

ACID ATTACK LAWS IN INDIA
*A Critical Legal Analysis Under the Bharatiya Nyaya
Sanhita, 2023*

Author: Srishti Rai.

Affiliation: Mahatma Gandhi Kashi Vidyapeeth, Varanasi

Email: srishti@lynxlegal.in

Submitted to: Journal of International Research & Multidisciplinary Innovation (JIRMI) **Date:**
11 February 2026

Abstract —

Despite the Bharatiya Nyaya Sanhita, 2023 (BNS) prescribing a minimum of ten years' imprisonment for acid attacks under Section 124 and a comprehensive ancillary framework for victim compensation and acid sale regulation, India recorded only convictions against 207 reported attacks and 703 pending cases in 2023 (NCRB). This paper examines the doctrinal architecture of acid attack law in India—tracing its evolution from IPC 1860 to BNS 2023—against the empirical record of implementation failure. Drawing on NCRB data (2017–2023), landmark Supreme Court jurisprudence, and a comparative analysis of Bangladesh's 2002 acid control model, it argues that India's

implementation deficit is primarily institutional rather than legislative. The paper identifies specific structural failures in investigation, prosecution, compensation, and acid sale regulation, and proposes concrete reforms grounded in Article 21 obligations.

Keywords: *Bharatiya Nyaya Sanhita 2023, Section 124 BNS, acid attack, vitriol age, IPC 326A, conviction rate, victim compensation, NCRB, gender violence, criminal law reform*

I. INTRODUCTION

Acid violence—or vitriol age—occupies a paradoxical position in India's criminal justice landscape. The BNS 2023, which replaced the Indian Penal Code effective 1 July 2024, contains among the most stringent statutory provisions for acid attacks of any jurisdiction in South Asia: a mandatory minimum of ten years' imprisonment, a victim-directed fine mechanism, free medical treatment obligations, and regulated acid sale. Yet the National Crime Records Bureau (NCRB) reported only 16 convictions against 207 acid attacks in 2023, with 703 cases pending trial and an estimated 88% pendency rate.¹ The Acid Survivors Trust International (ASTI) estimates actual annual incidence at approximately 1,000 attacks—nearly five times the official figure—due to severe underreporting driven by stigma, family pressure, and distrust of the legal process.²

The central argument of this paper is that India's acid attack law problem is not one of legislative inadequacy but of enforcement architecture failure. The BNS 2023 provisions are substantively sound; the institutional apparatus needed to translate them into outcomes is not. This paper examines the legal framework, the data, and the structural failures, and proposes targeted reforms.

II. LEGISLATIVE EVOLUTION: FROM IPC 1860 TO BNS 2023

2.1 The Pre-2013 Framework and Its Inadequacy

Prior to 2013, acid attacks in India were prosecuted under the general injury provisions of the IPC: Sections 320 (grievous hurt), 322 (voluntarily causing grievous hurt), 325, and 326 (using dangerous weapons or means). Section 326 technically permitted life imprisonment for corrosive substance

¹ Bharatiya Nyaya Sanhita, 2023 (Act No. 45 of 2023), s. 124, 125, 38 (came into force 1 July 2024).¹ National Crime Records Bureau (NCRB), Crime in India: Annual Reports 2017–2023, Ministry of Home Affairs, Government of India.

² Acid Survivors Trust International (ASTI), 'Case Analysis of 55 Indian Acid Attack Cases' (2024); ASTI research on average case duration (5–10 years) and offender-known data (60–70%).

injuries, but courts routinely imposed sentences of three to five years, with no mandatory minimum, no victim compensation mechanism, and no medical treatment obligation. The Law Commission of

India's 226th Report (2008) explicitly identified this framework as inadequate, recommending a distinct statutory offence for acid attacks, minimum sentencing, and a compensation regime.³

