

CITES Hub Model for Permit Data Exchange Project

Response from Musical Instrument Sector Observers

CITES Electronic Systems and IT Working Group

On behalf of the three organizations participating in the CITES Electronic Systems and IT Working group - Chambre Syndicale de la Facture Instrumentale (CSFI), the Confédération Européenne des Industries Musicales (European Soundmakers), and the League of American Orchestras – we appreciate the opportunity to provide input on the set of questions covering governance, legal considerations, technical requirements, operational challenges, and long-term opportunities.

In our shared approach to comments, we used the following framework for the response from musical instrument sector observers: response

1 – Trade in wood intended for musical instrument manufacture

The main issues concern electronic permit exchange and validation, traceability, HS codes and risk-based controls. These developments may affect import, export and re-export procedures for CITES-listed wood, as well as its management during processing.

2 – Trade in musical instruments

Electronic systems may facilitate verification of CITES documents and recognition of the legality of instruments. Work on traceability and risk-based controls could also affect finished instruments, although the current mandate does not provide for a specific system of individual identification or traceability of instruments.

3 – Non-commercial movements of instruments by musicians and orchestras

This area is covered by a specific provision in the Working Group mandate, which expressly calls for consideration of how CITES electronic permitting systems can simplify procedures for non-commercial movements of musical instruments. The objective is therefore to achieve genuine simplification of formalities encountered during international travel, beyond merely digitising existing procedures.

1. Governance and ownership

Question	Musical instrument sector observer response
How should observers and industry groups be engaged in governance of a CITES digital permit system or Global Hub?	It would be useful to provide structured consultation of observers and user sectors during system design, pilot phases and major subsequent developments. For the musical instrument sector, this consultation should take account separately of the constraints relating to trade in wood, trade in finished instruments and non-commercial movements of instruments. For the third activity, the CITES work on the “Rapid Movement of Musical Instruments” shows the value of directly involving musicians, orchestras and professional organisations in testing digital solutions, in particular for Musical Instrument Certificates (MICs), Traveling Exhibition Certificates (TECs) and border formalities. Governance and decision-making would naturally remain the responsibility of the Parties and the competent CITES bodies.
What level of transparency is expected regarding system changes, outages, and data handling?	A high level of transparency would be desirable regarding significant system changes, outages, recovery times, and rules governing data processing and retention. Users should be able to anticipate possible consequences for a shipment of wood or instruments or for an international tour. For non-commercial movements, transparency should also make it possible to know which Parties issue and accept MICs, which national procedures apply, and how electronic documents are to be validated at borders. It is crucial to note that border crossing for international tours are highly dependent on predictable procedures, as a time lag at a border can jeopardize public performances.
What accountability mechanisms would be needed if digital permits fail, delay shipments, or cause compliance issues?	In the event of failure or unavailability of the digital system, clearly defined fallback procedures should enable authorities and users to continue providing the elements necessary for implementation of CITES. These procedures could allow the submission, in an acceptable alternative form, of the documents and evidence required to obtain a permit or certificate, such as evidence of pre-Convention status or legal acquisition. Where a non-commercial movement benefits from an exemption, it should remain possible to provide evidence establishing the non-commercial nature of the movement and compliance with the conditions of the exemption. For MICs or TECs, IT unavailability should not, by itself, prevent inspection and credentialling of a legally documented instrument or jeopardise a tour. Business-continuity arrangements should therefore be defined and recognised in advance by participating Parties.
What governance model would observers consider legitimate and trusted?	Governance under the authority of the Parties and the CITES Secretariat, with clearly defined responsibilities, transparent rules for data management and access, and regular consultation of users, could provide a basis for trust. For a system intended to enable international exchange of permit data, it is essential to have a common governance framework and operating rules applied consistently by the Secretariat and participating Parties, particularly regarding recognition of data, responsibilities, security, incident management and continuity of service.

