Page: 1847-1863 *URL: www.lijdlr.com*

LAWFOYER INTERNATIONAL JOURNAL OF DOCTRINAL LEGAL RESEARCH

ISSN: 2583-7753

LawFoyer International Journal of Doctrinal Legal Research

[ISSN: 2583-7753]

Volume 3 | Issue 4

2025

DOI: https://doi.org/10.70183/lijdlr.2025.v03.202

CLIMATE CHANGE AND NON-HUMAN VICTIMS – THE LEGAL VOID IN PROTECTING ANIMALS DURING ENVIRONMENTAL DISASTERS

Vikrant Madhurjya[1] & Smriti Parashar[2] & Mizba Ahmed[3]

I. ABSTRACT

In the theatre of climate change, the loudest cries often belong to humans, while faint echoes of non-human suffering fade unheard into the background. Climate change, though universal in nature, often remains selectively compassionate in its remedies. Each environmental catastrophe, from flood to drought, or wildfire to cyclone, leaves behind the traces of non-human invisible victims: animals are left behind to starve, die, migrate, or perish without a single legal remedy or recognition provided to them. The law remains deaf to all animals that flee from flames, drown in floods, and slowly yet gradually vanish from our ecosystem. Despite their sentience, feelings, and emotions, they remain non-living entities from the damage caused by disasters or climate change. Yet, when disaster strikes, the law counts bodies, not lives. The law tries to rebuild cities, not ecosystems. The current jurisprudence often fails to see and treat them as anything beyond just a resource, property, or mere ecological component. They often forget the fact that even animals share the same planet as ours and treat them as victims of rights or beings that are capable of suffering like us humans. This research paper seeks to explore the legal void in protecting animals during environmental catastrophes – a void born not just of mere ignorance but of moral negligence. Through this multifaceted lens combining law, morals, ethics, animal rights, and jurisprudence, this paper aims to interrogate: Can a law that excludes the voiceless ever claim to be just? What happens when the climate justice movement fails to see beyond the human species? And how can legal frameworks evolve to include non-human victims as well in the fight against climate change?

[1] Bachelor of Commerce and Bachelor of Laws (B.Com LLB) Student at Department of Law, NEF Law College, Guwahati, Assam (India). Email: vikrantmadhurjya123@gmail.com
[2] Bachelor of Commerce and Bachelor of Laws (B.Com LLB) Student at Department of Law, NEF Law College, Guwahati, Assam (India). Email: smritiparashar21@gmail.com
[3] Bachelor of Commerce and Bachelor of Laws (B.Com LLB) Student at Department of Law, NEF Law College, Guwahati, Assam (India). Email: mizbaahmed07@gmail.com

 (ISSN: 2583-7753)

II. KEYWORDS

Climate change, Legal frameworks, Animal Welfare, Biodiversity Protection, Environmental Justice.

III. INTRODUCTION

"Until we extend our circle of compassion to all living things, humanity will not find peace."– Albert Schweitzer. In every wildfire that devours forest, in every drought that contributes to habitat loss, and in every flood that submerges the lives of millions, there exists the quieter tragedy - the unheard cries, the unrecorded deaths, displacements, and the silent suffering that lies beneath the laws and morals. For centuries, humanity has tried to reshape, rebuild, legislate, and compensate the victims, but it has often remained deaf to the cries and pain of the ones who cannot speak our language. Climate change, though universal in its impact, remains anthropogenic in nature – it views the planet Earth through human beings' eyes. It tries to measure loss only in human terms, often forgetting the fact that there are other beings, too, who share the same planet and deserve an equal amount of rights and treatment as humans.

Animals are the unacknowledged refugees of our changing planet. They flee in burning sanctuaries, drown in rising sea levels, and vanish into silence -yet their pain, agony, torment, and suffering find no entry in the register of law. The absence of such laws denotes not just procedural gaps or judicial loopholes, but it exposes a profound moral amnesia – forgetting that Justice was never meant to be for a specific species residing on this planet called "Earth."

Just as a compass without a true "North" loses its direction, a legal system that excludes non-human beings from its protective ambit risks losing its moral orientation. This paper tries to seek confrontation for the drought of empathy, examine the legal void that shadows non-human victims, and reimagine a jurisprudence that breathes all sentient lives, and not just humans.