2.2 The Laxmi PIL and the 2013 Amendments

The transformative intervention was Laxmi Agarwal's Public Interest Litigation filed as Writ Petition (Criminal) No. 129 of 2006, argued by Senior Advocate Aparna Bhat. Laxmi, attacked at fifteen in New Delhi in 2005 after rejecting a marriage proposal, petitioned the Supreme Court for three reliefs: recognition of acid attacks as a distinct offence, regulation of acid sales, and survivor compensation. The Court accepted the framing that unrestricted acid availability and the absence of medical and compensation mechanisms violated Article 21 of the Constitution (*Laxmi v. Union of India*, (2014) 4 SCC 427).⁴

The Criminal Law (Amendment) Act, 2013 inserted Sections 326A and 326B into the IPC: Section 326A prescribed a minimum of ten years' imprisonment extendable to life with a victim-directed fine; Section 326B addressed attempts (five to seven years). Section 357B CrPC mandated that state compensation under Section 357A be payable in addition to penal fines. Section 357C imposed free treatment obligations on all hospitals. Section 114B of the Indian Evidence Act introduced a presumption of intent under Section 326A. The Justice Verma Committee Report (2013) had recommended these changes, acknowledging acid violence as a gendered crime requiring specific legislative recognition.⁵

³ Law Commission of India, Report No. 226: 'The Inclusion of Acid Attacks as Specific Offences in the IPC and a Law for Compensation for Victims of Crime,' 2008

⁴ *Laxmi v. Union of India*, Writ Petition (Criminal) No. 129 of 2006, (2014) 4 SCC 427; orders dated 18 July 2013, 6 February 2015, 10 April 2015.

⁵ Justice J.S. Verma Committee, Report of the Committee on Amendments to Criminal Law, January 2013.

2.3 Codification Under BNS 2023

The BNS 2023 (Act No. 45 of 2023) carried forward the 2013 framework with refinements. Sections 326A and 326B IPC are now Section 124 BNS. Section 38 BNS (right of private defence extending to causing death) adds a seventh clause explicitly covering acid attacks as a trigger for lethal selfdefence—clarifying what courts had previously been required to infer. Section 116 BNS redefines grievous hurt to explicitly include permanent deformity from acid. These modifications represent legislative continuity with targeted conceptual refinement.⁶

III. STATUTORY FRAMEWORK UNDER BNS 2023

3.1 Section 124(1): The Principal Offence

Section 124(1) BNS provides:

"Whoever causes permanent or partial damage or deformity to, or burns or maims or disfigures or disables, any part or parts of the body of a person or causes grievous hurt by throwing acid on or by administering acid to that person, or by using any other means with the intention of causing or with the knowledge that he is likely to cause such injury or hurt or causes a person to be in a permanent vegetative state shall be punished with imprisonment... for a term which shall not be less than ten years but which may extend to imprisonment for life, and with fine: Provided that such fine shall be just and reasonable to meet the medical expenses of the treatment of the victim: Provided further that any fine imposed under this sub-section shall be paid to the victim."

Three elements deserve doctrinal emphasis. First, the actus reus is broad—throwing, administering, or using acid or any other means—preventing exploitation of definitional gaps. Explanation 1 defines acid to include any substance with acidic or corrosive character or burning nature capable of causing bodily injury leading to scars or disfigurement or disability, covering alkaline caustics and industrial corrosives. Second, the mens rea is disjunctive—intent or knowledge—preventing the accused from defeating liability by denying specific intent. Explanation 2 provides that permanent

⁶ PRS Legislative Research, 'The Bharatiya Nyaya Sanhita, 2023: A Summary,' 2024, available at prsindia.org; Standing Committee on Home Affairs, Rajya Sabha, Report No. 246 (10 November 2023).

damage 'shall not be required to be irreversible,' closing an evidentiary defence. Third, the proviso converts the fine into a compensation instrument, paid directly to the victim.⁷

