

# NOTIFICACIÓN A LAS PARTES

No. 2025/076

Ginebra, 16 de junio de 2025

ASUNTO:

BRASIL

*Paubrasilia echinata*: información actualizada, incluida la relativa al cultivo en plantaciones y las existencias

1. La presente Notificación se publica a petición del Brasil.
2. En su 19ª reunión, la Conferencia de las Partes adoptó las Decisiones [19.249 a 19.253](#) sobre *palo brasil* (*Paubrasilia echinata*).
3. De conformidad con la Decisión 19.249, la Secretaría preparó el documento [SC78 Doc. 73](#), en cuyo [Anexo 2](#) figura un proyecto inicial de informe titulado “*Paubrasilia echinata* bows: *Fine tuning traceability solutions*” para su examen por la 78ª reunión del Comité Permanente (SC78).
4. En respuesta a la invitación formulada por el Comité Permanente en su SC78 (véase la página 187 del acta resumida – [SC78 SR](#)), el Brasil desea aportar más información sobre *Paubrasilia echinata* (incluyendo, entre otras informaciones, las relacionadas con el cultivo en plantaciones y las existencias), que se presenta en el Anexo de esta Notificación.
5. Se invita a las Partes y a otros interesados pertinentes a que examinen la información que figura en la presente Notificación y su Anexo y a que formulen observaciones a la Autoridad Administrativa del Brasil escribiendo un correo electrónico ([dbio@itamaraty.gov.br](mailto:dbio@itamaraty.gov.br) y [cites.sede@ibama.gov.br](mailto:cites.sede@ibama.gov.br)) con el asunto “Notificación No 2025/076: *Paubrasilia echinata*” y con copia a la Sra. Thea Carroll ([thea.carroll@un.org](mailto:thea.carroll@un.org)) a más tardar el **18 de julio de 2025**.
6. El Brasil invita a las Partes a que comuniquen cualquier información pertinente sobre existencias de *Paubrasilia echinata*, por ejemplo, número de arcos y arcos para instrumentos musicales, así como su localización, en sus respectivas jurisdicciones, escribiendo un correo electrónico a [dbio@itamaraty.gov.br](mailto:dbio@itamaraty.gov.br) y [cites.sede@ibama.gov.br](mailto:cites.sede@ibama.gov.br) antes del 18 de julio de 2025.
7. El Brasil transmitirá cualquier información adicional que deba examinar la Secretaría sobre la base de las respuestas recibidas a la Notificación para la finalización del proyecto de informe “*Paubrasilia echinata* bows: *Fine tuning traceability solutions*”. Se presentará una versión final del informe como Adenda al documento sobre palo brasil (*Paubrasilia echinata*) a la Conferencia de las Partes para que lo examine en su 20ª reunión (CoP20; Samarcanda, 24 de noviembre a 5 de diciembre de 2025).

## INFORMACIÓN SOBRE *PAUBRASILIA ECHINATA* PROPORCIONADA POR EL BRASIL

### Resumen

En este documento se presenta información actualizada sobre *Paubrasilia echinata*, cuya supervivencia se ve cada vez más amenazada por la explotación ilegal vinculada al comercio internacional de arcos de violín. Actualmente, dicho comercio es la principal actividad relacionada con el uso de madera de *Paubrasilia echinata*. La reducción en más de un 50 % de su población en las últimas tres generaciones a causa de la explotación y el descenso de su distribución natural llevó al Gobierno del Brasil a designar esta especie maderable como en peligro crítico. Además, *Paubrasilia echinata* ha sido incluida en el Apéndice II de la CITES, así como en la Lista Roja de la UICN. Si no se adoptan medidas adicionales, las poblaciones raras y el linaje genético de la especie se extinguirán a finales de este siglo.

Las operaciones de aplicación de la ley en el Brasil han revelado que la madera de esta especie obtenida ilegalmente se blanquea a través del uso de informes técnicos fraudulentos, existencias ficticias y el uso indebido de créditos virtuales en el sistema del Documento de Origen Forestal (DOF) del Brasil. Las empresas adquieren autorizaciones para la tala de árboles plantados o degradados (a menudo de mala calidad o inadecuados) y las utilizan para justificar cantidades mucho mayores de madera nativa de alta calidad, enmascarando su origen ilegal y facilitando su comercio en el mercado nacional e internacional. A continuación, se señalan algunas de las principales conclusiones:

- **Existencias:** ninguna de las existencias mantenidas por empresas dedicadas a la fabricación de arcos en el Brasil se consideró adecuada para su comercialización con arreglo a la ley en vigor.
- **Plantaciones:** no hay registros de plantaciones en el sistema federal de control del Brasil (SINAFLO). Las plantaciones existentes son inadecuadas desde el punto de vista técnico y han sido utilizadas indebidamente para el blanqueo de madera obtenida de manera ilegal.
- **Aplicación de la ley:** desde 2018, la Operación Do Re Mi ha expuesto una sofisticada red criminal que adquiere permisos de forma fraudulenta, manipula el sistema DOF y exporta arcos al extranjero, en particular a Europa y los Estados Unidos.
- **Fraude documental:** se dispone de pruebas detalladas sobre la declaración de existencias ficticias, el uso indebido de permisos para madera "desvitalizada", así como afirmaciones falsas sobre el origen del árbol plantado, entre otras.
- **Incautaciones:** las autoridades brasileñas han interceptado numerosas exportaciones ilegales de arcos y varas de arco sin elaborar ocultas en cargamentos o equipajes. En algunos casos se utilizaron documentos falsificados o se realizó un uso indebido de los Cuadernos ATA.
- **Medidas urgentes necesarias para la conservación de la especie:** pese a las restricciones establecidas a nivel nacional, el comercio ilegal persiste. Sin controles internacionales más estrictos sobre los productos acabados, las poblaciones silvestres seguirán estando gravemente amenazadas.

### El Brasil solicita a las Partes que:

- Compartan datos sobre las existencias actuales de arcos o varas de arcos sin elaborar;
- Mejoren la documentación y la aplicación de la ley en relación con las importaciones y exportaciones de arcos; y
- Promuevan investigaciones sobre alternativas sostenibles al palo brasil.

