

Pau-Brasil & CITES: Options for Conservation & Music¹ July 2025



Pau-brasil (*Paubrasilia echinata*), also known as pernambuco, is a treasured species that grows only in Brazil and is beloved around the world as the wood that enables musicians playing stringed musical instruments to reach the highest levels of excellence. As the result of development pressures in the Brazilian Atlantic Rainforest, the species is endangered and protected under national law and CITES². Discussions are currently underway regarding regulation of the species under CITES. **In June 2025, Brazil submitted a proposal for pernambuco to be listed in Appendix I, which would effectively ban all international trade. In November 2025, CITES Parties will meet to review and potentially vote on the proposal.** But a ban is not necessary or appropriate. Instead, it should be possible for government decision makers to make it possible to achieve *all* of the following crucially important and commonly shared goals:

- Ensure full protection of natural populations of the species against exploitation and illegal trade;
- Enable sustainable production and trade of new bows using pau-brasil grown on regulated plantations; *and*
- Preserve the centuries-old cultural and artistic tradition of stringed-instrument music around the world by ensuring pau-brasil can be legally traded for bow making and cross-border performances globally.

We believe strongly that *all* of these goals are both attainable and mutually reinforcing.

Illegal Trafficking | The bow-making community condemns any illegal trade activity. We applaud Brazil's efforts to enforce its domestic laws, and we have partnered with Brazilian and internationally supported efforts to help protect and restore wild populations of pau-brasil. These efforts include intensive compliance training, consumer awareness campaigns, and new procedures to document the legality of newly made bows as agreed by CITES Parties under the Appendix II listing.

How does CITES work? | CITES regulations are highly complex. The Convention regulates trade and protects species in different ways depending on which of three CITES "appendices" a species is listed by agreement of the 185 Parties. The most restrictive appendix, Appendix I, generally prohibits trade and is reserved for species in danger of extinction. Appendix II limits trade to specimens for which it is possible to demonstrate legal acquisition. Appendix II also provides flexibility through "annotations" that target limits, while enabling trade that does not impair conservation³.

The Current Listing | Pau-brasil was listed on Appendix II in 2007, with an annotation excluding bows from trade controls. In 2022, this annotation was modified to require CITES permits for the international trade of: "All parts, derivatives and finished products, except re-export of finished musical instruments, finished musical instrument accessories and finished musical instrument parts." The amended annotation reflected the CITES Parties determination that requiring permits each and every time the multitude of existing bows cross international borders after the wood or finished bow has first departed Brazil would create an enormous administrative burden on CITES authorities, with no commensurate conservation value.

Why an Appendix I Listing Would Harm Conservation, Music, Livelihoods, and Prevent Achievement of Common Goals
Brazil requests that pau-brasil be moved from Appendix II to Appendix I. There are a number of reasons why placing pau-brasil on Appendix I would undermine both decades of progress towards the conservation of pau-brasil, and the development of a framework for the legal and sustainable use of planted pau-brasil trees that would ensure the future of stringed instrument music globally:

- **Impacts on conservation and planting initiatives:**
 - Since the early 1970s, an estimated three million pau-brasil trees have been planted for conservation, civic, or economic purposes in Brazil. In some cases, landowners have established plantations and planted several hundred

1 This document was prepared by the International Pernambuco Conservation Initiative (IPCI) (ipci.international) with the support of the International Alliance of Violin and Bow Makers for Endangered Species (alliance-international.org). IPCI is a non-governmental organization with representatives in Europe, North America and Brazil. IPCI has worked in cooperation with Brazilian organizations and institutions for over 25 years to conserve and restore populations of *Paubrasilia echinata*, while adhering closely to CITES and all other applicable laws. This document reflects IPCI's views and is based on discussions with Brazilian and international stakeholders.

2 The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), is an international agreement among 185 Parties (184 governments and the EU) that is administered by the United Nations. The aim of CITES is to ensure that international trade in specimens of wild animals and plants does not threaten the survival of those species.