3.2 Section 124(2): Attempt

Section 124(2) prescribes five to seven years' imprisonment for whoever throws or attempts to throw acid, or attempts to administer acid, with the intention of causing the harms enumerated in Section 124(1). The offence is cognizable, non-bailable, and triable exclusively by the Court of Session—designations that reflect the legislature's assessment of gravity and prevent pressure toward informal settlement at the police stage.⁸

3.3 Ancillary Framework

Section 396 of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), corresponding to former Section 357C CrPC, preserves the obligation on all hospitals—public and private—to provide free

first aid and treatment without demanding advance payment or documentation. The NALSA (Legal Services to Victims of Acid Attacks) Scheme, 2016, guarantees priority legal aid, counselling, and compensation access. State compensation schemes under Section 357A BNSS are operational in most states, theoretically independent of conviction.⁹

IV. JUDICIAL CONSTRUCTION: KEY CASES

Laxmi v. Union of India, (2014) 4 SCC 427: The foundational case. The Court held that the absence of regulation, medical support, and compensation for acid attack survivors violated Article 21. Directions included: regulation of acid sales (photo ID of buyer, seller registers); minimum compensation of Rs. 3 lakhs (Rs. 1 lakh within 15 days, balance within 2 months); free hospital treatment without preconditions; and non-negotiability of compensation regardless of conviction

⁷ LawRato.com, 'BNS Section 124 — Voluntarily causing grievous hurt by use of acid,' 2025; Vakilsearch BNS Section 124 Analysis; ApniLaw, 'Section 124 BNS Bare Act,' August 2025.

⁸ LawRato.com, 'BNS Section 124 — Voluntarily causing grievous hurt by use of acid,' 2025; Vakilsearch BNS Section 124 Analysis; ApniLaw, 'Section 124 BNS Bare Act,' August 2025.

⁹ NALSA, Legal Services to Victims of Acid Attacks Scheme, 2016; NALSA Compensation Scheme for Women Victims/Survivors of Sexual Assault/Other Crimes, 2018.

status. Ministry of Home Affairs compliance affidavits revealed multiple states had not implemented the Rs. 3 lakhs minimum even two years after the order.¹⁰

Parivartan Kendra v. Union of India, (2016) 3 SCC 571: Filed by an NGO regarding two Dalit sisters attacked in Bihar whose medical expenses had already exceeded Rs. 5 lakhs. The Court held Rs. 3 lakhs was a minimum, not a ceiling, and awarded Rs. 13 lakhs to the victims. It directed states to adjust compensation for the extent of injury, medical expenses, social stigma, and lost employability, and ordered inclusion of acid attack survivors in disability lists. The Court noted the petitioner's comparative argument that Bangladesh's 2002 Act offered significantly stronger regulatory protection.¹¹

Nipun Saxena v. Union of India, (2020) 18 SCC 499: The Court endorsed NALSA's 2018 Compensation Scheme as a minimum benchmark and reinforced that compensation cannot be contingent on identification or conviction of the offender—survivor relief flows from State obligation, not prosecutorial success.¹²

Shaheen Malik v. Union of India (2025): The Supreme Court examined persistent nonimplementation of the 2014–2015 Laxmi directions, prompted by the acquittal of the main accused in the 2009 Delhi acid attack case after a 16-year trial. The Court directed the MHA to report on state-level compliance with compensation and treatment obligations. The Allahabad High Court was

separately censured for Uttar Pradesh's delays of over a decade in compensation disbursement. Malik noted that none of the 300 survivors supported by her foundation had secured a conviction; many had been offered out-of-court monetary settlements.¹²

¹⁰ One Law Street, 'Laxmi vs. Union of India — (2014) 4 SCC 427 (Acid Attack Compensation Order)'; Lawbhoomi, 'Laxmi vs Union of India and Others,' May 2025.

¹¹ Parivartan Kendra v. Union of India, Writ Petition (Civil) No. 867 of 2013, (2016) 3 SCC 571 (7 December 2015).¹² Nipun Saxena v. Union of India, (2020) 18 SCC 499.