## 1. Information on Stockpiles in Brazil

The Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), in its capacity as the national CITES Management Authority, is currently assessing the declared stockpiles of *Paubrasilia echinata* wood held by bow-making companies to verify their legal origin. To date, none of the companies evaluated have been found to possess stockpiles deemed eligible for commercialization under current regulatory and legal requirements.

## 2. Existing *Paubrasilia echinata* Plantations in Brazil and Their Evaluation for Commercialization

At CoP19, Decision 19.252 invited Parties to support the implementation of the listing of *Paubrasilia echinata*, including by working with Brazil to identify existing plantations that could potentially be assigned CITES source codes “A” or “Y” in order to help establish a sustainable supply chain.

In line with this mandate, IBAMA is actively surveying existing *Paubrasilia echinata* plantations within Brazilian territory. As of the date of this notification, no plantations are registered in the National System for the Control of the Origin of Forest Products (SINAFLOR), as required under Article 16 of IBAMA Normative Instruction No. 21/2014. While some state environmental authorities maintain records of plantations, these remain outside the federal registration system.

Plantations have been identified in Una and Ilhéus (Bahia) under the State Environmental Agency of Bahia (INEMA), and in Aracruz (Espírito Santo) under the Institute of Agricultural and Forestry Defense of Espírito Santo (IDAF/ES), an agency linked to the Secretariat of Agriculture. Additional reports refer to planting initiatives by the Capixaba Institute for Research, Technical Assistance and Rural Extension (INCAPER), which also include ornamental trees in public areas. However, none of these plantations are registered in SINAFLOR.

Available data on these plantations are fragmented and technically insufficient. Records typically indicate only the number of seedlings distributed or planted, without providing critical information on morphotypes, the origin of seeds, silvicultural practices, seedling survival rates, or the qualitative characteristics of the trees. As such, any attempt to regularize these plantations for commercial purposes would require site-level technical inspections to assess their field conditions and compliance with applicable criteria.

The Government of Brazil acknowledges that plantation initiatives contribute to conservation. Indeed, large-scale planting programs have been carried out in southern Bahia and Espírito Santo through initiatives led by CEPLAC and INCAPER. Nevertheless, not all planted trees were intended for future commercial use, and they cannot be presumed to meet the technical standards required by the bow-making industry.

Violin bow production demands raw material with highly specific physical and mechanical properties—including density, rigidity, elasticity, fiber alignment, and sound conduction. Wood that presents cracks, knots, poor fiber orientation, or other defects is rejected by the industry. Furthermore, for any plantation to be considered under CITES source codes “A” or “Y,” it must be properly registered and demonstrably managed for sustainable harvest and export.

Enforcement actions have also revealed attempts by some actors to use plantations to conceal illegal logging exploitation - that is, as a cover to launder illegally sourced timber. In summary: (i) no *Paubrasilia echinata* plantations are registered in SINAFLOR; (ii) in general, the existing plantations are not technically suitable for bow production; and (iii) in some instances, plantations have been used to mislead regulatory authorities.

Therefore, Brazil concludes that *Paubrasilia echinata* plantations in the country are currently not suitable to supply bows, whether for domestic or international markets.

### 3. Enforcement Operations in Brazil Revealing the Link between International Trade and Threats to the Species

In 2018, the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA) launched "Operation Dó Ré Mi", an enforcement initiative targeting companies involved in the manufacture of bow blanks and finished bows made from *Paubrasilia echinata*, with a focus on operations in the state of Espírito Santo.

Between 2018 and 2024, IBAMA inspections uncovered substantial evidence of a long-standing criminal network engaged in the illegal exploitation of *Paubrasilia echinata* from native forest remnants. Despite being officially registered and environmentally licensed, several companies were found to have systematically disguised the illegal origin of their raw material through fraudulent means. These included the misuse of documentation issued by oversight agencies and the manipulation of the Forest Origin Document (DOF) system to generate virtual credits, thereby creating a false appearance of legality for both domestic and international trade.

IBAMA inspectors identified that many companies retained stockpiles of low-quality *Paubrasilia echinata* wood that had already been rejected by professional *archetiers* as unsuitable for bow making. Although these materials were unusable and excluded from actual production, companies continued to maintain them in inventory in order to preserve their virtual credit balances in the regulatory system. These stockpiles were typically written off or destroyed only when new, illegally sourced bow blanks were acquired, allowing the companies to maintain the illusion of traceability and regulatory compliance.

One notable case involved an *archetier* based in Coruripe, Alagoas, who maintained a visibly deteriorated stockpile of bow blanks. Despite their poor condition, the corresponding DOF credits were "legally" transferred to bow-making companies in Aracruz, João Neiva, and Santa Teresa (Espírito Santo), enabling these firms to conceal the incorporation of wood of illegal origin into their supply chains (see figure 1).

