

To: Wendy Fox, NWRA

From: Dody Wyman, IWRC

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

Representatives from both NWRA and IWRC worked endless hours to create the MSWR. With its third edition dated 2000, the current document is almost nine years old. Both organizations agree it's time for a fourth edition.

About three years ago, a large effort was put forth by both organizations to get input from as many stakeholders as possible in an effort to print a meaningful fourth edition. At that time, it was barely noticeable to most rehabilitators that both state and federal authorities had adopted the third edition as guidelines to be used in inspecting new and established facilities. In fact, many were happy to know that the authorities now had a means to shut down those very sub-standard rehabilitators everyone knows are out there. Therefore, at that time, only a handful of stakeholders expressed discontent with not only the title, but the use of the word "minimum" in the text.

In the past few years, however, the authorities have abandoned the word "guideline" and have been using the MSWR 3rd Edition as a *minimum* tape measure by which to insist that enclosures at both new and established facilities meet the *minimums*.

IWRC feels very strongly that the word "minimum" in the text as refers to cage design and dimensions should be eliminated. The existing cage dimensions were first established by well-meaning and very experienced rehabilitators. Nevertheless, they are arbitrary and have not been proven to be actual minimums. Indeed, they may make good guidelines in most cases, but should not be considered "absolute minimums" as is stated in the text.

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 our members that we will work with NWRA to change the wording and intent of both the text and the title of the document.

IWRC has suggested the title "Best Management Practices", but we are open to discussion on this. The words "suggested guidelines", "suggested principles", "recommended practices", "recommended standards" etc are far more palatable than arbitrary hard and fast *minimums*.

IWRC is ready to talk about this anytime. It is our hope that NWRA will have a chair and committee soon so that we may begin discussions. If nothing else, we would like to meet about this in Chicago in March.

You now know our position on the "minimum" quandary. Please send NWRA's position on this to me and I'll forward it to our board and committee. I look forward to fruitful discussions. Thank you.

Respectfully,

Dody Wyman, President  
IWRC Board of Directors