¹² Shaheen Malik v. Union of India, Supreme Court of India, proceedings reported 2025; see also Laxmi v. Union of India (2015 compliance monitoring proceedings), Casemine ref. 5790b247e561097e45a4e2a3.

V. EMPIRICAL EVIDENCE: NCRB DATA AND OUTCOMES

5.1 Reported Incidence, 2017–2023

NCRB data for the period 2017–2023 reveal the following trend in reported acid attack cases across India:¹³

Year	Reported Cases	Attempts	W. Bengal	U. Pradesh	Gujarat	Convictions
2017	244	—	Highest	2nd	—	—
2018	228	—	Highest	High	—	—
2019	240	—	High	Highest	—	—
2020	182	—	High	High	—	—
2021	176	—	Highest	2nd	—	—
2022	202	62	High	High	High	27
2023	207	65	57 cases	31 cases	15 cases	16

Table 1: NCRB Reported Acid Attack Cases and Convictions, India, 2017–2023. Source: NCRB, Crime in India Annual Reports (2017–2023); Statista, Dec 2023 (citing NCRB India).

The slight decline from the 2017 peak of 244 to 176 in 2021, followed by a reversal to 207 in 2023, is contested in interpretation. Some researchers attribute the dip to improved governance; others to increased deterrence of reporting rather than reduced incidence.¹⁴ ASTI's estimated annual incidence of ~1,000 attacks suggests that 2023's reported figure of 207 represents approximately 21% of actual

¹³ Statista, 'Number of Acid Attack Cases Reported across India from 2018 to 2022'; 'Number of Convictions in Acid Attack Cases across India from 2017 to 2022' (citing NCRB India, December 2023).

¹⁴ PMC/NCBI (2024), Singh N. et al.: declining trend attributed to improved governance and public awareness, though contested interpretation.

attacks—a reporting rate consistent with the documented deterrents of stigma, family pressure, and fear of retaliation.¹⁶

5.2 The Conviction Crisis

In 2023, of 703 acid attack cases pending before courts, only 16 convictions and 27 acquittals were recorded. Of 735 cases involving women victims scheduled for trial, 649 (88%) were pending from previous years.¹⁵ The Tribune India (October 2025) further reported that Delhi was the only Union Territory to register cases in 2023, with seven incidents, while several smaller states and UTs reported zero—a pattern researchers attribute partly to underreporting.¹⁶ ASTI's research documents an average case duration of five to ten years from attack to verdict in India.¹⁷ The Shaheen Malik case (2009–2025) is the extreme but not anomalous end of this distribution.

When cases do reach disposal, the prosecution loses more often than it wins (27 acquittals against 16 convictions in 2023), indicating evidentiary and prosecutorial failures rather than merely delay. The NCRB's 2022 data show 27 convictions—marginally higher but still a small fraction of the pending stock.¹⁸

VI. STRUCTURAL FAILURES IN IMPLEMENTATION

6.1 Failure of Acid Sale Regulation

The Supreme Court's 2013 Laxmi directions required states to enforce photo-ID requirements for acid purchase, seller-maintained registers, and SDM oversight, with the Poisons Act, 1919, violations made cognizable and non-bailable. Investigative reporting and NGO submissions have documented continued open sale of concentrated sulphuric and hydrochloric acid in Uttar Pradesh and West Bengal markets without identity verification.¹⁹ No state has enacted a comprehensive acid control statute analogous to Bangladesh's 2002 legislation. The PMC/NCBI study analyzing 2017–

¹⁵ The Tribune India, 'Delhi Only UT to Report Acid Attack Cases, Says NCRB Data,' October 2025.

¹⁶ The Tribune India, 'Delhi Only UT to Report Acid Attack Cases, Says NCRB Data,' October 2025.

¹⁷ Acid Survivors Trust International (ASTI), 'Case Analysis of 55 Indian Acid Attack Cases' (2024); ASTI research on average case duration (5–10 years) and offender-known data (60–70%).

