

CONVENCIÓN SOBRE EL COMERCIO INTERNACIONAL DE ESPECIES  
AMENAZADAS DE FAUNA Y FLORA SILVESTRES

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Septuagésima octava reunión del Comité Permanente  
Ginebra (Suiza), 3 – 8 de febrero de 2025

PALO DE BRASIL (*PAUBRASILIA ECHINATA*)

1. El presente documento ha sido presentado por los Estados Unidos de América,\* en nombre de un grupo de partes interesadas en el ámbito de los músicos y los instrumentos musicales en relación con el tema 73 del programa. El documento no refleja la posición oficial de los Estados Unidos.

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\* *Las denominaciones geográficas empleadas en este documento no implican juicio alguno por parte de la Secretaría CITES (o del Programa de las Naciones Unidas para el Medio Ambiente) sobre la condición jurídica de ninguno de los países, zonas o territorios citados, ni respecto de la delimitación de sus fronteras o límites. La responsabilidad sobre el contenido del documento incumbe exclusivamente a su autor.*

## Traducción no oficial

### ***Palo de Brasil (Paubrasilia echinata)***

#### **78ª del Reunión del Comité Permanente Inf. 26**

1. Este documento ha sido preparado por las organizaciones del sector musical que a continuación se enumeran, con el fin de presentar las opiniones de sus miembros con respecto al documento SC78 Doc. 73, *Palo de Brasil (Paubrasilia echinata)* :
  - Federación Estadounidense de Fabricantes de Violines y Arcos (AFVBM)
  - Asociación de Luthiers y Fabricantes de Arcos para el Desarrollo de la Fabricación de Instrumentos (ALADFI)
  - Confederación de Industrias Musicales Europeas (CAFIM)
  - Cámara Sindical de la Fabricación de Instrumentos Musicales (CSFI)
  - Grupo de Luthiers y Artistas de Arcos de Francia (GLAAF)
  - Federación Internacional de Músicos (FIM)
  - Alianza Internacional de Fabricantes de Violines y Arcos para Especies en Peligro de Extinción (Alianza)
  - Iniciativa Internacional para la Conservación del Pernambuco (IPCI)
  - Sociedad Internacional de Fabricantes de Violines y Arcos (EILA)
  - Asociación Japonesa de Instrumentos Musicales (JMIA)
  - Liga de orquestas americanas
  - PEARLE-Actuaciones en vivo en Europa (PEARLE)
  - Asociación alemana de fabricantes de violines y arcos (VDG)
  - Asociación de fabricantes de violines de Austria (VÖG)

Tras resumir brevemente la posición del sector de la música (párrafo 2) y aportar algunos antecedentes que servirán de contexto (párrafos 3 a 8), este documento presenta los comentarios y recomendaciones del sector de la música con respecto a los cuatro proyectos de decisión sobre *Paubrasilia echinata* presentados por la Secretaría al Comité Permanente (párrafos 10 a 19). En el párrafo 20 expresamos nuestra apreciación y reconocimiento al enfoque que la Secretaría le ha dado a esta difícil e importante cuestión y hacemos un llamamiento a las Partes para que trabajen con Brasil en favor de la conservación de *Paubrasilia echinata*. Este documento también incluye cuatro anexos, a saber:

- El Anexo 1 proporciona una descripción detallada de las acciones del sector de la música adoptadas desde la CoP19 en respuesta a las Decisiones 19.249 a 19.253;
- El Anexo 2 contiene la respuesta del sector al cuestionario adjunto a la Notificación a las Partes Nº 2023/033, *Madera de Brasil (Paubrasilia echinata)*;

- En el Anexo 3 se presenta un primer documento de información y divulgación titulado *Conozca su arco: consejos para fabricantes y vendedores de arcos de Pernambuco*; y
- En el Anexo 4 se presenta un segundo documento de información y divulgación titulado *Conozca su arco - Consejos para propietarios y usuarios de arcos de Pernambuco*.

