tami	Yes	Invalid	CW	Negative	No	1	No

16	48	0000652A313	Moti	No	Invalid/ TBV	Unfit	Negative	No	0	No
17	77	0006590B49	Anarkali	No	Invalid/ TBV	CW	Negative	No	0	No
18	49	000647B150	Laxmi	No	Invalid/ TBV	CW	Negative	No	2	Yes
19	83	961001000001952	Chanchal (Chanchali)	No	Invalid/ TBV	Unfit	Negative	No	1	No
20	75	00064EDF2E	Champa (Gulabkali)	No	Invalid/ TBV	CW	Negative	No	1	Yes
21	82	961001000002439	Rongmola (Rangoli)	No	Invalid/ TBV	CW	Negative	No	1	Yes
22	24	961001000006011	Rukmini	Yes	Invalid	CW	Negative	No	0	No
23	25	961001000004251	Golapi	Yes	Invalid	CW	Negative	No	1	No
24	88	958000000707867	Gulab Kali	Yes	Invalid	CW	Not screened	No	2	No
25	NA	0006A29323	Sonu	Yes	Invalid	CW	Negative	No	2	No
26	35	961001000002987	Maina	Yes	Invalid	Unfit	Negative	No	1	No
27	41	000647CBB8	Dilruba	Yes	Invalid	CW	Negative	No	2	No
28	113	961001000001968	Padma	Yes	Invalid	CW	Positive	No	0	No
29	27	961001000004783	Rongmala	Yes	Invalid	CW	Negative	No	2	No
30	122	00064E6489	Roopkali (Rupkali)	Yes	Invalid	CW	Negative	No	2	No
31	132	00065912CC	Kusum Mala	Yes	Invalid	Unfit	Not screened	No	1	No
32	20	00064F0737	Rajrani	No	Invalid/ TBV	Unfit	Negative	No	2	No
33	126	961001000004214	Golapi	Yes	Invalid	CW	Negative	No	1	No
34	96	000658FD9B	Shobha (Bhobha)	Yes	Invalid	CW	Negative	No	2	No
35	71	000647DAAE	Myna	No	Invalid/ TBV	CW	Positive	No	1	No
36	130	0006B71ECB	Luxmi	Yes	Invalid	CW	Negative	No	0	No
37	133	0006EFDB91	Bonmala	Yes	Invalid	CW	Positive	No	1	No
38	116	961001000004495	Phoolwanti	Yes	Invalid	CW	Negative	No	2	No
39	70	000647946C	Rohini	No	Invalid/ TBV	CW	Not screened	No	2	No
40	59	000647D83D	Champakali	No	Invalid/ TBV	CW	Negative	No	2	Yes
41	102	961001000002874	Sampa	Yes	Invalid	CW	Negative	No	1	No
42	125	00064E08AA	Luxmi	Yes	Invalid	CW	Negative	No	1	No
43	81	000652C1AA	Gomati (Maumati)	No	Invalid/ TBV	CW	Negative	No	1	Yes
44	4	00065911CA	Rashit	No	Invalid/ TBV	CW	Not screened	No	2	No
45	110	961001000005931	Birli	Yes	Invalid	CW	Positive	No	1	No