2. Legal and policy

Question	Musical instrument sector observer response
Do your members face legal or regulatory barriers to using digital CITES permits (e.g., requirements for paper originals)?	To our knowledge, instrument makers, traders and musicians do not currently use fully digital CITES permits or certificates for their international movements. Global CITES management authorities will be better-positioned to report legal or regulatory barriers arising directly from their use. However, it appears essential that a future electronic permitting system should result in a fully digital procedure for the use and verification of the permit or certificate during cross-border movement. If users were systematically required to carry a paper equivalent of the electronic permit, or the same supporting documents in paper form, much of the expected benefit of digitalisation would be lost. A distinction should be made between supporting documents required for the application, issuance or renewal of a permit or certificate - for example, where applicable, evidence of legal acquisition or NDF or pre-Convention status - and the permit or certificate itself and the documents required to accompany the specimen during cross-border movement. The former may remain necessary for the Management Authority to process an application or renewal. However, once an electronic permit or certificate has been issued and its authenticity can be verified by the competent authorities, those supporting documents should not have to accompany the specimen systematically in paper form, unless a separate legal requirement applies. A key criterion for the success of an eCITES system should therefore be recognition of the electronic permit or certificate by Management Authorities, customs and other competent authorities of the Parties concerned, without a parallel systematic requirement to present a paper original.
Are digital signatures and Public Key Infrastructure (PKI) based authentication recognised in the jurisdictions your members operate in?	At this stage, we are not able to confirm whether digital signatures and Public Key Infrastructure (PKI)-based authentication, when applied to electronic CITES permits and certificates, are legally and operationally recognised in all relevant jurisdictions. Beyond general legal recognition of electronic signatures, the essential issue for our sector is to ensure that an authenticated electronic CITES permit or certificate is effectively recognised and verifiable by CITES Management Authorities, customs and other competent authorities of all Parties participating in the system. This recognition should be secured before implementation so that users are not required to retain a parallel

	paper permit or certificate because the electronic document is not recognised in one of the countries involved in the movement.
What policy changes would be required to enable fully digital cross border permit exchange?	The legal and administrative barriers in the different jurisdictions should first be identified precisely. The sector could support the principle of recognising electronic data and documents where their authenticity can be verified, while providing appropriate fallback procedures. For non-commercial movements of instruments, the work on the “Rapid Movement of Musical Instruments” shows that effective digitalisation also requires more consistent implementation of existing procedures. SC78 notably identified inconsistent implementation among Parties. The future framework should therefore enable cross-border recognition and verification of electronic MICs and TECs without recreating, in digital form, the same divergences in national practice.
Are there concerns about data sovereignty, confidentiality, or commercial sensitivity?	Yes. Data sovereignty, confidentiality and protection of commercially sensitive information are important issues for our sector and should be addressed from the design stage of any electronic CITES data-exchange system. It should first be clearly defined what data would be exchanged, between which authorities, where it would be stored, for how long, who could access it and for what purposes. A particularly important distinction should be made between data necessary to verify the authenticity and validity of an electronic permit or certificate and the information and supporting documents supplied to the Management Authority for issuance or renewal. Those supporting documents may contain information on legal acquisition, NDF or pre-Convention status, as well as commercial information concerning suppliers, customers, sources of supply, quantities or transactions. The fact that this information is required by the Management Authority processing an application does not necessarily mean that it should be accessible to all authorities participating in the international exchange system. For manufacturers and traders, aggregated permit data could also reveal commercially sensitive information on business relationships, activity volumes and supply chains or sources. Safeguards should prevent access to or reuse of such information beyond what is necessary for implementation of CITES. For non-commercial movements of finished musical instruments, comparable attention should be paid to personal data and information concerning the travel of musicians and orchestras. We therefore suggest that the future system be based on data minimisation, use limited to defined CITES

	purposes, access based on the needs and responsibilities of the different authorities, protection of commercially sensitive information and personal data, and transparent rules on data retention and sharing. The objective should be to provide competent authorities with the information necessary to issue or verify CITES documents without systematically making the entire application file and supporting documentation available or transferable.
--	--