Nota: Los dos documentos *Conozca su arco* se han distribuido ampliamente entre fabricantes, distribuidores, propietarios y usuarios de arcos *Paubrasilia echinata*.

## La posición del sector musical

2. Nuestras organizaciones, y los fabricantes de arcos y músicos que representamos, condenan la tala ilegal de pernambuco, que representa una amenaza existencial para el árbol que da vida a la música de los instrumentos de cuerda y a nuestras profesiones, tal como se han ejercido durante siglos. Apoyamos el establecimiento de procedimientos verificables y el uso de tecnologías apropiadas y actualmente disponibles para garantizar la credibilidad de los especímenes legales de pernambuco en el mercado internacional. Igualmente, apoyamos la conservación de la especie y, exclusivamente, los usos legales y sostenibles del pernambuco.

## Contexto

3. Durante la 19.<sup>a</sup> reunión de la Conferencia de las Partes (CoP19, Panamá, noviembre de 2022), las Partes acordaron la siguiente Anotación #10 enmendada para la inclusión de *Paubrasilia echinata* en el Apéndice II:

*Todas las partes, derivados y productos terminados, excepto la reexportación de instrumentos musicales terminados, accesorios de instrumentos musicales terminados y partes de instrumentos musicales terminados.*

Las Partes también acordaron complementar la enmienda a la Anotación #10 mediante la adopción de las Decisiones 19.249 a 19.253, cuyos textos se citan más adelante en este documento.

4. Como se solicitó en la Decisión 19.249(a), la Secretaría de la CITES emitió, el 22 de marzo de 2023, la Notificación a las Partes No. 2023/033 relativa a las Decisiones 19.249 a 19.253. Esta Notificación contenía un cuestionario e invitaba a las Partes y a otros interesados pertinentes a completarlo, señalando que la Secretaría tomaría en consideración las respuestas en su informe al Comité de Flora.

Diez organizaciones que representan al sector musical enviaron una respuesta conjunta a esta Notificación en nombre de sus miembros (Ver Anexo 2).

5. El 20 de diciembre de 2024, la Secretaría publicó el documento SC78 Doc. 73, *Madera de Brasil ( Paubrasilia echinata )*, para su consideración por el Comité Permanente en su reunión número 78 (SC78, febrero de 2025). El documento SC78 Doc. 73 describe el progreso logrado desde la PC27 (julio de 2024) y evalúa la implementación de las Decisiones 19.249 a 19.253. En particular, afirma que la Secretaría ha finalizado un primer borrador de un informe titulado “ *Arcos de Paubrasilia echinata : Ajuste de las soluciones de trazabilidad*” (en adelante, “ *el Informe* ”). Se incluye un resumen ejecutivo del Informe como Anexo 1 del documento SC78 Doc. 73, y se hace referencia al informe completo como Anexo 2.
6. El párrafo 7 del documento SC78 Doc. 73 resume el Informe, afirmando lo siguiente:
  - A. En el capítulo 1 se describen las opciones para el establecimiento de un sistema de trazabilidad para los arcos de *Paubrasilia echinata*, que incluyen:
    - i) *marcar arcos individuales, emitir certificaciones y crear bases de datos centralizadas;*
    - ii) *tecnologías como la espectroscopia de infrarrojo cercano (NIRS) y el análisis de isótopos; y*
    - iii) *Métodos forenses como medio para identificar el origen de la madera.*
  - B. El capítulo 2 se describe como un análisis de cuestiones con relevancia transversal para la implementación de las Decisiones 19.249 a 19.253, “ *incluidas la aplicación de las normas, la gestión de existencias y el desarrollo de capacidades relacionadas con P. echinata* ”.
  - C. El capítulo 3 se describe concluyendo “ *con reflexiones para fortalecer la implementación de la inclusión de Paubrasilia echinata en el Apéndice II* ”; enfatiza “ *la necesidad de un sistema de trazabilidad global estandarizado para especímenes de madera de Brasil, y en particular arcos* ”; y destaca “ *soluciones como el análisis isotópico y el marcado de origen*”, así como “ *esfuerzos coordinados entre Brasil, los principales importadores y el sector privado para asegurar el comercio legal, sostenible y rastreable de especímenes de Paubrasilia echinata*”.
7. Mientras que el párrafo 8 del documento SC78 Doc. 73 establece que “ *la retroalimentación del Comité Permanente en la SC78, de conformidad con la Decisión 19.253, será esencial para la finalización del informe antes de su presentación para su consideración en la CoP20* ”, el párrafo 9 del mismo documento contiene cuatro proyectos de decisiones para ser aprobados por la Conferencia de las Partes en su próxima reunión (CoP20, Samarcanda, Uzbekistán, 24 de noviembre - 5 de diciembre de 2025). Como paso preliminar, estos proyectos de Decisiones se someten a la

