

Janalene,

So glad to hear your experience with PAWS was beneficial to you.

But, that is not the case here.

First off, I have WIC licensing for 2 Bald Eagles and 6 TVs, A Commercial Falconers License which covers red tails, kestrels, GHO, and Harris Hawks. And an Authorized Custodian License.

I do not diversify.

**NONE** of these birds are open to public spectators.

Due to Covid-19 and Avian Influenza, my property and facility and house have been closed off to ANYONE coming on our property since June. If someone came with a bird, they had to call the house, I would meet them at the gate, take the bird, put it in isolation for 2 weeks and proceed as required. I posted the property, because I know enough about the diseases to know the fatality rates and was protecting myself, my family and my birds and animals.

In September, I had 3 birds of rehab status, the rest were on WIC and Falconers license.

In September, my free range domestics were infected with Avian Influenza ***by the migratory ducks and geese in the creek that bisects our property.***

**NOT from any intake.**

I, foolishly, reported this to the CFIA.

My domestics, **as per the FWCA rules and regs, NEVER got anywhere near my raptors.**

CFIA came in and killed my domestics and then decided they wanted to MOVE the raptors from an avian influenza positive property to falconers and zoos "for their continued safety from the disease".

No one with any common sense wanted to have any part of taking on any bird that might infect their own and put them in a position as I was in.

MNRF sought out zoos and falconers and pretty much got the same answer of NO but sometimes in flowery description.

CFIA did not want their ego bruised so they registered a complaint with PAWS - NEVER HAVING EVEN SEEN MY RAPTORS!

**NEVER HAVING EVEN TESTED THEM FOR A.I.**

So one morning I get a call from a police officer telling me that I had to come to the gate and let them in cause they had a warrant.

Long story short, these so called 'experts' ended up freaking out my birds, attempted to transfer zoonotic diseases by refusing to change gloves or PPEs or booties and just handling birds from one cage and moving on to the next and handling them.

They used a sock to cover a raptors head! Anyone with any knowledge of raptors knows you NEVER use something like that. AND they used the SAME sock on each bird. Again, ignorance of zoonotics or what! They only stopped catching up and handling my birds when their 'expert' vet got taloned in his hand because he was freaking out over a hippoboscus fly and his 'expert' assistant let go of the red tail's foot that she was holding while he examined the bird.

**They didn't even know about the pressure points to release the talons!**

An expert would have!

An idiot releases the foot to go after a fly.

They killed one of my falconery birds that had been attacked by a coon and lost its foot.

They had me kill two others that were rehab.

They revoked their orders and so I released the final rehab bird bird.

Now I am in shit for that. Even though the bird had gone through the designated 3 weeks plus of quarantine by the CFIA and even though PAWS revoked their order.

With regards to their rules and standards.

To Quote:

“Cages must have  
(d) one or more areas that are out of view of spectators

Cages...secured to prevent,

(a) interaction with people that may be unsafe or inappropriate for the wildlife;”

**My facilities are NOT open to the public. I do not have charitable status. And I do not use my birds for sport.**

These are the criteria they used on the warrant.

**PAWS has stated to me that they use the following for references: Standards for Birds of Prey Sanctuaries - Global Federation of Animal Sanctuaries; Standards for Wildlife Rehabilitation (2021) – NWRA/IWRC; Animal Care Manuals – Association of Zoos and Aquariums (species specific manuals for permanent captives); Overseeing vet advice or consultant vet advice; AND Codes of Practice – National Farm Animal Care Council.**

NOW, the first one is pretty much a repeat of the NWRA/IWRC one which is what the MNRF cites us. CAZA animal care manual has two raptors listed – a Condor (not found in Ontario unless in a zoo) and a Great Horned Owl – of which I have one. Their care manual for this one bird is 133 pages in length. BUT I AM NOT A ZOO NOR AN AQUARIUM! Overseeing vet advice and consultation with a vet would be ideal if their vets had the necessary knowledge from years of first hand experience and not what they gleaned in their studies at Guelph University or in their offices.

The last one...my domestics and my pig are Farm Animals...Raptors do not fall into that category.

You may not feel like there is a conflict of interest, but there is.

It begins with overstepping their power and doing the job of the MNRF (making sure we use the standards). The MNRF does more than control and issue licenses. They also enforce those licenses and the standards by which they must be met. That’s why they have conservation officers who carry guns. PAWS needs to enlist the police if they want someone who carries a gun.

Even though PAWS Act states that they have control over “all animals and wildlife”, their generalization of their rules and regs bespeak more of zoos and such - rather than rehabilitation, falconers and even those with special animals (support et al).

They are overstepping their bounds because their rules and regs are so vague.