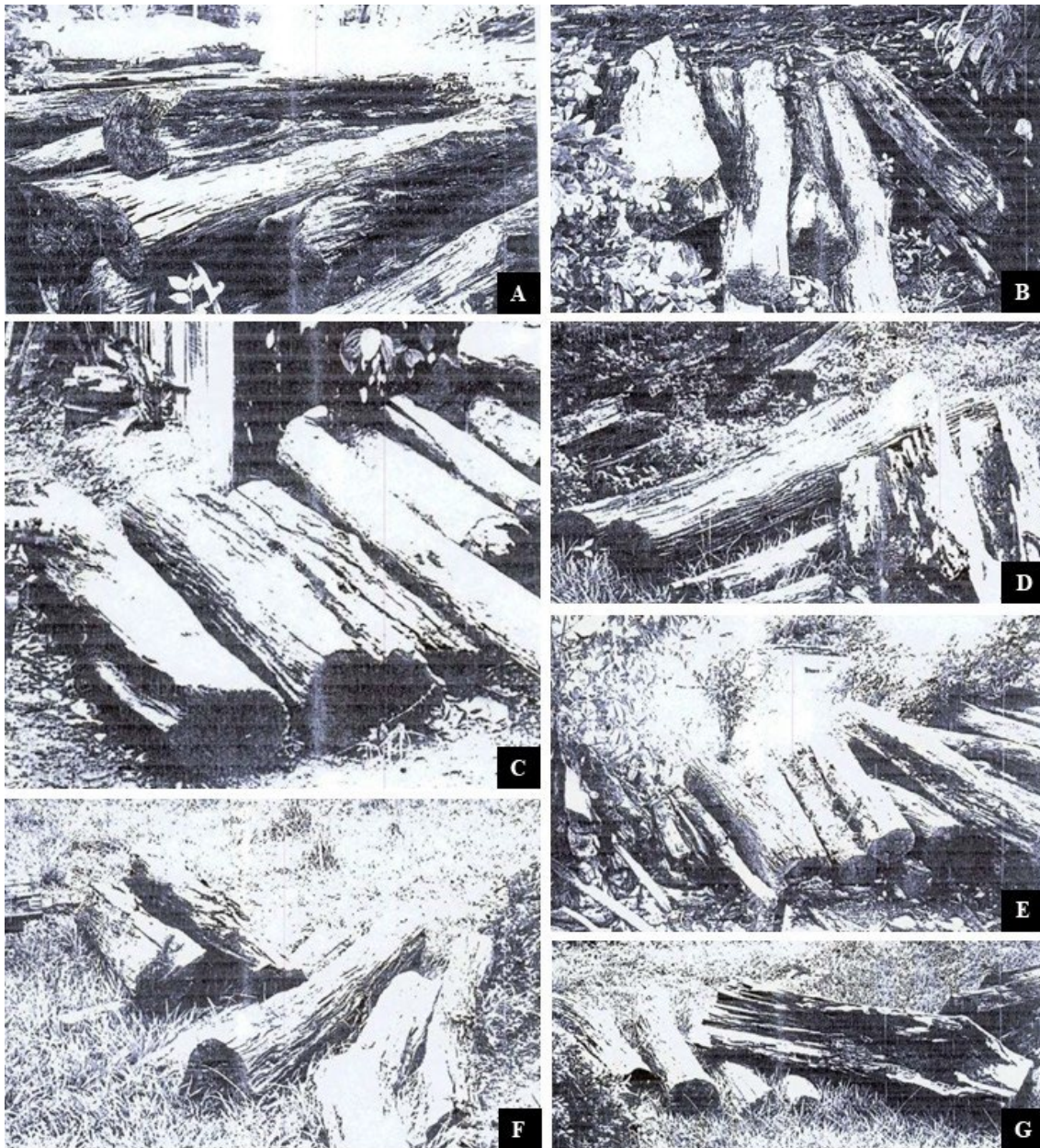


**Figure 1.** A–B: Storage of *Paubrasilia echinata* bow blanks and planks in precarious conditions at a facility in Coruripe (Alagoas). C–D: Degraded bow sticks exposed to rain and ground moisture, further illustrating poor storage practices. (Source: Guimarães, 2025)

Additionally, enforcement authorities documented a pattern of systemic fraud based on technical reports issued in the early 2000s. These reports authorized the use of weathered or degraded *Paubrasilia echinata* wood—such as stumps, stakes, and fence posts—allegedly salvaged from pastures or rural property improvements. In reality, these documents were used to obscure the true origin of sawn logs, planks, and bow blanks derived from freshly harvested native trees. Companies relied on these reports during the 2006 self-declaration process to insert fictitious inventory into the DOF system, thereby laundering hundreds of thousands of bow blanks of illegal origin (see figure 2).

#### 4. Specific Cases Uncovered by Brazilian Enforcement Authorities

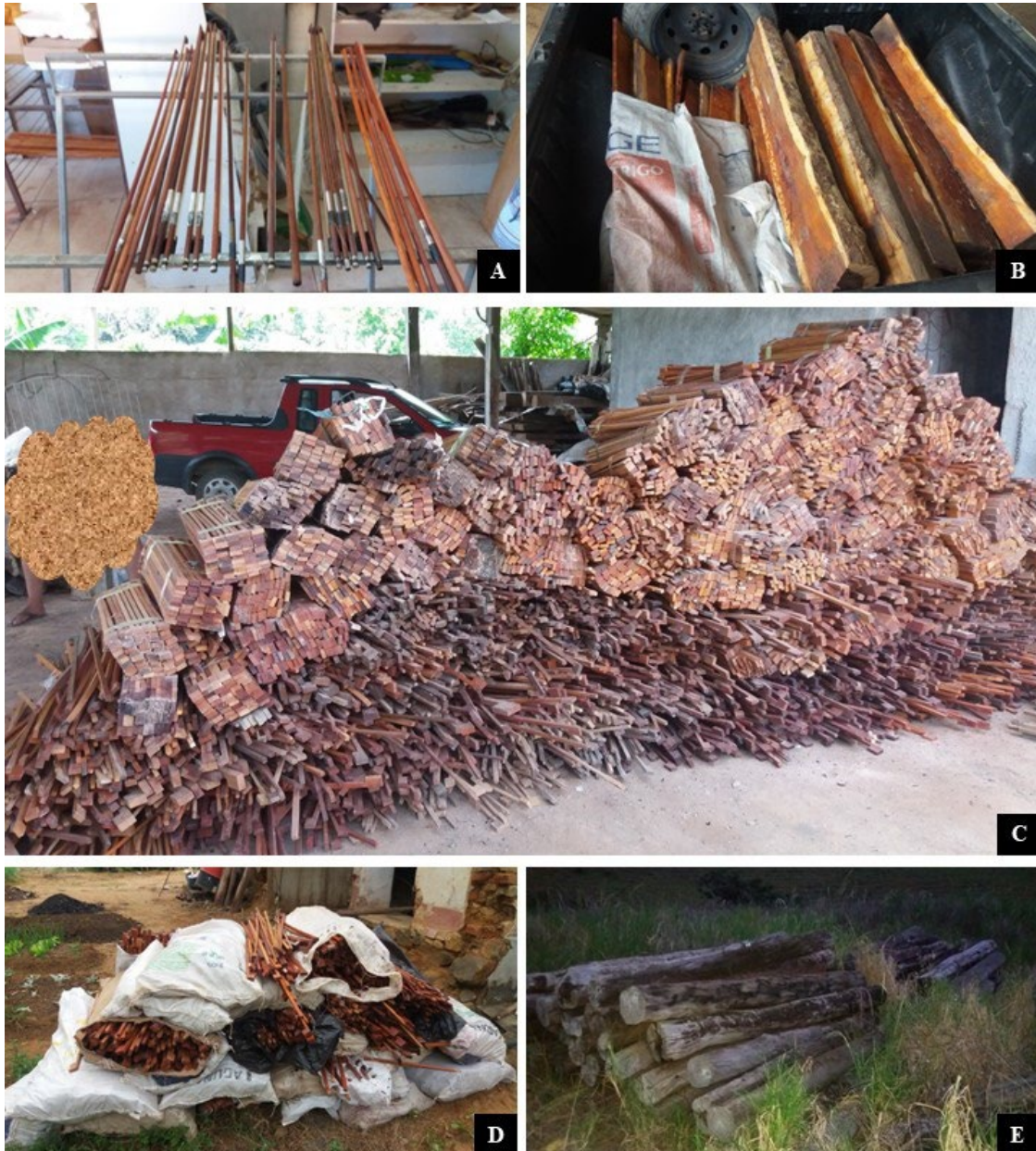
Operation Dó Ré Mi has brought to light several emblematic cases of fraud and illegal trade involving *Paubrasilia echinata*. One of the earliest cases involved two companies based in João Neiva and Santa Teresa (Espírito Santo). These companies had claimed that their bow stockpiles were pre-Convention and would suffice to meet market demand until planted trees from the 1990s and 2000s reached maturity. However, IBAMA's investigations revealed that this narrative was used to conceal ongoing illegal harvesting activities.



