

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Seventy-eighth meeting of the Standing Committee
Geneva (Switzerland), 3 - 8 February 2025

BRAZIL WOOD (*PAUBRASILIA ECHINATA*)

This document has been submitted by the United States of America on behalf of a group of musician and musical instrument stakeholders in relation to agenda item 73.* The document does not reflect the official position of the United States.

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

Brazilwood (Paubrasilia echinata)

78th Meeting of the Standing Committee

1. This document has been prepared by the music sector organizations listed below in order to present the views of their members with regard to SC78 Doc. 73, *Brazilwood (Paubrasilia echinata)*:

- American Federation of Violin and Bow Makers (AFVBM)
- Association des Luthiers et Archetiers pour le Développement de la Façure Instrumentale (ALADFI)
- Confederation of European Music Industries (CAFIM)
- Chambre Syndicale de la Façure Instrumentale (CSFI)
- Groupement des Luthiers et Archetiers d'Art de France (GLAAF)
- International Federation of Musicians (FIM)
- International Alliance of Violin and Bow Makers for Endangered Species (Alliance)
- International Pernambuco Conservation Initiative (IPCI)
- International Society of Violin and Bow Makers (EILA)
- Japanese Musical Instruments Association (JMIA)
- League of American Orchestras
- PEARLE-Live Performance Europe (PEARLE)
- Verband Deutscher Geigenbauer und Bogenmacher e.V. (VDG)
- Verband Österreichischer Geigenbauer (VÖG)

After a brief summary of the music sector's position (para 2) and some background information (paras 3 to 8), this document provides the music sector's comments and recommendations regarding the four draft Decisions on *Paubrasilia echinata* submitted by the Secretariat to the Standing Committee (paras 10 to 19). Paragraph 20 expresses our appreciation of the Secretariat's approach to this difficult and important issue and calls on the Parties to work with Brazil in favor of the conservation of *Paubrasilia echinata*. This document also includes four annexes, as follows:

- Annex 1 provides a detailed description of music sector actions taken since CoP19 in response to Decisions 19.249 to 19.253;
- Annex 2 contains the sector's response to the questionnaire attached to Notification to the Parties No. 2023/033, *Brazil wood (Paubrasilia echinata)*;
- Annex 3 presents a first information and outreach document entitled *Know Your Bow - Tips for Makers and Sellers of Pernambuco Bows*; and
- Annex 4 presents a second information and outreach document entitled *Know Your Bow - Tips for Owners and Users of Pernambuco Bows*.

Note: The two *Know Your Bow* documents have been very broadly distributed to makers, dealers, owners and users of *Paubrasilia echinata* bows.

The music sector's position

2. Our organizations, and the bow makers and musicians we represent, condemn the illegal harvesting of pernambuco, which poses an existential threat to the tree that gives life to stringed instrument music and to our professions as they have been practiced for centuries. We support the establishment of verifiable procedures and the use of appropriate and currently available technologies to ensure the credibility of legal pernambuco specimens in the international market. Equally, we support conservation of the species and only uses of pernambuco that are lawful and sustainable.

Background

3. During the 19th meeting of the Conference of the Parties (CoP19, Panama, November 2022), the Parties agreed to the following amended Annotation #10 for the Appendix II listing of *Paubrasilia echinata*:

All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts.

The Parties also agreed to complement the amendment to Annotation #10 by adopting Decisions 19.249 to 19.253, the texts of which are quoted later in this document.

4. As requested in Decision 19.249(a), the CITES Secretariat issued, on March 22, 2023, Notification to the Parties No. 2023/033 concerning Decisions 19.249 to 19.253. This Notification contained a questionnaire and invited Parties and relevant stakeholders to complete it, noting that the responses would be taken into consideration by the Secretariat in its reporting to the Plants Committee.

Ten organizations representing the musical sector¹ sent a joint reply to this Notification on behalf of their members (See Annex 2).

5. On December 20, 2024, the Secretariat posted SC78 Doc. 73, *Brazil wood (Paubrasilia echinata)*, for consideration by the Standing Committee at its 78th meeting (SC78, February 2025). SC78 Doc. 73 describes the progress achieved since PC27 (July 2024) and assesses the implementation of Decisions 19.249 to 19.253. More particularly, it states

1 *American Federation of Violin and Bow Makers (AFVBM), Confederation of European Music Industries (CAFIM), Chambre Syndicale de la Facture Instrumentale (CSFI), International Alliance of Violin and Bow Makers for Endangered Species (Alliance), International Federation of Musicians (FIM), International Pernambuco Conservation Initiative (France-Europe, Germany & USA), International Society of Violin and Bow Makers (EILA), Japanese Musical Instruments Association (JMIA), League of American Orchestras (League) and Live Performance Europe (PEARLE)*

that the Secretariat has finalized a first draft of a report entitled “*Paubrasilia echinata* bows: Fine tuning traceability solutions” (referred to as “*the Report*” hereafter). An executive summary of the Report is included as Annex 1 to SC78 Doc. 73, and reference is made to the full report as Annex 2.

6. Paragraph 7 of SC78 Doc. 73 summarizes the Report, stating that:
 - A. Chapter 1 outlines options towards the establishment of a traceability system for *Paubrasilia echinata* bows, including:
 - i) *marking individual bows, issuing certifications, and creating centralized databases;*
 - ii) *technologies such as Near-Infrared Spectroscopy (NIRS) and isotope analysis; and*
 - iii) *forensic methods as a means to identify wood origin.*
 - B. Chapter 2 is described as analyzing cross-cutting matters relevant to implementation of Decisions 19.249 to 19.253, “*including enforcement, stockpile management and capacity-building relevant to P. echinata.*”
 - C. Chapter 3 is described as concluding “*with reflections towards strengthening implementation of the Appendix-II listing of Paubrasilia echinata*”; emphasizing “*the need for a standardized global traceability system for Brazil wood specimens, and in particular bows*”; and highlighting “*solutions like isotopic analysis and origin marking*” as well as “*coordinated efforts between Brazil, major importers, and the private sector to ensure legal, sustainable and traceable trade of Paubrasilia echinata specimens*”.
7. While paragraph 8 of SC78 Doc. 73 states, i.e., that “*feedback from the Standing Committee at SC78, as per Decision 19.253, will be essential for the finalization of the report before submission for consideration at CoP20*”, paragraph 9 of the same document contains four draft Decisions to be approved by the Conference of the Parties at its next meeting (CoP20, Samarkand, Uzbekistan, 24 November - 5 December 2025). As a preliminary step, these draft Decisions are submitted to the Standing Committee’s consideration and approval before being possibly submitted to CoP20.
8. Noting the importance of these potential Decisions, the musical sector is grateful to both the Secretariat and the Standing Committee for offering us the opportunity to share our concerns and recommendations regarding the draft Decisions.

