

The Raptor Fliers Association of Western Australia Inc. (RFAWA) are pleased to present our submission on the introduction of the *Biodiversity Conservation Act 2016*, the *Biodiversity Conservation Regulations 2018* and particularly the Department of Biodiversity, Conservation and Attractions (DBCA) recently released draft '*Code of Practice for Wildlife Rehabilitation in Western Australia*'.

<b>CONTENTS OF THIS SUBMISSION</b> .....	1
<b>LETTER OF INTRODUCTION</b> .....	1
<b>FREE EXERCISE FLYING RAPTOR REHABILITATION - CODE OF PRACTICE</b> .....	1
<b>Introduction</b> .....	1
<b>Acknowledgments</b> .....	1
<b>Scope</b> .....	2
<b>Aims and goals of the Association</b> .....	2
<b>Our processes</b> .....	2
<b>Our policies</b> .....	2
<b>Our programs</b> .....	3
<b>Our partners</b> .....	3
<b>Our principles</b> .....	4
<b>Appendices and references index</b> .....	4
<b>RFAWA CODE OF ETHICS</b> .....	1
<b>Purpose</b> .....	1
<b>Introduction</b> .....	1
<b>Care, training and free-flying of raptors for rehabilitation</b> .....	1
<b>Use of Radio Telemetry/GPS/Satellite Tracking Systems</b> .....	2
<b>The role of mentors</b> .....	2
<b>Selection criteria for raptors to be free exercise flown for the purposes of rehabilitation</b> .....	2
<b>Reporting</b> .....	4
<b>Rehabilitation and release</b> .....	4
<b>Conclusion</b> .....	4
<b>CRITERIA FOR THE SELECTION OF RAPTORS TO BE FREE EXERCISE FLOWN FOR THE PURPOSES OF REHABILITATION</b> .....	1
<b>Purpose</b> .....	1
<b>Selection criteria</b> .....	1
<b>Skills and experience</b> .....	1
<b>Record keeping and reporting</b> .....	2
<b>Assessment of progress</b> .....	2
<b>Release protocols</b> .....	2
<b>Raptors assessed as unsuitable for release</b> .....	2
<b>APPROPRIATE USE OF EQUIPMENT AND TETHERING</b> .....	1
<b>Purpose</b> .....	1
<b>Equipment</b> .....	1
<b>Tethering</b> .....	2

<b>UNDERSTANDING, AND MEASURES TO AVOID MAL-IMPRINTING IN RAPTORS UNDERGOING REHABILITATION.....</b>	<b>1</b>
<b>Purpose.....</b>	<b>1</b>
<b>Imprinting.....</b>	<b>1</b>
<b>Implications of mal-imprinting.....</b>	<b>2</b>
<b>Taming.....</b>	<b>3</b>
<b>Measures to avoid mal-imprinting.....</b>	<b>3</b>
<b>Ethical considerations.....</b>	<b>4</b>
<b>Survival.....</b>	<b>4</b>
<b>The difference between Searchers and Dynamic Hunters.....</b>	<b>5</b>
<b>Conclusion.....</b>	<b>5</b>
<b>Summary.....</b>	<b>5</b>
<b>THE APPROPRIATE METHODS OF FITTING AND USE OF RADIO TELEMTRY OR GPS TRACKING SYSTEMS.....</b>	<b>1</b>
<b>Purpose.....</b>	<b>1</b>
<b>Retrieval and tracking.....</b>	<b>1</b>
<b>Transmitter mounting methods.....</b>	<b>2</b>
<b>Tail mounting.....</b>	<b>2</b>
<b>Neck mounting.....</b>	<b>2</b>
<b>Leg mounting.....</b>	<b>3</b>
<b>Backpack mounting.....</b>	<b>3</b>
<b>RFAWA position statement.....</b>	<b>3</b>
<b>RFAWA MEMBERS PERSONAL LETTERS.....</b>	<b>1</b>
<b>Gina Chapman-Stone.....</b>	<b>1</b>
<b>Rena Okley.....</b>	<b>3</b>
<b>Peter Reith.....</b>	<b>5</b>

## CONTENTS OF THIS SUBMISSION

- Letter of Introduction
- RFAWA Code of Practice
- RFAWA Code of Ethics

Other RFAWA policy/information documents:

- 'Criteria for selection of raptors to be free-exercise flown for the purpose of rehabilitation'
- 'Appropriate use of equipment and tethering'
- 'Understanding and measures to avoid mal-imprinting in raptors undergoing rehabilitation'
- 'The appropriate methods of fitting and use of radio-telemetry/GPS tracking systems'

RFAWA member personal letters:

- Gina Chapman-Stone
- Renae Okley
- Peter Reith

Please note: Raptor Reporting Forms 1 and 2 are currently under review, but can be made available later. The RFAWA Apprentice Workbook is included as a separate attachment.

The following letters of support for this submission are also included as attachments:

- Noel Hyde MNZM and Debbie Stewart MNZM, Wingspan Birds of Prey Trust and the New Zealand National Bird of Prey Centre
- Dr Gordon Mellor, Chairman of The Hawk Board (UK NGO advisory/liaison group on captive raptors)
- Prof Grahame Webb, Director, Wildlife Management International Pty. Limited

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Mr Mark Webb, Director General, Department of Biodiversity, Conservation and Attractions.  
Dr Manda Page

Dear Mr Webb and Dr Page,

This letter is to bring to your attention the work, ethos and particularly the recently revised *Code of Practice* (including appendices) of the Raptor Fliers Association of Western Australia (RFAWA Inc).

Our members developed these systems and protocols and for several years as a legally incorporated association have operated effectively and measurably as a group by combining knowledge and resources with regard to the use of highly effective free-exercise flight raptor rehabilitation techniques, thereby ensuring the best possible welfare standards and outcomes for all raptors in our care.

The most important indicator of likely success with regard to raptor rehabilitation is whether the bird can demonstrate that it can function as a natural predator immediately upon final release to the wild environment. We have demonstrated that free exercise methods comprehensively test suitability for release, in every case, including occasionally exposing weaknesses and unsuitability for release in some individuals, which may not have become apparent due to any other rehabilitation method.

Our methods are measurable, transparent and accountable, and are applied by practitioners who are highly skilled and experienced. Over the last five years as a structured group we have used these techniques to successfully rehabilitate and document (using our own Raptor Report Forms - see COP), some thirty native raptors including Brown Goshawks, Kestrels, Little Eagles, Hobbies, Brown Falcons, Peregrine Falcons and Wedge-Tailed Eagles. We are innovative and always looking for ways to improve our level of care and the methods we use.

For example, we were the first in the World to utilise and document the use of simulated, remote-controlled flying 'prey' items such as the 'Rocrow' and 'Roboduck', and the use of live-stream GPS tracking and the analysis of flight performance and fitness progression data, for the appraisal of suitability for the release back to the wild of raptors undergoing rehabilitation.

This work was the subject of a presentation given recently to the Raptor Research Foundation Conference held at Kruger National Park in South Africa.

I'd be happy to give the presentation to yourselves and any other interested parties within the Department of Biodiversity, Conservation and Attractions (DBCA).

There is also a short documentary film by RFAWA member Willian Ross which shows how these methods were used in the recent rehabilitation of an orphaned Peregrine Falcon. It can be viewed at <https://youtu.be/3Wqcf-6N-98> but I will also send you a copy each on a USB stick.

As an interest group whose combined membership has well over a hundred years of practical experience in the high standard day-to-day care, general management, training and free-exercise flying of raptors for the purposes of rehabilitation, and who may be affected by the introduction of new laws, regulations and guidelines, we offer this *Code of Practice* as an example of an effective working model with regard to the free-exercise flight aspects of raptor rehabilitation.

We are more than happy to advise upon and assist with (at no cost to DBCA and rehabilitators), further development of the DBCA *Code of Practice for Wildlife Rehabilitation in Western Australia*, including providing formal training, grading and advice for new raptor rehabilitators wishing to contribute in this highly specialised field.