3. Technical architecture and interoperability

Question	Musical instrument sector observer response
What systems do your members currently use to manage CITES permits (paper, national eCITES, customs portals, Single Windows)?	1 - Trade in wood intended for musical instrument manufacture: Manufacturers and traders may face several successive procedures: an application for an export or re-export permit, an import permit where required, followed by customs formalities. The systems used and their level of digitalisation may differ among Parties. In the European Union, the EU Wildlife Trade Regulations must also be taken into account, as they implement CITES while including stricter domestic measures and specific requirements. In particular, importing specimens of species listed in EU Annex B - which generally includes CITES Appendix II species - requires an EU import permit. CITES and customs procedures may also be handled through separate systems. eCITES should enable interoperability between national or regional systems, exporting and importing authorities and, where relevant, customs systems, while accommodating stricter regulatory requirements such as those of the EU. Duplicate data entry and repeated submission of the same information or supporting documents should be avoided. 2 - Trade in musical instruments: Requirements vary according to the species or specimens contained in the instrument, their CITES status, applicable annotations or exemptions, and the rules of the jurisdiction concerned. In the EU, the Wildlife Trade Regulations may result in requirements that differ from or are stricter than those arising from the Convention alone. Where a CITES document is required, the application, issuance and customs formalities may be processed in different systems. The future system should be able to accommodate these regulatory differences without requiring users to operate several parallel digital procedures. For finished instruments, the objective should in particular be to facilitate verification of legality and validity of existing documents, without automatically creating new traceability or individual-identification requirements that do not arise from the current mandate. 3 - Non-commercial movements of instruments by musicians and orchestras: The same instrument may cross several borders during a tour. Depending on the circumstances and Parties involved, these movements

	may in particular use a Musical Instrument Certificate (MIC), a Travelling Exhibition Certificate (TEC), or an applicable exemption. The MIC is especially important for musicians: it consolidates the CITES specimens contained in an instrument in a single certificate and can be used for up to three years for multiple cross-border movements during its period of validity. Practical difficulties remain, however, including differing recognition among Parties, the need for endorsement at designated CITES ports when crossing borders, the sometimes limited number of such ports, and the operating hours of competent authorities. In the EU, for instance, not all Member States will issue TECs, illustrating problems arising from differences in administrative practice among Member States. It is essential to note that a single musical instrument may not appear on more than one CITES permit at a time. TECs must be used for instruments in an ensemble traveling on tour. In those cases, an MIC for an instrument that has an active MIC must be invalidated before the instrument may be added to a TEC. It is also critical to note that the composition of instruments used on tours will change with each tour. This means that a TEC may only be used for one tour. In order for instruments included on a TEC to be eligible for a subsequent MIC or TEC, the active TEC must first be invalidated. MICs and TECs currently must be issued in hard copy for wet stamping and credentialed at every port. This means that the fully executed permit must be delivered to the issuing management authority for invalidating. It is also extremely difficult to receive the required original copy of an issued TEC. For instance, an EU-issued TEC for a US-based orchestra may not be couriered to the orchestra by the management authority before departure from the US. The US applicant must seek a broker located in the EU to receive the permit and courier the permit to the recipient. eCITES should enable consistent recognition and rapid verification of electronic MICs and TECs by the different authorities encountered during a tour. It could also facilitate issuance, use, invalidation and renewal and allow alternatives to certain physical border formalities to be considered. It should also make information on the procedures applicable in each Party readily accessible. The objective must be genuine simplification of non-commercial movements, in accordance with the Working Group mandate, rather than merely reproducing existing paper procedures in digital form.
What level of integration would be expected between a CITES digital system and national border systems?	The level of integration should primarily be determined by the functions necessary to verify and process the CITES document at the border. Competent authorities should be able to verify rapidly the authenticity, validity and relevant information of an electronic permit or certificate without requiring the same document in paper form. Where information is common to CITES and customs formalities, automated exchange could avoid duplicate entry and reduce errors.