For ease of use, we have opted to quote below each of the Secretariat’s proposed Decisions, as they appear in SC78 Doc. 73, followed by our comments to that proposed Decision.

9. On January 10, 2025, the Secretariat posted Annex 2 to SC78 Doc. 73, the full report, entitled *Fine tuning traceability solutions* (the “Report”). The Report assembles:
- much highly useful information regarding Brazil’s legal framework relevant to *Paubrasilia echinata*;
 - a discussion of timber traceability systems and relevant science-based resources;
 - summaries of information Parties provided to the Secretariat relevant to traceability;
 - and an analysis of cross-cutting issues relevant to implementation of Decisions 19.250 to 19.253.

Very significantly, the Secretariat’s report also concludes with a section called “*Reflections Towards An Improved Implementation of the Appendix II listing of Paubrasilia echinata*”. This section contains observations “that could serve as a basis for future work on *Paubrasilia echinata*”, including the following ideas:

- Establishment of commercial plantations of brazilwood;
- Conducting a national forest inventory;
- Active participation of the private sector in international fora and standardization of best practices;
- Brazilwood sustainable trade should be prioritized as a main strategy for the species long-term conservation;
- Establishment of a database for stockpiles and plantations;
- Capacity building and support for local producers;
- Support for research and development;
- Regulatory adjustments in export control.

Regarding the four draft Decisions on Paubrasilia echinata submitted to the Standing Committee

10. Draft Decision 20.AA prepared by the Secretariat reads as follows:

Directed to Parties, in particular source, transit and destination Parties for Paubrasilia echinata

20.AA *Parties, in particular source, transit and destination Parties for Paubrasilia echinata are invited to:*

a) consider the findings of the report "Paubrasilia echinata bows: Fine Tuning Traceability Solutions" (CITES Secretariat, 202X);

b) collaborate, as appropriate, with intergovernmental and non-governmental organizations and entities to develop voluntary marking or identification systems

for Paubrasilia echinata musical instruments to enhance traceability mechanisms for individual bows;

c) establish a mechanism to register Paubrasilia echinata bow and wood stockpiles; and

d) provide the Secretariat with information relating to the voluntary marking or identification systems developed for bows and the mechanism used to register Paubrasilia echinata bow and wood stockpiles.

11. Our comments and recommendations regarding draft Decision 20.AA(a):

We recommend amending this draft Decision as follows:

a) consider the findings and observations of the report "Paubrasilia echinata bows: Fine Tuning Traceability Solutions" (CITES Secretariat, 202X), including the opportunities it presents to support Brazil's efforts to stop illegal trade and promote conservation and implementation of the Appendix II listing of Paubrasilia echinata;

Rationale: The Secretariat's Report to the Parties includes very useful considerations of opportunities to support Brazil's efforts to prevent illegal trade and conserve and restore *Paubrasilia echinata*, and we suggest this be reflected in Decision 20.AA(a). We commend the Secretariat for taking a broad and comprehensive approach to this difficult issue.

12. Our comments and recommendations regarding draft Decision 20.AA(b):

We have significant reservations regarding the practicality and advisability of including in any new traceability system bows created before the implementation date of such a system. Accordingly, we propose amending draft Decision 20.AA(b) as follows:

b) collaborate, as appropriate, with intergovernmental and non-governmental organizations and entities to develop voluntary marking or identification systems ~~for Paubrasilia echinata musical instruments to enhance traceability mechanisms for individual bows~~ aimed at enhancing the traceability of musical instruments and individual bows that are made of Paubrasilia echinata and created after the date of entry into effect of a system approved by the Conference of the Parties.

Rationale: Marking existing bows, which include antiques and other valuable bows, would damage the originality, value and preservation of precious and irreplaceable artistic and cultural artifacts. It will not be practicable, therefore, to create a traceability system for already existing bows. And even if it somehow were, the administrative burden for CITES authorities and the music sector would be unsustainable. We recommend, therefore, that

traceability efforts be focused on newly created bows, i.e., bows created after the date of entry into force of any traceability system approved by the Conference of the Parties.

In addition to the ideas outlined in the Report, some building blocks of a future traceability system already exist. The trade sector is diverse and predominantly comprises individual makers of high-end bows, with their own methods and accounting systems, and small companies making student-level bows. Some bow makers have worked together to develop a model “*declaration of materials*” form to accompany newly made bows. Efforts by national CITES authorities to encourage and support the voluntary registration of existing pau-brasil wood stocks have the potential to benefit the identification of bows produced from existing stocks. In addition, the strengthening of Brazil’s permit verification system would make it possible for international buyers of pernambuco specimens to be confident that the future wood, blanks, sticks or bows entering their markets have been legally sourced. It will be important to have broad acceptance of any system, across the music sector but also across Parties.

13. Our comment and recommendations regarding draft Decisions 20.AA (c) and (d):

We recommend that draft Decision 20.AA (c) and (d) be amended as follows:

Parties, in particular source, transit and destination Parties for Paubrasilia echinata are invited to:

- c) establish a mechanism to register Paubrasilia echinata ~~bow and~~ wood stockpiles (including logs, sawn wood, blanks and sticks);*
- d) provide the Secretariat with information relating to the voluntary marking or identification systems developed for bows that are made after the entry into effect of any traceability system and the mechanisms used to register Paubrasilia echinata ~~bow and~~ wood stockpiles (including logs, sawn wood, blanks and sticks).*

Rationale: Wood stockpiles can be understood to include logs, sawn wood, blanks and sticks). Revising the draft Decision accordingly would establish consistency between the draft Decisions and the Report, which refers to wood stockpiles consistent with CoP19 Decision 19.251’s reference to “*Paubrasilia echinata stockpiles.*” Moreover, stockpiles of finished bows do not exist, though makers or sellers may have a relatively limited stock on hand. Efforts to register each of the vast number of existing bows made over the past 250 years and held by owners around the world would be impracticable and administratively overwhelming for CITES authorities and all involved. Bow makers and musicians, however, strongly encourage the creation of a uniform system for registration and recognition of pernambuco wood stockpiles. Such a system is essential in order to make possible the traceable, legal and sustainable use of pernambuco. Following CoP14 (June 2007), when pernambuco was first placed on CITES Appendix II, some Member States (e.g. France, Germany) accepted that bowmakers established in their territories voluntarily declare

their stocks of pau-brasil so that they be recognized as pre-Convention. Most CITES authorities did not take this step. Decision 19.251(b) encouraged the Parties to “*consider the registration of stockpiles of Paubrasilia echinata as appropriate.*” Following that Decision, additional bowmakers have declared their stocks since CoP19. This reflects the profession’s desire to register their future production in a legal and traceable system. We urge relevant authorities to adopt a harmonized approach for the registration of these stockpiles.