consideración y aprobación del Comité Permanente antes de su posible presentación a la CoP20.

8. Tomando nota de la importancia de estas posibles Decisiones, el sector musical agradece tanto a la Secretaría como al Comité Permanente por ofrecernos la oportunidad de compartir nuestras preocupaciones y recomendaciones con respecto a los proyectos de estas Decisiones.

Para facilitar el uso, hemos optado por citar a continuación cada una de las Decisiones propuestas por la Secretaría, tal como aparecen en el documento SC78 Doc. 73, seguidas de nuestros comentarios a esa Decisión propuesta.

9. El 10 de enero de 2025, la Secretaría publicó el Anexo 2 del Documento 73 del SC78, el informe completo, titulado *Perfeccionamiento de las soluciones de trazabilidad (el "Informe")*. El Informe reúne:

- abundante y muy útil información sobre el marco legal de Brasil en lo relevante a *Paubrasilia echinata*;
- un debate sobre los sistemas de trazabilidad de la madera y recursos científicos pertinentes;
- resúmenes de la información que las Partes proporcionaron a la Secretaría en materia de trazabilidad;
- y un análisis de las cuestiones transversales pertinentes a la implementación de las Decisiones 19.250 a 19.253.

Muy significativamente, el informe de la Secretaría también concluye con una sección llamada "*Reflexiones para una mejor implementación de la inclusión de Paubrasilia echinata en el Apéndice II*". Esta sección contiene observaciones "que podrían servir como base para futuros trabajos sobre *Paubrasilia echinata*", incluidas las siguientes ideas:

- Establecimiento de plantaciones comerciales de palo brasil;
- Realización de un inventario forestal nacional;
- Participación activa del sector privado en foros internacionales y estandarización de mejores prácticas;
- El comercio sostenible del palo Brasil debe priorizarse como estrategia principal para la conservación de la especie a largo plazo;
- Creación de una base de datos sobre existencias y plantaciones;
- Fortalecimiento de capacidades y apoyo a productores locales;
- Apoyo a la investigación y el desarrollo;
- Ajustes regulatorios en el control de exportaciones.

***En relación con los cuatro proyectos de Decisión sobre Paubrasilia echinata presentados al Comité Permanente***

10. El proyecto de Decisión 20.AA preparado por la Secretaría dice lo siguiente:

***Dirigido a las Partes, en particular a las Partes de origen, tránsito y destino de Paubrasilia echinata***

**20.AA** *Se invita a las Partes, en particular las Partes de origen, tránsito y destino de Paubrasilia echinata, a:*

*a) considerar las conclusiones del informe “Arcos de Paubrasilia echinata: Afinando las soluciones de trazabilidad” (Secretaría CITES, 202X);*

*b) colaborar, según corresponda, con organizaciones y entidades intergubernamentales y no gubernamentales para desarrollar sistemas voluntarios de marcado o identificación de instrumentos musicales de Paubrasilia echinata a fin de mejorar los mecanismos de trazabilidad de arcos individuales;*

*c) establecer un mecanismo para registrar las existencias de arcos y madera de Paubrasilia echinata; y*

*d) proporcionar a la Secretaría información relativa a los sistemas voluntarios de marcado o identificación desarrollados para arcos y el mecanismo utilizado para registrar las existencias de arcos y madera de Paubrasilia echinata.*