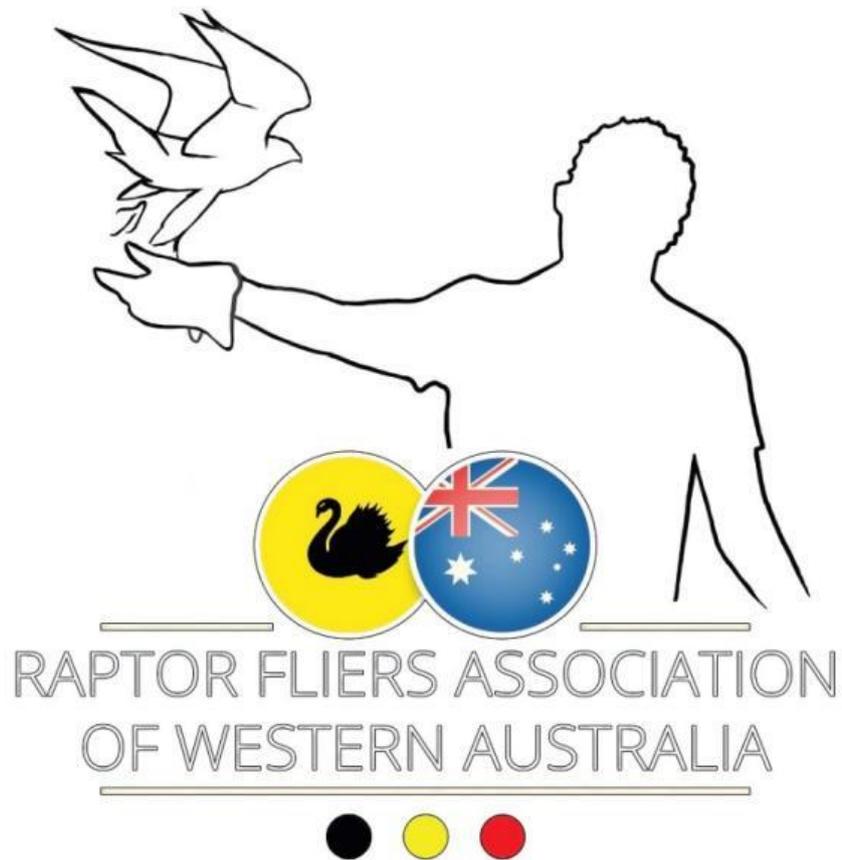
Until such time that the DBCA guidelines are finalised, we give our assurances that RFAWA members will continue to conduct all free-exercise flying prior to final release to the very highest standards transparently, measurably and accountably for the purposes of thorough rehabilitation of native raptors, and successful release to the wild environment.

Kind Regards,

Michael Calvin  
(on behalf of the members and supporters of RFAWA).



The final release of a Black Falcon after a successful free-flight rehabilitation by Martin Scuffins  
(Photo credit David Whelan)



**FREE EXERCISE FLYING RAPTOR REHABILITATION  
CODE OF PRACTICE**

## Introduction

The Raptor Fliers Association of Western Australia (RFAWA Inc.) is a registered, incorporated association, dedicated to the responsible care, rehabilitation and conservation of Australia's native Birds of Prey.

Formed in 2014, the Association comprises a small, but well credentialed group of raptor enthusiasts. They have the skills, knowledge and experience in captive raptor management and in the utilisation of free-exercise techniques for the purpose of the rehabilitation of injured or orphaned raptors. The goal is always returning them to the wild once they have measurably developed the strength, skills and experience to fend for themselves.

The primary focus of RFAWA is to bring our expertise in the art of free exercise flying to supplement and support the existing raptor care fraternity both in Western Australia and Australia-wide. In the case of those raptors currently in care that may benefit from the transparent and accountable utilisation and application of these techniques by suitably qualified practitioners, to the highest standards, and to optimise survival rates of any raptors being released to the wild environment.

Our evidence based approach, is to employ the most ecologically sustainable elements of falconry whilst applying contemporary knowledge and the use of modern technology, and in doing so wherever possible to contribute to conservation, education and scientific study, which is consistent with modern biodiversity conservation standards and expectations, and which we believe is a perfect fit for Western Australia.

## Acknowledgments

RFAWA acknowledges and thanks the following major contributing authors to this Code of Practice and related documentation: Michael Calvin; Jemima Parry-Jones MBE, Matt Lamb; Gina Pike; Renae Downer, Craig Bailey and Denise Lazenby<sup>1</sup>;

We would also like to express our gratitude to supporters and advisors around the World, particularly:

- Dr Nick Fox OBE – International Wildlife Consultants;
- Dr Adrian Lombard – President International Association of Falconry and the Conservation of Birds of Prey;
- Jemima Parry-Jones MBE – International Centre for Birds of Prey,
- Stuart and Amanda Payne – WA Conservation of Raptors,
- Trevor Oertel – South African National Birds of Prey Centre, and so many others.

Thank you all.

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<sup>1</sup> <https://www.dscribe.com.au/>

## Scope

This Code of Practice has been developed to provide guidance to RFAWA members who employ free exercise flying techniques, by setting appropriate standards required for the responsible care, management and rehabilitation of Birds of Prey in Western Australia. Other relevant and valuable information is contained within the appendices.

The scope covers:

- Aims and goals of RFAWA
- The processes and protocols we have in place
- Our policies
- Our programs
- Our Partners
- The ethics and standards by which we operate

## Aims and goals of the Association

- To provide and to encourage the use of high standard training and free exercise flying techniques in the rehabilitation and successful reintroduction to the wild of previously injured, orphaned and diseased Birds of Prey.
- To create, build and preserve a historical record of the use of these methods and their contribution to conservation, education and scientific study.
- To maintain and encourage a culture of 'competency first' and always striving for excellence.
- To bring greater awareness of raptors and the environment to the general public and to provide advice where required on general raptor management techniques.

## Our processes

RFAWA is committed to the use of this valuable and proven approach to captive raptor management in cases where it is appropriate in the circumstances, and to continually strive to improve standards and develop new techniques.

Our members were the first in the World to utilise robotic flying simulated prey, the 'Rocrow' and 'Roboduck' as a bridging tool to encourage hunting behaviour (Appendix 1 - link), and live-stream GPS tracking and study of flight performance data (Marshall GPS, Appendix 2 - link) during the active phase of free-exercise flight rehabilitation (see [www.rrawa.com](http://www.rrawa.com)).

We have developed systems and protocols to ensure the very highest standards of raptor care and husbandry, accountability and transparency. We achieve this via our Code of Ethics (Appendix 3), our membership grading, mentoring and apprenticeship training scheme (Appendix 4), and our raptor reporting protocols (Appendix 5).

We are committed to the future use of post-release satellite tracking equipment, and to the scientific study into the effectiveness of these methods. We encourage and actively support and participate in scientific study initiatives both domestically and internationally.

## Our policies

We are committed to the maintenance and use of only the highest standards in captive raptor management, the choice of and use of appropriate equipment and housing, and encouraging the use of any minimum standards expected by current and any future policies of the Department of Biodiversity, Conservation and Attractions (DBCA).

RFAWA employs strong but objective triage principles ensuring that valuable and limited resources are optimised in line with our Policy Statement '*Criteria for selection of raptors to be free-exercise flown for the purposes of rehabilitation*' (appendix 6).

We also encourage the use of, and adherence to our other **Policy Statements**. Some examples are:

- Appropriate use of equipment and tethering (appendix 7).
- Understanding and measures to avoid ‘mal-imprinting’ of wild raptors undergoing rehabilitation (appendix 8).
- The appropriate methods of fitting and use of radio telemetry/GPS tracking systems (appendix 9).

