

IWRC's Position Statement on the Minimum Standards for Wildlife Rehabilitators

Representatives from both IWRC and NWRA worked endless hours to create the original version of the MSWR approximately 20 years ago. With its third edition dated 2000, the current document is almost nine years old. Shortly after publication, the caging dimensions in this last version were officially adopted by the U.S. Fish & Wildlife Service to be used as *guidelines* when inspecting new and established facilities. In the past several years, however, some state agencies and some federal permit officers have been using the MSWR 3rd Edition as a *minimum* tape measure by which to insist that caging at both new and established facilities *meet the minimums*. IWRC's members have been calling for our help to not only update the caging dimensions, but to clear up the very confusing language that on one page refers to the document as a *guideline*, and on another page states that caging dimensions should be considered *absolute minimums*.

IWRC feels very strongly that the words *minimum* and *required* (by whom?) in the text should be eliminated. The caging dimensions are arbitrary and have not been proven to be actual *minimums*. Indeed, they may make good guidelines in many cases, but should not be considered *absolute minimums* as is stated in the current text. No studies have proven that 50 feet is the absolute *minimum* to rehabilitate a Red-tailed Hawk in. Why not 45 feet? 30 feet? The truth is probably somewhere between a phone booth and an ideal unlimited length.

We have heard from many of our members (mostly avian rehabilitators) who have received regulatory threats to have their long standing permits revoked if they don't add a few feet here or there to *meet the minimums*. Others have beautiful and very *functional* caging that has the same interior space but may be two feet shorter to meet local zoning laws. We could site case after case of angry members who want the word *minimum* deleted and replaced with something more workable like the original intent of *guidelines*. We have promised you, our members, that we will work to change the wording and intent of both the text and the title of the document.

Representatives from both IWRC and NWRA met with Fish & Wildlife Service representatives last spring. The intent of the full day meeting was to explain as much about wildlife rehabilitation and how the usage of the MSWR affects us. The end result was an invitation from Washington to revise the document fully – to make it user friendly for all rehabilitators and all permit officers.

To that end we intend to work with all rehabilitators from IWRC, NWRA, and any other interested stakeholders. We want to hear from everyone! Our Standards Committee Chairperson, Dan Martinelli, has set up a discussion board for everyone to have input and an open discussion on what we rehabilitators collectively want in a revision. Please join the discussions at <http://discussmswr.freeforums.org/index.php>

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