¹⁸ Statista, 'Number of Acid Attack Cases Reported across India from 2018 to 2022'; 'Number of Convictions in Acid Attack Cases across India from 2017 to 2022' (citing NCRB India, December 2023).

¹⁹ Vajiramandravi, 'India's Acid Attack Laws: High Acquittals and Implementation Gaps,' January 2026

¹⁶ Acid Survivors Trust International (ASTI), 'Case Analysis of 55 Indian Acid Attack Cases' (2024); ASTI research on average case duration (5–10 years) and offender-known data (60–70%).

2021 NCRB data found that acid availability in industrial clusters (textiles, rubber, metals) in high incidence states directly reduces acquisition cost and barrier for perpetrators.²²

6.2 Investigation and Prosecution Failures

Despite 60–70% of perpetrators being known to victims (ASTI data), chargesheeting rates are low and declining nationally, though better in metropolitan areas than in the overall national average.²⁰ Specific documented failures include: delayed FIR registration; inadequate forensic evidence collection (chemical analysis of substance, photographic documentation of injuries); absence of trained interviewing of trauma survivors; and police pressure on survivors to accept monetary settlements outside criminal proceedings. The Shaheen Malik proceedings (2025) described shoddy investigation, ignored evidence, and judicial insensitivity over sixteen years as systemic rather than exceptional.²¹

6.3 Compensation Delays and Hospital Non-Compliance

The Centre for Law and Policy Research has documented cases where the Rs. 3 lakhs minimum— itself inadequate given that a single reconstructive surgery costs approximately Rs. 3 lakhs (Parivartan Kendra, 2016)—is paid only partially or years after the attack, if at all. Male survivors have been denied compensation under state schemes framed exclusively for women.²² Private hospitals continue to demand advance payment before treating acid attack survivors in emergency conditions, in direct violation of Section 396 BNSS, as documented in NGO petitions before the Supreme Court as recently as 2023.²³ The Allahabad High Court censured Uttar Pradesh for delays

²⁰ Acid Survivors Trust International (ASTI), 'Case Analysis of 55 Indian Acid Attack Cases' (2024); ASTI research on average case duration (5–10 years) and offender-known data (60–70%).

²¹ PubAdmin Institute, 'Acid Attacks in India: Legal Responses and Survivor Stories,' January 2026, available at pubadmin.institute

²² Centre for Law and Policy Research (CLPR), 'Acid Attack Survivors: Implementing Their Right to Dignity,' March 2021, available at clpr.org.in.

²³ Law Chakra, 'Supreme Court Tells Acid Attack Survivors to Approach Legal Services Authority for Compensation Delay,' March 2025.

exceeding a decade in compensation disbursement.²⁴ The MHA's 2024 guidelines restated the Rs. 3 lakh entitlement—itsself evidence of persistent non-compliance.²⁵

²² Singh N. et al., 'Spectrum of Vitriolage in India: A Retrospective Data Record-Based Study,' Journal of Family Medicine and Primary Care, Vol. 13 Issue 2 (February 2024), PMC/NCBI Ref. PMC11006047.

6.4 Normalization of Out-of-Court Settlements

Despite acid attacks being non-compoundable offences under Indian law, a pattern of de facto settlement operates through police facilitation or community intermediaries. Malik's testimony that none of 300 foundation-supported survivors had secured a conviction—while many accepted financial settlements—reflects a rational response by survivors facing immediate financial need against the uncertain prospect of a decade-long trial.²⁶ This dynamic suppresses conviction data and normalizes impunity, creating a perverse incentive structure that undermines deterrence.