RFAWA advocates the requirement for any future raptor rehabilitation licencing (by DBCA) intended to improve and encourage greater transparency, accountability and higher standards at reasonable or no cost to the rehabilitator.

We hope to make significant contributions with regard to assisting DBCA in formulating appropriate systems and protocols for the use of free-exercise raptor rehabilitation.

### Our programs

Our programs include but are not limited to:

- Expert care of raptors and measurably successful rehabilitation.
- Access to good veterinary advice and help.
- Comprehensive mentoring and apprenticeship scheme.
- Conservation through Education – helping to ‘connect’ an ever growing urbanised population to the wild environment.
- Attending and presenting to domestic and international forums and conferences
- Engaging in and support to scientific study initiatives
- Providing expert advice to Government

### Our partners

RFAWA enjoys the support of many of the world’s leading experts in the field of captive raptor management.

We are a member nation of the International Association of Falconry and the Conservation of Birds of Prey (see [www.iaf.org](http://www.iaf.org)) which has 120 member organisations from over 89 countries, many of which are specialist raptor rehabilitation groups who are perfectly placed to advise on best practice.

The IAF is an accredited NGO which provides advisory services to UNESCO Intangible Cultural Heritage Committee (NGO 90006), is an accredited member of the International Union for the Conservation of Nature (IUCN), and is CITES accredited.

Our specialist advisor is Dr Nick Fox (OBE), widely considered to be a World leading raptor biologist, he has been at the helm of *International Wildlife Consultants* (see [www.falcons.co.](http://www.falcons.co.)) for over 30 years.

Along with a staff of around 20, including 3 PhD scientists and specialist aviculturists, Dr Fox has a proven track record of advising on and managing wildlife projects internationally.

## Our principles

The Raptor Fliers Association of Western Australia supports and encourages equality and diversity.

We believe in the principle of equity and fairness for all.

We support the ecologically sustainable use of wildlife for the purpose of conservation through education and scientific study.

We understand the value of, and utilise operant conditioning and free-exercise techniques to support the responsible and ethical management of raptors whilst in our care, and the thorough rehabilitation of sick, injured or orphaned raptors for the purposes of successfully returning them back to their natural environment whenever possible.

We welcome enquiries and respectful discussion based on reasonable, objective and evidence based opinion.

More information can be found on our website at [www.rrawa.com](http://www.rrawa.com).

## Appendices and references index

1. Robotic flying 'prey' used in Australia [www.wingbeat.com](http://www.wingbeat.com)
2. How the Marshall GPS works [www.marshallradio.com](http://www.marshallradio.com)
3. Code of Ethics
4. Apprentice Workbook
5. Raptor Reporting Form (Parts 1 and 2)
6. RFAWA Policy: Criteria for selection of raptors to be free-exercise flown for the purposes of rehabilitation
7. RFAWA Policy: Appropriate use of equipment and tethering
8. RFAWA Policy: Understanding and measures to avoid mal-imprinting in raptors undergoing rehabilitation
9. RFAWA Policy: The appropriate methods of fitting and use of radio-telemetry/GPS tracking systems



RFAWA's own hack box and tower....'hacking' can be a very effective rehabilitation technique



RFAWA Chairman Matt Lamb placing a brood of orphaned Peregrines into the hack box

# RFAWA POLICY STATEMENT



## CODE OF ETHICS

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A brood of orphaned Peregrine Falcons close to fledging

## **Purpose**

This Code of Ethics has been developed as part of a suite of policy documents that outline the ethics, standards and philosophy of RFAWA. It advises on best practice with regard to the ethical treatment of raptors in our care and in the wild, and is designed to be read as part of RFAWA's Code of Practice.

## **Introduction**

RFAWA members shall endeavour to employ, uphold and promote the use of the highest standards and best practice relating to the handling, general management, use of suitable equipment and housing, and conduct the training, conditioning and free-flying of Birds of Prey with the utmost consideration for the bird's safety and well-being and eventual rehabilitation where possible.

They must always seek to positively influence the public's perception of the Association and of the use and practice of the free flying techniques that we employ. Anyone with a casual or passing interest in free flying raptors should be made fully aware of the level of all legal aspects, commitment, dedication, time and costs involved. Those with a genuine interest will demonstrate enthusiasm, commitment, determination and maturity. They must be willing to serve out the required apprenticeship, or otherwise satisfy the committee of their prior training and qualifications.

In the interests of transparency and accountability, all members are strongly encouraged to keep a personal diary or logbook detailing as much information about each individual raptor being free flown, including:

- daily records of flying weight;
- the raptor's development and progress;
- veterinary records and reports; and
- any other notable information that may be of value to the Association, its members or interested parties.

Members must conduct their raptor free exercise flying activities in compliance with current laws and regulations and in mutual co-operation and trust with officials from Department of Biodiversity, Conservation and Attractions (DBCA, formerly DPaW) and other authorities.

Members must show respect towards landowners and private property (and always gain their prior permission to use their land), members of the general public, all wildlife and animal welfare. All members should be aware of the dangers of negative press and or TV coverage and refer media queries or requests for interviews to the Committee or the appointed Public Relations Officer.

## **Care, training and free-flying of raptors for rehabilitation**

All raptors that are being free exercise flown should carry a small identification tag which clearly shows the contact details of the rehabilitator. In the case of any rehabilitated raptor being returned to the wild, this tag must be removed before final release unless it is an approved identity ring or marker under the appropriate licencing from DBCA.

Members must ensure that all housing and equipment is fit for purpose and consistent with any guidelines provided by RFAWA. At the very least, all housing and equipment should meet the minimum standards and requirements of the DBCA guidelines see 'Code of Practice for Wildlife Rehabilitation in Western Australia' or any future revision/replacement of this document.

Raptors that are not undergoing daily handling, training or free flying should be free lofted in a suitable enclosure whenever it is practicable or required in the circumstances. Raptors that require tethering for

the purposes of daily handling and management should be suitably 'manned' and display a calm disposition.

RFAWA will advise Apprentice grade members as to the type and species of raptor their level of experience warrants them working with unsupervised (although we have no power to enforce this). RFAWA will consider the Apprentice's individual circumstances, mentor assessments and recommendations.

### **Use of Radio Telemetry/GPS/Satellite Tracking Systems**

In accordance with the required licensing in the case of raptors undergoing rehabilitation, and where otherwise appropriate, all raptors whilst being free exercise flown shall be fitted with a functional and activated GPS or radio-frequency transmitter that is fit for purpose and is securely attached in a suitable manner approved by the Association.

Every reasonable effort must be made to recover any errant raptor. Note: It is permissible, in exceptional circumstances only, and with the approval and direction of the Committee, to free-fly a raptor without the use of telemetry.

No raptor may be final-released to the wild environment whilst carrying any radio-telemetry and or GPS tracking device, or any other equipment other than under the appropriate licencing by DBCA. For further information, please see the RFAWA Policy Statement – *'The appropriate methods of fitting and use of radio telemetry and GPS tracking systems'*

### **The role of mentors**

The RFAWA Secretary shall keep a record of all graded members and approved mentors. The role and responsibilities of RFAWA mentors cannot be underestimated. Mentorship requires a high level of dedication, involvement and personal sacrifice and should not be taken lightly. It is much more than signing a form.

A mentor is responsible to the apprentice, to the raptor in their care, and in a wider sense to the upholding of the Aims and Goals and future well-being of the Association. The mentor must be highly skilled, experienced and competent, uncompromisingly ethical, and continually available to the apprentice.

The mentor must be able to fully appreciate the apprentice's needs and be able to guide them to and through the appropriate learning material, have an awareness of the status of all equipment or housing in use, the apprentice's activities, and the condition and current status of any raptor in their care.

### **Selection criteria for raptors to be free exercise flown for the purposes of rehabilitation**

Most raptors that are taken into care are not suitable as candidates for a training and free exercise flying program prior to release. This is usually because:

- they can be released within a few days in a reasonably fit condition; or
- injuries will prevent them from ever being fit enough to fend for themselves in the wild environment.