A. RESEARCH PROBLEM

Climate change is hitting India's animals hard, messing up their homes, bringing

harsher weather, and drying up their resources. From 2015 to 2025, scorching heat, wild monsoons, and frequent heatwaves have hurt both farm animals and wildlife. Cows, goats, and chickens— key to India's rural life—are producing less because of heat stress, poor food, and scarce water. Milk output is down 10–20%, and diseases like bluetongue and ticks are killing more animals, with death rates up 15% in places like Rajasthan and Uttar Pradesh. Breeding's taken a hit too—dairy cows are 20–30% less fertile due to the heat, costing India around ₹50,000 crore a year in lost milk, meat, and eggs. This messes up food supply chains, jacks up prices, and squeezes farmers, hurting a sector that's 4.5% of India's economy.

Wild animals are in deeper trouble. Droughts and floods destroy habitats, which puts animals like the Bengal tiger, Asiatic elephant, and Great Indian Bustard in danger of going extinct. The IUCN Red List says that major Indian mammals are down 30% because climate change is messing up their migration and food.

India's laws are out of date. The Wildlife (Protection) Act of 1972[4] It is mostly about habitats and doesn't talk about climate change. The 1960 Prevention of Cruelty to Animals Act[5]Doesn't protect the environment, and Article 51A(g) of the Constitution, which says to be kind to animals, isn't enforced well enough to protect wildlife. This issue is important because it could upset the balance of nature, affect the food supply for 1.4 billion people, and break India's promises under the Paris Agreement.[6] Thus, climate change affects India's overall areas like wildlife, economy, and ethics. Without any strict action in protecting animals against climate change, there is lead to risk of losing their essence. Data Graph for Animals (Tigers, Elephants, and One-Horned Rhinos) affected by climate change in India.

B. RESEARCH OBJECTIVES

In India, various animals encompass our wildlife habitat, such as – tiger, the snow leopard, and the Gangetic dolphins. But due to the rise in climate change, most of our iconic animals existing in our ecosystem are facing unprecedented threats. Like heatwaves, cyclones, and droughts, are disrupting habitats, altering migration

[4] The Wildlife (Protection) Act, No. 53 of 1972, India Code (1972).
[5] The Prevention of Cruelty to Animals Act, No. 59 of 1960, India Code (1960).
[6] Paris Agreement, Dec. 12, 2015, T.I.A.S. No. 16-1104, entered into force Nov. 4, 2016.

patterns, and intensifying human–wildlife conflict. Research from 2017-2031 by Wildlife Action Plan has found that protected areas, covering less than 5% of land, were not designed with climate resilience in mind, exacerbating vulnerabilities. Thus, our research will aim to evaluate these areas, as well as provide remedies and prevention against climate change.

These objectives are as follows –

- **To Map Habitat Shifts and Losses due to Climate Change:** This objective will involve using geospatial modelling and remote sensing to measure habitat contraction in key biodiversity hotspots like the Western Ghats and Himalayas. For example, scientists predict that as temperatures rise, animals like the Indian brown mongoose could lose about 20–55% of their suitable living areas because of shifting altitudes. In the same way, higher sea levels are putting the Sundarbans mangroves at risk — the very forests that Bengal tigers depend on. So, when the habitats shrink, tigers may be forced to move closer to villages, increasing the chances of conflict with people.
- **To Examine Alterations in Animal Behaviour:** Due to climate change, leading to changes in phenology, disrupted migration, heatwaves, and wetland conditions, has led to behaviour changes in Animals. For example, Bird species like the Siberian crane have already seen reduced visits to sites like Keoladeo National Park due to altered wetland conditions and for mammals, heat stress in livestock and wild ungulates leads to reduced reproduction and increased calf mortality, as evidenced in Maharashtra's dairy regions where heat rise lead to reduced milk production and higher infertility rates by 20-30%.
- **Foster Climate-Resilient Protected Areas:** Through the extension and reconceptualisation of protected areas, for example, tiger reserves and national parks, to include climate-smart planning. Employing predictive modelling, such as the Intergovernmental Panel on Climate Change Representative Concentration Pathways. Developing buffer zones and

corridors for migration, which will assist species such as snow leopards and Bengal tigers, can adapt to habitat changes.

