

## Musical Instruments and the Proposed Listing of *Cedrela spp.* on Appendix II without Annotation

### **Overview:**

Ecuador and Brazil have authored a proposal to be considered at the 18<sup>th</sup> Conference of Parties in Sri Lanka for listing *Cedrela spp.* in Appendix II without an accompanying annotation. Lacking an annotation, such a listing would result in an undue administrative burden, have an immediate and deleterious impact on the musical instruments industry and provide little – if any – additional conservation benefit. We strongly feel that an Appendix II listing must be accompanied by an annotation and an appropriate geographic limitation to focus on the conservation of wild populations in its natural range rather than *Cedrela spp.* cultivated in non-range state plantations.

### **Musical instrument industry commitment to the sustainability of *Cedrela spp.***

The musical instruments industry strongly supports efforts to conserve *Cedrela spp.* as well as further study of its biology, conservation, and trade. We share the authors' goal of reversing the reductions in population and losses of genetic diversity of the genus.

### **The use of *Cedrela oderata* (Spanish Cedar) in the construction of guitars has a long history:**

For centuries *Cedrela*, especially *Cedrela oderata*, has been used in minimal quantities, between 150 – 400 grams per instrument, by guitar builders.

### **The listing of *Cedrela spp.* without an accompanying annotation would result in a heavy administrative burden without a measurable conservation benefit.**

Plant species included in CITES Appendix II are typically accompanied by a # Annotation. The *Cedrela* listing as proposed would result in many tens of thousands of acoustic guitars annually being subject to the CITES permitting regimen with the attendant additional administrative burden. CITES management authorities and enforcement resources would be consumed with issuing CITES permits rather than actively ensuring that international trade in the *Cedrela* genus does not negatively impact its survival in the wild.

### **An annotation for the *Cedrela spp.* Appendix II listing should have the result of exempting finished musical instruments.**

Resolution Conf. 11.21 (Rev. CoP17), provides guidance and principles for annotations, and states that two main principles be followed as standard guidance when drafting annotations for plants: 1) controls should concentrate on those commodities that first appear in international trade as exports from range States; and 2) controls should include only those commodities that dominate the trade and the demand for the wild resource. Musical instruments do not first appear in international trade as exports from range States and are very far from dominating the trade. These principles and facts should guide the selection of the annotation.

For instance, Annotation #5, covering “logs, sawn wood and veneer sheets” and Annotation #6, which applies to “logs, sawn wood, veneer sheets and plywood”, apply to *Swietenia mahagoni* and *Swietenia macrophylla* respectively, which grow naturally in the same ranges as does *Cedrela*. They also properly regulate the wood when it first enters commerce, excluding all other commodities from CITES control.

### **Any *Cedrela* listing should only apply to neo-tropical species.**

While “captive breeding and artificial reproduction” may have had limited success in Central and South America, the cultivation of plantation *Cedrela* has been successfully undertaken in Ghana and the Ivory Coast. Accordingly, as with the *Swietenia* listings, the *Cedrela* listing should be confined to neo-tropical regions.

### **Implementation**

To avoid disruptions to trade and support enforcement protocols for management authorities, importers, and exporters, we encourage the timeframe for implementation to be extended beyond the standard 90-day period.