The very few raptors deemed to be suitable for training and free exercise flying prior to release are to be selected primarily for their suitability. Selection criteria include:

- the improved probability of successful release and longer-term survival in the wild, which can be directly attributable to the use of free-flying techniques, and when;
- other rehabilitation methods and release options may not be suitable for that particular individual, or have previously proven to be unsuccessful.

Typically, this would include young orphaned birds that cannot be hacked back, and are not human imprinted (see note below), or previously injured or incapacitated older birds (particularly those from the more dynamic hunter species) that have spent a protracted time period in captivity.

Note, Imprinting: Great care should be taken to ensure that no wild raptor becomes 'imprinted' onto a human foster parent. It is of questionable conservation benefit to release any imprinted raptor to the wild environment and is strictly against the ethos of RFAWA. Please see the RFAWA information sheet - *Understanding and measures to avoid the mal-imprinting of wild raptors undergoing rehabilitation.*

The more dynamic hunters, for example Peregrine Falcons, Goshawks, and Hobbies, depending on the individual circumstances, are more likely to require and benefit from extensive free exercise flight to build up the required levels of fitness which is consistent with, and essential for free living in these species.

The required levels of fitness varies from species to species. Ideally and as a general guide only, those of the 'Falco' genus should be able to perform one or all of the following:

- 30 to 50 passes to a swung lure,
- climb to 100 metres or more to a kite or drone suspended lure, and
- be capable of continuous single flights of several kilometres at a time.

Accipiters (the hawks) and other species should be able to:

- fly up to a kilometre at a time
- demonstrate an ability to twist and turn,
- grasp and hold firmly with both feet and
- in the case of the eagles and some of the searchers, the ability to seek out and use thermals

Raptors that are orphaned prior to fledging or reaching full hunting/foraging capability may require extensive free exercise flight or 'hacking' where practicable, up to the point that they can demonstrate that they have normal and healthy physical functions and hunting ability which are consistent with that species surviving in the wild environment.

Many non-imprinted raptors, which show an outwardly tame disposition during hands-on training and free exercise flying, very quickly revert to being afraid of the close approach of any human, including the previous handler, once back in the wild for a few days. However, prior to release they should also become accustomed to and demonstrate an awareness of the dangers of other natural predators in the wild environment.

## Reporting

Notwithstanding the requirement to comply with any COP or standards required by DBCA, RFAWA members shall complete the Association *Raptor Report Form (1 and 2 as appropriate)* detailing the circumstances of all raptors selected to undergo training and free exercise flying for rehabilitation. All raptor report forms should be submitted to the Association in a timely manner as stated on the form.

Note: The *Raptor Report Form* is for our own purposes to build and record a history of our conservation efforts. RFAWA reserves the right to share the information with interested parties as appropriate, with the consent of the rehabilitator concerned (see form), or if ordered to by the relevant authority.

## Rehabilitation and release

The laws of nature dictate that a wild free-living raptor must successfully and without assistance recognise, pursue, capture, kill and eat its natural quarry in the wild environment, and in the case of the searchers, be able to locate sufficient food. Without these abilities no raptor can be deemed fit for release either legally or morally. Our goal is to provide a platform for this natural and essential phenomenon through building fitness by means of conditioning and free exercise flying, and controlled exposure to all the variables of the wild environment.

RFAWA encourages rehabilitation and release methods which facilitate a raptor to reach and achieve:

- a high level of physical and mental fitness;
- demonstrable ability to fend for themselves in a manner which is consistent with normal survival of that species in the wild; or
- that monitors post-release survival in such a way that enables intervention and rescue in cases where it may be required.

It should be remembered at all times that whilst caring for any raptor, RFAWA members have a moral and legal obligation to ensure that its welfare is paramount. Inevitably this includes euthanasia when the bird has no realistic chance of a successful return to the wild, or when it cannot be reasonably assured that it can have a good quality of life whilst being retained for the purpose of educational display work or scientific study under the appropriate licencing.

Our endeavours with regard to rehabilitation should be in line with the guidelines outlined in the DBCA 'Code of Practice for Wildlife Rehabilitation in Western Australia' under which all members will be required to be licenced. It is our individual responsibility to ensure we are fully conversant with this document in its entirety, and particularly to Section 3.15 (Suitability for release) with regard to final release requirements.

Wild raptors undergoing free flight rehabilitation must only be held as long as they are progressing as expected towards successful release and they should be released in an appropriate location, in good feather and in perfect overall condition, once they are deemed fit to survive in the wild environment, or as soon as it is reasonably practicable thereafter.

## Conclusion

Any breach of RFAWA *Code of Ethics*, Regulations/laws by a member may be deemed to be an action injurious to the interests of the Association, and may result in disciplinary action or expulsion. The *Code of Ethics* may be modified by the RFAWA Committee at any time, and as it sees fit.

# **RFAWA POLICY STATEMENT**



## **CRITERIA FOR THE SELECTION OF RAPTORS TO BE FREE EXERCISE FLOWN FOR THE PURPOSES OF REHABILITATION**

## Purpose

To define the ethical selection criteria for injured or orphaned raptors, when considering free flying techniques for the rehabilitation and subsequent release of the bird into the wild environment.

Under the RFAWA Code of Ethics, members using free flying techniques in the rehabilitation of raptors, are required to apply ethical selection criteria to prioritise the future wellbeing of the bird. This process must be transparent and also meet the requirements of the current (and any future revision or replacement) DBCA document entitled 'Code of Practice for Wildlife Rehabilitation in Western Australia'.

## Selection criteria

Most raptors in care do not require, or may be unsuitable as candidates for rehabilitation via free exercise flying. In all cases, the primary consideration is the individual raptor concerned, and if it will measurably benefit from being subjected to 'hands-on' operant conditioning training and free flying exercise techniques, compared with the possible benefits of other rehabilitation practices. When considering the future health and welfare of the bird, all options must be evaluated.

To assess if a bird is suitable, we consider if it will derive measurable benefit from free-exercise, to the extent that it will, on completion of the program:

- have increased its ability to survive in the wild environment when released and;
- the welfare of the raptor will not be compromised in any way; and
- the free flying rehabilitation process will inform education and or scientific study.

If the answers to these questions is not an emphatic 'Yes', then other rehabilitation methods (if appropriate) or euthanasia should be considered.

## Skills and experience

RFAWA rules state that to undertake the rehabilitation of a raptor using free flying techniques, the practitioner is required to:

- complete an appropriate apprenticeship or;
- be fully competent and can demonstrate the skills, ability and knowledge to rehabilitate the type of raptor concerned; and
- is appropriately graded as qualified according to RFAWA membership categories

Other than in exceptional circumstances, in the event that this is the first Australian raptor to be handled, managed, trained and free flown by the practitioner, a suitable mentor will be appointed. The mentor will oversee the whole process in accordance with the rules and the RFAWA Code of Practice and ensure that the practitioner:

- observes and complies with all relevant laws, regulations and licencing requirements;
- has all the appropriate equipment, furniture and housing specific to the particular raptor, including an accurate weighing scale and access to (and suitable storage for) the relevant food types;
- has access to a suitably qualified Veterinarian and;
- has legal access to suitable private land for free flying.

### **Record keeping and reporting**

The practitioner will submit a completed Raptor Report Form (part 1) within the required time frame and commit to completing and submitting Raptor Report Form (part 2) at the appropriate time.

The Practitioner is required to securely attach a name or telephone number ID tag to the bird for the entire duration of the rehabilitation project and must comply with any other rules, laws and/or Code of Practice in relation to the use of radio telemetry or GPS tracking devices.

Useful data collected from GPS tracking devices should be stored as it may inform the rehabilitation process, education and scientific studies.

### **Assessment of progress**

The fitness progression of all raptors being free flown for rehabilitation should be continually assessed. When fitness levels (and hunting ability in the case of orphaned juveniles) are consistent with normal survival of that species in the wild environment, the raptor should be released in a suitable location.