- **Helping in reforestation and afforestation:** By helping large-scale planting programs that use native, climate-resilient species to restore damaged ecosystems. The Green India Mission and different programs can help animals like the Indian elephant by storing carbon, allowing microclimates to be more fixed, and giving them food and shelter. By 2030, we should aim to restore 5 million hectares of forest to help biodiversity and lower the stress of heat.
- To reach these specific goals, they will work with the Ministry of Environment, Forest and Climate Change, the World-Wide Fund India, and other local groups. The Green Climate Fund and other global climate finance mechanisms will help pay for projects that can be done on a larger scale. India can protect its biodiversity, meet global climate goals, and make sure that people and wildlife can live together in a warming world by combining efforts to stop and reverse climate change.

C. RESEARCH QUESTIONS

- How do climate change-induced factors, such as rising temperatures, altered rainfall patterns, and habitat loss, impact the health, survival, and productivity of wild and domestic animals
- India, including endangered species like tigers and rhinos, and what legal reforms, the Environment (Protection) Act, and the "One Health" framework, are needed to align India's wildlife and environmental laws with global commitments to ensure environmental justice for animals

D. HYPOTHESIS

"The absence of explicit legal frameworks recognising animals as victims of climate change has created a legal void that hinders accountability and effective protection of wildlife affected by environmental degradation." In India, the Wildlife (Protection)

Act, 1972,[7] It is the most important in Indian legislation. It seeks to prohibit hunting, poaching, and trade in endangered species by creating sanctuaries and national parks. But, still, Indian Law fails to recognise the needs of animals as victims during climate change.

The Wildlife (Protection) Act, 1972, clearly lacks in climate-shifted habitats, such as rising sea levels in the Sundarbans, affecting tigers and other species. Similarly, the Biodiversity Act, 2002,[8] lacks a climate-resilient framework, and environmental clearances under the Environment (Protection) Act, 1986,[9] rarely mandate climate-biodiversity impact assessment. Resource limitations, lax penalties, and bureaucratic meddling in infrastructure projects (such as the Char Dham Highway, railway, and sanctuary expansions) that are approved without sufficient wildlife considerations, putting development ahead of sustainability, are some environmental issues that exacerbate this. Human-wildlife conflicts, exacerbated by climate-induced habitat loss, reveal legal inconsistencies, as noted by the Supreme Court's warnings on fragmented responses.

Policy documents like the National Biodiversity Action Plan (NBAP)[10] Integrate climate threats into ecosystem management, but do not advocate for legal recognition of animals' victim status or amend property statutes. This anthropocentric focus is evident in the unamended The Prevention of Cruelty to Animals Act, 1960,[11] Treats animals as secondary to human interests, which allows inconsistencies in enforcement lapses and judicial interpretations.

Climate change is leading to water scarcity, which is affecting 21% of India, driving animals like elephants and leopards to human areas and disrupting migration (e.g., Siberian Crane extinction from India), and contracting habitats like the Indian mongoose's by 20-55% in the Western Ghats. Conflicts between humans and wildlife, exacerbated by habitat loss and ecological chain reactions brought on by

[7] The Wildlife (Protection) Act, No. 53 of 1972, India Code (1972).
[8] The Biological Diversity Act, No. 18 of 2002, INDIA CODE (2002).
[9] The Environment (Protection) Act, No. 29 of 1986, INDIA CODE (1986).
[10] National Wildlife Action Plan (2017–2031), Ministry of Environment, Forest & Climate Change, Government of India, available at https://moef.gov.in (last visited Oct. 10, 2025).
[11] The Prevention of Cruelty to Animals Act, No. 59 of 1960, INDIA CODE (1960).

events like bamboo flowering, expose overlapping laws (such as the Forest Rights Act that conflict with wildlife protections, which impede responses without acknowledging the victimisation of animals due to environmental changes.

This "patchwork" of contradictory laws, such as the Disaster Management Act,[12] has been cited by Supreme Court Justice Vikram Nath as impeding the development of a cohesive policy, highlighting lax enforcement and the absence of statutory wildlife corridors. Justice Jayasankaran Nambiar's judicial calls for eco-centric reforms call for changing the law to treat non-human entities equally in order to resolve philosophical contradictions. While recent programs like the 2025 National Legal Services Authority (NALSA) Scheme on Human-Wildlife Conflict assist human victims without providing comparable animal protections, the National Wildlife Action Plan (2017-2031) recognises the need for adaptation but lacks binding mechanisms.