46	92	000647CABE	Jaitara	Yes	Invalid	CW	Negative	No	2	No
47	93	0006A283B8	Anno	Yes	Invalid	Unfit	Negative	No	1	No
48	55	0006596414	Majani (Jai Moti)	No	Invalid/ TBV	Unfit	Positive	No	2	No
49	131	961001000005936	Chanchal	Yes	Invalid	Unfit	Negative	No	1	No
50	22	00065930A5	Pavan Mala	No	Invalid/ TBV	Unfit	Not screened	No	1	No
51	73	00065955A5	Rajkali	Yes	Invalid	CW	Positive	No	1	No
52	74	0006595D40	Champa	Yes	Invalid	CW	Negative	No	2	No
53	43	961001000004070	Rangdoi	Yes	Invalid	CW	Negative	No	2	No
54	100	000658FASF	Gouri	Yes	Invalid	CW	Negative	No	2	No
55	128	961001000005349	Joykala	Yes	Invalid	CW	Negative	No	1	No
56	56	0006595F0A	Laxmi	No	Invalid/ TBV	CW	Negative	No	1	Yes
57	98	000647A8D6	Hanumati (Manumati)	Yes	Invalid	CW	Negative	No	2	No
58	91	000647EA34	Rangmala	No	Invalid	Unfit	Negative	No	1	No
59	84	00065906B5	Champa	Yes	Invalid	Unfit	Not screened	No	2	No
60	90	000652B23D	Rangmala	No	Invalid/ TBV	CW	Negative	No	1	Yes
61	34	0006A27ACA	Chanchal	No	Invalid	CW	Negative	No	2	No
62	2	0006AZA852	Ramkali	Yes	Invalid	CW	Negative	No	1	No
63	57	961001000003672	Laksami	Yes	Invalid	CW	Negative	No	2	No
64	30	961001000005526	Bhogwati	Yes	Invalid	Unfit	Negative	No	0	No
65	21	0006584C6D	Champa	No	Invalid/ TBV	CW	Negative	No	2	Yes
66	104	0006594549	Basantmala	No	Invalid	CW	Negative	No	0	No
67	58	0006590681	Bijili	No	Invalid/ TBV	CW	Negative	No	1	Yes
68	85	000647B1EA	Bonti	No	Invalid/ TBV	CW	Negative	No	1	Yes
69	64	00065915E7	Chanchal	No	Invalid/ TBV	CW	Positive	No	1	No
70	120	961001000006038	Joya	Yes	Invalid	CW	Negative	No	1	No
71	95	961001000003168	Munni	Yes	Invalid	CW	Negative	No	1	No
72	17	961001000005823	Rangmala	Yes	Invalid	CW	Negative	No	1	No
73	129	961001000002961	Lakshmi	Yes	Invalid	CW	Not screened	No	2	No
74	10	00064F293D	Radha	No	Invalid/ TBV	CW	Not screened	No	1	No
75	99	000658EEC5	Rani	Yes	Invalid	CW	Positive	No	2	No

76	127	95800000719239	Champa	Yes	Invalid	CW	Negative	No	1	No
77	107	00064DF07D	Savetri	Yes	Invalid	CW	Negative	No	1	No
78	106	961001000005769	Champa	Yes	Invalid	Unfit	Not screened	No	1	No
79	23	000647CE93	Chanchal	No	Invalid/ TBV	CW	Negative	No	2	Yes
80	78	000658F9EB	Jathra	No	Invalid/ TBV	CW	Not screened	No	1	No
81	80	0006591302	Fulmala	No	Invalid/ TBV	CW	Negative	No	0	No
82	18	000659194C	Rupa	No	Invalid/ TBV	CW	Negative	No	1	Yes
83	15	0006590E56	Gulab kali	No	Invalid/ TBV	CW	Negative	No	2	Yes
84	13	000652C634	Maruti	No	Invalid/ TBV	CW	Negative	No	2	Yes
85	33	0006590ADA	Maniki	No	Invalid/ TBV	CW	Negative	No	1	Yes
86	79	000647D86C	Rajmangal	No	Invalid/ TBV	CW	Negative	No	2	Yes
87	123	961001000003424	Chameli	Yes	Invalid	CW	Negative	No	2	No
88	62	0006590CAD3	Bulbul (Rekha)	No	Invalid/ TBV	CW	Negative	No	2	Yes
89	16	000647BCD4	Rani (Gulabkali)	No	Invalid/ TBV	Unfit	Negative	No	1	No
90	51	0006591AE0	Laxmi	No	Invalid/ TBV	Unfit	Negative	No	2	No
91	53	000647D9D2	Jhomati	No	Invalid/ TBV	CW	Negative	No	2	Yes
92	52	00065901BF	Champakali	No	Invalid/ TBV	CW	Negative	No	2	Yes
93	36	000647D6F9	Madani	No	Invalid/ TBV	CW	Not screened	No	2	No
94	39	0006590412	Maniki	No	Invalid/ TBV	CW	Negative	No	2	Yes
95	87	961001000004791	Phoolkali (Fulmala)	No	Invalid/ TBV	CW	Negative	No	2	Yes
96	63	0006594862	Jayantikali	No	Invalid/ TBV	CW	Negative	No	2	Yes
97	44	0006590B99	Malti	Yes	Invalid	CW	Negative	No	1	No
98	14	0006591D9	Bobby	No	Invalid/ TBV	CW	Negative	No	2	Yes
99	105	000658F77D	Champa Chanchal)	Yes	Invalid	Unfit	Negative	No	1	No
100	68	000659097E	Champa	No	Invalid/ TBV	Unfit	Negative	No	1	No
101	115	000647BBDC	Pinki	Yes	Invalid	Unfit	Negative	No	0	No
102	111	961001000004498	Joymoti	Yes	Invalid	CW	Negative	No	1	No
103	94	000658F57D	Shanti	Yes	Invalid	CW	Negative	No	1	No

