

PRIORITY MNR List (Monique's List).

V 5.2 October 2024

Background comments

1)- Authorization: delays, check list over kill. Lost applications. ROD

It can take 2 to 3 years for a new rehabber to get approved and even then few get approved (Kawartha 3, Thunderbirds 3, Georgian Bay 2, Mally's 2 ½). From Sherri Cox course of 28 people (2019) only one has become a Rehabber. We know of at least 7 people who passed the exam and put in an application to become a rehabber and never heard back from their district and gave up. We are down to 46 Rehabber in the province from over 200. If the public cannot find help (no rehabbers have space) then they will try to look after the animal themselves

2)- Site inspections: Mandatory vs additional, over applying ROD

The site inspection list is over kill. Not all conditions need to be mandatory. A lot of the conditions if yes are a plus but if no should not block an approval. Most of the people who pass the exam feel they do not qualify under the Rehabbers check list. A lot of the MNR people do not have the knowledge to know what is right. Some Rehabbers find armed enforcement officers intimidating

3)- Communications: Both ways. Listening to Rehabbers. New staff notices. Participating in Rehabber events. ROD

A lot of Rehabbers only hear from their MNR district contact if there is a problem. Some have not heard from their district person in years (the record is 5 years). Most are not even told if they have a new district rep. In a lot of cases they find out about new rules by accident. Survey of Rehabbers found 32% said communications from MNR was poor. 35% found return phone or emails from MNR was sporadic.

4)- Consulting: with wildlife rehabbers before changing regulations, Use Wildlife Rehabbers as experts. ROD & Policy

Policy or rule changes have become more restrictive on Rehabbers (media, use of foster care people, use of surrogates, authorization, site inspections, condition 16 b), policy 2.3 ect). Changes are made behind closed doors with little discussion with Rehabbers. When the MNR did ask for Rehabbers opinions (rehabbers check list) they did not listen to anything that was said. Survey of Rehabbers found 90% say their MNR rep little or no knowledge of wildlife rehabbing only the rules.

5)- MNR Key point person (Rehabbers can teach, also able to get things done inside the MNR). ROD

If we had a point person in the MNR (at the Regional Level) that Rehabbers

could work with. Most MNR people know little about wildlife rescue and rehabbing. They are given no training and learn as they go, then they move on. An MNR point person could be trained by Rehabbers and be a voice for rehabbing in the MNR. District staff would also have someone they could talk to that knew what and how Rehabbers operate. Two Northern Regions would not need a Point Person.

6)- Partnership vs Master Servant Relationship

A) Encouraging not discouraging. Rehabbers as an asset vs a liability

B) MNR not trusting Rehabbers. Adding extra conditions.

C) MNR District Staff not trained in rehabbing

ROD

Lack of trust of Rehabbers by the MNR is where the conflict comes from.

Rehabbers know more about rehabbing than the MNR will ever know. Yet the MNR are the ones adding extra regulations. MNR District Staff gets no training in Wildlife Rehabbing. When it is a Master Servant Relationship (varies from the District to District) there is little trust either way. Survey of Rehabbers found 55% of Rehabbers consider relationship with MNR a Master Servant relationship. 56 % said relationship with their District Office was fair or poor. 25% said they do not trust their District Office and 25% said sometimes. Most of the Rehabbers in the Northern Regions have said their MNR people trust them and they trust their MNR reps. In the two Northern Regions the relationship between the MNR is a real partnership.

7)- Prohibition: If it does not say you can do it you can't. Wild Life photos.

Media ban.

ROD & Policy

If it does not say in writing that a Rehabber can do something than they cannot do it (lack of knowledge about wildlife rescue and rehabbing). As one MNR person told us if he does not know something he always says no (he also said there is no one in the MNR that he can talk to about Rehabbers- another reason for the point person)

8)- Surrogates: Allowed (in print so can refer to).

Policy

Surrogates are the most effective way to raise an orphaned wild animal. About every four years someone in the MNR goes after Rehabbers for using Surrogates (Aspen 2012, Bluewater 2016, Doris Krahn Integration Section 2020) Despite a mountain of evidence and no credible reason or science the

MNR still refuses to allow surrogates. They have said in some exceptions they have allowed Raptor Rehabbers, but we know of no such cases.

9)- Kill First Policy: Non releasable: new order surrogates, educational, roadside zoos. Policy

In some Districts is if an animal cannot be released into the wilds it has to be put down (regulations say “may”). We are trying to get that is the last thing not the first. Another justification for Surrogates. Recent addition of condition 16 b) says any animal that exhibits any symptom of distemper (including physical symptoms such as diarrhea) shall be killed. This could be applied to almost any adult wild animal that is brought to a Rehabber.

10)- Release restrictions: Private, public property. Distance Policy

The Rehabbers that handle mammals are running into the problem that you have to have permission to release an animal onto private property and you are not allowed to release on public property. This is creating a problem of how do you release an animal within 15 km of where it was captured if there is nowhere to release it? Releasing orphaned raccoons, squirrels and skunks in the center of a city is not going to work because Rehabbers cannot train the young to avoid cars and the other dangers of city life like the original mother.

11) – Log Book: update timing, information not used. Policy 2.3 trying to find Rehabbers doing something wrong “tool to ensure that wildlife rehabilitation is not a path for wildlife to enter the illegal trade.” ROD & Policy

MNR can be really ridged that the log book has to be update in 24 hours from when an animal comes in. During baby season the first priority has to be the animal not updating the log book. Some Rehabbers have been fined for not updating their log book on time. The information in the log book is never used and are told to destroy after three years. Policy 2.3 indicates a deep distrust of Rehabbers on something that never has been an issue or even a point of discussion.

12) - Outside Interference: Animal control, Humane Societies, Municipal, PAWS. 24hour rule, FWCA set aside. ROD

Other organizations are claiming jurisdiction over Rehabbers. PAWS now says they have the right to inspect Wildlife Rehabbers and impose their own regulations on Rehabbers (PAWS conditions are at odds with MNR conditions). Cities are banning wildlife rehabbing within their boundaries (Oshawa, Welland) and Toronto has to approve any rehabber. A Humane Society said “any wild animal handle by the public has to be put down”.

13)- Right of Appeal: Unfair and bad interpretation of regulations. Same appeal process as hunters. Given in 2018 gutted in April 2024 ROD

The original intention the “right of appeal” was so MNR staff would be accountable for their actions with Rehabbers.” Procedural fairness “was given by the Minister. It was gutted in 2024 by MNR staff. An appeal process where the Rehabbers can present their side and it is not done behind close doors.

History: Monique’s list came about from a meeting in 2017 that Monique (ADM of ROD at the time) attended with 35 Rehabbers. After hearing complaints and problems from Rehabbers for over 3 hours, Monique recommended putting together a list of major problems that could be worked on. The list became known a Monique’s List (Changed to Priority MNR List at request of ROD)

Survey of Rehabbers was taken in September of 2021 with a response rate of 80%. 68% of Rehabbers supported resolving issues on Monique’s list. Only 3% said no.

Resolved Problems to Date

A)- Certification marking MNR exams (Sherri Cox)

B)- New Study Guide

C)- Start talking with wildlife rehabbers (still sporadic but a start)