11. Nuestros comentarios y recomendaciones con respecto al proyecto de Decisión 20.AA (a):

Recomendamos modificar este proyecto de Decisión de la siguiente manera:

*a) considerar las conclusiones y observaciones del informe “Arcos de Paubrasilia echinata: Afinando las soluciones de trazabilidad” (Secretaría CITES, 202X), incluidas las oportunidades que presenta para apoyar los esfuerzos de Brasil para detener el comercio ilegal y promover la conservación e implementación de la inclusión de Paubrasilia echinata en el Apéndice II;*

Fundamento: El Informe de la Secretaría a las Partes incluye consideraciones muy útiles sobre las oportunidades de apoyar los esfuerzos del Brasil para prevenir el comercio ilegal y conservar y restaurar *Paubrasilia echinata*, y sugerimos que esto se refleje en la Decisión 20.AA (a). Felicitamos a la Secretaría por adoptar un enfoque amplio y exhaustivo para abordar esta difícil cuestión.

12. Nuestros comentarios y recomendaciones con respecto al proyecto de Decisión 20.AA (b):

Tenemos importantes reservas en cuanto a la viabilidad e idoneidad de incluir, en cualquier nuevo sistema de trazabilidad, los arcos creados antes de la fecha de implementación de dicho sistema. En consecuencia, proponemos modificar el proyecto de Decisión 20.AA (b) de la siguiente manera:

- b) *colaborar, según corresponda, con organizaciones y entidades intergubernamentales y no gubernamentales para desarrollar sistemas voluntarios de marcado o identificación ~~de instrumentos musicales de Paubrasilia echinata a fin de mejorar los mecanismos de trazabilidad de arcos individuales~~ destinados a mejorar la trazabilidad de los instrumentos musicales y arcos individuales fabricados con Paubrasilia echinata y creados después de la fecha de entrada en vigor de un sistema aprobado por la Conferencia de las Partes.*

Justificación: Marcar los arcos existentes, que incluyen antigüedades y otros arcos valiosos, dañaría la originalidad, el valor y la preservación de artefactos culturales y artísticos preciosos e irremplazables. No será factible, por lo tanto, la creación de un sistema de trazabilidad para los arcos ya existentes. E incluso si de alguna manera lo fuera, la carga administrativa para las autoridades de la CITES y el sector de la música sería insostenible. Por lo tanto, recomendamos que los esfuerzos de trazabilidad se centren en los arcos de nueva creación, es decir, los arcos creados después de la fecha de entrada en vigor de cualquier sistema de trazabilidad aprobado por la Conferencia de las Partes.

Además de las ideas esbozadas en el Informe, ya existen algunos elementos básicos para la estructuración de un futuro sistema de trazabilidad. El sector comercial es diverso y está compuesto predominantemente por fabricantes individuales de arcos de alta gama, con sus propios métodos y sistemas de contabilidad, y pequeñas empresas que fabrican arcos para estudiantes. Algunos fabricantes de arcos han colaborado para elaborar un modelo de formulario de “declaración *de materiales*” que acompañe a los arcos recién fabricados. Las iniciativas de las autoridades nacionales de la CITES para fomentar y apoyar el registro voluntario de los lotes de madera de pau-brasil existentes tienen el potencial de beneficiar la identificación de los arcos producidos a partir de dichos lotes. Además, el fortalecimiento del sistema de verificación de permisos de Brasil permitiría a los compradores internacionales de especímenes de pernambuco tener la seguridad de que la madera, las piezas en bruto, las varas o los arcos que ingresen a sus mercados en el futuro son de origen legal. Será importante que haya una amplia aceptación de cualquier sistema, en todo el sector de la música, pero también entre las Partes.