### **Release protocols**

The practitioner will give due consideration to all release protocols and expectations in accordance with Section 3.15 of the 'Code of Practice for Wildlife Rehabilitation in Western Australia' which are also detailed on the RFAWA Raptor Reporting Form (part 2).

### **Raptors assessed as unsuitable for release**

The physical demands placed upon any raptor during free exercise flying may occasionally expose frailties and unsuitability for release back to the wild that may not have been obvious due to any other rehabilitation method. In such cases an alternative course of action should be sought, including euthanasia.

# **RFAWA POLICY STATEMENT**



## **APPROPRIATE USE OF EQUIPMENT AND TETHERING**



Quality equipment plays an important role. Here, an eagle is wearing a leather hood which helps to calm the bird during a veterinary examination. Photo credit Magnus Wildt.

## Purpose

As a responsible organisation which ranks the welfare of raptors in our care as the highest priority, RFAWA is committed to taking all reasonable steps to ensure that any equipment used by members is of the highest quality and design, and is fit for purpose. This document outlines minimum standards for equipment and tethering,

## Equipment

There can be a world of difference between what appears to the casual observer or untrained eye to be perfectly serviceable or effective equipment, and equipment that is well designed and made especially for the purpose.

A perfect example of this may be a piece of a log with a staple hammered half way up the shaft as a tethering ring (see pics). Although it may suffice if the raptor being tethered to it is under constant supervision, the fact is that a single bate (vigorous wing flapping) can easily result in broken flight feathers, or more serious damage to the bird.



Examples of poorly designed perches for any raptor.

Although importing to Australia can be expensive, many of the larger and heavier items can be produced locally by skilled craftsmen. RFAWA only endorses equipment which is of the highest quality and is fit for purpose. Sharing photos and ideas privately within the membership will quickly help to identify suitable equipment whilst enabling members to learn from the knowledge and practices of more experienced members.



Raptor perches which are well designed and perfectly fit for purpose.

## Tethering

When a raptor is being managed in such a way that it requires daily handling, tethering using equipment which is fit for purpose can play a vital role, particularly in the initial training of the raptor.

Consideration should be given to the comfort of any tethered raptor. They require appropriate shelter that takes into account weather conditions, particularly protection from strong wind, direct sunlight and heavy rain or hail and other predators

Raptors being tethered should display a calm disposition to their surroundings and they should be checked upon regularly and/or, tethered within a secure weathering, particularly where there may be other predators.

In line with the *RFAWA Code of Ethics*, raptors that are not being handled daily and flown regularly should be free-lofted in a suitable enclosure in line with Section 3.10 and Section 4 (appendix A) of DBCA's '*Code of Practice for Wildlife Rehabilitation in Western Australia*'.

Although these standards apply to raptors undergoing rehabilitation, they also provide a useful guide to the size and shape requirements of suitable housing for raptors kept for other purposes but which are not being regularly free-exercise flown, such as those on Regulation 16 wildlife display licences.



RFAWA acknowledges and supports the Position Statements of the **International Association of Avian trainers and Educators (IAATE)**<sup>2</sup> titled '[Tethering and the use of jesses](#)' and '[Free Flight for Programs](#)'

As a responsible organisation, RFAWA expect that the standards outlined in these documents are observed and maintained.

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<sup>2</sup> <https://iaate.org/position-statement/position-statements>

# RFAWA INFORMATION SHEET



## UNDERSTANDING, AND MEASURES TO AVOID MAL-IMPRINTING IN RAPTORS UNDERGOING REHABILITATION

## Purpose

To define the process and measures required to avoid the mal-imprinting of raptors undergoing rehabilitation; and to outline the impact of mal-imprinting on raptors.

Please note: These guidance notes are entirely with regard to wild orphaned/juvenile raptors undergoing care/rehabilitation and intended for release back to the wild environment.

## Imprinting

'Imprinting' is an entirely natural process. It is a function which keeps the species pure by ensuring they seek to breed only with their own kind, and perfectly adapted to their particular niche and role in the environment. The young of all birds and animals naturally imprint onto their parents for self-identification purposes, appropriate nesting and breeding areas, and appropriate food items.

The function of naturally imprinting in raptors is largely completed by fledging time and in normal circumstances is set for life. This prepares them to later identify and select a suitable mate and area in which to breed.

As an example, a Kestrel would choose another Kestrel to pair and breed with, rather than attempting to breed with any other raptor or random bird. So, it can be seen that imprinting is not only entirely natural but also an essential function for the on-going survival of the species in the wild environment.

Running concurrently with the imprinting process, the ***fear response*** (fight or flight) develops through lack of familiarity - not being exposed to other living things, or by the chick observing their parent's appropriate response to anything that may present a danger to them.

This mechanism naturally compels them to stay away from dangers (anything they don't recognise or aren't comfortable with) in the nest, after fledging, and for the rest of their lives. So, although imprinting and the fear response are wrapped together in the same developmental package, they can be considered as separate entities with differing functions. As will become clear, one is eventually set, the other is flexible.

In natural situations, parental imprinting is essential if a young bird is to function and interact appropriately with other members of the same species, and to later successfully contribute to the wild gene pool.

Complications can occur when the young raptor has no natural parent to feed it from the time it can first focus (typically about 5 to 8 days old for a Kestrel for example), through to fledging, and to a much lesser degree thereafter, depending upon the species.

Because imprinting is a natural and essential process, for the purposes of this paper hereafter, we refer to non-natural imprinting as '*mal-imprinting*'.

## Implications of mal-imprinting

In rescue or rehabilitation situations, if a pre-fledging raptor comes into care before natural imprinting onto its parents is complete, the mechanism and requirement to imprint is still strong.

Unless measures are taken to avoid it, the young raptor may very easily 'mal-imprint' onto its substitute parent. This may include any non-conspecific raptor within regular sight or housed within the same aviary as the young raptor.

In cases where the young raptor becomes mal-imprinted, the main two factors where there can be a significant and lasting negative effect are with regard to its own sexual identity (for example it may believe it is a human and will later seek to pair and breed with a human) and the development of the fear response is compromised. This in itself can lead to two dangers.

Firstly, that the bird develops an inappropriately low or non-existent fear of humans and other natural predators. This can expose it to all manner of danger. Secondly, but perhaps more significantly, in extreme circumstances this lack of fear can manifest itself in the bird attacking random people, pets or other inappropriate living things and or objects particularly if they are not doing well in the wild and are hungry, or when they come into breeding condition. In the case of eagles and the more powerful raptors, this has the potential to be dangerous in the extreme.

Other undesirable and unnatural behavioural consequences of mal-imprinting during the rehabilitation process may emerge. However, the level of typical mal-imprint behaviour is often subjective, and specific to the species or individual character of the raptor.

As with most living things, raptors can vary in temperament and some may exhibit extreme behavioural traits, while others exposed to very similar conditions and influences during the critical development period appear to exhibit almost normal, naturally imprinted behaviour.

However, when hungry or isolated from company for any length of time, a bird's true psychological status and the indicators of mal-imprinting becomes clear. Indications are, the presence of any or all of these behavioural traits:

- The lack of or inappropriately low fear response to humans and other predators.
- Head twisting and twitching (this is often seen in mal-imprints whether hungry or not and is often interpreted as 'cute').
- Possessively (and often aggressively) mantling over food, in some cases even when they are not particularly hungry.
- Vocalisation, particularly incessant screaming.

In the case of any raptor that is intended to go back to the wild environment, mal-imprinting should be avoided at all costs.

As a responsible raptor interest group RFAWA actively discourages mal-imprinting and provides sound advice when and where we can. It's our ethical and legal responsibility to ensure that any raptor we put back to the wild is 'fit' for such a purpose.