	For non-commercial movements, integration should reflect the realities of touring: successive crossings through several countries, designated CITES ports and fixed schedules. CoP20 Inf. 34 specifically identifies physical validation of MICs at each border, the limited number of ports and officers' operating hours as difficulties. Electronic verification, validation and credentialing recognised between authorities could therefore provide a particularly tangible simplification, provided personal data are protected and access is limited to information necessary for the control.
What cybersecurity assurances would observers need to trust a global digital permit exchange?	1 - Trade in wood intended for musical instrument manufacture: ensure the integrity and availability of permits while protecting commercially sensitive data, particularly information concerning suppliers, customers and supply chains. A system failure should not result in unjustified blocking of a shipment. 2 - Trade in finished musical instruments: ensure that the authenticity, validity and history of CITES documents can be verified reliably, while protecting information concerning owners, transactions and instruments. 3 - Non-commercial movements by musicians and orchestras: protect personal data and travel information, with availability suited to touring constraints. A system outage or cyberattack should not prevent verification of a valid MIC or TEC or, by itself, lead to an instrument being blocked or a tour being unnecessarily disrupted. Cross-cutting principle: for all three activities, the system should ensure document authenticity and integrity, data protection, access limited to necessary information and continuity of procedures during outages.

4. Financial and sustainability

Question	Musical instrument sector observer response
What costs do your members currently incur due to paper-based permits (delays, courier fees, lost documents, reissues)?	The cost of issuing a paper CITES permit or certificate varies according to the country and applicable national procedures. In addition to this direct cost, users incur administrative and logistical costs related to processing and circulation of paper documents. Permit and certificate issuance times must also be taken into account; in some countries they can be very long. Although these delays do not necessarily result from the paper format itself, they represent a significant indirect cost and can have substantial economic consequences. 1 - Trade in wood intended for musical instrument manufacture: secure courier costs for original permits; costs associated with corrections, loss or reissuance; and goods being held pending documents. Long issuance times, in some cases several months, can seriously disrupt supply and production planning. This is particularly significant in instrument making, where some woods require drying, stabilisation or

	preparation periods before they can be worked. A delay of several months in importing wood can therefore shift the entire planned cycle of material preparation and instrument manufacture, affecting production and delivery schedules, inventories and the company's wider economic activity. 2 - International trade in finished musical instruments: document transmission costs and costs of corrections or reissuance. Use of specialised carriers, freight forwarders or service providers to handle CITES and customs formalities can entail very high, sometimes prohibitive costs, particularly for craftspeople, small businesses or instruments of relatively modest value. Issuance delays may also postpone a sale or delivery and generate additional transport, storage or rescheduling costs. 3 - Non-commercial movements by musicians and orchestras: costs of obtaining or renewing MICs/TECs, sending originals, administrative time and additional expenditure to reach a designated CITES port. CoP20 Inf. 34 notes that the limited number of authorised ports and restricted officers' hours can make travel less efficient and more costly. Rerouting flight/train/cargo carrier plans to accommodate the limited port locations and hours for physical credentialing of documents poses extreme financial implications for touring musicians. Delays are particularly critical for concerts, festivals, competitions or tours with fixed dates. Recent TEC difficulties, particularly in the EU, have also required the additional steps named above. Digitalisation will not necessarily eliminate delays arising from administrative assessment of applications. It should, however, reduce costs and delays associated with transmitting, transporting, correcting and verifying paper documents and, where possible, the share of intermediary costs directly attributable to their physical handling.
Would your members support a cost-recovery model for digital permit exchange (subscription, transaction fees, voluntary contributions)?	At this stage, it appears premature to support a particular cost-recovery model. It would first be necessary to clarify which costs and services would be financed, who would bear them and what exactly would constitute a "transaction". Fees already charged by some Parties for issuing permits should be distinguished from any additional fees for electronic exchange. For all three activities, any model should be assessed against the savings actually delivered. Transaction fees could accumulate for operators handling many permits; for instruments, they should not simply be added to existing costs; and for a tour involving several borders, the same MIC or TEC should not generate new fees at each data exchange, validation or crossing. The principle should be that digitalisation reduces, rather than increases, the overall cost of CITES procedures.
What financial barriers exist for smaller operators or organisations?	Financial barriers do not arise only from the cost of CITES permits, which varies among countries. They form part of a significant accumulation of compliance costs linked to national, regional and international