13. Nuestros comentarios y recomendaciones con respecto a los proyectos de Decisión 20.AA (c) y (d):

Recomendamos que el proyecto de Decisión 20.AA (c) y (d) se modifique como sigue:

*Se invita a las Partes, en particular las Partes de origen, tránsito y destino de Paubrasilia echinata, a:*

- c) *establecer un mecanismo para registrar lotes existentes de madera (incluidos troncos, madera aserrada, trozos y palos) Paubrasilia echinata y arcos*
- d) *Proporcionar a la Secretaría información relativa a los sistemas voluntarios de marcado o identificación desarrollados para los arcos que se elaboren con posterioridad a la entrada en vigor de cualquier sistema de trazabilidad y los mecanismos utilizados para registrar los lotes existentes y arcos de madera Paubrasilia echinata (incluidos troncos, madera aserrada, trozos y palos).*

Justificación: Los lotes existentes de madera pueden entenderse como troncos, madera aserrada, piezas brutas y palos. Revisar el proyecto de Decisión en este sentido establecería coherencia entre los proyectos de Decisión y el Informe, que se refiere a los lotes existentes de madera de conformidad con la referencia de la Decisión 19.251 de la CoP19 a las “lotes existentes de Paubrasilia echinata”. Además, no existen lotes de arcos terminados, aunque los fabricantes o vendedores pueden tener un inventario relativamente limitado a mano. Los esfuerzos para registrar cada uno de los vastos números de arcos existentes fabricados en los últimos 250 años, y en poder de propietarios de todo el mundo, serían impracticables y administrativamente abrumadores para las autoridades CITES y para todos los involucrados. Sin embargo, los fabricantes de arcos y los músicos alientan firmemente a la creación de un sistema uniforme para el registro y reconocimiento de los lotes existentes de madera de pernambuco. Tal sistema es esencial para hacer posible el uso trazable, legal y sostenible del pernambuco. Tras la CoP14 (junio de 2007), cuando el pernambuco se incluyó por primera vez en el Apéndice II de la CITES, algunos Estados miembros (por ejemplo, Francia y Alemania) aceptaron que los fabricantes de arcos establecidos en sus territorios declararan voluntariamente sus lotes existentes de pau-brasil para que los reconocieran como lotes pre-Convención. La mayoría de las autoridades de la CITES no tomaron esta medida. La Decisión 19.251(b) alentó a las Partes a “considerar apropiado el registro de las existencias de Paubrasilia echinata”. A raíz de esa Decisión, otros fabricantes de arcos han declarado sus lotes desde la CoP19. Esto refleja el deseo de la profesión de registrar su producción futura en un sistema legal y trazable. Instamos a las autoridades pertinentes a que adopten un enfoque armonizado para el registro de estos lotes en existencia.

14. Recomendamos la inclusión en el proyecto de Decisión 20.AA de un nuevo apartado (e) que disponga lo siguiente:



*Se invita a las Partes, en particular las Partes de origen, tránsito y destino de Paubrasilia echinata, a:*

- e) colaborar, según corresponda, con organizaciones y entidades intergubernamentales y no gubernamentales para continuar y ampliar los esfuerzos para sensibilizar a los productores y consumidores (en particular a los músicos) sobre la situación de Paubrasilia echinata, su uso sostenible y cualquier sistema de trazabilidad aprobado por la Conferencia de las Partes para esta especie.*

Justificación: El sector musical lleva más de 25 años trabajando en cooperación con actores de Brasil para conservar *Paubrasilia echinata*, promover el registro de lotes en existencia, aumentar la comprensión de los materiales utilizados para crear sus arcos y fortalecer la conciencia sobre los requisitos de los permisos CITES y las leyes aplicables. Es de vital importancia que, en la mayor medida posible, esta labor continúe en estrecha cooperación con las autoridades CITES y, especialmente, después de la entrada en vigor de cualquier nuevo sistema de trazabilidad adoptado por la Conferencia de las Partes.