14. We recommend the inclusion in draft Decision 20.AA of a new subsection (e) providing as follows:

Parties, in particular source, transit and destination Parties for Paubrasilia echinata are invited to:

- e) collaborate, as appropriate, with intergovernmental and non-governmental organizations and entities to continue and expand efforts to sensitize producers and consumers (in particular musicians) of the status of Paubrasilia echinata, its sustainable use, and any traceability system approved by the Conference of the Parties for this species.*

Rationale: The music sector has for more than 25 years been working in cooperation with partners in Brazil to conserve *Paubrasilia echinata*, to promote stock registration, to increase understanding of the materials used to create their bows, and to strengthen awareness of CITES permit requirements and applicable laws. It is crucially important that this work continue in close cooperation with CITES authorities to the greatest extent possible, and especially after the entry into effect of any new traceability system adopted by the Conference of the Parties.

15. Draft Decision 20.BB prepared by the Secretariat reads as follows:

Directed to Brazil as the only range State of Paubrasilia echinata

20.BB *Brazil is invited to:*

- a) consider the findings of the report "Paubrasilia echinata bows: Fine Tuning Traceability Solutions" (CITES Secretariat, 202X), and its linkages or implications for national policies, conservation strategies, and trade regulations; and*
- b) assess information on plantation-grown Paubrasilia echinata stocks to meet current and future market demand for musical instruments, and share this information with the Secretariat.*

16. Our comments and suggestions regarding draft Decision 20.BB include a proposed amendment to subsection (b) and three additional proposed subsections:

- b) *assess* continue assessing information on plantation grown *Paubrasilia echinata* stocks in order to determine both if they can be considered source code A or Y and their potential to meet current and future market demand for musical instruments, and share this information with the Secretariat;
- c) carefully consider the steps and timeframe required to create a legal framework for sustainable use of plantation-grown wood in order to avoid the risk of pressure on wild populations, and share this information with the Secretariat;
- d) designate, within the Brazilian administration, a point of contact for stakeholders to communicate the information they have in relation to existing plantations of *Paubrasilia echinata* and plans to create future plantations or programs aimed at reinforcing pau-brasil plantations; and
- e) share with the Secretariat Brazil's national strategy or priorities for the conservation of *Paubrasilia echinata* and the sustainable use of timber of this species originating in plantations, as well as opportunities for international cooperation to achieve the strategy's goals.

Rationale: As stakeholder organizations, some of which have been working in Brazil and in cooperation with Brazilian governmental, scientific and non-governmental entities for more than 25 years to support science, conservation and restoration of *Paubrasilia echinata*, we fully support Brazil in its effort to protect the species. Accordingly, we respectfully offer our comments and suggest additional draft decisions for Brazil's consideration. Our understanding is that Brazil has been assessing information regarding plantation-grown *Paubrasilia echinata* stocks. Here we use the term "*plantation*" to include both artificially propagated specimens and specimens grown through assisted production in agroforestry settings, such as those grown under programs developed by Brazilian public institutions and others, in cooperation with local farmers (e.g., cacao farms) and with international support from bow makers.

A national scientific symposium, organized by the *Federal University of Southern Bahia* was held in Ilhéus on 5-6 December 2024. This event, which focused exclusively on *Paubrasilia echinata*, highlighted the significant amount of scientific and restoration work currently underway in Brazil's Atlantic Rainforest. This work is of central importance, both for the potential recovery of *Paubrasilia echinata* and because the increased availability of specimens for sustainable use would depress demand for specimens illegally harvested from wild populations. This multi-faceted approach, using traceability tools, investments in science and conservation with international support offers a pathway for restoration of the species under the current Appendix II listing, provided a legal framework for sustainable use can be established in Brazil.

Our suggested amendments to draft Decision 20.BB acknowledge Brazil's work in this area, encourage the development of a legal framework for the sustainable use of plantation-grown specimens, and foster the creation of opportunities for international cooperation in support of Brazil's efforts to conserve and restore *Paubrasilia echinata*. We strongly encourage the Parties to offer support to Brazil's efforts to implement the Appendix II listing of *Paubrasilia echinata* and conserve and restore the species.

17. The draft Decision 20.CC prepared by the Secretariat reads as follows:

20.CC *Subject to extrabudgetary resources, the Secretariat shall:*

a) consolidate information relating to:

- i) the voluntary marking or identification systems developed by source, transit and destination Parties for *Paubrasilia echinata*;*
- ii) the mechanisms used to register *Paubrasilia echinata* bow and wood stockpiles; and*
- iii) make the information available to Parties on request; and*

b) submit a report to the Standing Committee relating to the information received from Parties in terms of Decisions 20.AA and 20.BB.

Our comments and suggestions to draft Decision 20.CC include a proposed amendment to subsection (a)(ii) and an additional proposed section.

18. Our proposed amendment to Decision 20.CC (a)(ii)

We recommend that draft Decision 20.CC (a)(ii) be amended as follows:

*ii) the mechanisms used to register *Paubrasilia echinata* ~~bow and~~ wood stockpiles (including logs, sawn wood, blanks and sticks); and*

Rationale: Wood stockpiles can be understood to include logs, sawn wood, blanks and sticks. Revising the draft Decision accordingly would establish consistency between the draft Decisions and the Report, which refers to wood stockpiles consistent with CoP19 Decision 19.251's reference to "*Paubrasilia echinata* stockpiles". Moreover, stockpiles of finished bows do not exist, though makers or sellers may have a relatively limited stock on hand. In addition, efforts to register each of the vast number of existing bows made over the past 250 years and held by owners around the world would be impracticable and administratively overwhelming for CITES authorities and all involved. Bow makers and musicians, however, strongly encourage the creation of a uniform system for registration (and recognition) of pernambuco wood stockpiles.

19. We propose to add a new section 20.CC (b), as follows:

20.CC *Subject to extrabudgetary resources, the Secretariat shall:*

- b) submit to the Standing Committee, at its 81st meeting to be held in 2026, a proposal for the approval of a voluntary marking or identification system for *Paubrasilia echinata* individual bows to enhance the traceability of these specimens;*

[Note: If the above proposed 20.CC (b) is approved, current 20.CC (b) should be renumbered as 20.CC (c).]

Rationale: As organizations representing the music sector, we strongly support the creation of a traceability system for bows made of *Paubrasilia echinata* and call on CITES to help advance this crucial step as expeditiously as possible. In addition, we believe that, in order to be efficient, such a system must be harmonized and implemented as broadly as possible across range, transit and destination Parties. While existing efforts by the Parties identified in the Report provide a useful foundation of such a system, we believe that a single uniform system will be necessary to avoid confusion, inefficiency, and unnecessary administrative burdens, and to enable an effective global traceability system for the species. We recognize that adopting a harmonized system will present challenges. Our sector is prepared to commit to this work, and we have full confidence in the capacity of the Secretariat to help Parties achieve this critical objective. The existing examples of traceability systems focused on other CITES-listed species may serve as helpful references in this connection.