## Taming

Conditioning through taming for the purposes of facilitating a relatively stress-free experience for the raptor during free exercise rehabilitation, is **NOT** the same as mal-imprinting.

It is different because in already fully-fledged birds, with some prior experience of free-living before they come into care, the imprinting process is already complete in the vast majority of cases.

This taming is actually nothing more than the process which negates the fear response by desensitising the raptor to the training environment and is normally temporary and totally reversible in a short amount of time.

When the use of these 'hands-on' management techniques ceases, many raptors become unapproachable even within the confines of an aviary within a few days. This reversal is even more quickly and obviously pronounced once they are released back to the wild environment. Often any approach to within 50 metres results in the previously tame bird flying immediately away.

This is evidenced by many thousands of raptors previously used for falconry which upon release to the wild quickly reverted to a state of total wildness.

## Measures to avoid mal-imprinting

When any rescued nestling raptor cannot, within a reasonable amount of time be placed back within the nest and care of the natural parents, and it must be taken into care to be rehabilitated, there are several things to consider, and a few things that can be done to avoid all-together, or certainly lessen the odds that any bird may become mal-imprinted and possibly as a result, become unsuitable as a candidate for release back to the wild.

When any very young raptor which cannot yet feed itself is taken into care, it should be kept in a large container with adequate ventilation and an artificial nest. The nest should replicate as near as possible the environment in which it would naturally be brought up in

At this very early stage, food can be given via forceps through a small hole in a sheet or blanket which acts as a screen and completely conceals the person and the false 'environment' beyond it.

Better still, replace the forceps with a replica of the natural parent's head and neck. Most young raptors can be taught to feed themselves within days of opening their eyes. Ideally, the container should be in a room set aside for the purpose, where there is no other intrusion or disturbance other than for the covert provision of food. It is also important to remember that raptors also imprint on sound almost before sight, so keeping quiet, or better still playing a recording of the species involved is important.

Once the raptor can self-feed from freshly chopped natural food out of a bowl, we recommend placing the bowl into the container using a screen or sheet to obscure the handler from view. The bird should **NEVER** make the association between the food and the human supplier.

If it can already see, mirrors may be firmly affixed to adjoining corners of the container where the food bowl is placed, so the raptor can see its own reflection as it feeds. This helps it with self-identification as a raptor.

## Ethical considerations

It should be noted that the practice of hand-feeding without subterfuge, and allowing the bird to live in close proximity and full sight of humans as it grows, or stroking, cuddling and vocalising to the bird may drastically reduce its chances of ever being a suitable candidate for release back to the wild.

Mal-imprinting can damage the bird for life and has no place in the field of ethical raptor rehabilitation. There is no place for misplaced anthropomorphic sentiment in the ethical rehabilitation of raptors. As soon as it can stand, feed itself and thermo-regulate, the bird may be placed into a suitable 'seclusion' design aviary with adults of the same species to be foster reared. It is essential that the particular bird(s) they are placed with are suitable for such a purpose.

Even when the foster parents may not actively feed and rear the chick, but present no danger to it, a food chute may be utilised so that daily rations can be dropped directly onto a nest ledge without the supplier being seen by the birds (particularly the young ones).

If the rearing aviary has built into it at least one side of shade-cloth (with an external secure layer of weldmesh) or other suitable material which the young raptor can see through into adjacent woodland or open vista where there is ordinarily little or no un-natural disturbance, all the better.

Once fully grown and fledged, it's up to the rehabilitator to consider whether the bird has any realistic chance of survival if simply released. Depending upon the species, they may want to consider 'hacking' or the use of free-flying techniques by a qualified and ethical practitioner.

Perhaps most importantly, carefully consider and evaluate whether any orphaned raptor can actually be successfully rehabilitated and released back to the wild. Does it have a reasonable chance of survival? Will it be a potential contributor to the wild gene pool?

Naturally, it's important that the bird is in good health physically, and seems to be 'fit' from observations of the bird flying within the confines of an aviary, and everything seems to be working as it should. It's also important that the bird is capable, or will quickly become so, of successfully foraging for, or hunting its own natural prey in the wild environment.

Equally as important is that the bird is NOT mal-imprinted and therefore can (possibly) make a meaningful contribution to the wild gene pool. It's also important to consider whether the young raptor has a reasonable level of predator awareness and is capable of escape.

## Survival

Why can't an inexperienced (dynamic hunter) raptor catch and kill whatever it wants? It may look to be in fantastic condition with bright alert eyes, strong legs and feet with razor sharp talons. It appears to be the epitome of an apex predator, surely it can catch its food, its easy, right? Well, the fact is that it's certainly not easy.

If it were easy, there would be no natural requirement for young Peregrines (for example) to stay together as a family group for up to three months in most cases after fledging, whilst they learn and then refine all the finer points of hunting which allow them to become a successful apex predator. Even then, on average only about 30% of them will survive their first winter.

A juvenile that has never flown free in its natural and very demanding wild environment and which has totally missed out on all such parental guidance has virtually no chance of survival. In these cases, free-exercise techniques are incredibly useful and at times necessary for the realistic survival of the raptor once released.

## The difference between Searchers and Dynamic Hunters

In the raptor kingdom, birds may be loosely categorised as hunters, or searchers. Within these categories there are inexperienced juveniles, and those which have had prior extensive free-living experience of the wild environment.

The dynamic hunters are most likely to be better suited to rehabilitation by a handler suitably qualified in hacking and/or free flying, in order to be successfully rehabilitated.

Most others may not require free-flying techniques. Often, they can recover within the confines of an aviary until such a time as they are deemed to be ready for release.

RFAWA commends efforts to provide the most suitable rehabilitation aviaries whenever they are appropriate in the circumstances.

## Conclusion

From a raptor rehabilitation perspective, the aim is to fully restore the raptor back to the wild so that it may live out its life naturally with the likelihood that it will survive and contribute to the wild gene pool.

From an ethical, objective, environmental and/or biological perspective, irreversibly mal-imprinted raptors should not be released to the wild environment.

In the vast majority of cases, mal-imprinted individuals may do no more than take from the environment but give nothing back. They may also cause damage by un-productively occupying a breeding or hunting territory that might otherwise be suitable for a natural and productive breeding pair.

Mal-imprinted birds are likely to be more vulnerable to attacks from all manner of predators that they would normally instinctively recognise and evade.

In the worst cases, mal-imprinted raptors when hungry can become aggressive towards people and pets. When kept in captivity, they require very careful handling with the safety of the public paramount. In addition, methods of food provision particularly need to be managed appropriately by skilled practitioners.

## Summary

- 'Imprinting' is an entirely natural process which occurs during the early part of any raptor's life, it is during this time frame that any 'mal-imprinting' may occur.
- Raptors that have already become independent of their parents are past the age where mal-imprinting normally occurs.
- Taming (manning) by skilled practitioners for the purpose of free-exercise flight training is NOT the same as mal-imprinting.
- Taming is a temporary state of mind which is entirely reversible and has no lasting effects on raptors returned to the wild environment, whereas imprinting/mal-imprinting is permanent and should be avoided.

# **RFAWA POLICY STATEMENT**



## **THE APPROPRIATE METHODS OF FITTING AND USE OF RADIO TELEMETRY OR GPS TRACKING SYSTEMS**



### Purpose

Radio-telemetry or GPS equipment allows a handler to track and safely retrieve a raptor participating in free flying or undergoing rehabilitation. The following guidelines are to inform the use of equipment for raptors that are in our care.

### Retrieval and tracking

While free exercise flying any raptors in our care, and particularly to retrieve any raptor undergoing rehabilitation, radio telemetry, and much more recently live-stream real time GPS tracking systems are proven methods for the rapid and safe retrieval of any errant raptor.



Radio-telemetry receiver with directional 'yagi' antenna

## Transmitter mounting methods

The combined weight of any transmitter and mounting equipment should be given due consideration. It is generally accepted that the limit should not exceed 2.5% of the bird's normal body weight.