VI. CONCLUSIONS

The key observations and interpretations after the scrutiny of 103 applications & supporting documents, field evaluations including assessment of animals, housing and working conditions and laboratory investigations are concluded below:

- As per the Counter Affidavit filed by the Rajasthan Forest Department in W.P(C) No. 743 of 2014 (“Wildlife Rescue and Rehabilitation Centre and Ors. versus Union of India and Ors.”), there were 132 privately owned captive elephants in Rajasthan in January 2015. In January 2016, the official database showed the number as 110 captive elephants. In October 2017, details of 103 captive elephants were sent to the AWBI for registration under PARR, 2001. As per the postmortem reports shared with the AWBI team, four elephants died during the period June 2017 to November 2017.
- Out of 103 applications, one elephant named Sundarkali (AWBI Application No. 3 and Ride No.38) died in October 2017.
- Out of 102 applications, matters related to legal compliance of keeping, using 53 elephants are pending before the Magistrate Court in Jaipur and hence the matter is sub-judice for these 53 elephants. Out of 53 elephants, an FIR (FIR No. 1271/36 dated 12.12.2007) was filed by the Rajasthan Forest Department against 52 elephants under Sections 9, 39, 40, 43, 48, 49, 50 & 51 of the Wildlife Protection Act, 1972 and the matter is pending before the Metropolitan Magistrate No.35, Amer, Jaipur. Also a case is pending against the custodians/ care takers of elephant Malti (Ride no 44 and AWBI application No 97), before Metropolitan Magistrate No.35, Amer, Jaipur, under Section 3 and 11 of the Prevention of Cruelty to Animals Act, 1960 and Indian Penal Code 289 and 429.
- Out of 102 elephants, the legitimacy of Ownership Certificates, transfer of possession and custody of the remaining 49 elephants is also in question, based on the interpretations of Wildlife (Protection) Act, 1972, the Rules framed thereunder, the guidelines of MoEF&CC and the evaluation parameters set by the AWBI. None of the custodians of these elephants could produce relevant documents to prove the legitimacy of custody. The documents which most of these custodians failed to produce include, a valid Ownership Certificate, a Transport Permit allowing the elephant to be taken to the State of Rajasthan issued by the relevant Forest Department and an NOC (No Objection Certificate) issued by the Rajasthan Forest Department expressing no objection in taking the concerned elephant to the State of Rajasthan. In addition, most importantly, a legal document to prove the transfer of possession of the animal, ideally vetted by the Chief Wildlife Wardens of relevant States, could not be produced.
- Out of 103 applications, 48 elephants to whom Ownership Certificates were issued by the Rajasthan Forest Department seem to be illegitimate as they mention “source of purchase” and “present market value” of the elephant. Both these citations indicate the commercial value of an elephant, which is prohibited under the law. Several Ownership Certificates issued by the Rajasthan Forest Department are in addition to the old Ownership Certificates issued to a previous custodian, by another State’s Forest Department, thereby contradicting the provisions of Wildlife (Protection) Act, 1972. It is also pertinent to note that, out of the 48 Ownership Certificates issued by Rajasthan Forest Department, nearly 20 were issued prior to the notification of The Declaration of Wild Life Stock Rules, 2003.