Therein lies the conflict.

As a rehabilitator – licensed by the MNRF for 25 years and rehabbing long before that. What is the point in having two government departments – one with less knowledge about wildlife (PAWS), than the other (MNRF) – doing double inspections on facilities? What is the point in setting vague standards that are suppose to encompass ALL without taking into consideration the reasons some are in captivity? What makes them think that body weight and muscle tone in birds is brought on by poor care? I would love to hear a falconer while they educated them on this! What makes them think that removal from their cages of items found in the wild would be better enhanced by putting TVs food in paper bags or giving the raptors ‘toys’ or lining their cages with sheets, etc.?

What makes them think that totally enclosing an accipiter in a cage will stop that bird from experiencing visual and vocal stress? Do they not understand they can still hear and by enclosing them they are denying them natural sunlight, natural vitamin, natural hours of light and dark?

Their ignorance is paramount – and I am only making reference to avian.

This is simply a flexing of muscles and unfortunately it will affect each and every person who has any animals and they don’t even have to be a rehabilitator!

It leaves rehabbers in the lurch.

Who do we go to for clarification? Who do we go for enforcement?

When will PAWS take CFIA to task for the inhumane way they tested my birds (shoving a 6” stick swab up the cloaca to ¼” from the end of the stick! And doing the same down the throat. 🤢🤮) and the inhumane way in which they killed them – some with poor measures of sedatives and euthanol that took 15 minutes to kill the birds 🤢🤮🤢 OR the guys that went out, chased the birds down, grabbing these frightened birds and then broke the necks of the birds (with some getting away from them with permanent injury to their necks 🤢🤮🤢).

Not something I can get out of my head – EVER!

PAWS is targeting and harassing and NOT doing their job OR doing their job in a half-assed way. But they want me to rebuild a 120x12x12 foot cage by December 19<sup>th</sup>. Well, they revoked that one cause I just took the birds out of the cage. They ignored the fact that a storm had done damage to the roof – not irreparable, but not something you tackle in winter weather.

Even the CFIA is back-peddling. They came in and sprayed my driveway saying it was now “clear of Avian Influenza” (even though they insisted that the driveway would be infected by the wind blowing the virus onto it) and all of a sudden, even though they didn’t spray or clear cut or dig up or anything, a 330’x 30’ section of our property is now designated as a “warm zone”. And all this even though they are designating my property (3.75 acres) as AI positive for 120 (not consecutive) days at +4oC. Even though degree days states that AI will die in 2 days at 25oC...which was had throughout September and October!

Conflicts of interest – you bet your sweet bippy and they are trying to show they’ve ‘done good’ by what they’ve done!

Maybe the group you had in thought they didn’t have to do anything and were polite and informative with you. But, completely different set here. So much more they did and didn’t do that they were suppose to.

The Open Sky Raptor Foundation is made up of myself and my 82 year old husband.

We don’t have the luxury of lots of volunteers or lots of money, but my birds have NEVER suffered until now.

And that is all thanks to CFIA and PAWS.

Carol Ricciuto

Open Sky Raptor Foundation

Grimsby, Ontario

Hi Everyone,

I just wanted to share some information that I recently became aware of regarding PAWS and hope that it helps to clarify their role vs that of the MNRF. The reason for sending this out is in response to the email that we recently received from Sandy. I hope you find this information beneficial.

As you may already know, we are a facility that has permanent wild animals that are seen by the public. Because of that, we are inspected by PAWS on a proactive annual basis along with the MNRF.

Recently we had a black bear placed in our care after it was seized by PAWS for inadequate living conditions as a permanent animal at another facility. During this process I had a chance to chat to a senior official regarding PAWS role and their responsibilities with wildlife rehabbers. Other than the proactive annual visits with facilities that have animals seen by the public, he informed me that they will only go into other facilities where someone has filed a complaint (generally the public) or they have been asked to come in by another

government agency such as the MNRF. For the latter, PAWS is then responsible to work with the facility to ensure that minimum standards are met for the permanent wildlife in captivity.

Below is their Standards of Care for Captive Wildlife if you're curious of the conditions wildlife in your care must meet.

From my experience and interaction with PAWS, I don't feel like there is a conflict of interest between them and MNRF. The MNRF controls and issues the licenses to have captive wildlife while PAWS oversees that their Standards of Care are adhered to if need be.

I hope that this information helps in some way. If anyone has any questions for me regarding our experience with them I'd be happy to chat.

[O. Reg. 444/19: STANDARDS OF CARE AND ADMINISTRATIVE REQUIREMENTS \(ontario.ca\)](#)

Janalene Kingshott  
Director of Animal Welfare  
Aspen Valley Wildlife Sanctuary