VII. COMPARATIVE PERSPECTIVE: BANGLADESH

Bangladesh, once among the world's worst-affected countries for acid violence with 494 reported attacks in 2002, reduced annual incidence to 13 cases by 2024—a 97% decline over two decades.²⁷ The Acid Offences Prevention Act, 2002 established specific criminal offences with graded punishments (including capital punishment for attacks causing death) and specialized tribunals for expedited trial. The Acid Control Act, 2002 imposed comprehensive licensing for production, import, sale, and storage, with criminal liability for violations and mandatory shop sealing within thirty days of illegal sale findings. These provisions were enforced through sustained public awareness campaigns and active monitoring by the Acid Survivors Foundation Bangladesh.

²⁴ SCC Online Blog, 'Calcutta High Court Calls for Upholding Feminist Roots in Acid Attack Compensation Case,' September 2023

²⁵ Ministry of Home Affairs, Guidelines on Acid Attack Survivors (2024); Advisory Circulars on Compensation, available at www.mha.gov.in.

²⁶ Vajiramandravi, 'India's Acid Attack Laws: High Acquittals and Implementation Gaps,' January 2026

²⁷ Shankar IAS Parliament, 'Acid Attacks in India: A Growing Crisis and the Struggle for Justice,' January 2026 (Bangladesh data: 494 attacks in 2002, 13 in 2024).

India's framework differs from Bangladesh's in three critical respects: (1) India has no dedicated acid control statute—regulation is dispersed across the Poisons Act, 1919, Supreme Court directions, and state administrative orders; (2) India has no dedicated tribunal system for acid attack cases, subjecting them to general Court of Session backlog; and (3) Bangladesh's regulatory and awareness interventions were systematically integrated, whereas India's have been fragmented.²⁸ The Parivartan Kendra petitioner explicitly invoked Bangladesh's 2002 model before the Supreme Court as early as 2013, but the structural reforms it embodies remain unimplemented in India.

VIII. DOCTRINAL ASSESSMENT: LAW VERSUS ENFORCEMENT ARCHITECTURE

The BNS 2023 provisions are, by comparative international standards, well-designed. The mandatory minimum, broad acid definition, disjunctive mens rea, irreversibility exclusion, and victim-directed fine collectively constitute a sophisticated statutory architecture. The ancillary framework—hospital treatment obligation, state compensation scheme, legal aid under NALSA, regulated sale—is substantively comprehensive. The Centre for Justice and Peace has observed that acid attack jurisprudence in India is characterized by a 'recurring pattern' of courts re-entering 'regulatory terrain they have already mapped, due to executive inaction.'²⁹

This pattern has constitutional dimensions. The Supreme Court's holding in *Laxmi* that the absence of regulation, medical support, and compensation violated Article 21 carries a corollary: the subsequent non-implementation of remedial directions constitutes a continuing Article 21 violation. This is not merely a compliance deficit but a structural accountability gap—non-compliance with judicial directions in the field of survivor rights carries no effective sanction, and the executive has repeatedly relied on the Court to reinstate obligations it had already been given.

²⁸ Shankar IAS Parliament, 'Acid Attacks in India: A Growing Crisis and the Struggle for Justice,' January 2026 (Bangladesh data: 494 attacks in 2002, 13 in 2024).

²⁹ Centre for Justice and Peace (CJP), 'Acid Attack Jurisprudence in India: Constitutional Promise and Persistent Institutional Failure,' December 2025, available at cjp.org.in.

The policy implication is precise: further legislative amendment is not the primary requirement. The legislative design is adequate. What is absent is enforcement architecture—investigative capacity, prosecutorial training, judicial infrastructure, compensation disbursement systems, and regulatory enforcement mechanisms that can translate legislative text into outcomes.