20. The music sector applauds the Secretariat's efforts in developing the *Report*, which brings together a significant body of information and range of perspectives, making it an invaluable tool for future traceability, conservation, science and policy efforts relating to *Paubrasilia echinata*. We encourage Parties to work with Brazil and other stakeholders to advance the Secretariat's recommendations, described above. We believe that our comments and recommendations regarding the draft Decisions are consistent with the Report's findings and recommendations.

Annex 1

Music sector actions since CoP19

Decision 19.252, directed to “Governmental, inter-governmental and non-governmental organisations and other entities”, is particularly relevant to music sector stakeholders. The Decision invites:

- a) support for the implementation of the pernambuco listing inter alia by:
 - i) *exploring ways to increase the traceability of finished bows, including for example, the development and implementation of a system of a unique individual marking and by sensitising producers and consumers (in particular musicians) of the status of the species,*
 - ii) *working with Brazil to identify existing Paubrasilia echinata plantations within Brazil that could be considered source code A or Y to establish a sustainable supply chain; and,*
- b) *provide information to the Secretariat, as requested in Decision 19.249. [Emphasis added.]*

The music sector has responded to this call to action in several ways:

- **Information to Parties:** On March 22, 2023, the CITES Secretariat issued Notification to the Parties No. 2023/033 concerning Decisions 19.249 to 19.253. Notification No. 2023/033 contained a questionnaire and invited Parties and relevant stakeholders to complete it, noting that the responses would be taken into consideration by the Secretariat in its reporting to the Plants Committee. Enclosed as Appendix 2 are responses to the Secretariat’s questionnaire that were developed by ten music sector organizations representing instrument makers and musicians from throughout the world.
- **Information to makers, musicians and consumers:** In consultation with CITES authorities a variety of music sector stakeholders developed two model informational tools², under the campaign “Know Your Bow”, for local adaptation and distribution (via, e.g., professional organizations and media, and web sites). These documents are enclosed as Appendix 3 and Appendix 4, and are also available in online formats as [Know Your Bow for Owners and Users](#) and [Know Your Bow – Tips for Makers and Sellers of Pernambuco Bows](#). These guides will be updated on a continual basis. Where existing bows are concerned, music sector observer organizations have prepared guidance to help makers, musicians and consumers take near-term voluntary steps towards documenting what might be known about the materials used in bows made prior to the February 23, 2023 implementation date of the CoP19 amendment. Bow makers have also developed a comprehensive list of CITES-covered and other common species used in making bows. Music stakeholders are using their vast communications networks to draw public attention to CITES, the status of pernambuco, efforts to combat illegal trafficking, and support for conservation of the species through the development of a pernambuco conservation strategy and in such articles as: “[Into the Wood](#)” (Symphony Online, January 6, 2023); “[Salviamo il Pernambuco](#)” (Archi Magazine, February 2023); [Les difficiles négociations en faveur du pernambouc des archets](#) (Association Française du Vioncelle, April 11, 2023) “Pernambuco

² *Know Your Bow – Tips for Makers of Pernambuco Bows and Know Your Bow – Tips for Owners and Users of Pernambuco Bows.*

Update: Time to Take Action!” (Bass World, 2023); and “With Coveted Wood Facing Restrictions, Musicians Who Use Bows Face a Choice” (Vermont Digger, April 27, 2023). In May 2024, U.S. musical instrument stakeholders partnered with the U.S. Fish and Wildlife Service to host an online compliance training event, available as a recorded educational resource, [Travel Rules for Protected Species and Musical Instruments](#). Representatives of music sector organizations are also organizing concerts and making presentations to musicians, ensembles, orchestras, performing arts sector federations, and makers to build awareness, and an initiative is underway to create conservation-focused curricula at lutherie schools throughout the world.

- **Conservation and sustainable use:** For 25 years, [the International Pernambuco Conservation Initiative \(IPCI\)](#) has worked in cooperation with Brazilian government authorities, scientists and NGOs to conserve pernambuco. In addition to investments in science and awareness building, IPCI has supported the replanting of approximately 340,000 pernambuco (and other) seedlings in reserves, civic areas and on privately owned farmlands using an agroforestry approach, especially with cocoa farmers using a “cabruca” system in which pernambuco provides helpful shade for crops. The existing legal framework on the national and state levels is not well understood by landowners and needs to be strengthened and harmonized in order to ensure that plantation-grown trees can be legally harvested and sustainably used. A well-functioning and verifiable legal framework has the potential to relieve the pressure on wild populations created by illegal cuttings. It would also make it possible for landowners to see the long-term economic value of planting pernambuco on their lands. Bow making requires very little wood on an annual basis. The science and other conditions exist to support the creation of a sustainable national commodity that would support bow making and music throughout the world.

The music community, and instrument makers in particular, are continuing to support this work. In 2024, IPCI renewed partnerships and commitments that will support the creation of Brazil’s first seed bank for *Paubrasilia echinata*, implementation of traceability technology, and new planting of *Paubrasilia echinata* seedlings. In December 2024, IPCI participated in Brazil’s first national scientific symposium dedicated to *Paubrasilia echinata*. Presentations by technical experts over two days confirmed the existence of technologies that can aid the establishment of a traceability system, as well as mixed-species and farm-based conservation and replanting programs that can be expanded to restore the species, provided national and international policy frameworks are supportive of such initiatives.

- **Coordination within the sector:** The following is a non-exhaustive list of groups working in collaboration with a wider network of international musical instrument stakeholders to advance compliance and public information efforts in support of sustainability for the pernambuco species.
 - American Federation of Musicians of the United States and Canada ([AFM](#))
 - American Federation of Violin and Bow Makers ([AFVBM](#))
 - Association des luthiers et archetiers pour le développement de la facture instrumentale ([ALADFI](#))
 - Confederation of European Music Industries ([CAFIM](#))
 - Chambre Syndicale de la Facture Instrumentale ([CSFI](#))
 - Groupement des Luthiers et Archetiers d’Art de France ([GLAAF](#))
 - International Alliance of Violin and Bow Makers for Endangered Species ([Alliance](#))
 - International Federation of Musicians ([FIM](#))

- International Pernambuco Conservation Initiative ([France-Europe](#), [Germany](#) & [USA](#))
 - International Society of Violin and Bow Makers ([EILA](#))
 - Japanese Musical Instruments Association (JMIA)
 - League of American Orchestras ([League](#))
 - PEARLE – Live Performance Europe ([PEARLE](#))
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- **Communication with Parties, the CITES Secretariat and other stakeholders:** Since CoP19, music sector stakeholders have maintained regular communications with CITES management authorities, the CITES Secretariat, range state officials, technical experts, environmental organizations and other stakeholders interested in the fate of pernambuco.

