

Your Voice In Europe: ROADMAP feedback for Action Plan against Wildlife Trafficking

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Related document: Action Plan against Wildlife Trafficking

Feedback:

Introduction

Pearle - Live Performance Europe is the European federation representing through its member associations the interests of about 7,000 organisations. Pearle* covers, inter alia, the interests of orchestras, music ensembles and other music groups. It is also a recognised social partner representing employers within the European sectoral social dialogue committee 'live performance' facilitated by the DG Employment and Social Affairs.*

As part of the “better regulation” approach the European Commission invites stakeholders to give feedback about the roadmap on the EU future Action Plan against wildlife trafficking in which several policy options are discussed.

Pearle welcomes this initiative of the Commission.*

Pearle is aware of the new dimension of wildlife trafficking and fully supports the Commission goals on combating illegal cross-border trade in ivory and other protected species.*

Concerns of the live performance sector

In the context of this discussion the main concern for the live performance sector is related to the travelling and touring with musical instruments containing CITES protected species such as ivory, Brazilian rosewood, lizard skin, tortoiseshell or whalebone. It is absolutely vital for professional musicians, orchestras and smaller sized music ensembles and groups to travel with those instruments to perform abroad. Not being able to tour to third countries such as the US would have major economic implications for the music sector as a whole and reduce substantially the employment deriving from touring.

The touring activities are in no sense related to (illegal) trade with endangered species. Protected species manufactured in musical instruments are taken from legal stocks, certain woods are grown directly on plantations of instrument makers. In the case of ivory it has to be emphasised that it was used in the past from legal, pre-Convention stocks; since more than 30 years it has been replaced by alternative materials such as fossil mammoth ivory – which however cannot be distinguished from protected ivory by the custom services.

In order to make travelling with musical instruments containing protected species easier and reduce administrative burdens for musicians, orchestras, ensembles and other music groups, the European Commission transformed CITES resolution conf. 16.8 into European law. Pearle welcomed the European musical instrument certificate as well as the extension of the travelling exhibition certificate to include touring orchestras amongst the beneficiaries. It has however to be insured that both CITES certificates are rightly implemented in the Member States and that musicians, orchestras, music ensembles and groups do not face administrative difficulties (such as in Hungary), legal impediments (such as in the UK) or high financial costs (such as in Finland) when asking for these certificates.

Feedback on the roadmap

The Commission presents three different policy options which all have the aim of responding in an appropriate and effective way to the dramatic increase of wildlife trafficking.

Pearle agrees with the Commission that wildlife trafficking is a multi-dimensional problem which has to be tackled simultaneously at different levels. Preventing further poaching, minimising the demand side, properly managing wildlife and enforcing rules should be part of an overall strategy to address the issue. As it is pointed out in the roadmap, existing tools, policies and resources are to be used in a more strategic and targeted manner. To take action at international level and build a global partnership against wildlife trafficking is certainly most important in the Commission approach.

In this context, Pearle would like to urge the Commission to continue to engage in a dialogue with US authorities (also in the margins of the TTIP negotiations) and make sure that a European or broader international strategy on wildlife trafficking will not affect the travelling and touring with musical instruments containing CITES protected species.

A new European Action Plan should aim to fewer impediments to travel with musical instruments, as it would harm the live performance and music sector as a whole and hinder the dissemination of culture at large. Concretely, Pearle asks the Commission to provide a clear and practical guidance to Member States, to monitor the implementation of European law and ensure the consistent understanding of EU tools, such as the MIC and TEC within the Union and in third countries, with the aim to avoid unpleasant situations for musicians and orchestras at the customs.