15. El proyecto de Decisión 20.BB preparado por la Secretaría dice lo siguiente:

***Dirigido a Brasil como único estado de distribución de Paubrasilia echinata***

**20.BB** *Se invita a Brasil para que:*

- a) considere las conclusiones del informe “Arcos de Paubrasilia echinata: perfeccionando las soluciones de trazabilidad” (Secretaría CITES, 202X), y sus vínculos o implicaciones para las políticas nacionales, las estrategias de conservación y las reglamentaciones comerciales; y*
- b) evalúe la información sobre las existencias de Paubrasilia echinata cultivadas en plantaciones para satisfacer la demanda actual y futura del mercado de instrumentos musicales, y compartir esta información con la Secretaría.*

16. Nuestros comentarios y sugerencias con respecto al proyecto de Decisión 20.BB incluyen una propuesta de enmienda al apartado (b) y la propuesta de tres apartados adicionales:

- b) ~~evaluar~~ seguir evaluando la información sobre las existencias de Paubrasilia echinata cultivadas en plantaciones a fin de determinar si pueden considerarse código fuente A o Y y su potencial para satisfacer la demanda actual y futura del mercado de instrumentos musicales, y compartir esta información con la Secretaría;*

- c) considerar cuidadosamente los pasos y los plazos necesarios para crear un marco jurídico para el uso sostenible de la madera de plantaciones a fin de evitar el riesgo de presión sobre las poblaciones silvestres, y compartir esta información con la Secretaría;
- d) designar, dentro de la administración brasileña, un punto de contacto para que las partes interesadas comuniquen la información que tengan en relación con las plantaciones existentes de *Paubrasilia echinata* y los planes para crear futuras plantaciones o programas destinados a reforzar las plantaciones de pau-brasil; y
- e) compartir con la Secretaría la estrategia o prioridades nacionales de Brasil para la conservación de *Paubrasilia echinata* y el uso sostenible de la madera de esta especie con origen en plantaciones, así como las oportunidades de cooperación internacional para alcanzar los objetivos de la estrategia.

Fundamento: Como organizaciones interesadas, algunas de las cuales han trabajado durante más de 25 años en cooperación con entidades gubernamentales, científicas y no gubernamentales brasileñas para apoyar la ciencia, conservación y restauración de *Paubrasilia echinata* en Brasil, apoyamos plenamente a Brasil en su esfuerzo por proteger la especie. En consecuencia, ofrecemos respetuosamente nuestros comentarios y sugerimos proyectos de decisión adicionales para que Brasil tenga a bien considerarlos. Entendemos que Brasil se ha dado al proceso de evaluar información sobre lotes existentes de *Paubrasilia echinata* cultivados en plantaciones. Aquí utilizamos el término " *plantaciones* " para incluir tanto especímenes propagados artificialmente como especímenes cultivados a través de producción asistida en entornos agroforestales, como los que se cultivan en el marco de programas desarrollados por instituciones públicas brasileñas y por otros, en cooperación con agricultores locales (por ejemplo, en plantaciones de cacao) y con el apoyo internacional de los fabricantes de arcos.

El 5 y 6 de diciembre de 2024 se celebró en Ilhéus un simposio científico nacional organizado por la *Universidad Federal del Sur de Bahía*. Este evento, que se ocupó exclusivamente del *Paubrasilia echinata*, destacó el importante trabajo científico y de restauración que se está realizando abundantemente en la selva atlántica (mata atlántica) de Brasil en estos momentos. Este trabajo es de central importancia, tanto por su relevancia en la recuperación potencial de *Paubrasilia echinata* como por el hecho de que a mayor disponibilidad de especímenes para uso sostenible, habrá menor demanda de especímenes extraídos ilegalmente de poblaciones silvestres. Este enfoque multifacético, que utiliza herramientas de trazabilidad, inversiones en ciencia y conservación con apoyo internacional, ofrece una vía para la restauración de la especie en el marco de la lista actual del Apéndice II, siempre que se pueda establecer un marco legal para el uso sostenible en Brasil.