**Figure 2.** A–G: Photographic documentation of 20 fence posts located on a rural property in Córrego do Francês, Aracruz (Espírito Santo), referenced in a March 2006 inspection report issued by the State Environmental Agency. The report authorized the extraction of 2.5 m<sup>3</sup>

of *Paubrasilia echinata* Brazilwood, which was subsequently donated to a bow-making company based in Jacupemba, Aracruz. (Source: Guimarães, 2025)

A bow maker from João Neiva was found hiding 20,747 bow blanks across two rural properties owned by family members (Figure 3). To legitimize the stock, he had presented technical reports alleging the wood came from decommissioned utility poles originally auctioned by an energy company in Tocantins. These poles were allegedly sold to a third party in Goiás and later acquired by the bow maker. However, the poles were located intact on the inspected properties and were not even of *Paubrasilia echinata*, but of *Astronium* species (Figure 4). The bow blanks were seized, and the company was fined and suspended. Nevertheless, the *archetier* later resumed operations using virtual credits acquired from a supplier in Alagoas to continue supplying bows—primarily for export to the United States.



**Figure 3.** A: Bows being prepared in a small workshop located at the bow maker's residence in João Neiva (Espírito Santo). B: Car trunk loaded with logs of *Paubrasilia echinata* (Brazilwood). C–D: Bow sticks hidden on two separate rural properties owned by the bow maker's father in Demétrio Ribeiro, João Neiva (ES). E: Posts of *Astronium* sp. found on the family property, accompanied by an invoice issued in Goiás and used to fraudulently generate virtual credits in the SisDOF system as if they were *Paubrasilia echinata*. (Source: Guimarães, 2025)

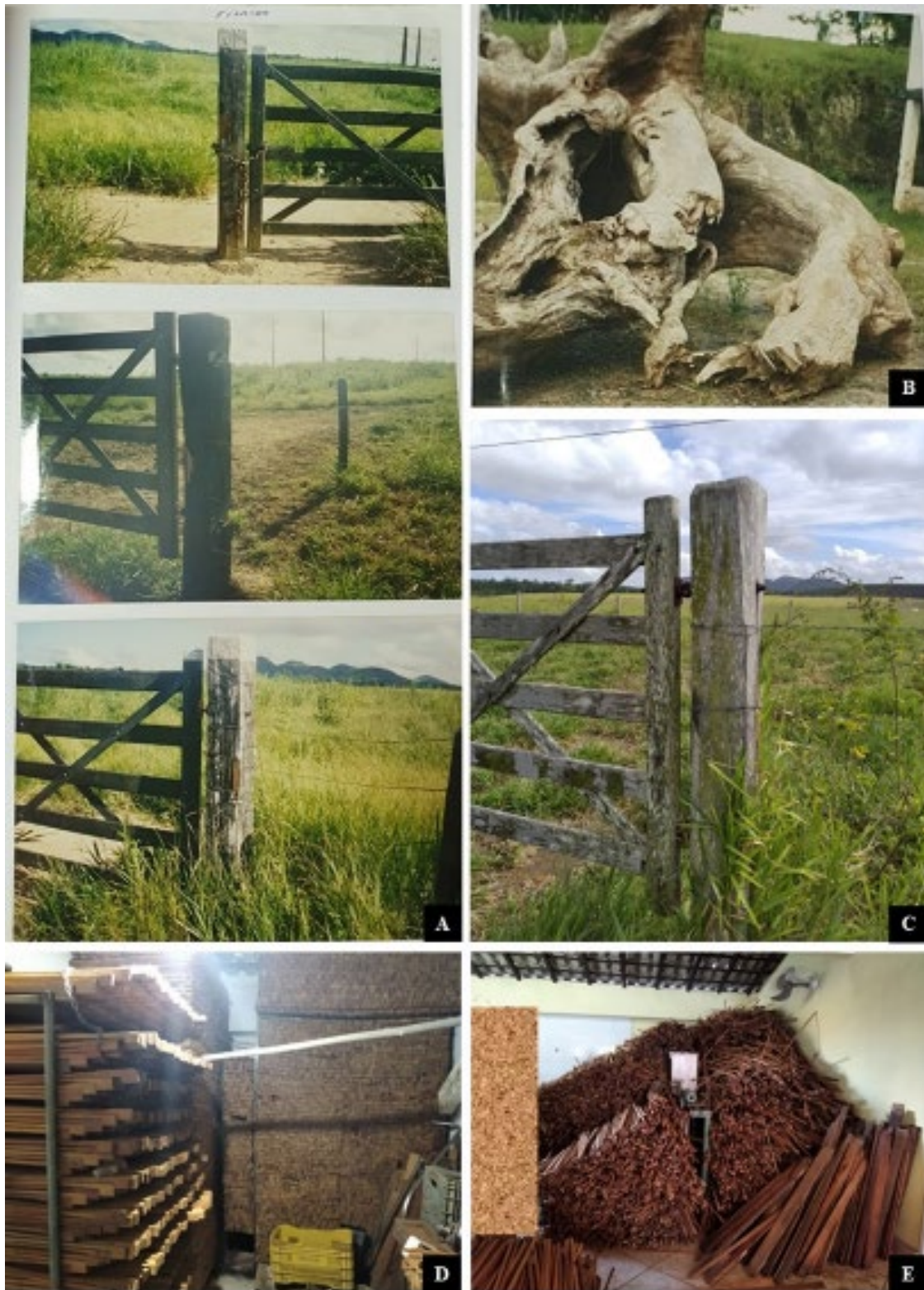
The company in Santa Teresa, associated with the João Neiva *archetier*, was also found to maintain a fictitious stockpile. Macroscopic wood analysis confirmed that logs stored on the premises were

