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We thank the International Bureau and the Offices of designated members under the Madrid System for allowing us to constructively engage with them to suggest and implement improvements to the Madrid System for all users.

In preparation of the forthcoming Madrid Working Group meeting, CITMA welcomes the opportunity to provide the following comments:

MM/LD/WG/24/2 – Survey on National or Regional Certificates

The survey results speak for themselves. 85.9% of users confirmed that national or regional certificates would be advantageous. Locally issued certificates were the most accepted document across all seven scenarios examined in the survey, ahead of statements of grant of protection and WIPO attestations in every case, including customs proceedings (57.3%), judicial proceedings (54.3%), commercial transactions (52.3%) and
online platform infringement procedures (52.2%).

Meanwhile, 97.2% of Offices issue certificates for domestic registrations but only 22.2% do so for international registrations.

We note the minority view that WIPO documentation should be universally accepted. We understand the aspiration, but the survey confirms it does not reflect current reality. Users need practical solutions and users value and expect a tangible certificate as proof of their rights across all regions covered by the Madrid System.

MM/LD/WG/24/3 – National or Regional Certificates and Relevant Dates

CITMA strongly supports the proposed amendments to Rules 18ter, 31 and 40 and reiterates the position we expressed at the Twenty-Third Session.

The introduction of registration certificates in locally accepted languages for IR designations is a long-overdue step toward ensuring that holders receive the same documentary evidence of protection as direct trademark filings. The built-in flexibility — electronic delivery, phased timing — is sensible and workable.

On relevant dates: we strongly support the requirement to indicate the date on which protection was granted in every case. We support the "where possible" framing for use requirement dates, recognising legal complexity in some jurisdictions — but urge Offices to treat this as a genuine obligation rather than a discretionary one. We reiterate our suggestion that both dates appear prominently in any certificate issued under Rule 18ter(6).

On the transitional period, we support the November 2027 entry into force, noting that Rule 40(9) provides adequate protection for Offices requiring more time to adapt.

MM/LD/WG/24/4 – Further Elaboration of the UK Proposals

CITMA passionately agrees with the proposals advanced by the Delegation of the United Kingdom, with whom we work very closely. We appreciate the Delegation's continued commitment to improving the Madrid System.

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Partial Renewal

We strongly support the practical solution proposed in paragraphs 21 to 26: enabling holders to cancel or limit entire classes in conjunction with a renewal request through the eMadrid platform, without amending the Regulations. This is a pragmatic, user-responsive solution.

As we noted at the Twenty-Third Session, partial renewal will help remove deadwood from the Registers — marks that serve no commercial purpose but continue to block legitimate businesses. It will also deliver real cost savings, particularly for SMEs, potentially freeing up budget for active enforcement.

Centralised Replacement

CITMA strongly supports the introduction of a centralised filing mechanism for replacement requests.

We acknowledge the concerns about centralised examination and consider the proposed hybrid approach — centralised filing by the International Bureau, substantive examination by the relevant national or regional Office — to be both workable and appropriate.

The statistics are stark: in 2025, only 67 international registrations had at least one replacement notification recorded. This underutilisation reflects the procedural burden the current system places on users. A centralised filing mechanism would change this and allow users to easily consolidate their trademark portfolios, reduce internal complexity and save costs.

Subsequent Designation for Pending Applications

We support enabling subsequent designations to be filed during the period between application submission and registration number assignment. This improvement to the Madrid system would better reflect commercial realities where applicants frequently identify new markets during processing periods. As we noted at the Twenty-Third Session, this ‘black-out’ period can place businesses at a real disadvantage when they wish to expand geographic scope within the Paris Convention priority period.

The current restriction appears to reflect administrative IT constraints rather than unavoidable treaty language. The use of the unique reference number already assigned by the International Bureau offers a practical path forward.

Other Matters

We reiterate the comments we made on 11 November 2021 and again ahead of the Twenty-Third Session regarding the introduction of new languages and dependency. These remain important to our members.

Keven Bader
Chief Executive

21st September 2026