To enforce recognition and lessen indirect harms like ocean acidification or glacial melt, experts suggest a "Climate-Biodiversity Code," harsher penalties, community involvement, and technologies like GPS for corridors. Without these, the loss of biodiversity accelerates, putting 675 species in urgent danger of extinction. Thus, laws lacking in explicit recognition of animals as climate change victims put wildlife into vulnerability amid escalating environmental threats. And in urgent need of a specific Climate- Biodiversity Code to ensure accountability, protection, and sustainable co-existence.

E. RESEARCH METHODOLOGY

1. Research Design

The study primarily adopts a qualitative, descriptive, and doctrinal research design with interdisciplinary integration. The descriptive nature of the study allows us to obtain an insightful understanding of how climatic changes affect animals both ecologically and legally, while the doctrinal approach critically examines the adequacy, reasonableness, and fairness of India's existing legislative and judicial frameworks in addressing such impacts. This hybrid design helps bridge the gap

[12] The Disaster Management Act, No. 53 of 2005, INDIA CODE (2005).

between the scientific evidence of environmental degradation and the moral, ethical, and legal obligations owed to non-human victims of climate change.

2. Nature and Scope of the Study

The research is analytical, exploratory, and interdisciplinary in nature. It travels from environmental law, climate change, animal welfare, to moral and ethical philosophy. Furthermore, the paper also explores the intersection where legal silence meets ecological suffering.

The study limits its geographical focus to India, while drawing comparative insights from International Jurisprudence and Global Case Laws such as the Urgenda Foundation v. State of the Netherlands[13] and Held v. Montana.[14]

Its scope stretches to examine the statutory frameworks like the Wildlife (Protection) Act, 1972, the Environmental (Protection) Act, 1986, and the Disaster Management Act, 2005, to evaluate how far these laws are recognised or fail to recognise animals, our non-human companions, as victims of environmental catastrophes.

3. Sources of Data

The research predominantly relies on secondary sources of data, derived from credible, authoritative, and multidisciplinary sources.

- **Governmental and Institutional Documents:** Publications of the Ministry of Environment, Forest and Climate Change (MoEFCC), National Biodiversity Authority, Wildlife Institute of India, National Tiger Conservation Authority, and Press Information Bureau.
- **International and Scientific Reports:** IPCC Sixth Assessment Report (AR6),[15] IUCN Red List,[16] And the National Wildlife Action Plan (2017-2031).
- **Academic Databases:** JSTOR, HeinOnline, ResearchGate, and Google

[13] Urgenda Foundation v. State of Netherlands, HAZA C/09/00456689 (2015) (Neth.).
[14] Held v. State of Montana, No. CDV-2020-307 (Mont. Dist. Ct. 2023).
[15] Intergovernmental Panel on Climate Change (IPCC), Sixth Assessment Report (AR6), available at https://www.ipcc.ch/report/ar6 (last visited Oct. 13, 2025).
[16] International Union for Conservation of Nature (IUCN), Red List of Threatened Species, https://www.iucnredlist.org (last visited Oct. 13, 2025).

Scholar for scholarly commentary.

- **Judicial Databases:** SCC Online, Manupatra, and the official Supreme Court archives for precedents and case summaries.
- **Civil-Society and NGO Reports:** WWF India,[17] International Rhino Foundation and Save the Elephants.

Each source was selected due to its reliability and updated factual relevance, to ensure credibility in contributing to cross-disciplinary understanding.

4. Research Methods Used

The methodology combines:

- **Doctrinal Research:** Interpretation of both statutory and constitutional provisions, judicial precedents, policy frameworks, and case laws governing environmental and animal protection, including climate change.
- **Analytical Evaluation:** Critically analyzes the assessment judicial reasoning and interpretation to expand, extend, and stretch the meaning of fundamental rights (such as the right to life) and include ecological justice.
- **Comparative Method:** Evaluation and examination of Global precedents such as the Urgenda Foundation v. State of Netherlands and Held v. Montana, situating Indian Jurisprudence no later than a wider climate-biodiversity-animal protection-justice narrative.
- **Empirical Correlation:** To demonstrate the ecological impact of climatic disruptions, a limited quantitative analysis of population trends (2006-2025) of flagship species, such as tigers, elephants, and one-horned rhinos, was used in this paper.