Annex 2

Music Sector Response to CITES “Questionnaire on Brazil Wood (*Paubrasilia echinata*)”

Notification to the Parties No. 2023/033

Annex 2

Questionnaire on Brazil wood (*Paubrasilia echinata*)

1. Please complete and submit this questionnaire to the Secretariat at info@cites.org with copy to isabel.camarena@un.org by 17 April 2023.
2. Contact information

a) Party, Organization, or Institution:	<ul style="list-style-type: none"> • American Federation of Violin and Bow Makers (AFVBM) • Confederation of European Music Industries (CAFIM) • Chambre Syndicale de la Facture Instrumentale (CSFI) • International Alliance of Violin and Bow Makers for Endangered Species (Alliance) • International Federation of Musicians (FIM) • International Pernambuco Conservation Initiative (France-Europe, Germany & USA) • International Society of Violin and Bow Makers (EILA) • Japanese Musical Instruments Association (JMIA) • League of American Orchestras (League) • PEARLE – Live Performance Europe (PEARLE) 	
b) Contact:	Name	John Bennett (AFVBM, Alliance, EILA, IPCI-USA) Michael Jousserand (CAFIM) Jacques Carbonneaux (CSFI) Benoît Machuel (FIM) Edwin Clement (IPCI France-Europe) Arthur Dubroca (IPCI France-Europe) Paul Sadka (IPCI France-Europe) Thomas Gerbeth (IPCI-Germany) Yuki Hori (JMIA) Heather Noonan (League) Silke Lalvani (PEARLE)
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Traceability and supply chains of *Paubrasilia echinata*

3. Regarding traceability to register the provenance of *Paubrasilia echinata* bows:

Traceability of <i>P. echinata</i> bows	Answer or comments		
3.1. Are you aware of any traceability system in place for bows of <i>P. echinata</i> ? <i>Tick or mark in bold whichever applies</i>	<input checked="" type="checkbox"/> No	We are not aware of any comprehensive international traceability system for bows. At the same time, we have also answered yes below because bow makers in various countries have been voluntarily marking and using documentation that they have developed to declare the materials contained in the bows they make.	
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Acquired bows	<input type="checkbox"/> Owners <input type="checkbox"/> Musicians <input type="checkbox"/> Manufacturers
		<input checked="" type="checkbox"/> Produced bows	<input type="checkbox"/> Owners <input type="checkbox"/> Musicians <input checked="" type="checkbox"/> Manufacturers
		<input type="checkbox"/> Transported bows	<input type="checkbox"/> Owners <input type="checkbox"/> Musicians <input type="checkbox"/> Manufacturers
3.2. Are you aware of <i>any other</i> traceability system for musical instrument accessories or musical instruments parts? If so, please provide some details.	Yes. Some other instruments, such as guitars or woodwinds are marked with serial numbers and/or name and/or year of manufacture. Because of their size and shape, bows do not lend themselves to extensive marking beyond marks identifying their maker. Also, at present, because the practice of making unique marks on individual bows has not been often used, there is not yet a generally accepted trade standard.		
3.3. Are you aware of any recent developments on the marking of bows of <i>Paubrasilia echinata</i> ? If so, please specify.	Generally, the marking of bows has not been practiced during the long history of artisanal bow making or even by the very small number of makers today that make more than 50 bows per year (most artisans make approximately 20-25 annually). A very small handful of bow makers have begun exploring unique marking options.		
3.4. According to you, what are the key elements of a	After more than two centuries of production, millions of bows exist in trade today. The overwhelming majority of these are not accompanied by		

Traceability of <i>P. echinata</i> bows	Answer or comments
<p>traceability system for pernambuco bows?</p>	<p>documents describing the provenance of the pernambuco they contain. In addition, only an extremely small number of top bow-making experts would potentially have the ability to identify even the approximate age of a bow. Moreover, marking a valuable older or antique bow would create the risk of potentially devastating impacts on the originality, value and preservation of precious artistic and cultural artifacts. It will not be practicable, therefore, to create a traceability system for already existing bows. The focus should be on newly created bows.</p> <p>When pernambuco was first placed on CITES Appendix II, a few CITES management authorities, particularly in Europe (e.g., Germany), created national registration systems to identify existing stocks of pre-Convention wood. Most CITES authorities did not take this step. Decision 19.251(b) encouraged the Parties to “consider the registration of stockpiles of <i>Paubrasilia echinata</i> as appropriate”. Some bow makers in countries with no registration system have already voluntarily created their own inventories and stock documentations. Others have done so since CoP19.</p> <p>It is too early to identify the key elements of a traceability system for pernambuco bows. The trade sector is diverse and predominantly comprises individual makers with their own methods and systems of accounting. That said, efforts by national CITES authorities to encourage and support the voluntary registration of existing stocks according to internationally agreed standards have the potential to benefit the identification of bows produced from existing stocks. In addition, the strengthening of Brazil’s permit verification system would make it possible for international buyers of pernambuco specimens to be confident that the future wood, blanks or bows entering their markets have been legally sourced. It will also be important to have broad acceptance of any system, across the music sector but also across nations.</p>
<p>3.5. Please provide any other information you consider relevant to the traceability of bows and other specimens of <i>Paubrasilia echinata</i>.</p>	<p>The bow making trade is interested in learning more about the traceability tools that have been used for timber and other commodities. We would like to understand more about the potential for traceability to be applied to pernambuco specimens (wood, blanks and bows) first leaving Brazil.</p> <p>Examples exist in certain European countries of the elements of systems that may have the potential to be used internationally. In France, for example, artisanal bow makers are registered at the Chamber of Crafts or Chamber of Commerce and the bows they produce are branded with their name.</p> <p>European and US bowmakers are small artisan workshops. A more limited number of larger, industrial companies around the world may also use pernambuco, some of which is of low quality. Putting aside the need for valid CITES permits at all times, the manufacturing of inferior bows from</p>

Traceability of <i>P. echinata</i> bows	Answer or comments
	<p>pernambuco wood that has been cut before it is mature should never be allowed or brought to the market.</p> <p>In order to be fully effective, any voluntary system will require interest and participation from throughout the world.</p> <p>Where existing bows are concerned, music sector observer organizations have been preparing guidance to help makers, musicians and consumers take near-term voluntary steps towards documenting what might be known about the materials used in bows made prior to the February 23, 2023 implementation date of the CoP19 listing.</p> <p>The bow-making trade is currently encouraging makers to assess and document their inventories to the extent possible. Because of the vast number of bows in existence, however, the marking and documentation of all existing bows in circulation among makers, retailers and musicians is impossible. Many owners of older valuable bows, however, have documents of authenticity provided to them by recognized experts. It may be possible for this work to be expanded on and standardized to some extent, taking into account the very limited number of experts worldwide.</p>
<p>3.6. Please provide any information relating to the existence and status of plantations of <i>Paubrasilia echinata</i> that could be considered source code A or Y.</p>	<p>For more than 20 years, the International Pernambuco Conservation Initiative (IPCI) has worked with Brazilian government authorities, scientists and NGOs to conserve pernambuco. In addition to investments in science and awareness building, IPCI has supported the replanting of approximately 340,000 pernambuco (and other) seedlings in reserves, civic areas and on privately owned farmlands using an agroforestry approach, especially with cocoa farmers using a “cabruca” system in which pernambuco provides helpful shade for crops. The existing legal framework on the national and state levels is not well understood by landowners and, it seems, needs to be strengthened and harmonized in order to ensure that plantation-grown trees can be legally harvested and sustainably used. A well-functioning and verifiable legal framework has the potential to relieve the pressure on wild populations created by illegal cuttings. It would also make it possible for landowners to see the long-term economic value of planting pernambuco on their lands. Bow making requires very little wood on an annual basis. The science and other conditions exist to support the creation of a sustainable national commodity that would support bow making and music throughout the world. The music community, and instrument makers in particular, are prepared to support such an initiative.</p>
<p>3.7. List of attachments or relevant links.</p>	<p>AFVBM: https://afvbm.org Alliance: https://www.alliance-usa.org CAFIM: https://www.cafim.org</p>