This amnesty scheme declared by the Central Government with a timeframe of 180 days allowed elephant owners having no Ownership Certificate to declare the captive elephants in possession, in order to be considered for issuing a legitimate Ownership Certificate by the Chief Wildlife Warden. Remaining 28 elephants out of 48 were issued Ownership Certificates, 7-14 years after the 2003 amnesty scheme, raising questions about the legitimacy of these Ownership Certificates.

- Out of 102 applications, 19 captive elephants were observed to be blind, either unilaterally (right or left eye) or bilaterally (both eyes), rendering them unfit for any work, as the safety of the elephant and the people are at high risk if such wild animals are used at public places and for rides.
- Out of 91 elephants screened for tuberculosis (TB), 10 elephants were found to be positive for tuberculosis. Blood or serum samples could not be collected from the remaining elephants, out of the total 102 applications, as these animals were not cooperating. Probably they were scared, since they may not be familiar with such veterinary procedures. These remaining 11 elephants (1 dead) have to be subjected to TB screening before deciding whether they qualify for registration under the PARR, 2001.
- 100% elephants from 102 applications were found to be suffering from various foot problems including, overgrown toenails with cracks, deformation, discoloration, overgrown cuticle around nails and in the interdigital space dry and cracking and thin, uneven and bruised foot pads etc. These animals spend their lives on hard concrete floor, whether at work place or in their sheds and the lack of adequate and regular foot care seems to be a major reason for these prevalent foot conditions, which if not treated now will lead to painful and crippling foot diseases in the future.
- Out of 102 elephants, 47 elephants have their tusks. The custodians of these elephants could not produce any document regarding prior permission taken from the Forest Department for doing so, which is in apparent violation of the Wildlife Protection Act, 1972 and the MoEF&CC guidelines. In all the 47 animals, the tusks showed lateral wear and tear possibly because of coming in contact with hard concrete floor when they lie-down and get up, and some also have a transverse cut, which is man-made.
- Out of 103 applications, more than 28 elephants were found to be above the age of 50 years.
- Many elephants were observed to display stereotypical behavior such as repetitive swaying and head-bobbing ranging from moderate to intense, indicative of extreme mental distress and deterioration.
- Since the load limit prescribed by MoEF&CC in its guidelines does not allow even the tallest elephant (above 2.55 m) to carry load weighing more than 200 kg on a hilly terrain, rides at Amber fort cannot be permitted. As per field evaluations conducted, the weight of the howdah, safety gears and one mahout alone would weigh around 200 kg.
- Out of 102 applications, as per the prescribed load limits recommended by the MoEF&CC for an elephant of a particular height, only 49 elephants can offer rides on plane terrains with one rider in addition to a mahout and only 43 elephants can offer rides on plane

terrains with two riders at a time, excluding the mahout. However, as observed, the welfare of all these 49 elephants are compromised with poor condition of the feet, prevalence of wounds, dermatitis etc. Moreover, 24 elephants out of 49 under this category do not qualify other legal criteria or parameters set by the AWBI for registration under PARR, 2001.

- Out of the above said 49 elephants, only 25 elephants can be registered with the AWBI for offering rides on a plane terrain with restriction on number of riders, provided, the validity of their Ownership Certificate is confirmed by the Rajasthan Forest Department and efforts are taken by the custodians of these elephants to improve the welfare conditions. Out of 25 elephants eligible to be used for rides on plane terrain, 10 can carry only one rider excluding the mahout and only 15 elephants are carry 2 riders, excluding the mahout. Moreover, a set of tranquilizing equipment with essential drugs for meeting emergencies must be made available at the elephant village along with an assurance of availability of expert veterinarians for its use.
- Rajasthan Forest Department may establish the legitimacy of the above mentioned 25 Ownership Certificates by producing the declaration made by these 25 elephant custodians under Section 40(1) of the Wildlife Protection Act, 1972 and Rule 4(1) and 4(2) of 'The Declaration of Wild Life Stock Rules, 2003'. The RFD should also produce the report on inquiry and preparation of inventories done under Section 41(1) of 'The Wildlife Protection Act, 1972' and Rule 8(1), 8(2) and 10 (1) of 'The Declaration of Wild Life Stock Rules, 2003' and the Ownership Certificates issued under Section 42 of 'The Wildlife Protection Act, 1972' and Rule 11(1) of 'The Declaration of Wild Life Stock Rules, 2003'.
- Elephant Champa (AWBI Application no 59; Ride No. 84) who is presently suffering from malnourishment, severe wounds all over the body, foot ailments etc. needs to be immediately seized and rehabilitated to a reputable elephant-care center, where she should receive the much needed veterinary care and a nutritious diet.
- Though the scope of this evaluation is limited to checking the eligibility of registering the elephants and the custodians for offering rides and other performances under PARR, 2001, the AWBI team deemed it as their duty to additionally mention the random harvesting of ivory from the elephants in violation of all wildlife protection laws, and the illegal presence of 3 juvenile sub-adult elephants, who were not part of the applications submitted to the AWBI. With the pair of cut ivory from each elephant weighing at least 0.5 to 1 kg, the estimated weight of total ivory from 47 elephants alone which has no legal accounts, is estimated to be approximately 25 - 50 kg. Enclosed is a media article dated 13 October 2015 (**Annexure-21**), stating that ivory bangles are a popular artefact in Rajasthan and Gujarat.