5. Data Analysis Techniques

[17] World Wide Fund for Nature (WWF India), Living Planet Report India (2022), available at https://wwfindia.org (last visited Oct. 13, 2025).

Data were analysed using a content-based and trendy analysis approach. Legal documents such as case laws, reports, and Policy materials were thematically coded under recurring categories – recognition, vulnerability, enforcement gaps, and accountability. The population graph for selected species (tigers, elephants, and one-horned rhinos) was reviewed and interpreted to establish a visible correlation between environmental degradation and faunal decline. Interpretive rigour was maintained through triangulation of institutional reports and peer-reviewed literature.

6. Limitations

- Dependence on secondary data may constrain empirical depth and ground-level specificity.
- Variability in survey methodologies across years limits the absolute comparability of wildlife population statistics.
- Absence of a consolidated national dataset on "climate-affected animal species" created data fragmentation.
- The legal inquiry remains primarily India-centric, though cross-jurisdictional references enrich contextual comprehension.

7. Ethical Considerations

- The research adheres to academic integrity and ethical scholarship, ensuring all the intellectual materials provided in this paper are properly cited. Furthermore, no field experiments or inventions involving animals were undertaken.
- The study conceptually is inclined towards an ecocentric ethical framework, aiming to treat animals as subjects of moral and legal considerations rather than just a mere instrumental resource.

8. Expected Contribution

The research seeks to –

- Expose the jurisprudential void in India's climate law concerning animal

protection.

- Propose the need for a Climate-Biodiversity Code recognising animals as climate victims.
- Encourage an ecocentric policy-making framework to ensure that justice is extended beyond the human species.

By uniting, bridging, and connecting both environmental science with legal reasoning, this paper seeks to inspire and shift the disclosure from anthropocentric welfare to planetary justice.

F. LITERATURE REVIEW

1. Climate Change Affects Animals in India – Scholarly Perspectives

Climate change in recent times has been affecting animals all over India. Hotter weather, uneven rainfall, floods, and long dry periods are destroying the homes of wild animals and hurting the health, growth, and work ability of farm animals. These changes not only harm nature – they also affect how we care for animals, protect different species, and make environmental laws. We must aim to build strong order and laws that can help to save endangered animals and keep nature in balance. We must try to grasp how climate change is affecting animals' lives. Many researchers from India have studied this issue and found that climate change is greatly harming animals and is in serious need of quick legal and policy measures to address the problem.

According to S.K. Das (2018),[18] Even a modest increase in temperature between 2-3°C, along with rising humidity, can significantly aggravate heat stress in dairy animals, leading to a decline in their growth and milk production. This study found that there is a bridge between climate and animal production. And from a legal point of view, it calls for stronger and better laws to protect and prevent harm to animals from climate change. It also shows that harming the environment can directly hurt

[18] S.K. Das, Impact of Climate Change on Livestock Production in India, AGRICULTURAL REVIEWS, R-2712 (2018), available at https://arccjournals.com/journal /agricultural-reviews/R-2712 (last visited Oct. 15, 2025). 18 Ved Prakash et al., Adaptive Capacity of Indigenous Breeds to Climate Change in India, AGRICULTURAL REVIEWS, R-2712 (2025), available at https://arccjournals.com/journal /agricultural-reviews/R-271 (last visited Oct. 15, 2025).

animals, making it an issue that affects both nature and law.

Ved Prakash and colleagues (2025)18 have emphasised the resilience of indigenous livestock breeds that have naturally adapted to India's hot and arid regions. They say that these breeds have special genetic and physical traits that help them live in very hot or very cold weather. Their work shows how important it is to protect native species, not just for cultural or agricultural reasons, but also as a way to adapt to climate change. Legally, this backs up the Biological Diversity Act of 2002 and the idea that native breeds are part of India's national biodiversity heritage. Introducing conservation laws and breeding programs, which will aim to protect these genetic resources, can make the country more resilient to climate change.