Traceability of <i>P. echinata</i> bows	Answer or comments
List here any attachments and links you will provide as a complement to this section.	CSFI: https://www.csfi-musique.fr EILA: https://www.eila.org FIM: www.fim-musicians.org IPCI-Germany: https://www.ipci-deutschland.org IPCI-USA: http://ipci-usa.org League: https://americanorchestras.org PEARLE: https://www.pearle.eu Traceability: a management tool for businesses and governments (FAO 2016): https://www.fao.org/publications/card/en/c/83dcd903-46ce-4612-859c-460e883e5e59/

Enforcement

4. Please provide information on recent developments regarding *Paubrasilia echinata* for the following aspects:

Enforcement	Answer or comments
4.1. National enforcement actions:	We are aware that enforcement actions have been taken in Brazil.
4.2. International enforcement actions:	We are aware that other enforcement agencies have been cooperating with Brazilian authorities.
4.3. Illegal trade (e.g. seizures):	We have seen news reports regarding seizures of illegal pernambuco specimens.
4.5. Other relevant information relating to enforcement:	Our organizations and the bow makers and musicians we represent condemn in the strongest possible terms the illegal harvesting of pernambuco, which poses an existential threat to the tree that gives life to stringed instrument music and, with it, our professions as they have been practiced for centuries. We support continued enforcement and the establishment of verifiable permitting that will ensure the credibility of legal pernambuco specimens in the international market. <i>"Into the Wood"</i> Symphony Online, January 6, 2023

Stockpiles

5. Please provide any information relevant to the registration of stockpiles of *Paubrasilia echinata*, as follows:

Registration of stockpiles	Answer or comments
5.1. Are you aware of any stockpile registration system for specimens of <i>P. echinata</i> ?	<input type="checkbox"/> No/Unknown <input checked="" type="checkbox"/> Yes. Please elaborate:
	In 2007, France's Ministry of Ecological Transition began the voluntary registration of stocks of pre-Convention wood. Since then, no monitoring has been recommended or imposed. The status of the current stocks is unknown to the CITES management authority.

Registration of stockpiles	Answer or comments	
		<p>In 2007, on the initiative of the IPCI, the quantity (sticks, boards, logs) of <i>Paubrasilia echinata</i> was recorded in Germany and Austria and reported to the CITES authorities. Since then, separate material accounting has been mandatory. In some regions of Germany, CITES officials are making repeated checks of these documents.</p> <p>In Belgium it seems that it has always been possible to declare stockpiles.</p> <p>In Italy, the registration depends on the areas or regions.</p> <p>Some European countries do not have systems for the registration of stockpiles.</p> <p>In the United States, makers were encouraged in 2007 to voluntarily document their stocks of pre-Convention wood. No formal governmental registration process was initiated.</p>
5.2. Additional information relevant to the implementation of Decision 19.251	Bow makers and musicians encourage the creation of a uniform system for registration (and recognition) of pre-Convention stocks of pernambuco wood. Such a system is essential in order to make possible the fluid, legal and sustainable use of pernambuco.	

Capacity building

6. Please provide a list of the most urgent capacity building needs to support implementation of the listing of *Paubrasilia echinata* in Appendix II, as follows:

Capacity building need list	Comments or justification
1) Registration of existing stocks of pre-Convention wood	A standard, uniform international system is needed.
2) Investigation of potential voluntary traceability system	A voluntary traceability system for post-CoP19-produced bows has potential. Makers and musicians will need to work with experts to learn more about the tools and approaches that may be best suited to the specific qualities of bows.
3) Awareness building activities	The music sector is in urgent need of support from national CITES authorities to increase awareness of CITES, CITES decisions pertaining to pernambuco, and how to be legally compliant.
Support for conservation	
4) Inventory of trees	We encourage the undertaking by the Brazilian government of an exhaustive inventory of wild pernambuco populations as well as plantation-grown trees on Brazilian soil in all states of the Atlantic coast from Sao Paulo to Recife in collaboration with Brazilian public

Capacity building need list	Comments or justification
	and private organizations. IPCI and other international organizations are prepared to support such an initiative, as appropriate.
5) Protection of the Atlantic Rainforest	The survival of pernambuco will depend on regional and state-level planning that prioritizes conservation of timber resources throughout the Atlantic Rainforest. Unchecked urban and agricultural development pressures threaten to destroy what little remains of the Atlantic Rainforest's globally significant forests.
Legal permitting and plantations	
6) Elimination of fraud from the permitting process	Without reliable, verifiable permits, illegal activity will continue, forests will be depleted, and international markets will struggle to recognize fraudulent documents. Bow makers and musicians want to support Brazilian enforcement efforts to the greatest extent possible and would welcome cooperation in this connection.
7) Information about illegal activities	Information about illegal activities, to the extent it can be shared, would help the music sector to fight against illegal trafficking, which is an important goal of the sector.
8) Legal framework for plantation wood.	The creation and promotion of a fully integrated (national and state), transparent legal framework for the sustainable harvesting and use of plantation-grown pernambuco holds the potential to reduce illegal cuttings, strengthen populations of pernambuco, create livelihoods and support bow making and stringed instrument music.

Decisions 19.249 to 19.253

7. Please provide any additional information relevant to the implementation of Decisions 19.249 to 19.253 on Brazil wood (*Paubrasilia echinata*).

Bow makers and musicians are mobilized and motivated to work in cooperation with Brazilian and other environmental authorities to promote legal compliance, explore a voluntary traceability system and continue to support science and the conservation of pernambuco.