3 References to the text of the CITES Convention and relevant resolutions and annotations are available at cites.org.

thousand trees with an expectation of future use. A substantial number of these plantings were conducted under the auspices of a federal agency. Nearly none of these trees would meet the CITES criteria for an exemption from Appendix I for trade purposes⁴. For example, the many trees that have been planted in ecologically favorable agroforestry systems such as Cacaú Cabruca, and any products derived from them, would not be eligible for CITES permits. This would reverse progress and severely harm the decades of efforts made and currently underway by Brazilian scientists, environmentalists and local farmers to establish a sustainable source of pau-brasil and regrow pau-brasil. A “win-win” opportunity would be turned into a defeat. By contrast, registering and making possible the legal trade of these trees, many of which are mature enough for harvesting, would easily ensure the future of stringed instrument music, which requires very little wood annually. This progress could only be achieved by using the tools available under Appendix II.

- **Impacts on musicians:**

- *Buying and selling banned:* With very limited exceptions, buying and selling the large universe of existing pau-brasil bows would be banned. Musicians would lose access to these bows, which are essential to their livelihoods and cannot be even remotely compared to bows made of alternative wood. Musicians would also lose the value of their investments, which sometimes represent life savings.
- *Travel permits and stamps for each border:* Musicians traveling with any of the vast number of bows created during the over 250-year history of modern bow making would need a CITES permit or a Musical Instrument Certificate (MIC). Government officials would need to stamp these documents every single time a musician crosses a border, regardless of the bow’s age or origin. In addition, and very importantly, some countries do not accept MICs. Others restrict their use to a limited number of designated entry/exit points, creating a high burden on traveling musicians. To obtain these permits, musicians, makers and sellers would need to provide documents proving that the bow, or the wood from which it is made, was obtained prior to September 13, 2007. For most bows, experts and bow owners would find it impossible to prove the bow’s origin, age and/or the date on which the tree they come from was harvested. This is because, over the course of the many decades and centuries of the existence of these bows, documents were not required. Typically, bows were sold from owner to owner, often handed down from generation to generation.
- **Administrative burdens:** Requiring a permit for finished bows would pose tremendous administrative burdens for CITES management authorities, likely beyond their capacities, and professionals (bow makers, musicians, orchestras, tour organizers, etc.), without providing any conservation benefit.
- **The end of bow making:** The historic craft of bow making would be brought to an end, both inside Brazil, where it is an emerging source of local livelihoods, and outside Brazil. This would create irreparable (and avoidable) harm to music and culture around the world.

How the Appendix II Listing Can Save Pau-Brasil and Stringed-Instrument Music | By contrast, pau-brasil’s Appendix II listing and annotation provide a framework of regulatory and non-regulatory tools and options that the Parties agreed to in 2022 to support conservation, future sustainable use and controlled trade, while preserving music and culture worldwide. In February 2025, CITES parties took further steps to advance this Appendix II process. An agreed process exists. This work should be sustained. Appendix II enables and enhances protection of the species in the following ways:

- ✓ Provides a framework for international cooperation and continued advancement of science, conservation (e.g., the recently announced project to create Brazil’s first pau-brasil seed bank), and reforestation, and will enable the implementation of new global “traceability” initiatives that will prevent illegal activity.
- ✓ Permits the regulated and sustainable use of trees grown in agroforestry systems⁵ in which species are grown together for mutual shared benefit, e.g., in Bahia, where cacao is grown alongside planted pau-brasil.
- ✓ Provides flexibility to conserve the species, while protecting domestic livelihoods, trade, and music.

For additional updates, please check alliance-international.org, ipci-france-europe.org/en or americanorchestras.org/pernambuco-exemption-and-conservation.

⁴ Only “artificially propagated” plant specimens would be *potentially* exempt from a trade ban. CITES defines “artificially propagated” very narrowly and authorizes commercial trade only when each of several criteria have been met.

⁵ CITES defines these systems as “assisted production.”