There are four commonly used methods of attaching radio transmitters to raptors and all four have their merits and disadvantages, depending upon the species being tracked and the nature of the land being flown over, for example wide open farm land or wooded forestry.

The four methods of attachments are to the tail, around the neck, to the leg (tarsus) and by means of a backpack. The advantages and disadvantages of each are as follows:

### Tail mounting

#### Advantages:

- Easy and quick to affix and remove (once the tail-mount has been properly fitted).
- Always above the ground allowing better signal transmission
- Doesn't hamper normal flight capabilities.

#### Disadvantages:

- Tail feather(s) can be torn out if caught on branches/fence line etc.
- Transmitter weight must be reduced which most often means less powerful transmissions and/or shorter battery life.



### Neck mounting

#### Advantages:

- Easy and quick to affix and remove, by means of the correct sized light elastic band.
- Always above the ground allowing better signal transmission.

#### Disadvantages:

- Transmitter weight must be reduced which most often means less powerful transmissions and/or shorter battery life.
- Risk of danger to the raptor if the wrong strength elastic band is used.
- During flight sits along the length of the underside of the body of the raptor and may 'whip' at the legs/feet and tail feathers during high speed stoops. (see pic)
- Many raptors don't tolerate the neck mount if left on for long periods of time, such as overnight and so may be forcibly removed by the raptor.



## Leg mounting

### Advantages:

- Easy and quick to affix and remove by means of a traditional leather 'bewit' or by a cable tie (see pic).
- During flight it sits under the tail and has no measurable negative impact upon flight capability.

### Disadvantages:

- High risk that it can get caught up in fences or branches and badly damage a bird's leg.
- Comes into contact with the ground reducing signal output.
- It's an easy target for a bored raptor which may pull at and destroy or remove the antenna.
- It is also an easy target for a wild raptor to chase the one being flown thinking it has food.
- Is also more likely to come in contact with electric lines and cause electrocution



## Backpack mounting

### Advantages:

- Sits high up between the shoulders so never comes into contact with the ground allowing improved signal transmission.
- Easy and quick to attach and remove by means of spring mounts.
- Rarely becomes dislodged.

### Disadvantages:

- Some raptors don't tolerate the backpack.
- Less suitable for the accipiters (hawks) due to the possibility that the bird could get hung up on a branch with catastrophic outcomes.



## RFAWA position statement

Since the development of radio-telemetry for the safe recovery of raptors over 40 years ago, hundreds of thousands of raptors around the World have been safely flown and recovered by this means. It is estimated that over 100,000 practitioners use this equipment every year.

The RFAWA **Code of Ethics** strongly encourages the use of radio-telemetry and/or GPS tracking devices for all raptors being free-exercise flown for any reason.

The use of radio-telemetry and or live stream GPS tracking devices facilitates rapid recovery in the case of errant raptors, as well as the added ability to observe the raptor's growing fitness and transition to suitability to free-living in the case of GPS. This now facilitates free exercise flight at healthy, natural weights.

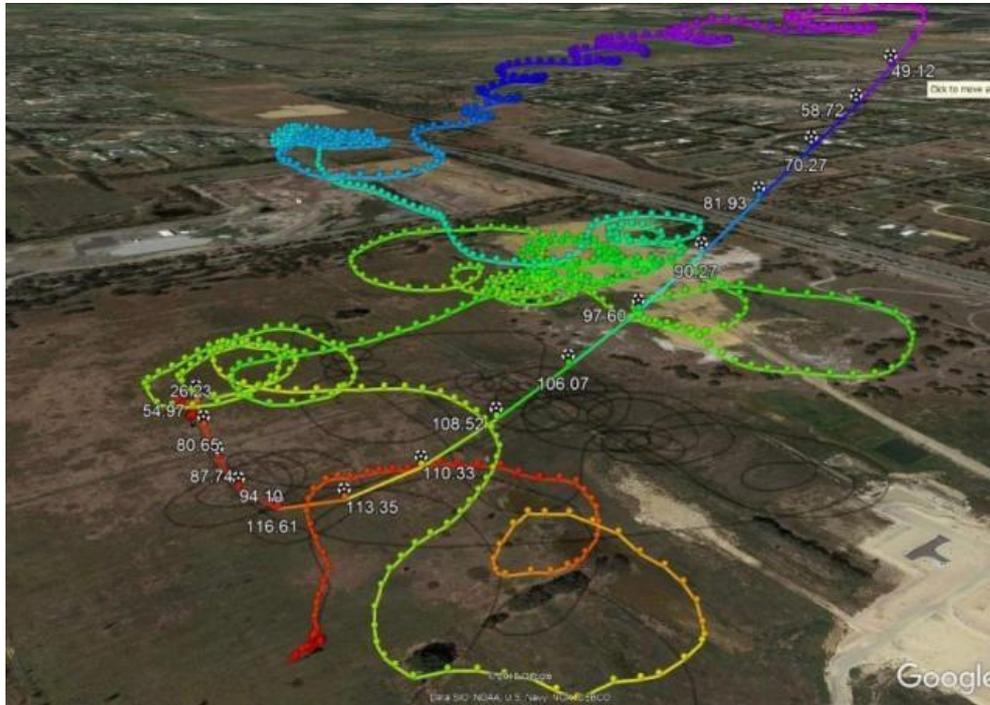
Currently the Department of Biodiversity, Conservation and Attractions (DBCA) rules dictate that a 'wild-take' Regulation 17 licence be applied for and granted in order for wild raptors undergoing free exercise flight rehabilitation, to be radio and or GPS tagged.

RFAWA hopes that in the future members will require no such licence for the attachment of tracking devices **during rehabilitation but before final release** as long as:

- suitably designed and weighted transmitters are used
- safe attachment methods are employed, accountability and reporting processes are transparent, and
- RFAWA reporting systems are used in accordance with the Code of Practice.

We fully support the requirement for the application and granting of licences for the ***post-release tracking*** of any raptor following completion of rehabilitation.

We encourage members to apply for such licences going forward, as tracking systems become more affordable and fit for purpose with regard to size and operating duration.



GPS flight data from a juvenile Peregrine Falcon (female) learning her trade during free-flight rehabilitation. Figures show stopping speed in mph.

## RFAWA MEMBERS PERSONAL LETTERS

Gina Chapman-Stone

To Whom It May Concern:

RE: RFAWA Submission with regard to the DBCA Code of Practice for Wildlife Rehabilitation.

I am a veterinary nurse that started caring for birds of prey in January 2013 and after about a year and a half of fumbling and tears I met Michael Calvin, founder of RFAWA, in late 2014. During that beginning time I was always questioning what I was doing and knew there was better way but had no idea where to obtain the information. I had been left in the dark by my previous mentor with very little education on the proper care of raptors.

Michael gave me advice on many techniques which proved to be in the best interest of the birds and gave the birds in my care a better quality of life and greater chance of survival post release. The knowledge I have gained has also improved the quality of life for my Regulation 16 birds that will live out their days in captivity. They are now flown free daily through the cooler months and rested during moult. The improvement in the condition of their feathers and mentality is palpable. Their behaviour has improved and they have become a pleasure to work with, as many of their "bad habits" from previous carers that left them boxed or in aviaries, have been extinguished.

In March 2015 the inaugural meeting for RFAWA was held. At this I had the opportunity and pleasure of meeting other likeminded individuals with their own personal experiences. It has turned out to be an opportunity that has meant the world to myself and the birds in my care. Together we have a wealth of knowledge in a network of fantastic people, animal care, veterinary, rescue and of course release. Together we stand to improve standards and make it possible for others to find good, solid information on gold standard care of these amazing and dynamic creatures, and we work brilliantly together as a team to achieve this.