IX. RECOMMENDATIONS

- (i) **Dedicated Acid Control Statute:** Enact a central Acid Control Act consolidating the dispersed regulatory framework into a single enforceable licensing regime with criminal liability for unauthorized sale, mandatory premises sealing, and uniform enforcement standards—modeled on Bangladesh's 2002 Act.
- (ii) **Fast-Track Courts:** Establish dedicated fast-track Sessions Courts for acid attack cases under the BNSS with statutory time limits for investigation, chargesheeting, charge framing, and final disposal—drawing on the POCSO fast-track court model.
- (iii) **Revised Compensation:** Revise the Rs. 3 lakhs minimum upward to reflect actual first-year medical costs (estimated at Rs. 6–10 lakhs based on Parivartan Kendra data), with automatic inflation indexation. Operationalize the Justice Verma Committee's recommendation for a national lifelong rehabilitation fund covering medical, psychological, and livelihood support.
- (iv) **Mandatory Investigation Protocols:** Develop and mandate specialized acid attack investigation protocols addressing chemical analysis, injury documentation, and trained survivor interviewing. Include accountability reporting obligations for district police on registration and investigation of acid attack cases.
- (v) **Hospital Compliance Enforcement:** Create a monitoring mechanism within State Health Departments and District Legal Services Authorities to track and enforce Section 396 BNSS compliance, with a digital complaint mechanism for denial of emergency treatment.
- (vi) **Gender-Sensitive Training:** Institutionalize mandatory gender-sensitivity training for police officers and Sessions Court judges handling acid attack cases through the National Police Academy and National Judicial Academy respectively.

X. CONCLUSION

The Bharatiya Nyaya Sanhita, 2023 represents the most recent and refined iteration of India's legislative response to acid violence. Section 124's mandatory minimum, broad definitions, victim-directed fine, and ancillary framework constitute, on paper, a comprehensive statutory architecture. The empirical record—16 convictions against 207 reported attacks and 703 pending cases in 2023, a documented 88% pendency rate, persistent compensation non-disbursement, and open acid sale in major industrial states—demonstrates that this architecture has not been built into practice.

The Bangladesh comparison shows that a comparable trajectory of legislative commitment, when backed by enforcement architecture with institutional teeth, can reduce acid attack incidence by 97% over two decades. India's path to comparable outcomes does not require more legislation; it requires investigative capacity, prosecutorial training, fast-track judicial mechanisms, adequately funded survivor rehabilitation, and administrative accountability. The Supreme Court's jurisprudence from *Laxmi* (2014) to *Shaheen Malik* (2025) has mapped the constitutional obligations comprehensively. The remaining work is institutional—and it is overdue.

REFERENCES AND CITATIONS

Legislation

¹ Bharatiya Nyaya Sanhita, 2023 (Act No. 45 of 2023), s. 124, 125, 38 (came into force 1 July 2024).

Bharatiya Nagarik Suraksha Sanhita, 2023, s. 396 (former CrPC s. 357C).

Indian Penal Code, 1860, ss. 320–326; ss. 326A, 326B (as ins. by Criminal Law (Amendment) Act, 2013, Act 13 of 2013).

Code of Criminal Procedure, 1973, ss. 357A, 357B, 357C (as amended 2013).

Indian Evidence Act, 1872, s. 114B (as ins. 2013).

Legal Services Authorities Act, 1987; Poisons Act, 1919.

Acid Offences Prevention Act, Bangladesh, 2002; Acid Control Act, Bangladesh, 2002.

Case Law

⁴ *Laxmi v. Union of India*, Writ Petition (Criminal) No. 129 of 2006, (2014) 4 SCC 427; orders dated 18 July 2013, 6 February 2015, 10 April 2015.

¹¹ Parivartan Kendra v. Union of India, Writ Petition (Civil) No. 867 of 2013, (2016) 3 SCC 571 (7 December 2015).

¹² Nipun Saxena v. Union of India, (2020) 18 SCC 499.

¹³ Shaheen Malik v. Union of India, Supreme Court of India, proceedings reported 2025; see also Laxmi v. Union of India (2015 compliance monitoring proceedings), Casemine ref. 5790b247e561097e45a4e2a3.

Bengai Mandal alias Begai Mandal v. State of Bihar, Patna High Court, 2010.