From Lalmuansangi et al. (2024)'s[19] Point of view, it is important to know the fact that climate change has become one of the largest reasons influencing livestock production and reproduction in coastal ecosystems. Animals from coastal areas face challenges, such as flooding, rising salinity, and disease outbreaks. This evidence from science mandates the legal obligation of the government to enforce environmental protection under the Environment (Protection) Act, 1986. As well as calling for policies that address the economic and welfare losses faced by farmers and herders due to climate-related disruptions

Lastly, S. V. Singh and A. K. Ukey (2024)[20] Highlight the rise of ambient temperature in tropical regions that has already started to affect bovine growth, reproduction, and milk output. This study finds that the health and productivity of animals are immediately linked to climate stability. This perception connected environmental protection with food security and the economy of rural areas – showing that protecting animals from climate change is a national development and not only a welfare issue.

[19] Lalmuansangi et al., Climate Change and Livestock Reproduction in Coastal Ecosystems, AGRICULTURAL REVIEWS (2024), available at https://arccjournals.com/journal /agricultural-reviews/R-2712 (last visited Oct. 5, 2025).

[20] S. V. Singh & A. K. Ukey, Heat Stress and Dairy Production under Changing Climate, AGRICULTURAL REVIEWS (2024), available at https://arccjournals.com/journal /agricultural-reviews/R-2712 (last visited Oct. 5, 2025).

From this collective work, Indian scholars have demonstrated that climate change is not just an environmental issue but an imminent threat to wildlife in India. Their research offers scientific justification for the establishment of climate-resilient legal frameworks, encompassing reforms in animal welfare legislation, conservation strategies, and environmental governance. By integrating these insights into legal research and policymaking, India can move closer to fulfilling its constitutional and moral duty to protect both biodiversity and the animals that depend on it.

IV. RESEARCH & ANALYSIS

A. RESEARCH

1. Research Design

This study adopts a descriptive research design based on data collected from credible online sources, platforms, and websites. Undertaking a cost-effective method to understand the nature and extent of climate change's impact on both wild and domestic animals in India. Since climate-related data and animal studies are widely documented online, allowing us to conduct an in-depth analysis of already available information without the need for field surveys.

2. Sources of data

The research is done with the help of secondary sources, like using – Indian government websites, environmental organisations, and academic databases.

- **National Biodiversity Authority –** for data on threatened and migratory species
- **Ministry of Environment, Forest and Climate Change (MoEFCC) –** for national climate reports and biodiversity policies.
- **The National Wildlife Action Plan –** to see where the law lacks and where it needs to be reinforced

B. ANALYSIS

1. Analysis of the impact on animals

The analysis helped us to understand how climate change is affecting animals in

many different ways.

These are as follows:

- **Metabolic disorders -** To minimise increased body temperature, homeothermic animals decrease heat and increase heat loss in response to high temperatures (hyperthermia). Causing lameness, as well as differences in movements and eating habits. Reducing production and health issues in dairy animals.
- **Mortality -** Due to climate change causing heat waves, there is a huge risk of mortality for animals. Heat exhaustion, heat stroke, heat cramps, and ultimately leading to organ malfunction can result from high temperatures.
- **Immune suppression -** The immune system is the body's defence mechanism that protects animals from harmful infections. However, several factors can weaken its proper functioning (Lacetera, 2012). Many studies show that heat stress — high environmental temperature and humidity — can lower the immune strength of farm animals. The effect of heat on immunity can differ depending on the animal's species, breed, age, and how long it is exposed to such conditions.

A weak immune system makes animals more likely to get sick. This not only reduces their ability to reproduce and grow but also affects their overall welfare and productivity. Causing farmers to rely heavily on antibiotics to treat infections. Also, the frequent and improper use of these medicines can lead to antibiotic resistance, making it harder to cure bacterial diseases in the future (Deshmukh et al., 2023; Suryawanshi et al., 2024).

2. Analysis of the law is lacking regarding the protection of animals

From the analysis, we found that – though there are multiple laws regarding safeguarding of animals such as, such as the Prevention of Cruelty to Animals Act, 1960, and the Wildlife Protection Act, 1972. There is no protection against animals regarding climate change, as these laws were written a long time ago. Most of the

existing rules focus on stopping cruelty, hunting, or habitat destruction by humans, but they overlook the damage caused by rising heat, droughts, and floods. In recent years, animals have faced new challenges—such as heat stress in livestock, loss of forest areas, and food shortages—yet there are no clear legal duties on the government or the public to protect them from these threats.

