

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.¹

Bows take center stage. In November 2022, 19th Conference of the Parties of CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) amended the annotation for pernambuco (#10).² 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 Brazil³ 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-export⁴ 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

¹ 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.

² 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."

³ 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.

⁴ A re-export is any exportation of a CITES specimen following the initial export/import of that specimen.

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

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

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

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

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

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

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

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

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

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

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

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