not *Paubrasilia echinata*, despite the presence of genuine Brazilwood blanks in production (Figure 4). This deceptive practice led to the seizure of all bows, blanks, and logs. Prior to detection, the company had exported over 7,000 bows and blanks, primarily to the United States.



**Figure 4.** A: Inspection of logs by IBAMA during the “Violin Bows Operation” in May 2009, at a company’s stockpile in Santa Teresa (Espírito Santo). B: Fictitious *Paubrasilia echinata* logs found at the same company’s yard in October 2018, during the first phase of Operation Dó Ré Mi. C: Utility poles acquired in Goiás, allegedly made of Brazilwood, as indicated in a 2013 technical report issued by the State Environmental Agency and presented by a bow maker from João Neiva. D: The same poles discovered hidden on a rural property in Demétrio Ribeiro (Espírito Santo) in October 2018, with macroscopic analysis confirming the species as *Astronium* sp. (Source: Guimarães, 2025)

In 2020, another fraud was exposed when a company claimed to have sourced 8.3 m<sup>3</sup> of Brazilwood from 42 fence posts, two larger posts, and a single root. IBAMA returned to the rural property and confirmed the fence was still standing and the root untouched (Figure 5). As a result, 26,489 bow blanks were seized. Before the fraud was uncovered, the company had already sold over 8,000 blanks to eight different companies and *archetiers* —including nearly 2,000 to Portugal. After the fraud was uncovered, IBAMA canceled the licenses and notified the importing country.



**Figure 5.** A: Original images of fences cited in a 2005 State Environmental Agency Inspection Report, used to justify the extraction of *Paubrasilia echinata* for bow-making purposes. B: Photograph of a root mentioned in the same report, allegedly yielding 1.2 m<sup>3</sup> of raw material for bow blank production. C: Fence revisited by IBAMA in May 2020 at the same rural property in Aracruz (Espírito Santo), confirming that the posts had never been removed. D: Stockpile of bow blanks identified at a company in Aracruz. E: Bow blanks counted during the third phase of Operation Dó Ré Mi, conducted in May 2020. (Source: Guimarães, 2025)

In 2019, IBAMA uncovered 102 *Paubrasilia echinata* logs concealed on a rural property in Linhares (Espírito Santo), linked to a bow maker based in Aracruz (Figure 6). The declared sources of the timber—fence posts, roots, and devitalized trees—were inconsistent with the size, quality, and condition of the seized logs. Although no export invoices were provided, which limited IBAMA's ability



to quantify the full extent of international sales, investigations confirmed that bows had been sold to clients in the United States and Italy through intermediaries.



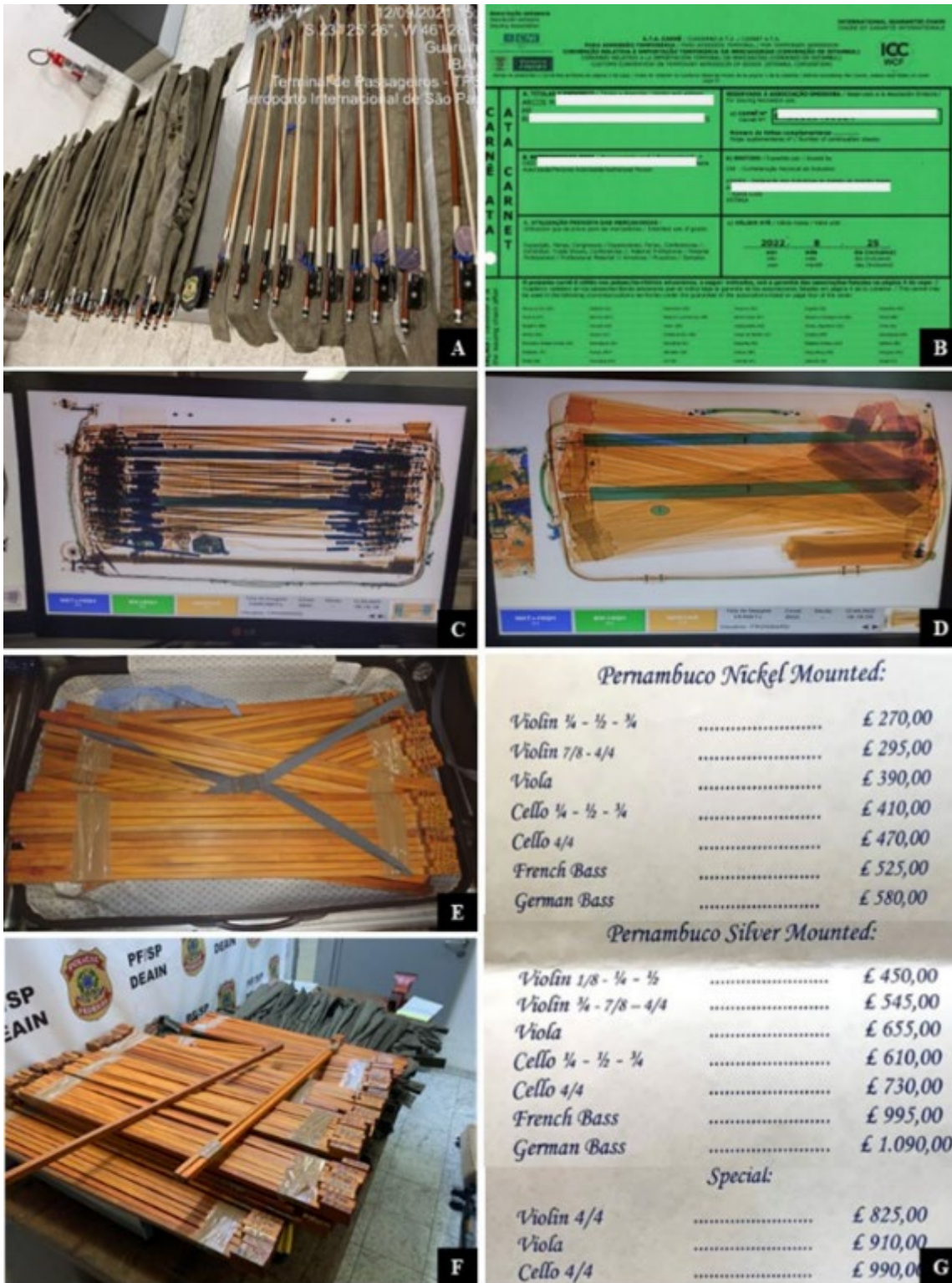
**Figure 6.** Discovery of 102 *Paubrasilia echinata* (Brazilwood) logs in September 2019, hidden beneath shade cloth on a rural property in Linhares (Espírito Santo), linked to a bow maker based in Aracruz. (Source: Guimarães, 2025)

