



C.F. MARTIN & CO., INC.

March 1, 2017

John E. Scanlon
Secretary-General
CITES Secretariat
International Environment House
11 Chemin des Anémones
CH-1219 Châtelaine, Geneva
Switzerland

Dear Mr. Scanlon,

I am writing in reference to the recent listing of Dalbergia (rosewood) and Guibourtia species on CITES Appendix II, ratified at the 17th Conference of Parties in Johannesburg, South Africa in September/October 2016.

My family founded C.F. Martin & Co. (Martin Guitar) in 1833. We have sustainably made the highest quality acoustic guitars from the finest tone woods in the world for 184 years. The recent listing, aimed at those who carelessly acquire, use and abuse rosewoods, has created a great strain for us, our supplier base and musical instrument makers in general.

The process used to propose and to approve this listing was unusual in several respects. First, only one, very limited, non-detrimental finding was used in the analysis. Second, the annotation included with the listing only gave a finished-goods commercial exemption to Mexico. It did not give consideration to the impact on countries with long histories of safeguarding these species or to organizations like ours with an even longer history of robust conservation practices.

The implementation period was just 90 days. This gave companies like ours and CITES management authorities around the world, very little time to develop and implement policies, procedures and automated systems required to comply with the new regulation.

Although we are generally very supportive of laws and regulations aimed at conservation and sustainability around the world, this one has been extremely burdensome, time consuming, stressful and costly for us to ensure compliance. We have spent countless hours trying to understand the poorly defined and constantly changing requirements generated by this hastily drafted and ill-defined regulation. We have heard the same story from companies and CITES management authorities around the world.

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As a result, we now have millions of dollars of CITES-compliant products on shipments packed and ready to go that are awaiting import and/or export permits. There is no way to know when these permits will become available as individual countries struggle to come up to speed. This is compounded in areas like the European Union (EU) where each country has its own specific requirements.

Additionally, the hastily ratified listing has created huge difficulties for Nicaragua, Costa Rica and Guatemala as they do not have the financial means available to implement compliance requirements. Effectively the speed of implementation has stranded millions of dollars of commerce in these economically strapped countries.

India, which has a long history of preserving and protecting its native East Indian Rosewood, has seen fit to take an official Reservation on this listing. This could effectively prevent them from trading with all other treaty signatories. Again millions of dollars of legal and ethical commerce have been left stranded.

I strongly urge the Secretariat to consider whether this and future listings can be written and implemented in a way that maintains the spirit of conservation but makes it easier, less costly and less onerous to comply.

Sincerely,

C. F. Martin IV
CEO and Chairman of the Board
C. F. Martin & Co., Inc.