Annex 3

Know Your Bow – Tips for Makers and Sellers of Pernambuco Bows

As of February 23, 2023, finished bows exported from Brazil for the first time must be accompanied by a valid CITES export permit issued by Brazil’s CITES Management Authority.³

Bows take center stage. In November 2022, 19th Conference of the Parties of CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) amended the annotation for pernambuco (#10).⁴ While pernambuco (*Paubrasilia echinata*) has been included in Appendix II of CITES since September 13, 2007, finished bows had not been subject to CITES controls. Under the revised annotation, all parts, derivatives, unfinished and finished products of pernambuco exported from Brazil⁵ will require a valid export permit issued by Brazil’s CITES Management Authority. The permit will be required for the initial export from Brazil and import into destination countries. Importantly, the revised annotation creates a limited exception for all *subsequent* re-export⁶ of *finished* musical instruments, accessories, and parts.

Although the international trade of the majority of finished pernambuco bows outside of Brazil will continue not to require a CITES document, the new permit requirements are likely to have broad implications for how all finished bows are bought and sold. Buyers and owners will want assurance that their bows are legal and safe to own and travel with internationally. Bow makers have a crucially important role to play. By gathering and sharing information with buyers and customers, bow makers can promote awareness and compliance with the law, show support for combating trafficking of pernambuco wood and bows, demonstrate commitment to the conservation of pernambuco, and help to avoid further restrictions in the future.

Below are recommended steps for compliance and voluntary action.

Confirm the legality of your bows. As of February 23, 2023, it will be very important for you to ascertain the legality of the bows coming into your possession by requesting a valid CITES export permit or, for bows made before February 23, 2023, documentation demonstrating that a CITES permit is not required. (As we learn more about the permit process Brazilian CITES authorities are developing for finished bows exported on or after February 23, 2023, we will inform you.)

Gather evidence of legality. Buyers will want reassurance of the legality of the bows you are selling. We urge you to gather whatever documentation is available to demonstrate that the bows in your possession are legal or contain legally obtained pernambuco. Such documentation might include:

- CITES documents that may be available:
 - pre-Convention declarations (or certificates) for pernambuco wood obtained before September 13, 2007
 - permits for wood or bow blanks imported after September 13, 2007

³ The requirement will also apply to finished bows exported from Brazil for the first time prior to February 23, 2023 and arriving in the destination country on or after February 23.

⁴ The revised annotation #10 reads: ““All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts.”

⁵ Should pernambuco ever be grown outside of Brazil, pernambuco exported from that “country of origin” would also require a valid export permit from that country’s CITES Management Authority.

⁶ A re-export is any exportation of a CITES specimen following the initial export/import of that specimen.

- export permits for finished bows first exported from Brazil after February 23, 2023 (or exported for the first time prior to February 23, 2023, but arriving in the country of destination on or after February 23)
 - in the EU: import permits for finished bows first exported from Brazil after May 20, 2023 (or exported for the first time prior to February 23, 2023, but arriving in the country of destination on or after May 20) [Note: Makers outside the EU and US are encouraged to consult national CITES authorities to confirm that import permits are not required in their country.]
- Dated receipt of purchase and/or sale
 - Where receipts are not available, authorities suggest having a signed, dated statement, with complete contact information and describing the circumstances of the transaction or exchange of ownership.
 - Identifying photographs, including any markings or distinguishing characteristics of the bow
 - Dated certificate of insurance
 - Dated third-party instrument evaluation, if any

Assess inventory and develop documentation for customers. We highly recommend being prepared to provide customers with necessary information about the bows you are selling by taking the following steps:

- Inventory numbers of sticks, boards, and total weight of all pernambuco wood on dated and signed letterhead. Include available documents and date stamped photos.
- Inventory all finished bows, new and old, on dated and signed letterhead. Include documents and date stamped photos of each finished bow.
- Indicate on these letters that this pernambuco was in your possession in advance of Feb. 23, 2023
- Update existing inventory that you might have created in 2007 to record transfers into and out of stockpiles. Cellphone apps are available for date stamping.
- Notarize documents and store with important documents for future reference.

Travel to Brazil. Documentation will also be extremely important if you are planning to travel to or from Brazil with bows. You will need to demonstrate that the bows you will transport from Brazil are not leaving the country for the first time and therefore subject to CITES controls.

Assist musicians by assessing bows brought in for repair. When bows are brought in for repair, remind the owner of the importance of documenting the legality of their pernambuco bow. If the owner does not have adequate documentation and requests a written appraisal, qualified shops can provide written certificates that would include the bow's maker and location, materials used, and the approximate date it was made.

Older bows. Bows made and located outside of Brazil with pernambuco cut before 2007 will be considered "pre-Convention" under CITES. No historic CITES paperwork (e.g., CITES permits or certificates) will be associated with the bow. Note, however, that if you purchased from another maker, that person may have a CITES certificate verifying that the wood used was pre-Convention, depending on whether the wood was traded internationally after the CITES listing. For bows made after 2007 outside of Brazil, confirmation that the wood used was exported from Brazil prior to 2007 or with a CITES document after 2007 will help establish legality.

Wood and bow blanks. We recommend that you maintain clear and concise records of the CITES permits associated with post-2007 bow blanks or raw wood that you have in your possession. If you are making new bows using wood or blanks, we suggest keeping accurate, dated records on hand for each piece of wood or bow blank, and providing documentation proving legality to buyers to the extent possible.

Pernambuco stockpiles. We urge you to consult with your country's CITES Management Authority to learn whether and what options may exist for registering your pernambuco stockpile. Update your inventory to record any transfers of materials into and out of those stockpiles. As we learn more about stockpile registration policies, we will share additional information.

Take action to support conservation. We all have a vitally important role to play in ensuring the conservation of the pernambuco species in Brazil and the future health of the threatened forest ecosystem in which it grows. Learn more about the [accomplishments of the International Pernambuco Initiative \(IPCI\)](#) and how you can [support IPCI](#) and its work to sustain the species today. You can also find information here: [IPCI France-Europe](#), [IPCI Germany](#), [IPCI Canada](#), and [International Alliance of Violin and Bow Makers for Protected Species](#).

Your cooperation is crucially important. Compliance today will be good for bow making, good for buyers of our bows, and good for conservation of the species on which we all depend. For further information, contact your [national CITES authority](#).

This document was prepared by the International Alliance of Violin and Bow Makers for Endangered Species, the International Society of Violin and Bow Makers, the International Pernambuco Conservation Initiative (IPCI France-Europe, IPCI-Germany, IPCI-USA), La Chambre Syndicale de la Facture Instrumentale, League of American Orchestras, PEARLE – Live Performance Europe. For additional information, please contact John Bennett, bennettandassoc@aol.com; Thomas Gerbeth, bogenbau@gerbeth.eu; Jacques Carbonneaux, jcarbonneaux@csfi-musique.fr; or Arthur Dubroca, ipci.france.europe@gmail.com.

