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Mr. Peter Shadie
Director, IUCN World Heritage Programme

Request for a Study of the “Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island and Iriomote Island” Natural World Heritage Candidate Site

We represent Japan Environmental Lawyers for Future (JELF), an environmental organization comprising about 450 lawyers throughout Japan. JELF is Japan’s largest environmental organization of lawyers. In partnership with other Japanese environmental organizations and academic societies concerned with the ecosystem, we are proceeding with a lawsuit to protect Katoku Beach, located in Setouchi Town of Kagoshima Prefecture, from large artificial structures. We hereby present the following request to the IUCN.

Japan Environmental Lawyers for Future (JELF) Headquarters
2nd Floor, Akita Gakuenmeieki Building
15-19 Tsubaki-cho, Nakamura-ku, Nagoya, Japan 453-0015
Telephone: 052-459-1753
Email: jelf@green-justice.com
Executive Director: Naoki Ikeda, Lawyer
Coordinator: Haruki Nishioka, Lawyer

I. Summary

Preparations are currently being made for the the construction of a seawall construction on the Katoku Coast¹ in Kagoshima Prefecture. This will result in the loss of the valuable natural resources of this location.

The Katoku Coast is a beautiful natural coast. Little such coast remains in Amami Oshima. The Katoku River empties into the sea at Katoku Beach, and its watershed hosts a diverse ecosystem endemic to the island. Katoku River, Katoku Beach, and their periphery form a continuous region with the proposed “Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island and Iriomote Island” site, which the Japanese government wants inscribed on the World Heritage List. Katoku Coast should be conserved along with the government-proposed site.

As such, we believe that keeping Katoku Coast in its natural state is essential for judging the requirements for “integrity” needed for World Heritage inscription. Additionally, the Katoku Coast and Katoku River watershed still host the unique Amami ecosystem, which should be designated part of the proposed site. It should, therefore, have been designated thus from the outset, but the Japanese government has not even designated it a buffer zone. Arguably, the Japanese government has incorrectly assessed the value of Katoku Beach and also the natural value of Amami Oshima, and therefore the government’s proposal does not fulfill the “protection and management” requirement for World Heritage List inscription.

For this reason, on the occasion of the field study scheduled for this summer, we ask

¹ * The coast at Katoku, in Setouchi Town, Oshima County, Kagoshima Prefecture. Katoku is in the southern part of Amami Oshima.

that the IUCN start by investigating the state of the Katoku Coast. We also strongly request that, because seawall construction on said coast would damage its natural environment and ecosystem, the IUCN issue a recommendation for corrective action to Japan's government so that it would cancel construction.

II. The Katoku River Area and Katoku Beach Have Outstanding Universal Value

The Katoku Beach has a form called a pocket beach. It has a natural sandy beach with no artificial structures, which is unusual even in the Ryukyu Archipelago. Although much of the Amami Oshima coast is made of sand with biological origins, such as that from coral, Katoku Beach's sand is non-coral river sand transported there by the Katoku River, which is a rarity on this island. Beginning in the Ryukyu Kingdom era, people in the Okinawa-Amami region practiced a traditional way of coastal protection which involved conserving sandy beaches by planting kewda (*Pandanus odorifer*) trees. Along with this kewda forest, Katoku Beach in its entirety presents a beautiful landscape. Via the Katoku River, the beach forms a continuum with the upstream forested area, so that a nearly untouched and integrated natural environment and ecosystem stretch from the mountains to the sea via the river.

Owing to a long history of repeated division and isolation as a continental island, the Katoku Coast and Katoku River watershed have rich biodiversity featuring many endemic species, endangered species, and more, thus presenting a natural environment which should be conserved as an integral part of the proposed site. For example, the green sea turtle (*Chelonia mydas*) and loggerhead sea turtle (*Caretta caretta*)*² come ashore here to lay their eggs. In 2002 the leatherback turtle (*Dermochelys coriacea*),*³ an endangered species, was seen coming ashore to lay eggs. In addition, hermit crabs including a terrestrial hermit crab (*Coenobita* sp.) and six endangered shellfish species have been observed here, which indicates that land-sea continuity is maintained. What is more, the Katoku River provides habitat for the endangered Ryukyu ayu (*P. altivelis ryukyuensis*), which has already disappeared from Okinawa and is now found only on Amami Oshima. This fish swims upriver into the mountains to spawn, thereby creating integrated mountain-river continuity.

As this shows, the Katoku Coast is a priceless natural coast which provides habitat for many endangered species; features continuity and integration of mountains, a river, and the sea; and has an untouched sandy beach without a seawall.