	regulations applying to wood, other materials, instruments and accessories. In the European Union, the sector is notably affected by the EUTR, EUDR, REACH, the PPWR, EPR schemes and various national wood regulations. CITES obligations are added to these requirements. This is particularly significant for our sector given the increase, over successive CoPs, in CITES listings and revisions concerning species used in musical instrument manufacture. It is important, however, to stress that the increase in such listings does not mean that the musical instrument sector is responsible for the pressures threatening these species. Instrument making generally uses very small volumes compared with other sectors, and some tropical species used for instruments are predominantly exploited for other uses, notably furniture and flooring. 1. Trade in wood intended for musical instrument manufacture: small operators bear permit costs, administrative time, possible intermediary costs and consequences of delays even where the volumes of wood used are very small. French data for 2017 illustrate this imbalance: the instrument sector represented 6% of the volume of rosewoods imported but 91% of CITES permits, compared with 94% of volume and 9% of permits for furniture. eCITES costs calculated per permit or transaction could therefore weigh disproportionately on low-volume operators. 2. International trade in musical instruments: craftspeople and small businesses face administrative costs together with international transport, customs formalities and, where necessary, freight forwarders or specialist service providers, whose costs may become prohibitive relative to the transaction value. Additional eCITES fees could further reduce the economic viability of some international sales. 3. Non-commercial movements by musicians and orchestras: individual musicians, small groups and ensembles often have limited administrative resources. In addition to certificate fees, there is time spent on procedures, possible travel to designated CITES ports and the financial risk of delay or inability to travel with the appropriate instrument. CoP20 Inf. 34 reports that the time and cost associated with the MIC may lead some musicians or ensembles not to travel with their best instruments. The principal risk is therefore that eCITES could add new costs for users already bearing a significant regulatory burden. The future system should instead remain financially accessible to small operators and organisations and seek, as far as possible, to reduce their administrative and documentary costs.
How should costs be shared between Parties, industry, and the Secretariat?	One principle appears essential: when public authorities establish regulatory obligations, they should also ensure that regulated persons and businesses have access to effective, proportionate and affordable

	means of complying without jeopardising their economic viability. Modernisation of CITES procedures should therefore not transfer to economic operators the main cost of building and operating infrastructure necessary to implement the regulatory framework. Funding of the central infrastructure, its operation and the interoperability required for permit exchange should primarily be borne by the Parties and the Secretariat, according to their respective responsibilities. This is particularly important because our sector already bears a significant accumulation of regulatory costs. Additional eCITES costs should not jeopardise the viability of businesses and jobs, weaken the craft and heritage skills associated with the manufacture, maintenance and restoration of musical instruments, or more broadly affect musical life, artistic practice and the international movement of musicians, orchestras and their instruments.
--	---

5. Operational

Question	Musical instrument sector observer response
What operational challenges do your members face with current CITES permit processes (delays, errors, inconsistent formats, verification issues)?	The main difficulties concern issuance times, differences in procedures between countries, dependence on paper originals, errors or corrections, and coordination where several authorities are involved. 1 - Trade in wood intended for musical instrument manufacture: sometimes very long delays complicate supply planning and can disrupt production cycles; corrections and circulation of originals complicate imports, exports and re-exports. 2 - Trade in finished musical instruments: the interaction between CITES, customs and logistics formalities varies by jurisdiction; circulation of originals between manufacturer, seller, buyer, representative, freight forwarder or carrier creates delays and risks of loss. 3 - Non-commercial movements by musicians and orchestras: Please see the answer to Question 3.1 for additional details. SC78 identified inconsistent implementation of simplified procedures among Parties as the main obstacle. CoP20 Inf. 34 details difficulties in determining which Parties recognise the MIC and TEC, validation of the certificate at each designated port, the limited number of ports and restricted officers' hours. Some Parties will accept an MIC or TEC issued beyond their borders, while others require an additional MIC or TEC issued by the country of import. In these cases, for instance, a TEC will not appear to be fully validated on return to the first country of re-export, requiring special consideration of the multiple TECs issued for the shipment, and delaying full clearance of the instruments that are returning to their home country.