Las enmiendas que sugerimos al proyecto de Decisión 20.BB reconocen la labor de Brasil en esta área, alientan el desarrollo de un marco legal para el uso sostenible de especímenes cultivados en plantaciones y fomentan la creación de oportunidades para la cooperación internacional en apoyo de los esfuerzos de Brasil por conservar y restaurar *Paubrasilia echinata*. Instamos firmemente a las Partes para que apoyen los esfuerzos de Brasil para implementar la inclusión de *Paubrasilia echinata* en el Apéndice II y para conservar y restaurar la especie.

17. El proyecto de Decisión 20.CC preparado por la Secretaría dice lo siguiente:

**20.CC** *Con sujeción a los recursos extrapresupuestarios, la Secretaría deberá:*

- a) *consolidar información relativa a:*
  - i) *los sistemas voluntarios de marcado o identificación desarrollados por las Partes de origen, tránsito y destino para Paubrasilia echinata;*
  - ii) *los mecanismos utilizados para registrar los arcos y las reservas de madera de Paubrasilia echinata ; y*
  - iii) *poner la información a disposición de las Partes que la soliciten; y*
- b) *presentar un informe al Comité Permanente sobre la información recibida de las Partes en términos de las Decisiones 20.AA y 20.BB.*

Nuestros comentarios y sugerencias al proyecto de Decisión 20.CC incluyen una propuesta de enmienda a la subsección (a)(ii) y una sección adicional propuesta.

18. Nuestra propuesta de enmienda a la Decisión 20.CC (a)(ii)

Recomendamos que el proyecto de Decisión 20.CC (a)(ii) se modifique como sigue:

- ii) *los mecanismos utilizados para registrar Paubrasilia echinata existencias de madera (incluidos troncos, madera aserrada, trozos y palos); **y arcos***

Fundamento: Se puede entender que los lotes existentes de madera incluyen troncos, madera aserrada, piezas brutas y palos. Revisar el proyecto de decisión en este sentido establecería coherencia entre los proyectos de decisión y el informe, que se refiere a los lotes existentes de madera de conformidad con la referencia de la Decisión 19.251 de la CoP19 a los “lotes de *Paubrasilia echinata*”. Además, no existen lotes de arcos terminados, aunque los fabricantes o vendedores puedan tener inventarios relativamente limitados a mano. Adicionalmente, los esfuerzos requeridos para registrar cada uno de los muchos arcos existentes, fabricados en los últimos 250 años y en poder de propietarios de todo el mundo, serían impracticables

y administrativamente abrumadores para las autoridades de la CITES y para todos los implicados. Sin embargo, los fabricantes de arcos y los músicos alientan firmemente la creación de un sistema uniforme para el registro (y reconocimiento) de las existencias de madera de pernambuco.

19. Proponemos añadir un nuevo artículo 20.CC (b), de la siguiente manera:

**20.CC** *Con sujeción a los recursos extrapresupuestarios, la Secretaría deberá:*

- b) *presentar al Comité Permanente, en su 81ª reunión que se celebrará en 2026, una propuesta para la aprobación de un sistema voluntario de marcado o identificación de arcos individuales de *Paubrasilia echinata* para mejorar la trazabilidad de estos especímenes;*

[Nota: Si se aprueba el apartado 20.CC (b) propuesto anteriormente, el apartado 20.CC (b) actual debería reenumerarse como 20.CC (c).]

Justificación: Como organizaciones que representan al sector musical, apoyamos firmemente la creación de un sistema de trazabilidad para los arcos fabricados con *Paubrasilia echinata* y rogamos a la CITES que preste su ayuda para avanzar en este paso crucial a la celeridad posible. Además, creemos que, para que sea eficiente, un sistema de este tipo debe armonizarse e implementarse lo más ampliamente posible entre la distribución, el tránsito y destino como Partes. Si bien las iniciativas existentes de las Partes identificadas en el Informe proporcionan una base útil para dicho sistema, creemos que será necesario un sistema único y uniforme para evitar confusiones, ineficiencias y cargas administrativas innecesarias, y para permitir la trazabilidad mundial eficaz para la especie a través de un sistema único. Reconocemos que la adopción de un sistema armonizado presentará desafíos. Nuestro sector está preparado para comprometerse con esta labor y tenemos plena confianza en la capacidad de la Secretaría para ayudar a las Partes a lograr este objetivo fundamental. Los ejemplos existentes de sistemas de trazabilidad centrados en otras especies incluidas en los Apéndices de la CITES pueden servir como referencias útiles a este respecto.

