



July 11, 2025

Assistant Director Jerome Ford
Migratory Birds
5275 Leesburg Pike, MS: MB
Falls Church, VA 22041

Subject: Migratory Bird Permit Memorandum dated July 18, 2024

We at American Falconry Conservancy (AFC) take issue with this memorandum directing temporary use of certain (plastic) zip-tie bands for raptors hatched in 2022-2027.

50 CFR 21.85 is directive in nature and requires captive-bred raptor nestlings held under a raptor propagation permit be banded with a numbered, seamless, metal band provided by the Service within 2 weeks of hatching. Only raptors marked with a numbered, seamless, metal band provided by the Service may be transferred, sold, or bartered. This standard in Part 21 was signed into law by the Secretary of Interior and has been enforced and met without question for many years by the raptor propagator community.

There are a minimum of two sources available for these bands in the US and our USFWS has access to both. Plastic zip-tie substitutes in different colors do not last nearly as long as the seamless metal bands, are more difficult to read after being worn a short period of time and are especially problematic for use in the smaller species used in falconry.

The Service is currently not in compliance and therefore in violation of 50 CFR 21.85. We believe this is unacceptable and suggest each Region unable to provide seamless bands in accordance with this regulation immediately order the required seamless bands in the numbers and sizes to comply with 50 CFR 21.85 as written.

Please acknowledge and respond.

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