	eCITES should therefore not only dematerialise documents but also help make procedures for non-commercial movements more consistent, verifiable and rapid.
What onboarding support would be needed to transition to digital permits (training, helpdesk, testing environment)?	The transition should be prepared in advance through simple procedures, clear information, accessible training, responsive technical support and a testing environment. It should avoid maintaining parallel paper and digital systems for an extended period and should provide fallback procedures known in advance. For non-commercial movements by musicians and orchestras, onboarding should incorporate needs already identified in the “Rapid Movement” work: clear information on Parties issuing and accepting MICs, rules applicable to MICs, TECs and exemptions, and border-validation arrangements. SC78 supported a dedicated CITES webpage, a registry of arrangements by Party and simplified “one-page” guides. These resources should be linked to the future digital system. Training and testing should cover not only users but also Management Authorities, customs and officers responsible for controls.
How should digital permits be validated at borders to avoid delays?	Validation should be simple, rapid, reliable and consistently recognised by participating Parties. Officers should be able to verify directly the authenticity, validity and necessary information of the electronic document without re-entry or systematic presentation of a parallel paper original. For non-commercial movements, the issue is particularly concrete: the MIC and the TEC are consolidated permits, but they currently have to be endorsed by competent authorities at designated ports when borders are crossed. CoP20 Inf. 34 identifies this requirement, together with the limited number of ports and their operating hours, as sources of difficulty. An electronic system should therefore allow alternatives to physical endorsement to be considered and facilitate real-time information exchange between Management Authorities and enforcement authorities. It could also simplify issuance, invalidation and renewal of MICs. The objective should not be to reproduce electronically a succession of physical stamps. A common fallback procedure should nevertheless allow a lawful movement to continue in the event of technical unavailability. As CITES considers opportunities to streamline credentialling procedures, it is helpful to take into account that shipments using a TEC are also accompanied by an ATA carnet – an internationally accepted form of evidence that the material in the shipment will return to its home country. Efficiencies for such shipments should be considered.

What service-level expectations exist (uptime, response times, versioning stability)?	A global CITES permit-exchange system should provide a high level of availability, speed and stability where its operation determines the issuance, exchange or verification of documents required for international movements. For commercial movements, response times must be compatible with logistics operations and avoid goods being held unnecessarily. For musicians and orchestras, the requirement is even more immediate: border crossings are linked to travel schedules and fixed concert or tour dates. Verification of a MIC or TEC should therefore be possible immediately or within a very short time. Version changes should be announced and tested in advance, without rendering already issued certificates unusable or compromising interoperability. Failure of the central system, a national system or a border connection should not, by itself, place a user in non-compliance or block a lawful movement.
---	--

6. Comparative model insights (Hub vs P2P vs Regional)

Question	Musical instrument sector observer response - FOR DISCUSSION/VALIDATION
Would your members prefer a single Global Hub, direct Point-to-Point exchange, or regional hubs?	It appears premature to favour one model before the feasibility assessment. For our sector, the main criterion is not the architecture itself but the outcome: interoperability among Parties, border recognition, reliability, simplicity and avoidance of duplicate procedures. A Global Hub could be useful if it enables different national systems to exchange data without replacing them. For tours, it should in particular enable the same MIC or TEC to be verified consistently in several successive countries.
What risks do observers see in a centralised model (outages, governance, data concentration)?	The main risks are a single point of failure, concentration of sensitive data, excessive dependence on central infrastructure, and issues of governance, access and data sovereignty. These risks should be weighed against possible benefits: common standards, better visibility of documents and more consistent cross-border verification. A centralised architecture should not mean that all supporting documents or commercial and personal data are stored in one place.
Do you perceive any risks in Point-to-Point models (e.g., inconsistency, bilateral complexity, uneven adoption)?	Yes. A P2P model may multiply bilateral connections, versions, tests and technical arrangements between Parties. Uneven adoption could recreate the current fragmentation in digital form. This is particularly relevant for a business trading with many countries and for a tour crossing several borders in succession. Common CITES standards and a high level of interoperability among participating systems would therefore be essential to avoid simply reproducing existing procedural fragmentation digitally.
Could a hybrid model be acceptable?	Yes, potentially. It could preserve effective national or regional systems while using a common mechanism for cross-border exchange and verification. Its value would nevertheless depend on common standards, clear governance and a consistent user experience. It should not create several competing digital routes that users themselves must understand or manage.