Seawall construction is also strongly opposed by prominent Japanese environmental organizations and activists including the Nature Conservation Society of Japan (NACS-J), Japanese Association of Benthology, The Ecological Society of Japan, The Ichthyological Society of Japan, Association for Protection of Marine Communities, Save Amami, Society for Protecting Amami's Forests, Rivers, and Coastal ecosystems, Amami Nature Conservation Association, Miyuki Okuda, Satoko Seino, as well as 28,000 signatories of the change.org.petition pleading for the preservation of the "Jurassic Beach" of Amami and against a humongous seawall.

III. Requirements for World Heritage List Inscription

To be inscribed on the World Heritage List, it is necessary for the World Heritage Committee to find "outstanding universal value." Amami Oshima's geographical, ecological, and cultural value have "outstanding universal value" that is suitable for the

²²*² Endangered A2bd (IUCN), Endangered II (Japan Ministry of Environment).

³³*³ Vulnerable A2b (IUCN).

heritage of humanity. Inscription on the list also necessitates fulfillment of the requirements for the site's "integrity" and a "protection and management mechanism," but destruction of the Katoku Coast would clearly prevent fulfillment of the requirements for integrity and a protection and management mechanism, which are needed for inscription of the proposed site.

III-1. Integrity

"Integrity" means that a site still has all of what shows its outstanding universal value for World Heritage. As stated above, the Katoku Coast and Katoku River watershed form a mountain-river-sea continuum, and even now host a diverse ecosystem which is peculiar to Amami Oshima and which corresponds to these continuously linked geographical characteristics. There are also initiatives at Katoku Beach and the Katoku River watershed to learn from and enjoy Amami Oshima's natural environment. And in relation to the World Heritage purpose of cultural tourism, the Katoku River watershed, the sea, and montane area are an integrated whole that shapes a culture.

A very small part of the Katoku River's upstream portion has been designated a proposed site by the government, but we argue that in order to satisfy the requirement for integrity, the Katoku River area and Katoku Coast must also be placed within the proposed natural heritage site.

That is to say, as long as the Katoku River area and Katoku Beach are not included in the proposed natural heritage site, that site would arguably lack integrity and continuity, and would thus be inadequate in terms of the integrity requirement. Although the government has included a small part of the Katoku River headwater area in its proposed site, it has not proposed Katoku Beach and the entire Katoku River area even as a buffer zone. Further, permitting the construction of a large structure at Katoku Beach would physically damage the heritage and mar the cultural value of Amami Oshima.

III-2. Protection and Management Mechanism

Inscription as World Heritage requires Japan to have a domestic legal system and a protection and management mechanism for implementing the World Heritage Convention. In the protection and management of a World Heritage site, its outstanding universal value and its state of integrity must be maintained and reinforced. In order to properly conserve humanity's assets, it is necessary to enact domestic laws for designated sites, and in addition to establish not only designated sites but also appropriate buffer zones, thereby protecting designated sites from reckless development.

However, although the Japanese government and Kagoshima Prefecture recommend Amami Oshima as a natural World Heritage site, they not only exclude the Katoku Coast and Katoku River watershed from the designated site, but also exclude them from the buffer zone, and pursue seawall construction into the bargain. If the government designated Katoku Beach a buffer zone and properly protected it under the Natural Parks Law or other domestic law, such a seawall would not be built.

That the Katoku Coast and Katoku River watershed have, for the sake of seawall construction, not been designated even as a buffer zone happened because the government erroneously assessed the natural value of Katoku Beach and even of Amami Oshima itself. With an inadequate conservation and management system, and further with the coast and watershed being excluded from the buffer zone, it is safe to say that the government's stance is not one of sincerely implementing protection policy.

If seawall construction proceeds as at present and a concrete seawall is built, it will clearly have an irreversible impact on the valuable natural environment of the Katoku River coast, with the consequence being the loss of the valuable Katoku Coast asset.

Therefore, unless the Japanese government and Kagoshima Prefecture immediately cancel the Katoku Coast seawall construction plan and stop construction work, and at the least designate the Katoku River area and Katoku Beach a buffer zone, arguably the requirement for a protection and management mechanism will not be satisfied, and the proposed site should not be inscribed as a World Heritage site.

IV. Conclusion

In view of this situation, we hope that the IUCN will, in its field study scheduled for October 2019, properly ascertain the well-preserved natural state of the Katoku Coast. Additionally, we strongly request that, having fully understood the gravity of the situation that would result if seawall construction on the Katoku Coast destroys the irreplaceable natural environment and ecosystem of Katoku Beach, the IUCN advises the Japanese government to change its plan and cancel seawall construction.