VII. RECOMMENDATIONS

Based on the compilation of observations and its interpretations as per important legal provisions, guidelines of MoEF&CC and parameters set by AWBI in its application form for registering captive elephants under PARR, 2001, the results of the evaluation concludes that none of the 102 elephants qualifies all the criteria set for registration with the AWBI. The recommendations of the AWBI authorised team are as below:

1. AWBI may advise the RFD and the Department of Archeology and Museums (who manages Amer Fort) that, no elephant from the 102 applications can be registered with AWBI under PARR, 2001 for offering rides at Amer Fort as it would violate the provisions of PARR, 2001 and MoEF&CC's 2008 guidelines on load limits permissible on hilly terrain, apart from not meeting the parameters set by AWBI regarding legal compliances. Under the law, Department of Archeology and Museums, Rajasthan government have no authority to register elephants for joy rides/ allow elephant rides.
2. AWBI may advise the RFD that, if it could confirm the validity of Ownership Certificates issued to 25 elephants and ensure improvement in their welfare as mandated by MoEF&CC's 2008 guidelines, these 25 elephants may be given registration under PARR, 2001 for offering rides only on plane terrains, provided that, the load restrictions as per the MoEF &CC guidelines are strictly followed. The load restriction here would mean that, out of 25 elephants, 10 elephants (below 2.55 m height) can carry only one rider excluding the mahout and only 15 elephants (above 2.55 m height) can be used for offering rides to two riders at a time, excluding the mahout. Moreover, a set of tranquilizing equipment with essential drugs for meeting animal emergencies must be made available at the elephant village along with the assurance of availability of expert veterinarians for its use.
3. AWBI may advise RFD that, in order to protect public health and the welfare of 10 elephants who tested reactive for TB tests, these animals maybe seized and quarantined immediately and be provided with necessary veterinary care. Moreover, all the elephants in Jaipur who are not screened for TB by the AWBI team may be subjected to the necessary TB tests immediately. AWBI may also advise the RFD on the implementation of the '2017 Recommendations for the Diagnosis, Treatment and Management of Tuberculosis (Mycobacterium tuberculosis) in Elephants in Human Care' published by 2017 Stakeholders Task Force on Management & Research Priorities of Tuberculosis in Elephants **(Annexure-22)**.
4. AWBI may advise the RFD to inspect elephant Champa (AWBI Application no 59; Ride No. 84) who is presently suffering from malnourishment, severe wounds all over the body, foot ailments etc. and to seize the elephant immediately as per the provisions of Section 42 of the WPA, 1972, in order to prevent the infliction of any further cruelty on her and provide her with immediate and intensive veterinary care, good nutrition, a high-quality life without chains, and the company of other elephants in a reputable elephant-care centre.
5. AWBI may advise the RFD to conduct an immediate inquiry into the current practice of cutting tusks without taking necessary permission from the forest department, into why there are three juvenile sub-adult elephants in Jaipur in private custody in rampant violation of wildlife protection laws and also into ascertaining the accurate number of captive elephant population in Rajasthan.

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Date: 11.04.2018