

July 31, 2025

The Honorable Marco Rubio
Secretary of State
U.S. Department of State
2201 C Street NW
Washington, DC 20520-0001

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 2024

Response to Published Document: 2025-02504 (90 FR 9275)

Re: Executive Order 14199 Withdrawing the United States From and Ending Funding to Certain United Nations Organizations and Reviewing United States Support to All International Organizations

We submit this statement in response to Executive Order 14199, to express our support for continued engagement by the United States in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The underlying purpose of CITES is to support sustainable trade, and under the terms of the treaty, trade encompasses both commercial transactions and any travel across borders with covered materials. A great many musicians perform with legally crafted and legally purchased musical instruments that contain elephant ivory, tortoise shell, reptile skin, tree species, and other materials that have become subject to CITES controls. Very small amounts of ivory and tortoiseshell may be found in an array of older stringed, wind, percussion, and brass instruments. Reptile skin may be found on the grips of bows for stringed instruments, and a variety of woods are used in the construction of stringed, percussion, and woodwind instruments. Musicians and instrument makers routinely engage in international commerce with these instruments, and musicians travel with them for global performances.

Among commodities covered under CITES, musical instruments uniquely remain in use over very many years and cross borders frequently. U.S. participation in CITES safeguards essential trade with other CITES nations and protects American musical instrument manufacturers' access to essential materials. U.S.-based companies represent 44% of global music product sales and iconic U.S. brands represent a vital part of America's cultural heritage and manufacturing leadership. CITES-listed materials used to manufacture musical instruments in the U.S. not only meet the rigorous demands of professional musicians but also enhance acoustic performance that can significantly influence resonance and tonal clarity.

If the U.S. were to withdraw from CITES, international movement of musical instruments would still require CITES compliance when crossing borders to the [184 Parties to the treaty](#), while the U.S. would lose the opportunity to influence CITES policies. An undue burden would be applied to U.S. musicians and other travelers that navigate permit procedures as CITES-equivalent documents would be required. Some countries of destination may be impossible to access due to their own domestic restrictions that limit engagement with non-Party countries.

The United States has been a leading voice at the CITES table for commonsense solutions that improve opportunities for musicians to engage in travel and trade with their professional and highly valuable tools.

- The U.S. initiated the CITES Musical Instrument Certificate created in 2013 under [CITES Resolution Conf. 16.8 on Frequent Cross-Border Noncommercial Movements of Musical Instruments](#) to establish streamlined procedures specific to musical instruments.
- The U.S. is a leading voice in policy discussions related to those procedures, and participates in an ongoing CITES working group as an outcome of the 2022 intervention

by the U.S. at the 19th Conference of the Parties (CoP19), [CoP19-Inf-18-R1 Consideration of Additional Efficiencies in the Movement of Musical Instruments for Non-Commercial Purposes](#), to pursue urgently-needed improvements to the CITES musical instrument permit process.

- The U.S. was an essential partner in crafting a [commonsense exemption from CITES permit requirements](#) for musical instruments made from rosewood in 2019 at the 18th Conference of the Parties (CoP18). This solution lessened the extreme permit burden and expense that U.S. authorities and music stakeholders alike had been shouldering.
- The U.S. Fish and Wildlife Service has been a critical partner in informing music stakeholders of CITES compliance procedures that will facilitate essential global travel with musical instruments. This transparency and education has prevented musicians from risking confiscation of the tools of their trade while engaging in routine travel and commerce.
- The 20th Conference of the Parties (CoP20) this November 2025 includes agenda items of great significance to the music sector, including [a proposal submitted by Brazil regarding *Paubrasilia echinata*](#), that would subject nearly every professional bow for stringed instruments in use by country, bluegrass, folk, and classical musicians to CITES controls at every border crossing. These talks will also advance next steps in improving the CITES Musical Instrument Certificate, annotations that govern a wide array of species, and other policy matters that will impact travel and trade.

The U.S. simply cannot afford to step away from critical international policy discussions that will impact U.S. stakeholders, their valuable possessions, and their livelihoods.

We urge the Administration to maintain robust U.S. engagement in CITES, and we welcome an opportunity to meet with senior Interior and State Department leaders to discuss opportunities for the U.S. to engage in the 20th Conference of the Parties. We encourage a review of the attached [comments filed on May 21, 2024](#) and [comments filed on January 27, 2025](#) by music stakeholders in response to the first two public comment periods, and we look forward to participating in the next series of public engagement regarding the full CoP20 agenda.

We appreciate the opportunity to partner with the U.S. government to advance policy solutions that will ensure that international cultural activity and legal trade is supported while protections for endangered species are advanced.

Sincerely,

**American Federation of Musicians of the
United States and Canada
American Federation of Violin and Bow
Makers
Carnegie Hall
Chamber Music America
International Alliance of Violin and Bow
Makers for Endangered Species**

**International Pernambuco Conservation
Initiative-USA
International Society of Violin and Bow
Makers
League of American Orchestras
National Association of Music Merchants
(NAMM)
Recording Academy**

CC:

Justin "J" Shirley, Principal Deputy Director, U.S. Fish and Wildlife Service

John Thompson, Deputy Assistant Secretary for Environment, Bureau of Oceans and International Environmental and Scientific, U.S. Department of State