



Ms Jessika Roswall
Commissioner for Environment, Water Resilience
and a Competitive Circular Economy

23 July 2025

Object: Brazil's proposal to list *Paubrasilia echinata* (Pernambuco) in CITES Appendix I at CoP20

Dear Commissioner Roswall,

We, the undersigned organisations, represent European bow-makers, luthiers, orchestras, musical ensembles, and musicians, whose professional activity largely depends on the crafting and use of bows made of *Paubrasilia echinata* (also known as Pernambuco).

We are highly concerned about Brazil's proposal (CoP20 Prop. 46) to move *Paubrasilia echinata* from CITES Appendix II to Appendix I at the 20th Conference of the Parties (CoP20) that will be held from November 24th to December 5th in Samarkand (Uzbekistan).

While we fully support the protection of *Paubrasilia echinata* and stand behind the fight against its illegal harvesting and trafficking, we believe the Brazilian proposal does not adequately serve this purpose. This proposal, if adopted, would undermine or nullify decades of conservation work, harm sustainable use systems, and threaten the livelihoods of musicians, bow-makers and luthiers in the EU and beyond.

In 2007, *Paubrasilia echinata* was listed in CITES Appendix II to improve control over the illegal harvesting and export of this endangered species. Since then, it has been subject to targeted trade regulation. In 2022, CITES parties also decided to include finished products (including bows) in Appendix II while exempting re-exports of finished musical instruments and parts, to minimise administrative burdens while promoting legal, traceable trade and supporting conservation.

We wish to recall that Brazil's bow-making community, in collaboration with international partners, has made substantial efforts since the 1970s, with over three million trees planted in conservation, agroforestry, and plantation systems. In particular, the *International Pernambuco Conservation Initiative* (IPCI) has collaborated with Brazilian scientists, environmentalists, and institutions for over 25 years to restore populations of *Paubrasilia echinata*.

Moving *Paubrasilia echinata* from CITES Appendix II to Appendix I would have a devastating impact on the professionals we represent. It would:

- **Impose unmanageable burdens** on musicians, who would:
 - Face permits and stamps obligations for every cross-border movement of bows, many of which are centuries old and lack provenance documents.
 - Lose access to Pernambuco bows, which are essential for professional, high-quality performance.
 - Suffer substantial financial losses due to the sudden devaluation of their lifelong investments in Pernambuco bows.
- **Overwhelm CITES authorities** with administrative tasks of little or no conservation benefit.
- **Discourage** future planting and reforestation efforts, which could result in a worrying conservation setback.
- **Collapse European bow making**, the craft's centre and historical birthplace.
- **Criminalise** legal trade and sustainable use, even from regulated plantations and community forestry.

Brazil's legitimate concerns can be adequately addressed under the current Appendix II listing and in compliance with CoP19 decisions 19.251 and 19.252, which urge Parties to:

- Enhance traceability and certification of *Paubrasilia echinata* wood and finished bows.
- Support Brazil in enforcing existing policies, overseeing plantations, and implementing reforestation programs, including the establishment of a *Paubrasilia echinata* seed bank.

By regulating international trade from sustainable sources while safeguarding natural populations and their habitats, the parties would also help preserve a centuries-old European tradition and protect the livelihoods of hundreds of thousands of professionals across the EU.

Brazil's proposal to ban all trade, including legally sourced wood and finished bows, will not resolve enforcement challenges but risks pushing commerce underground, eroding transparency and accountability.

We also want to emphasise that listing *Paubrasilia echinata* in Appendix A (as per Council Regulation 338/97) would have further adverse consequences for the music sector in the EU.

We, therefore, urge the European Commission to oppose CoP20 Prop. 46 and to reaffirm its commitment to Appendix II as the appropriate CITES regulatory mechanism for *Paubrasilia echinata*.

For your information, we are attaching the joint comments that the music sector has submitted to the CITES Secretariat in response to the Brazilian notification.

We remain available for technical input and dialogue as CoP20 preparations continue.

Yours respectfully,

cc. to Mr Glenn Micallef, Commissioner for Intergenerational Fairness, Youth, Culture and Sport

Confederation of European Music Industries (CAFIM). The Confederation of European Music Industries used to gather European musical instrument manufacturers only. On May 5, 1977, as unification within Europe gradually progressed, the confederation came to cover the entire branch. Today, CAFIM represents the music trade in the whole of Europe, including wholesalers, retailers and importers. Its general objectives are to promote and safeguard the interests of the European musical instrument industry as well as those of practising musicians in every conceivable way.

www.cafim.org

The International Federation of Musicians (FIM), founded in 1948, is the only body representing musicians' unions globally, with members in 65 countries covering all regions of the world. FIM is recognised as an NGO by various international authorities, including WIPO, UNESCO, the ILO, the European Commission, the European Parliament, and the Council of Europe.

www.fim-musicians.org

IPCI France-Europe and IPCI Deutschland e.V.. In 2000, bowmakers from France, Germany, and the United States formed the International Pernambuco Conservation Initiative (IPCI) in response to the severe depletion of the Brazilian Atlantic Forest and pernambouc tree populations. Pernambuco is essential for crafting bows used by professional musicians. Without it, string music and cultural heritage around the world would not exist as we know them. The IPCI's mission is to preserve the genetic diversity of *Paubrasilia echinata*, restore the species, and establish a framework for its sustainable future use. With over 400 artisan members from 24 countries, IPCI is funded by its members to support long-term conservation efforts.

There are 4 IPCI international organisations collectively known as IPCI: IPCI-Canada, IPCI France-Europe, IPCI-Germany and IPCI-USA.

<https://www.ipci-france-europe.org/> and <https://www.ipci-deutschland.org/>

PEARLE* – Live Performance Europe is the 'Performing Arts Employers Associations League Europe'. Pearle* represents through its member associations the interests of more than 13 000 organisations in the music, performing arts and live entertainment sector. This includes profit as well as non-profit organisations, ranging from micro-enterprises to organisations with over 250 employees. As a European employers' association, Pearle* takes part in the European sectoral social dialogue.

www.pearle.eu