7. Decision making (CITES Process)

Question	Musical instrument sector observer response
What evidence would observers need to support adoption of a digital permit exchange mechanism?	Real-world pilots should measure reliability, issuance and verification times, errors, border acceptance, service continuity, costs and data protection. Pilots should include Parties with different levels of capacity and all three activities in our sector. For non-commercial movements, an international tour scenario involving several borders, MICs/TECs and time constraints would be particularly useful to determine whether digitalisation genuinely simplifies the procedure.
What criteria would observers use to judge feasibility (cost, reliability, border acceptance, legal certainty)?	Key criteria would include legal certainty, recognition by authorities of participating Parties, interoperability, reliability, cybersecurity, continuity of service, data protection, total cost and ease of use. The actual reduction in delays, duplicate data entry and paper formalities should also be measured. Feasibility should be assessed separately for wood flows, trade in finished instruments and non-commercial movements.
Would observers support piloting before formal adoption?	Yes, in principle, before any general roll-out. A pilot should involve Management Authorities, customs and users, with transparent assessment criteria and a panel including large and small businesses, craftspeople, musicians and orchestras. It should test not only technical data exchange but the complete real-world process, from application through border verification, including fallback procedures.

8. Political & Stakeholder

Question	Musical instrument sector observer response
How do observers with strong national systems view a Global Hub?	A Global Hub should add value without requiring replacement of effective national systems. Its role could be to enable interoperability and cross-border recognition among existing systems. For users, it is important to avoid a Global Hub becoming an additional administrative layer or requiring re-entry of data already supplied to the national authority.
What incentives would encourage voluntary participation?	The most convincing incentives would be demonstrable operational benefits: reduced duplicate data entry and delays, faster border verification, less dependence on paper originals, compatibility with existing systems, controlled costs and technical support. For non-commercial movements, the possibility of simplifying the use, invalidation, renewal and border validation of MICs/TECs would provide a concrete benefit.

9. Strategic and long term

Question	Musical instrument sector observer response
How could digital permits support future innovations (traceability, improved compliance, analytics, risk management)?	Digital data could improve permit verification, anomaly detection, analysis of trade flows and risk-based controls. For MICs/TECs, they could facilitate issuance, invalidation, renewal and verification between authorities and potentially reduce the need for physical endorsements.

	For traceability, digital permits could also establish a more reliable link between a specimen and the corresponding CITES document where an identification or marking system has previously been adopted under the CITES framework applicable to the species concerned. For example, if the specific work on <i>Paubrasilia echinata</i> resulted in an individual marking system for bows, the unique identification number marked on the bow could also be recorded in the electronic permit or certificate data, enabling authorities to verify directly the link between the specimen and its document. It is nevertheless important to distinguish clearly between digital exchange of permit data and a specimen traceability system. Digitalisation of a permit should not, in itself, create new marking, identification or traceability obligations for wood, components, bows or finished instruments. Where an identification requirement has been decided separately, eCITES should, however, be designed to integrate and use that information.
Could a Global Hub support broader digital transformation of CITES?	Potentially, but this development should be progressive and based on identified CITES needs. The priority should be to demonstrate that electronic permit exchange and verification operate reliably, are legally recognised and interoperable. Once that foundation is established, the platform could facilitate other functions, including information exchange between authorities, risk-based controls or access to up-to-date information on Parties' procedures.
What long-term value do observers see in a fully digital CITES ecosystem?	Long-term value would lie in more reliable information, faster verification between authorities, fewer errors and redundant procedures, and better targeted controls. For our sector, however, success should not be measured by the degree of digitalisation alone, but by the actual reduction in administrative burden. For non-commercial movements, the "Rapid Movement" work provides a concrete objective: enabling musicians and orchestras to know which rules apply, have their documents recognised more easily and cross borders without CITES formalities unnecessarily disrupting tours, while maintaining effective controls.