IBAMA also identified that bows and bow blanks were being illegally transported via airports. At Guarulhos International Airport (GRU), Brazilian enforcement authorities intercepted three separate attempts by individuals attempting to board international flights carrying finished bows and bow blanks made of *Paubrasilia echinata* concealed in suitcases. A similar case occurred at Rio de Janeiro International Airport, involving a foreign national (Italian). The passengers involved were en route to Switzerland, Italy, Colombia, and England.

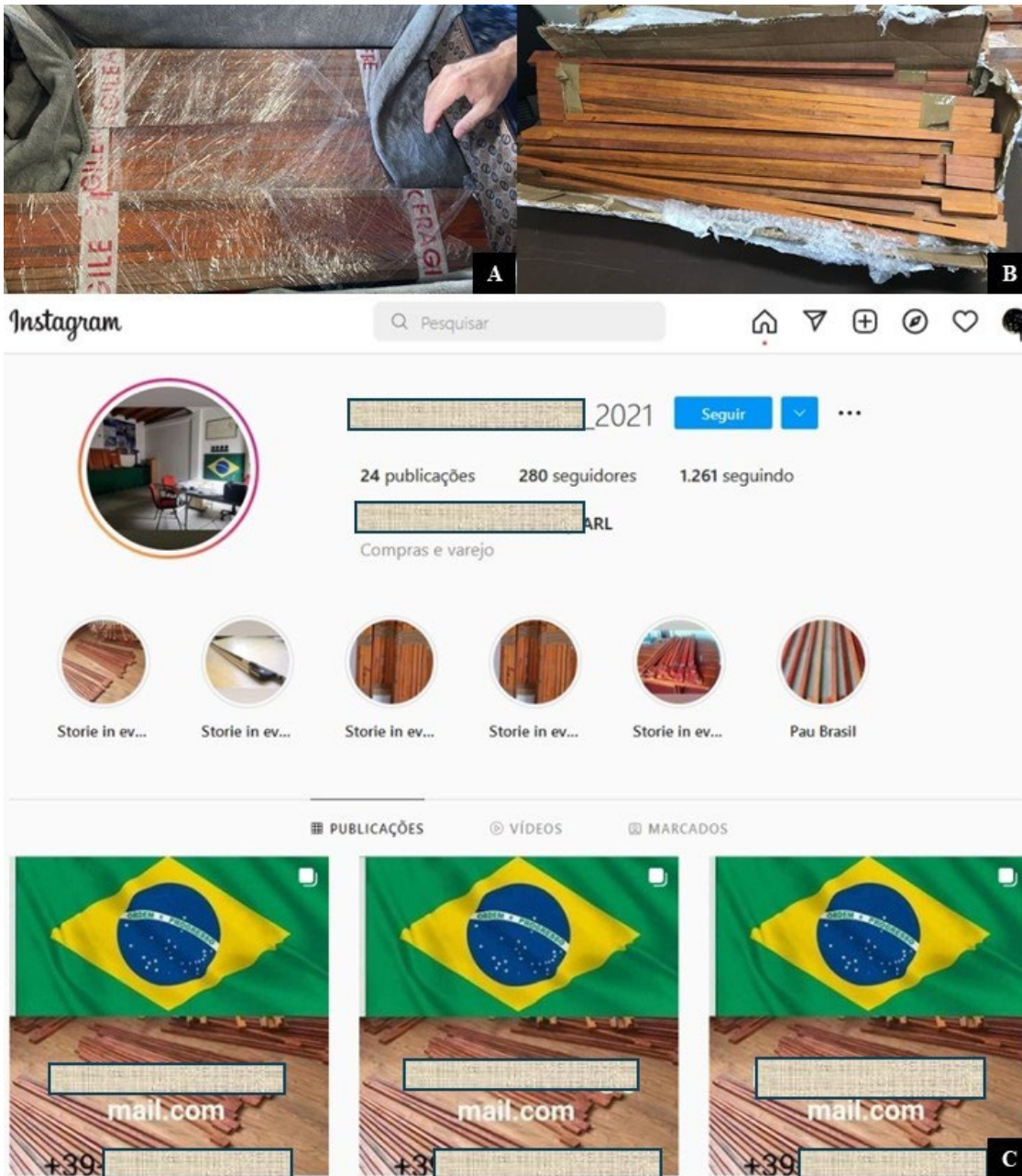
Among those apprehended was a well-known bow maker from Domingos Martins (Espírito Santo), whose company had previously been subjected to enforcement action and embargo (Figure 7). In one of the attempts, the *archetier* presented an ATA Carnet and claimed the material was intended for exhibition. In another instance, he was found transporting bows and blanks without any accompanying invoices, licenses, or proof of legal origin. The items were being carried in the luggage of two employees of his company, who fled the airport upon seeing their employer approached by federal police.

