April 23, 2007

Division of Scientific Authority  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Room 750  
Arlington, VA  22203

Via Email: scientificauthority@fws.gov


On behalf of the American Symphony Orchestra League and the American Federation of Musicians, we write today to urge the U.S. representative to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) to oppose an Appendix II listing of “parts and derivatives” of the pernambuco tree.

The majority of fine bows used by musicians worldwide are made from pernambuco wood. The quality of these bows is integral to the quality of music performed for listeners internationally. For this reason, musicians, performing arts organizations, and listening audiences value the pernambuco tree as an essential resource. The music community supports conservation efforts that will ensure the long-term sustainability of this wood, and supports CITES action that will responsibly regulate trade in cut lumber from the pernambuco tree.

However, we do not support the listing, as proposed by Brazil, which would also include “parts and derivatives” in Appendix II, thereby inhibiting the ability of musicians to travel with the bows and instruments they own.

Parts and Derivatives Listing Would Hamper International Cultural Activity

The proposal under consideration by CITES would apply export restrictions to both cut lumber and finished products made from pernambuco wood and two types of rosewood. Finished instruments made from this wood transported across international borders would be subject to new restrictions, and each of the more than 170 countries that are a party to CITES, including the United States, may apply varying requirements for the certification of personally-owned objects. If this proposal moves ahead as-is, bows, guitars, and other musical instruments made from these woods would be subject to strict and burdensome
certification and permit requirements that could make international travel very difficult for orchestra musicians.

When orchestras embark on tour, they frequently visit multiple countries while abroad. Because each country’s export certification requirements may vary, orchestras touring to multiple countries would encounter particularly complex certification requirements. The time and expense of certifying bows may prove too burdensome for orchestras to bear, essentially preventing orchestra musicians from bringing American orchestral music to the rest of the world.

International tours are undertaken by orchestras of all sizes. Orchestras are nonprofit organizations, and must manage their resources very efficiently. Orchestra administrators and musicians from across the country, including the New York Philharmonic, the Vermont Youth Orchestra, the Annapolis Symphony Orchestra, the Atlanta Symphony Orchestra, the New Jersey Symphony Orchestra, and others, have weighed in directly with the U.S. Fish and Wildlife Service to explain that a parts and derivatives listing would severely impact the ability of orchestra musicians to travel internationally.

These unintended consequences can be avoided by amending the proposal to include an exemption for finished products.

**America’s Musical Community Supports Responsible Conservation.**

The American music community supports responsible conservation efforts that will safeguard the long-term sustainability of the pernambuco tree. For the past seven years, the international community of bow makers has taken action to conserve and restore the pernambuco tree, founding The International Pernambuco Conservation Initiative (IPCI).

With members in 22 countries, including the United States and Canada, IPCI works with the Brazilian government and the scientific community to conserve and restore pernambuco. Their efforts encompass research, dialogue, and on-the-ground reforestation. IPCI supports improvements to the environmental, economic, and social conditions that impact the pernambuco tree.

We commend IPCI for their dedication to this conservation effort, and support action by Brazil and the international community that will responsibly regulate the trade of cut lumber, as a means of protecting pernambuco against the effects of deforestation. However, this may be done without restricting travel with bows and instruments. The pernambuco tree and other species can be protected without compromising the ability of musicians to perform internationally.
Global cultural exchange is important now more than ever.

Founded in 1942, and chartered by Congress in 1962, the American Symphony Orchestra League leads, encourages, and supports America’s orchestras while communicating to the public the essential value and cultural importance of orchestras in their communities and the vitality of the music they perform. The League’s membership encompasses nearly 1,000 member symphony, chamber, youth, and collegiate orchestras of all sizes, and links a national network of thousands of instrumentalists, conductors, managers, board members, volunteers, staff members, and business partners. The American Federation of Musicians of the United States and Canada (AFM) is the largest organization in the world dedicated to representing the interests of professional musicians. The AFM’s more than 100,000 members perform all styles of music, including symphonic, jazz, rock, hiphop, and country.

Orchestras from all regions of the country and of all budget sizes present international musicians to U.S. audiences and travel abroad to present their music to the world. By inviting foreign musicians to perform, orchestras provide American audiences the opportunity to experience a diversity of musical talent. When traveling abroad, America’s adult and youth orchestra musicians are ambassadors for American culture, sharing an artistically rich musical experience and reaching across borders to build lasting international partnerships.

The United States should support policies that encourage international cultural exchange while supporting responsible conservation efforts at the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). We urge the United States representative to CITIES to support an exemption for finished products made from pernambuco wood.

Sincerely,

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