20. El sector de la música aplaude los esfuerzos de la Secretaría en la elaboración del *Informe* que, al reunir un cuerpo de información y una diversidad de perspectivas significativos, se constituye en herramienta inestimable para futuros esfuerzos de trazabilidad, conservación, trabajos científicos y políticos en torno al *Paubrasilia echinata*. Alentamos a las Partes para que trabajen con Brasil y otros sectores interesados en la promoción de las recomendaciones de la Secretaría, anteriormente descritas. Creemos que nuestros comentarios y recomendaciones sobre los proyectos de decisión son coherentes con las conclusiones y recomendaciones del Informe.

## 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 tools<sup>1</sup>, 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 Francaise du Vioncelle, April 11, 2023) “Pernambuco

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<sup>1</sup> *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](mailto:info@cites.org) with copy to [isabel.camarena@un.org](mailto:isabel.camarena@un.org) by 17 April 2023.
2. Contact information

a) Party, Organization, or Institution:	<ul style="list-style-type: none"> <li>• American Federation of Violin and Bow Makers (AFVBM)</li> <li>• Confederation of European Music Industries (CAFIM)</li> <li>• Chambre Syndicale de la Facture Instrumentale (CSFI)</li> <li>• International Alliance of Violin and Bow Makers for Endangered Species (Alliance)</li> <li>• International Federation of Musicians (FIM)</li> <li>• International Pernambuco Conservation Initiative (France-Europe, Germany &amp; USA)</li> <li>• International Society of Violin and Bow Makers (EILA)</li> <li>• Japanese Musical Instruments Association (JMIA)</li> <li>• League of American Orchestras (League)</li> <li>• PEARLE – Live Performance Europe (PEARLE)</li> </ul>	
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 <b>bold</b> 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: <a href="https://afvbm.org">https://afvbm.org</a>  Alliance: <a href="https://www.alliance-usa.org">https://www.alliance-usa.org</a>  CAFIM: <a href="https://www.cafim.org">https://www.cafim.org</a></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: <a href="https://www.csfi-musique.fr">https://www.csfi-musique.fr</a> EILA: <a href="https://www.eila.org">https://www.eila.org</a> FIM: <a href="http://www.fim-musicians.org">www.fim-musicians.org</a> IPCI-Germany: <a href="https://www.ipci-deutschland.org">https://www.ipci-deutschland.org</a> IPCI-USA: <a href="http://ipci-usa.org">http://ipci-usa.org</a> League: <a href="https://americanorchestras.org">https://americanorchestras.org</a> PEARLE: <a href="https://www.pearle.eu">https://www.pearle.eu</a>  Traceability: a management tool for businesses and governments (FAO 2016): <a href="https://www.fao.org/publications/card/en/c/83dcd903-46ce-4612-859c-460e883e5e59/">https://www.fao.org/publications/card/en/c/83dcd903-46ce-4612-859c-460e883e5e59/</a>

#### 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.<sup>2</sup>**

**Bows take center stage.** In November 2022, 19<sup>th</sup> Conference of the Parties of CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) amended the annotation for pernambuco (#10).<sup>3</sup> 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 Brazil<sup>4</sup> 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-export<sup>5</sup> 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

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<sup>2</sup> 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.

<sup>3</sup> 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."

<sup>4</sup> 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.

<sup>5</sup> 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](#).**

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*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](mailto:bennettandassoc@aol.com); Thomas Gerbeth, [bogenbau@gerbeth.eu](mailto:bogenbau@gerbeth.eu); Jacques Carbonneaux, [jcarbonneaux@csfi-musique.fr](mailto:jcarbonneaux@csfi-musique.fr); or Arthur Dubroca, [ipci.france.europe@gmail.com](mailto: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](#).

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