At the time of inspection, the *archetier* was also found in possession of a detailed price list for the bows (Figure 7G) and handwritten notes identifying buyers in the United Kingdom who had placed orders for the seized material. This particular episode was captured by a television crew and is publicly available at: <https://www.youtube.com/watch?v=k9ZPap8D4y4&list=PLRAX6tv2OMU4NC7bQJA1tw9VPi5yZknBj&index=13>

As for the Italian national apprehended in flagrante delicto (Globo, 2022a), investigations revealed that he had been actively marketing *Paubrasilia echinata* bow blanks to European buyers through his social media platforms (Figure 8). Several months prior to his arrest, a shipment of bow blanks sent from Brazil to Italy via Campinas International Airport (VCP) had already been intercepted by authorities, having been falsely declared as non-protected wood products.



**Figure 7.** A: Seizure of 208 *Paubrasilia echinata* bows in November 2021 from a passenger at Guarulhos International Airport en route to Switzerland. B: ATA Carnet presented as accompanying documentation for the seized material. C–D: X-ray images of suitcases containing bows and bow blanks. E–F: Additional seizure in April 2022 of 114 bows and 120 Brazilwood bow blanks from a bow maker intercepted at Guarulhos Airport while attempting to travel to England, without any documentation proving legal origin or commercialization authorization. G: Price list found in the possession of the archetier, listing bow models and prices in British pounds. (Source: Guimarães, 2025)



**Figure 8.** **A:** Seizure of 70 *Paubrasilia echinata* bow blanks at Rio de Janeiro International Airport in June 2022, found in the suitcase of an Italian citizen. **B:** Interception of 442 bow blanks at Campinas International Airport in April 2022, falsely declared as “sticks of non-protected wood for handicraft,” originating from a company linked to the same individual. **C:** Brazilwood bows offered for sale on social media platforms by the same Italian citizen. (Source: Guimarães, 2025)

In a review of logging authorizations for timber from planted trees, IBAMA identified systemic misuse of such authorizations to generate inflated virtual credits in the Forest Document Control System (SisDOF). These authorizations frequently included exaggerated volume estimates for planted trees that were structurally weak, twisted, and characterized by short commercial trunks, often including non-merchantable limbwood. The objective was to artificially increase the number of credits available for bow blank production (Guimarães, 2025).

These inflated credits were then used by companies to mask the incorporation of *Paubrasilia echinata* illegally harvested from remnant native forests in southern Bahia—thereby laundering illicit timber under the guise of legal plantation sources. This practice not only undermines traceability and enforcement but also directly contributes to the continued pressure on wild populations of the species. IBAMA’s findings reaffirm that planted trees, as currently managed and recorded, are not

of sufficient quality for the production of bows for musical instruments and cannot serve as a sustainable or legal substitute for native timber.

## **5. Frauds involving planted trees**

During the second phase of Operation Dó Ré Mi, conducted in September 2019, IBAMA inspectors identified two particularly revealing cases of fraud involving the misuse of logging authorizations for planted trees.

In one case, IBAMA found that the remaining trees at a plantation site displayed characteristics typical of low-quality specimens planted along fence lines—crooked stems, low diameter at breast height (DBH), and short commercial trunks. Field inspections confirmed that the heartwood was still immature. At the company's yard, the *archetier* claimed that most of the 16 m<sup>3</sup> of wood authorized for cutting had already been processed into slats. However, the logging permit had been issued less than eight months prior—far too short a time for logs to have dried adequately for bow making. Open-air drying at that pace would almost certainly result in cracking and splitting, rendering the material unsuitable.

Moreover, the slats found on-site were made from well-dried wood with mature heartwood, inconsistent with the 17-year-old trees from which the wood was supposedly sourced. Among the remaining unsawn logs, inspectors noted a mixture: some displayed mature, reddish heartwood, while others did not—suggesting that the company had used the permit to launder illegally harvested native wood from remnants of Atlantic Forest in southern Bahia. Consequently, all wood associated with the authorization was seized, and both the company and the project technician were fined for submitting false information in environmental administrative proceedings.



**Figure 9.** A: Remaining tree in a *Paubrasilia echinata* plantation in Fundão (Espírito Santo), showing low diameter at breast height (DBH) and a short commercial trunk. B–C: Stumps of 17-year-old trees cut at the same plantation, lacking mature heartwood formation. D–E: Yard of a bow-making company in Jacupemba, Aracruz (ES), containing slats and logs allegedly sourced from the Fundão plantation. (Source: Guimarães, 2025)

The same *archetier* had previously submitted two other cutting authorization requests for *Paubrasilia echinata* trees planted as ornamentals in urban residences in the districts of Guaraná and Jacupemba (Aracruz, ES). In both cases, the trees were still standing at the time of inspection. They were short, with immature stems and premature branching that produced interlocked grain—features that render the wood unfit for bow making. Neither case had received state authorization.



**Figure 10.** A: *Paubrasilia echinata* tree planted in Jacupemba, Aracruz (Espírito Santo), included in a cutting authorization request submitted to the state environmental agency, with an estimated yield of 0.9 m<sup>3</sup> in logs. B: 22-year-old *Paubrasilia echinata* tree planted in the urban area of Guaraná, Aracruz (ES), also included in a cutting authorization request, estimating a yield of 0.352 m<sup>3</sup> in logs. (Source: Guimarães, 2025)

In another particularly egregious case, the same *archetier* harvested nine trees from a 25-year-old plantation and destroyed the stumps and roots, alleging interference with a papaya plantation. When questioned about the harvested wood, he claimed it had already been sawn and processed into bows, which had been sold to Europe. This raised suspicions, as *Paubrasilia echinata* typically requires five to eight years of proper drying to be viable for bow making.