10. Cross agency alignment

Question	Musical instrument sector observer response
Where do your members experience misalignment or conflicting requirements between CITES permit processes and other agencies (e.g., customs, trade, environment, border authorities)?	Difficulties arise where CITES, customs, trade, environmental and border-control requirements are insufficiently coordinated, or where several authorities separately request similar information. For wood and commercially traded instruments, this can lead to duplicate data entry, different documents or classifications, and validation sequences that are difficult to coordinate. For non-commercial movements of finished musical instruments, the recent difficulties with TECs provide a particularly concrete example. In the EU, where a tour involves several Member States, differences in administrative practice can create uncertainty, notably as to the Member

	State and Management Authority competent to process the TEC application, even though the objective is to allow the temporary movement of the same instruments through several countries. These difficulties require additional exchanges and coordination between Management Authorities and complicate preparation of an international tour. More generally, the CITES work on the Rapid Movement of Musical Instruments also shows that difficulties can result from the combination of the certificate itself, its recognition by the Party concerned, border-validation requirements, designated CITES ports and availability of competent authorities. Development of eCITES should therefore be an opportunity to improve not only technical interoperability between systems but also consistency and coordination of procedures between authorities. Digitalisation should not reproduce existing administrative divergences in electronic form.
What interoperability challenges arise when connecting CITES processes with other digital systems your members rely on (Customs, Single Windows, trade portals, environmental registries)?	At this stage, we do not have sufficient feedback to identify concrete interoperability difficulties between CITES processes and other digital systems such as customs systems, Single Windows, trade portals or environmental registries. We therefore prefer not to comment on the existence or nature of such difficulties. In developing eCITES, however, it appears important that interoperability with other systems should not multiply data entry, procedures or information requested from users, nor extend access to data that are not necessary for implementation of CITES. For a MIC or TEC, the system should in particular enable successive authorities to verify the same certificate and its status without requiring the musician or orchestra to recreate the information in several national portals.
Are there emerging cross-agency issues or trends your members are seeing that CITES should consider in future digital system design?	The proliferation of digital systems managed by different administrations may paradoxically increase the burden if each system requires its own data entry, identifiers or supporting documents. eCITES design should therefore favour common standards, controlled reuse of data and close coordination with customs and border systems. The rapid movement of instruments also demonstrates the importance of up-to-date administrative information: Parties accepting MICs and TECs, applicable procedures, competent ports and validation arrangements. SC78 specifically supported a dedicated CITES webpage, a

	registry by Party and simplified guides. As far as possible, this information should be linked to the future digital environment.
--	---

References taken into account for Activity 3: SC78 Doc. 56, “Rapid Movement of Wildlife Diagnostic Samples and of Musical Instruments”; CoP20 Inf. 34, “CITES Musical Instrument Certificate”.

Proposed general conclusion

The musical instrument sector sees significant potential in the digitalisation of CITES procedures, provided that it leads to genuine simplification, better interoperability and greater legal certainty, rather than merely reproducing existing procedures electronically or adding new obligations.

It is important that the feasibility assessment distinguish the implications of the proposed solutions for trade in raw materials, particularly woods used in musical instrument making; international trade in finished instruments; and temporary non-commercial movements of instruments by musicians and orchestras. These activities have different characteristics, risk levels, and administrative needs.

For trade in wood and instruments, potential benefits include improved permit validation, fewer errors and duplicate entries, better recognition of documents between authorities and more effective risk-based controls.

For non-commercial movements of finished musical instruments, digitalisation should be considered not only as a means of dematerialising existing documents but also as an opportunity to simplify the procedures themselves, in accordance with the Working Group’s specific mandate concerning such movements.

Before supporting a particular model - Global Hub, P2P exchange, regional hub, or hybrid model – CITES would benefit from engaging the sector in assessing the results of the feasibility study and, if possible, pilot projects. The main criteria should be international interoperability, border recognition, reliability, continuity of service, data protection, cost and simplicity for users.

Finally, we note that the global musical instrument community is vast, encompassing, for example, manufacturers, musicians, and associations worldwide, both large and small, yet only a tiny fraction is able to participate in the CITES process. Those of us who attend do our best to coordinate and to represent the interests of the larger community but acknowledge that we cannot speak for everyone affected by these decisions.