There have been times when I have received phone calls for birds that required rescuing and have been unable to get there myself. The network we have with RFAWA has made it possible to get someone to the animals in so many areas, great distances apart. During the rehabilitation of many different birds' questions often arise at different stages, this can cause stress and doubt, but being a part of RFAWA means there is always someone to call with experience in the area requiring advice keeping rehab smooth and moving forward towards the goal of release.

I have never felt as supported as I do with the people of RFAWA on my team. Thanks to the collective knowledge of RFAWA I have learnt from the best about suitable equipment and where to obtain these things. Poor equipment means risking the bird's feathers or injury, equalling longer time in captivity and worst case, death. A lot of the equipment I had been using before was dangerous and often broke feathers.

The use of telemetry prevents loss of a free flying bird prematurely often resulting in death if they were not ready to be away from your care and protection. In the beginning I had kept birds on creance lines which stopped them from reaching their full potential and fitness levels. So many times have I called upon the knowledge of the group and time and time again they have come through improving quality of care and best practice with brilliant results, giving me the confidence to continue helping with the conservation of these species.

In November 2016 I received a call from a local kangaroo carer stating she had a brown falcon in her care that required flying before returning to the wild. The falcon had been hit by a car doing 120km/hr, smashing the grill and becoming wedged in the front of the car. Remarkably the bird sustained only a concussion and no broken bones. The bird had been kept in a pet pack then a small parrot aviary for approximately 3 weeks in the previous persons care. The result was a very fat, unfit falcon.

After a couple of weeks of obtaining the correct body mass index to work with the bird, taming and building trust, we began to fly. He quickly built fitness going for walks/flights. I always place a name tag and telemetry in case retrieval is required but with the application of sound training guided by members of RFAWA, the bird has never left my sight. "Rusty" was returned to free living with the fitness he needed.

Without putting him through these tests we would never have known if he could gain height when flying, if he had the fitness needed to evade predators, or the ability to find and catch prey. We have given this bird the opportunity to return to the wild in perfect condition, perfect feathers, clear mind, fitness and strength. All made possible with the knowledge available through our network and free-flying rehabilitation techniques.

The network, support and information has been an absolute god sent for me and my birds and has changed our lives for the better. Every day I appreciate the things I have learnt from RFAWA and put their standards into everything I do for the birds in my care. The result it is visible in their feather condition, temperament and overall demeanour. For that I am forever willing to help the others where ever I can in the future of RFAWA and the conservation of raptors.

If you require any further information, I am more than happy to provide it, I can be contacted on the above details. Thank you for taking the time to read my letter of support for this submission.

Regards,

Gina Chapman-Stone.  
Animal Instinct Wildlife Services

## Renaë Okley

To the WA Department of Biodiversity, Conservation and Attractions

Ref: The RFAWA Code of Practice submission

My name is Renaë Okley and I started working with Birds of Prey back in 2013. I stumbled into this when I went to a local market and met an elderly man who had several birds on a static display. After chatting for a while, I organised to go and meet the birds one day and I guess that is how my passion for Birds of Prey began.

In the beginning I learnt a lot of things from Dave, I spent a lot of time cleaning out and culling the rats and mice for food and cleaning bird aviaries and the mews (housing). I started manning (taming) some of the birds and eventually attended displays and classes with David. As time progressed and David's health deteriorated, I was offered to take on his birds. Not fully being aware of what I was getting myself into, I accepted his offer and took on his Regulation 16 birds and obtained a Reg' 16 licence of my own.

When I had been training with David I had been told of many people and societies here in WA who were also involved with Birds of Prey and he warned me about the things they had done to him over the years. Being naive and trusting I believed all that had been told to me, including the fact that falconry in Australia was illegal and I wouldn't be able to free exercise fly my birds, which I thought was a strange policy given that it would restrict their basic rights and one of the five freedoms.

When I eventually had all the birds in my own care and was out on my own, I started to realise that not everything that I had been told was completely correct. I also realised that not all of the ways in which I had been trained to do things were correct.

I was then introduced (by Emma Lipianin of DPaW) to a gentleman by the name of Michael Calvin from England. Upon meeting Michael my eyes were opened to how things should be. I soon realised that not all of the methods that I had been taught for releasing birds were giving these birds the best chance of survival.

Since meeting Michael and getting involved with RFAWA (I'm now the membership secretary and coordinate our own Raptor Reporting systems), I have had the pleasure of helping to get a Wedge Tail Eagle back into full flight fitness and released back to the wild.

I have learnt how to properly care for and train my Little Eagle to fly freely to a lure for fitness and general health (the first time in 10 years she was able to actually soar across the sky). Now it's obvious that this bird's life in care is one of so much higher quality without any of the previous stress due to a number of factors that have now been put right.

I have changed my release protocols, and have steps in place to ensure I have done everything possible to ensure the bird's success back in the wild. I have also come to the realisation that often difficult decisions have to be made, this was particularly difficult for me at first but now I totally get it.

I have met some incredible people from around the world who have such an incredible wealth of knowledge, one of which was Dr Nick Fox who visited us and spent a few days giving workshops and guidance to members of RFAWA and he did this entirely for free because he believed in and supports the high standards we are striving to achieve every time.

I have been able to form a great network of people, who when tasked with a situation, band together to do what is right for the birds involved, putting all personal prejudice aside. I have been able to grow my experience and friendships with some amazing people, giving me support, training and encouragement that makes me confident that I am doing the right thing for the animals that come into my care.

Having the group has helped me learn so much that I wish I had had access to, prior to taking on all of the birds. It scares me that other naive young adults may fall into a similar situation as myself, but not have the access to the training and support that I, and all the birds in my care now benefit from.

Now we have the opportunity to re-set the course by supporting the work of this small but important raptor enthusiast group which has the knowledge of the World's best at its fingertips. We shouldn't miss this opportunity.

Sincerely, Renae.

Peter Reith

To whom it may concern.

My name is Peter Reith and I grew up in Africa and have been flying birds of prey since I was 12, so a little over 18 years now. I have released dozens of birds of prey successfully back into the wild through free flying techniques, a number of them here in WA, which in my opinion is the only way to successfully rehabilitate an injured raptor.

When I moved to Australia 6 years ago, I was amazed at how similar our bushland was and the vast amounts of open space Australia had. I assumed there would be a large rehabilitation/falconry fraternity here and I was shocked to learn this was not the case. In fact, the first information I was given was that no rehabilitation existed outside the commercial space and that "falconry and free flying raptors" was illegal...I noted how the two were often said in the same sentence!

I received little to no help or information despite my attempts but I refused to give up because there was no way such a wildlife rich state did not have an appropriate organisation for raptor rehabilitation. Then I came across the Raptors Fliers Association of Western Australia. I instantly knew I had found the right group. Their standards were high and their code of conduct was superb. I was confident right away that I would be dealing with the best group in the State. The group is fantastic.

Collectively, they have a pool of knowledge that spans over 100 years of free flying raptor experience. They were helpful and encouraging, and with their support and guidance I was able to find my way in the free flying space here in Australia. Since linking up with the association I have successfully rehabilitated and released 4 birds of prey over the last 4 years. Although the group was small, I have always received support and help 24 hours a day, 365 days a year from 2am frantic phone calls about a sick bird and treatment advice to the equipment and logistical support during free flying. In my 18 years of flying birds I have to say how great the association has been and what an asset they are to raptor conservation in Western Australia.

The association keeps detailed records of all the birds that have come under their care. This database was a huge contributing factor for my 3rd bird of prey, an Australian Little Eagle that I successfully rehabilitated and released. There was little to no data on the species available online, especially from a rehabilitation point of view, such as healthy weights and diet. The association was able to help out with this information and this was key to the bird's survival and healthy release.

The association has also been involved in shows and educational displays as well as contributing to several research projects.

I commend the RFAWA Code of Practice, and without their existence I would be concerned for the general care of many captive raptors within Western Australia. I look forward to the continued support from the association and the joint efforts towards the successful release of suitable raptors in the future.

Regards,

Peter Reith.

**End of RFAWA submission.**