

**Statement to the European Commission  
Stakeholders Meeting on CITES  
on behalf of the International Association of Violin and Bow Makers (EILA)  
15 July 2022**

The International Association of Violin and Bow Makers (EILA) and its members from 25 countries around the world, including throughout Europe, strongly support Brazil's call for conservation of *paubrasilia echinata* or pernambuco. We are joined in this statement by our partner organizations, the International Pernambuco Conservation Initiative (IPCI), the International Alliance of Violin and Bow Makers for Endangered Species, Chambre Syndicale de la Factice Instrumentale, the Confederation of European Music Industries, the International Federation of Musicians, and PEARLE – Live Performance Europe,

Europe is the proud home of modern bow making and of much of the world's stringed instrument music. Pernambuco bows are crucial to the precision, projection and tone of stringed instrument music. That is why they are used by the greatest living stringed instrument musicians of our day and virtually every professional player.

Our trade has been committed to saving pernambuco, which grows only in Brazil's Atlantic Rainforest and has been under tremendous pressure from urban and agricultural development for several decades. In 2000, bow makers from France, Germany and the United States formed IPCI. Since that time, IPCI has invested in conserving pernambuco, planting over 250,000 seedlings in partnership with the Brazilian government, cacao farmers and Brazilian environmental NGOs, and supporting the work of leading scientific experts on the country's national tree.

Bow making uses a relatively small quantity of pernambuco – one tree can provide a lifetime supply for each of the world's artisanal bow makers. The illegal harvesting and trading of pernambuco, however, cannot ever be tolerated. We were heartbroken to learn of the results of Brazil's recent investigation. We immediately contacted authorities to understand the nature of the criminal activity and what we as a trade can do to better educate our community, improve verification of legality, and contribute to halting illegal activities.

By the Brazilian government's own implied admission, the efficiency of the legal regime governing conservation and protection of pernambuco remains below expectations. As Brazil's CITES proposal acknowledges, the extent of natural populations of pernambuco is not understood and the National Program for the Conservation of Brazilwood "has not made significant progress in taking measures to protect the species". Despite the species being on the national endangered species list for many years, and despite ongoing deforestation and evidence of the illegal trafficking by Brazilian bow makers, Brazil has had no domestic export permit requirement for finished bows. In the absence of strict domestic controls, the export of illegally harvested pernambuco in the form of bows has reached worrying levels. Buyers have been left to rely on paperwork presented by Brazilian traders and good faith representations. We agree that something must change and we are ready to participate in the change.

We have reviewed Brazil's proposal to list *paubrasilia echinata* on Appendix I. We are currently seeking to follow up with CITES authorities to make sure we understand Brazil's intention. At this stage, we believe that stricter domestic control on exports and CITES permit requirements under the existing Appendix II listing would suffice to reach Brazil's legitimate objectives.

An Appendix I listing, by contrast, would trigger unintended consequences that are not fully acknowledged in Brazil's proposal.

- Virtually all movement throughout the world of the many tens of thousands of pernambuco bows transported across borders by makers or used for performances by musicians worldwide, including all bows that were made decades if not centuries ago, would become subject to the issuance of permits and the credentialling of those permits by CITES management authorities at ports worldwide. This considerable additional burden on CITES and customs officials would jeopardise their ability to address permit requests and cross-border movements efficiently.
- Permits for commercial trade, essential to supplying musicians and making it possible for them to buy and sell the bows they need, would become virtually impossible to obtain.
- As a result, the entire world of stringed instrument music would be undermined.
- In addition, the lifetime savings musicians and makers have invested in their bows would be severely diminished.

We believe a balanced policy solution is obtainable. We welcome dialogue with the European Commission, the Brazilian government, CITES delegations, environmental, cultural and all other stakeholders. It is essential that we address illegal trafficking and ensure the conservation of pernambuco, while also protecting the future of stringed instrument music.

We also fully endorse the statement being made today by our musical community colleagues regarding the importance of streamlining the Musical Instrument Certificate process, measures that will be in everyone's best interest.

Thank you.