Government and Institutional Reports

¹ National Crime Records Bureau (NCRB), Crime in India: Annual Reports 2017–2023, Ministry of Home Affairs, Government of India.

⁵ Justice J.S. Verma Committee, Report of the Committee on Amendments to Criminal Law, January 2013.

³ Law Commission of India, Report No. 226: 'The Inclusion of Acid Attacks as Specific Offences in the IPC and a Law for Compensation for Victims of Crime,' 2008.

⁹ NALSA, Legal Services to Victims of Acid Attacks Scheme, 2016; NALSA Compensation Scheme for Women Victims/Survivors of Sexual Assault/Other Crimes, 2018.

²⁸ Ministry of Home Affairs, Guidelines on Acid Attack Survivors (2024); Advisory Circulars on Compensation, available at www.mha.gov.in.

⁶ PRS Legislative Research, 'The Bharatiya Nyaya Sanhita, 2023: A Summary,' 2024, available at prsindia.org; Standing Committee on Home Affairs, Rajya Sabha, Report No. 246 (10 November 2023).

Academic and Research Publications

²² Singh N. et al., 'Spectrum of Vitriolage in India: A Retrospective Data Record-Based Study,' Journal of Family Medicine and Primary Care, Vol. 13 Issue 2 (February 2024), PMC/NCBI Ref. PMC11006047.

^{2, 16, 19, 23} Acid Survivors Trust International (ASTI), 'Case Analysis of 55 Indian Acid Attack Cases' (2024); ASTI research on average case duration (5–10 years) and offender-known data (60–70%).

²⁵ Centre for Law and Policy Research (CLPR), 'Acid Attack Survivors: Implementing Their Right to Dignity,' March 2021, available at clpr.org.in.

³² Centre for Justice and Peace (CJP), 'Acid Attack Jurisprudence in India: Constitutional Promise and Persistent Institutional Failure,' December 2025, available at cjp.org.in.

^{14, 20} Statista, 'Number of Acid Attack Cases Reported across India from 2018 to 2022'; 'Number of Convictions in Acid Attack Cases across India from 2017 to 2022' (citing NCRB India, December 2023).

^{17, 18} The Tribune India, 'Delhi Only UT to Report Acid Attack Cases, Says NCRB Data,' October 2025.

^{1,27} Shankar IAS Parliament / Insights on India, 'Acid Attacks in India: A Growing Crisis and the Struggle for Justice,' January 2026; 'Acid Attacks in India: Law, Data, Challenges and Way Forward,' December 2025.

^{21,29} Vajiramandravi, 'India's Acid Attack Laws: High Acquittals and Implementation Gaps,' January 2026.

²⁶ Law Chakra, 'Supreme Court Tells Acid Attack Survivors to Approach Legal Services Authority for Compensation Delay,' March 2025.

^{30,31} Shankar IAS Parliament, 'Acid Attacks in India: A Growing Crisis and the Struggle for Justice,' January 2026 (Bangladesh data: 494 attacks in 2002, 13 in 2024).

²⁴ PubAdmin Institute, 'Acid Attacks in India: Legal Responses and Survivor Stories,' January 2026, available at pubadmin.institute.

^{7,8} LawRato.com, 'BNS Section 124 — Voluntarily causing grievous hurt by use of acid,' 2025; Vakilssearch BNS Section 124 Analysis; ApniLaw, 'Section 124 BNS Bare Act,' August 2025.

¹⁰ One Law Street, 'Laxmi vs. Union of India — (2014) 4 SCC 427 (Acid Attack Compensation Order)'; Lawbhoomi, 'Laxmi vs Union of India and Others,' May 2025.

²⁷ SCC Online Blog, 'Calcutta High Court Calls for Upholding Feminist Roots in Acid Attack Compensation Case,' September 2023.

¹⁵ PMC/NCBI (2024), Singh N. et al.: declining trend attributed to improved governance and public awareness, though contested interpretation.