

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

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- Headquarter: select
- Register: 820204218058-24
- Size: select
- Publication: can be published with your personal information

## **Related document: Action Plan against Wildlife Trafficking**

## **Feedback:**

*Feedback on the roadmap on the EU future Action Plan against wildlife trafficking*

### *Introduction*

*The EILA, the International Association of Violin and Bow Makers ([www.eila.org](http://www.eila.org)) represents the interests of 162 members who have their workplaces all over the world. Becoming a member is subject to strict requirements. The EILA would like to underline that musical instruments and the way they are built belong to our European cultural history and identity. The craft of building musical instruments as violins and bows has been expanded far beyond Europe during the last 300 years, creating a worldwide community of musical instrument makers and performers.*

*As part of the “better regulation” approach, the European Commission invites stakeholders to give feedback regarding the roadmap on the EU future Action Plan against wildlife trafficking and discuss several policy options. The EILA welcomes this initiative of the Commission and is aware of the new dimension of wildlife trafficking and fully supports the Commission’s goals in combating illegal cross-border trade in illegally logged wood and other protected species.*

### *Travelling with musical instruments*

*No musical instrument or bow is identical to the other. A musical instrument is the voice of each individual performing musician. In that respect, music is the result of a unique symbiosis between the skills and interpretations of an individual musician and his or her musical instrument.*

*The EILA fully supports Pearle\* Live Performance Europe (the European federation representing through its member associations the interests of about 7,000 organisations) in its concerns and*

*proposed solutions related to travelling and touring with musical instruments containing CITES protected species.*

*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. The EILA welcomed the European Musical Instrument Certificate as well as the extension of the travelling exhibition certificate to include touring orchestras amongst the beneficiaries. A new European Action Plan should aim to lower impediments to travel with musical instruments. Without it there's a risk to the live performance and music sector as a whole and the dissemination of culture at large.*

*In this context, the EILA 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. Not being able makes tours in 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 this activity.*

#### *Doubts about the well-functioning of CITES*

*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. The EILA agrees with the Commission that wildlife trafficking is a multi-dimensional problem which has to be tackled simultaneously at different levels. Therefore, to take action at international level and build a global partnership against wildlife trafficking is certainly most important in the Commission approach.*

*Unfortunately, members of the EILA observe third rate musical instruments containing first rate elements derived from CITES listed species. These musical instruments always originate from certain Asian countries. When compared with the accompanying CITES export certificates from these Asian countries, knowledge and awareness among respective CITES Management Authorities seems limited sometimes. When compared with the price for which these musical instruments are offered for sale, supply of first class CITES listed materials must be abundant. The EILA wonders how these CITES listed materials could have entered these Asian countries in such high quantities, precisely because the CITES Protocol prohibits a laissez-faire policy towards the import of CITES listed species.*

*In its initiative, the Commission indicates that there are differences among EU CITES Management Authorities in their functioning and that the Commission will oblige underperforming EU Member States to improve the quality and functioning of their respective CITES Management Authorities. The EILA would be grateful if such quality checks and subsequent additional binding targets for improvement could be introduced towards not only the European but all individual underperforming CITES Management Authorities.*

*EILA*

*September 2015*



# EILA

Entente  
Internationale des  
Luthiers et  
Archetiers

October 6, 2015

Mr Gaël de Rotalier  
"Global Sustainability, Trade and Multilateral Agreements" Unit  
DG Environment - European Commission  
Av. Beaulieu 9 - office 3/107  
1160 Brussels  
Belgium

**Transparency Register:** 820204218058-24

Dear Mr de Rotalier,

**Re: Feedback on the roadmap on the EU future Action Plan against wildlife trafficking**

The EILA, the International Association of Violin and Bow Makers ([www.eila.org](http://www.eila.org)) represents the interests of 162 members who have their workplaces all over the world. Becoming a member is subject to strict requirements. The EILA would like to underline that musical instruments and the way they are built belong to our European cultural history and identity. The craft of building musical instruments as violins and bows has been expanded far beyond Europe during the last 300 years, creating a worldwide community of musical instrument makers and performers.

As part of the "better regulation" approach, the European Commission invites stakeholders to give feedback regarding the roadmap on the EU future Action Plan against wildlife trafficking and discuss several policy options. The EILA welcomes this initiative of the Commission and is aware of the new dimension of wildlife trafficking and fully supports the Commission's goals in combating illegal cross-border trade in illegally logged wood and other protected species.

**Travelling with musical instruments**

No musical instrument or bow is identical to the other. A musical instrument is the voice of each individual performing musician. In that respect, music is the result of a unique symbiosis between the skills and interpretations of an individual musician and his or her musical instrument.

The EILA fully supports Pearle\* Live Performance Europe (the European federation representing through its member associations the interests of about 7,000 organizations) in its concerns and proposed solutions related to travelling and touring with musical instruments containing CITES protected species.

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. The EILA welcomed the

Entente Internationale des Maîtres Luthiers et Archetiers d'Art – [www.eila.org](http://www.eila.org)  
Jan Strick, président ([peter@beareviolins.com](mailto:peter@beareviolins.com)) - Charles Rufino, secrétaire ([amdg@rufinoviols.com](mailto:amdg@rufinoviols.com))

European Musical Instrument Certificate as well as the extension of the travelling exhibition certificate to include touring orchestras amongst the beneficiaries. A new European Action Plan should aim to lower impediments to travel with musical instruments. Without it there's a risk to the live performance and music sector as a whole and the dissemination of culture at large.

In this context, the EILA 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. Not being able makes tours in 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 this activity.

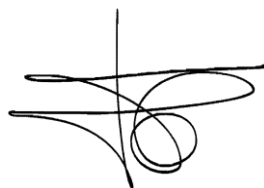
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Sincerely,



Jan Strick  
**President**  
EILA  
c/o 8 Elm Street  
Huntington, NY 11743

/2