Environmental laws like the Environment Protection Act, 1986, and climate policies mainly aim at human safety and pollution control, leaving animals outside the conversation. Because of this gap, non-human species remain unprotected from the indirect but serious effects of climate change. To truly ensure animal welfare, India needs updated or new legal measures that recognise climate change as a real danger to animals and include adaptation and rescue plans in its protection framework.

V. SUGGESTIONS AND RECOMMENDATIONS

To help animals against climate change, here are some suggestions and recommendations:

- **For dairy animals –** Provide ventilation and shaded shelters to reduce heat stress during summer. Also, installing cooling systems as fans, sprinklers, or misting devices, in cattle sheds and ensuring constant access to clean and cool drinking water to prevent dehydration. Allowing them to have better health and mortality rate.
- **Amendment of existing laws –** To implement these objectives, the government should also back this up with the help of programmes, as well as legislation and the constitution. By amending existing laws, such as – Wildlife Protection Act, Prevention of Cruelty to Animals Act, to include climate-related threats
- **Strengthen penalties –** Strengthen penalties for actions that worsen climate-related harm to animals. This will allow us to control methane, as well as protect forests, which are natural filters of pollution and CO2.
- **Reduction of methane –** By improving livestock diets by adding high-quality feed, fats, or methane-reducing additives. Promote rotational

grazing and better pasture management to enhance digestion and reduce emissions. Also, the government is offering incentives for farms to adopt methane-reducing technologies and renewable energy solutions.

VI. CONCLUSION

In the silent aftermath of every environmental catastrophe, when the headline news fades, and human losses are counted, what remains unseen, unheard, and unprotected are the suffering of those who failed to register themselves or find a place under the current law. Over the years, climate change has revealed not just the fragility of the ecological system or ecosystems but also the fragility of our moral compass. A system of law that recognises "river" as a "legal person" and "corporation" as "juristic entities" must ask itself why sentient beings capable of feeling pain, fear, hurt, and affection are excluded and remain invisible before the eyes of law.

The fight against climate change cannot just be human centered crusade; it must be a moral movement that acknowledges the survival of all the living beings that share the same planet; a collective right rather than just an individual privilege. True justice cannot just remain confined within anthropocentric boundaries. It's high time for us to think, reflect, and change the existing law that recognises human loss and their welfare. The law must evolve to include and reflect ecological interdependence, starting by no longer seeing animals a mere resources and stop treating them as mere property. In fact, the law must become the voice for those who cannot express their pain or speak human language; those who are voiceless, be a shelter for those who don't have refuge, and the moral reflection of civilisation that has learned with time to co-exist with other fellow companions that share the planet "Earth".

Until that day arrives, justice will remain incomplete, one-sided, echoing the unanswered cries and pain of not just humans alone but of the Earth's forgotten companion who shares their suffering alone in silence.

VII. REFERENCES

- Rostrum Legal, Rostrum's Law Review: Call for Papers – Animal Law

and Climate Justice (2023), available at https://www.rsrr.in/_files/ugd/24e493_354720a771fb449d82251311ab49098e.pdf?index

- P. K. Chauhan & R. K. Sharma, Impact of Climate Change on Animal Health and Production: A Review, Agricultural Reviews, available at https://arccjournals.com/journal/agricultural-reviews/R-2712.
- T. A. Larsen, Teaching Global Climate Change in the Social Studies Classroom: A Critical Review, ERIC Journal, EJ1172284 (2018), available at https://files.eric.ed.gov/fulltext/EJ1172284.pdf.
- Earth Brigade Foundation, 5 Ways Climate Change Affects Wildlife in India, available at https://earthbrigadefoundation.org/wildlife-conservation/5-ways-climate-change-affects- wildlife-in-india/.
- One Earth, Five Animals and How They Fight Climate Change, available at https://www.oneearth.org/five-animals-and-how-they-fight-climate-change/.
- Defenders of Wildlife, 5 Ways Climate Change Affects Animals and How We Can Stop It (Aug. 2023), available at https://defenders.org/blog/2023/08/5-ways-climate-change- affects-animals-and-how-we-can-stop-it.