When asked to identify the remaining wood, the *archetier* claimed to have mixed it with other stocks. Inspection photos revealed two distinct wood piles: one containing logs with high sapwood content and little mature heartwood—consistent with plantation-grown material—and another with logs featuring very mature, reddish heartwood, clearly inconsistent with the plantation’s characteristics and likely sourced illegally from native forests (Figures 11F and 11G). As a result, the plantation was embargoed to prevent further abuse of regulatory mechanisms, and both the company and responsible technicians were fined.



**Figure 11.** A–C: *Paubrasilia echinata* trees planted on a rural property in Aracruz (Espírito Santo), authorized for cutting in September 2018. D–E: Stumps of the planted trees inspected by the State Environmental Agency in January 2019, following the authorized harvest. F–G: Logs inspected during the same visit at the businessman’s rural property—images provided to IBAMA—showing two distinct types of wood: one consistent with plantation-grown material (F), and another with mature heartwood indicative of illegal extraction from wild sources (G). (Source: Guimarães, 2025)

Following these findings, IBAMA identified a network of intermediaries operating since 2019 to supply illegal Brazilwood logs and planks from several municipalities in Bahia—Potiraguá, Mascote, Camaçan, Eunápolis, and Porto Seguro—to bow-making companies in Espírito Santo. These materials were laundered using virtual credits previously acquired through fraudulent logging authorizations. In order to maintain the appearance of consistency in their inventories, some bow makers were even found to be burning defective bow blanks—material they could not use—so as not to draw attention from enforcement authorities.



**Figure 12.** A: *Paubrasilia echinata* (Brazilwood) bow blanks being burned in a wood-fired oven by a bow maker from Aracruz (Espírito Santo). Image captured from footage aired on the television program *Fantástico* on April 12, 2022 (Globo, 2022b). B–C: Additional bow blanks found in an oven on a rural property owned by the same bow maker in October 2020, indicating attempts to eliminate unusable stock while maintaining apparent inventory consistency. (Source: Guimarães, 2025)

## 6. Final considerations

Under Brazilian law, the extraction of *Paubrasilia echinata* (Brazilwood) from the wild is strictly prohibited, reflecting its legal status as a critically endangered species (Brazil, 2008). Despite this prohibition, enforcement authorities have documented the continued illegal felling of centuries-old trees in forest fragments, particularly in southern Bahia.

Investigations conducted under Operation Dó Ré Mi since 2018 revealed that certain companies in the bow-making industry deliberately misled federal environmental authorities and engaged in sophisticated laundering schemes involving illegally sourced *Paubrasilia echinata*. These companies and *archetiers* obtained documents—most notably technical reports referring to devitalized wood—intended to create a façade of legality for wood extracted from native populations. As enforcement tightened, these actors began exploiting planted trees, not for their commercial suitability, but to generate virtual credits in IBAMA's control system (SisDOF), thereby perpetuating illegal trade under the appearance of compliance.

No bows made from *Paubrasilia echinata* have been legally exported from Brazil since the entry into force of Normative Instruction No. 08/2022 on 1 June 2022. Furthermore, since the implementation of the new CITES annotation on 23 February 2023, the Brazilian CITES Management Authority has not issued any permits for bows or other finished parts of musical instruments made from the species.

Nevertheless, the sophistication of the criminal networks involved suggests that they may have already developed alternative routes and methods for trafficking Brazilwood bows and bow blanks, which command high prices on the international black market. The repeated seizure of illicit bows and blanks concealed in cargo, packages, and passenger luggage at Brazilian airports demonstrates that foreign companies and *archetiers* are actively receiving and likely laundering illegally sourced materials—often with the help of regulatory documentation issued by their own domestic authorities.



Without international action, the absence of controls on the trade in finished bows will continue to facilitate the circulation of Brazilwood products of illegal origin, ultimately placing them in the hands of musicians and orchestras worldwide.

There is an urgent need for consumer countries to monitor existing stocks of *Paubrasilia echinata* bows and bow blanks, assess losses due to production waste and rejected materials, and improve traceability and transparency throughout the supply chain.

Brazil calls on the international community to strengthen protections for *Paubrasilia echinata*, given the ongoing impact of global trade on its natural populations. Brazil also encourages the musical instrument industry to intensify research into alternative materials that could replace Brazilwood in the production of high-quality violin bows.

## 7. References

- Brazil (2008). Federal Decree No. 6,660 of 2008. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_Ato2007-2010/2008/Decreto/D6660.htm](https://www.planalto.gov.br/ccivil_03/_Ato2007-2010/2008/Decreto/D6660.htm). Accessed on: 06 April 2025.
- Brazil (2012). Federal Law No. 12,651 of 2012. Available at: [https://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2012/lei/l12651.htm](https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2012/lei/l12651.htm). Accessed on: 06 April 2025.
- Globo (2022a). *Italiano tenta embarcar com Pau-brasil na mala e acaba preso*. Published on 7 June 2022. Available at: <https://g1.globo.com/rj/rio-de-janeiro/noticia/2022/06/17/italiano-tenta-embarcar-com-pau-brasil-na-mala-e-acaba-preso.ghtml>. Accessed on: 06 April 2025.
- Globo (2022b). *Segundo a PF, quadrilha pode ter faturado mais de 500 milhões de reais com a venda ilegal de pau-brasil*. Aired on 12 April 2022. Available at: <https://globoplay.globo.com/v/11178009/>. Accessed on: 06 April 2025.
- Guimarães, F.B. (2025). *Enforcement actions against illegal trade of Paubrasilia echinata: revealing frauds in Brazil's bow making industry*. Master's thesis, Universidad Internacional de Andalucía.
- IBAMA (2014). Normative Instruction No. 21 of 2014. Brazilian Institute of the Environment and Renewable Natural Resources. Establishes the National System for the Control of the Origin of Forest Products (SINAFLOR). Published in the Federal Official Gazette on 27 August 2014.

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