Annex 4

Know Your Bow – Tips for Owners and Users of Pernambuco Bows

How well do you know your Pernambuco bow? Pernambuco wood is used in most advanced student and professional bows. The Pernambuco (*Paubrasilia echinata*) tree is native to the Atlantic forests in Brazil and its populations are threatened. Bow owners and users can take voluntary actions to: (1) support sustainable plantations of Pernambuco and conservation efforts, (2) document basic facts about the wood used in their bows, and (3) be informed consumers. **Voluntary steps today can help to avert the possible need for trade restrictions later.**

Do I need special permits to buy, sell, or travel with my finished Pernambuco bow internationally? In most cases, special permits are not required. On February 23, 2023, new rules went into effect, requiring CITES permits for all Pernambuco wood the first time it is exported from Brazil – including, for the first time, finished bows exiting Brazil. **The vast majority of Pernambuco bows made over the past two hundred years were already located outside of Brazil before the newest rules came into effect and are not subject to these new permit requirements.** However, all bow owners and consumers should better understand the history of the bows they own, gather basic facts and documentation, and learn how to take action to help sustain the Pernambuco trees in their native habitat for future generations.

What is CITES? The [Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES\)](#) is a treaty that regulates international trade in animal and plant species. It provides a framework for cooperation and collaboration among its member Parties (most countries globally) to ensure that international trade in specimens of animal and plant species is legal and does not threaten their survival in the wild. Species are listed in three [CITES Appendices](#), each providing a different level of controls over trade. As a musician, orchestra, or music ensemble, you might be aware that material used in musical instruments such as ivory, lizard skin, and Brazilian rosewood is already under CITES controls. CITES Parties meet every two to three years at the Conference of Parties (CoP) to re-evaluate controls species-by-species. Groups representing music stakeholders participate in these policy discussions and the latest one took place in November 2022 in Panama (CoP19).

How does CITES protect Pernambuco? Since September 13, 2007, the Pernambuco wood used in bows has been included under CITES Appendix II, with rules that require any wood material exported from Brazil (up to the unfinished “bow blank” stage) to be legally and sustainably harvested and accompanied by CITES permits when traded internationally. However, until February 23, 2023, finished bows were not subject to CITES requirements or controls and could travel without CITES permits. As of February 23, 2023, CITES permits are required for *all* Pernambuco wood the first time it leaves Brazil – including finished bows as they leave Brazil. CITES Parties adopted these measures at CoP19 in an effort to halt trafficking of Pernambuco wood and bows and to protect wild populations of Pernambuco.

If I don’t need CITES permits to buy, sell, or travel with my Pernambuco bow outside of Brazil, why do I need to learn more about how it was made? Now that CITES is regulating bows as finished products in this new way for exports from Brazil, it is wise to proactively have a record to make clear for future resale that your bow is CITES compliant with the latest rules, meaning it was located outside of Brazil before February 23, 2023, made outside of Brazil before February 23, 2023, or was exported as a finished bow

from Brazil with a CITES permit after that date. Documentation is also a helpful way to establish that certain bows are exempt from permit rules.

How do I know if my bow is made with Pernambuco? Seek out a bowmaker or luthier to evaluate the material and confirm the wood in the bow. You can ask for a written declaration from a bowmaker or expert evaluator describing the material in the bow. Many older bows do not have identifying marks from their maker. Make the best effort to collect the following:

- Dated third-party instrument evaluation, noting maker, approximate year made, and material
- Take identifying photographs, including any markings or distinguishing characteristics of the bow

How can I demonstrate that my finished bow was already outside of Brazil before February 23, 2023, and has not required a CITES permit as a finished product? Make a best effort to document your bow's birthdate, purchase date, and location. The new CITES permit export requirement only applies to finished bows (as well as finished musical instruments, finished musical instrument accessories, and finished musical instrument parts) exported the *first* time from Brazil on or after February 23, 2023. The following documentation can help establish legality of existing bows:

- Dated receipts of sale
- Dated insurance policy
- A signed affidavit attesting to the date (or approximate date) the bow came into your ownership outside of Brazil
- A signed statement from the maker, verifying the bow was legally crafted

If your bow was made and sold after Feb. 23, 2023, you probably have one or more of these documents already. If you don't, you should contact the maker or seller and ask for them. Most bow-makers are now well-informed about the new legal environment and are aware that customers are seeking documentation.

Gathering this evidence can help to establish that the bow was already a finished product located outside of Brazil when the new CITES regulations came into force, and, therefore, was not illegally exported from Brazil without a CITES permit or any other document required under Brazilian law.

What should I keep in mind when traveling with my bow? Remember: as long as you are outside of Brazil, a CITES permit is not required when traveling with a finished bow unless it contains other material covered under CITES controls, such as sea turtle or elephant ivory. If you plan to travel to Brazil with your Pernambuco bow, it will be critically important to gather evidence (see section above) that your bow was already outside of Brazil prior to February 23, 2023. In the absence of such evidence, you may be faced with serious complications on your departure from Brazil.

How can I determine whether the Pernambuco wood used to make my bow was harvested and traded in compliance with CITES? Bows made and located outside of Brazil prior to September 13, 2007 (when Pernambuco was first included under CITES Appendix II) are considered "pre-Convention" under CITES, which means that no historic CITES paperwork (e.g., permits) connected with the wood used to make the bow was required. For bows made after Sept. 13, 2007 outside of Brazil, confirmation that the wood was exported from Brazil prior to Sept. 13, 2007 or was traded internationally with a CITES permit or pre-Convention certificate can help establish its legal origin.

How can I be an informed consumer and re-seller? Bows exported from Brazil on or after February 23, 2023 *must be* accompanied by a valid CITES export permit issued in Brazil (the same is true for bows that

have been in transit from Brazil and reached their country of destination on or after February 23, 2023). It is very important to ascertain the legality of the bow(s) coming into your possession after February 23, 2023 by requesting proof that a CITES permit was not required, or a copy of the valid CITES export permit. In case you decide to re-sell your bow in the future, your buyer will probably ask you to provide the documents outlined above as evidence of its legal origin. Stay tuned as we learn more about the permit process that Brazilian CITES authorities will adopt for finished bows exported on or after February 23, 2023.

For further information, contact your [national CITES authority](#).

How can I take action to support conservation? We all have a vitally important role to play in ensuring the conservation of the Pernambuco species in Brazil and the future health of the threatened forest ecosystem in which it grows. Learn more about how you can [support the International Pernambuco Conservation Initiative](#) and its work to sustain the species and find more information here: [IPCI Germany](#), [IPCI Canada](#), [IPCI USA](#), [International Alliance of Violin and Bow Makers for Protected Species](#), [Information in French](#).

This document was prepared by American Federation of Musicians of the United States and Canada, Association of British Orchestras, The Independent Society of Musicians (ISM), International Alliance of Violin and Bow Makers for Endangered Species, International Federation of Musicians (FIM), League of American Orchestras, Musicians' Union (MU), National Association of Music Merchants (NAMM), Pearle Live Performance Europe. For additional information, please contact Heather Noonan hnoonan@americanorchestras.org; Silke Lalvani silke@pearle.eu; or Benoît Machuel benoit.machuel@fim-musicians.org.*

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