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June 18, 2021

Mr. Tim Badman Director IUCN World Heritage Programme Rue Mauverney 28 1196 Gland Switzerland

## Dear Director Badman:

Thank you for your work at the IUCN World Heritage Programme. Thank you also for recommending that the UNESCO World Heritage Committee inscribe the Amami-Oshima Island, Tokumo-Shima Island, the Northern Part of Okinawa Island, and the Iriomote Island as World Heritage (WH) sites. I hope that the Committee will inscribe them as WH sites.

As an environmental NGO member and a local citizen in Okinawa, I have questions regarding the Programme's evaluation of the Northern Part of Okinawa Island, especially concerning the U.S. military's Northern Training Area. Please see the questions attached below. If you could provide answers to them, I would very much appreciate it. I want to gain a proper understanding of how the IUCN WH Programme had endeavored to address the issues of the NTA under complicated circumstances. And I hope to make the best use of your responses in ensuring that the Northern Part of Okinawa Island is worthy of World Heritage Status and its inscription process receives broader support.

There are two reasons why I am asking the IUCN WH Programme the guestions.

First, like many others, I am disappointed that in *IUCN World Heritage Evaluations 2020-2021*, there is little discussion on what we consider the most problematic in the Northern Part of Okinawa Island, the U.S. military's Northern Training Area (NTA). For example, there is no mention of the impacts of the U.S. military training on the nomination site or discarded military materials found in the returned land in the nominated site.

Of course, I understand that it was difficult for the IUCN to address the issues of the NTA when the Ministry of the Environment, the Okinawa Prefectural Government, and local municipalities were reluctant to discuss them. Still, clarification from the Programme regarding the issues of the NTA could help us understand how the Programme has adhered to the principle of scientific integrity.

Second, a series of developments in Okinawa has created a complicated situation with possible implications for the inscription process. On June 4, the Okinawa Police raided the

house of entomologist Miyagi Akino in Higashi Village near the nominated site. While she has researched butterflies, insects, and plants in the Yambaru forest (in the northern part of Okinawa Island), she has also been active in advocating the protection the forest from the NTA.

The police house raid took place because, back in April, Ms. Miyagi took some discarded military materials she had collected from the returned land (former NTA area now part of the WH nominated area) to the gate of the Northern Training Area. She left them at the gate as a form of protest to the U.S. military, demanding they take care of them. The Police have charged her with "forcible obstruction of business." The Police confiscated her research computer, cameras, mobile phone, etc., only to return them later. She had to go to the Police station for interrogation.

The police house raid has created two public reactions. Many people and the media have criticized the raid as a form of intimidation and human rights violations. I myself participated in a petition demanding the Police to stop harassing her. Also, many others and the media have turned attention to that IUCN WH Programme's Evaluations does not discuss the issue of military discarded materials left on the WH nominated site. We now see an increasing number of critical and accusatory comments and opinions directed at the IUCN on SNS and the internet.

It would be unfair and unproductive if any misplaced or unwarranted criticism and accusation continue. I believe that clarification from the IUCN WH Programme would help alleviate this situation.

Again, I want to gain a proper understanding of how the IUCN WH Programme had endeavored to address these issues under complicated circumstances. And I hope to make the best use of your responses in ensuring that the Northern Part of Okinawa Island is worthy of World Heritage Status and its inscription process receives broader support.

Sincerely,

Hideki Yoshikawa Director

Hideki Yoshikawa

#### Questions:

- 1. *IUCN World Heritage Evaluations 2020-2021* states that "However, there is an anomaly in the configuration of the Okinawa component part of the nominated property, with a long strip of the JWTC (or NTA) protruding into the nominated property, but not included in it." (p. 7-8).
- 1-1. Is this sentence meant to address the issues of boundaries between the nominated site and the NTA?
- 1-2 What actions does the Programme hope to see from the Japanese government and the U.S. military to address the boundaries issues?
- 2. *IUCN World Heritage Evaluations 2020-2021* does not discuss the impacts of the NTA (both its presence and training) on the nomination site.
- 2-1. Did the IUCN WH Programme consider the impacts of the NTA (both its presence and training) on the nomination site in its evaluation process?
- 2-2. If so, what was the IUCN's evaluation of the impacts?
- 2-3. What part of *IUCN World Heritage Evaluations 2020-2021* or the Japanese Ministry of the Environment's Application documents are related to or address the impacts of the NTA?
- 2-4. Do the Programme and the Ministry of the Environment have any agreements or shared understandings that address the issues of the NTA but are not available to the public for the time being?
- 2-5. If the IUCN WH Programme did not consider the impacts of the NTA on the nominated site in its evaluation process, why did it not do so?
- 3. *IUCN World Heritage Evaluations 2020-2021* does not discuss the situation that there are still many discarded military materials left unchecked in the returned land of the nominated site.
- 3-1. Did the IUCN WH Programme consider in its evaluation process the issues of discarded military materials left unchecked in the nomination site?
- 3-2. If so, what the Programme's evaluation of these issues?
- 3-2. What part of *IUCN World Heritage Evaluations 2020-2021* or the Japanese Ministry of the Environment's Application documents are related to or address the issues of discarded military materials?
- 3-4. Do the Programme and the Ministry of the Environment have any agreements or shared understandings that address the issues of discarded military materials but are not available to the public for the time being?

- 3-5. If the IUCN WH Programme did not consider the matters regarding discarded military materials in the nominated site in the evaluation process, why did it not do so?
- 4. At present, the relationships among U.S. and Japan and China are at one of the lowest points in history, and military issues have become a very sensitive topic.
- 4-1. Given that China is the chair of the upcoming UNESCO World Heritage Committee meeting, did the IUCN WH Programme consider this tense political situation in its evaluation of the Northern Part of Okinawa Island in relation to the NTA?

Mr. Peter Shadie Director IUCN World Heritage Programme UCN World Headquarters Rue Mauverney 28 1196 Gland Switzerland

# Dear Director Shadie,

We appreciate that the IUCN World Heritage Programme has taken into consideration our concerns and suggestions in its evaluation of the nomination of the Northern Part of Okinawa Island (NPOI), Amami-Oshima Island, Tokunoshima Island, and Iriomote Island for UNESCO World Natural Heritage status over the last three years.

Today, we write to provide the Programme with updated information and suggestions regarding the NPOI. In many respects, they resonate with what we discussed in our "NGO Evaluation and Suggestions Regarding the Nomination of the NPOI for World Natural Heritage" submitted to the Programme in October 2019. We hope that they can help the Programme to properly evaluate the nomination of the NPOI and that they can help lead to the successful inscription of these four splendid sites as World Natural Heritage.

# Conditions of the Returned Land

In our NGO Evaluation and Suggestions, we discussed our concerns that "many parts of the returned land (or former U.S. Military's Northern Training Area or NTA) are still littered with bullet shells, blanks, unexploded ordinance, and other discarded military materials, including toxic chemicals." We argued thus that the Japanese Ministry of the Environment was "misleading" when it stated that "the returned land was confirmed to be free from soil contamination and water pollution (p.128)" in its nomination document.

As of April 2020, many parts of the returned land still appear to face the same problems. For example, on December 25, 2019, a group of observers, including National Diet Councilor Tetsumi Takara and Hideki Yoshikawa, visited Landing Zone Firebase Jones (LZ FBJ), one of the six former aircraft landing zones in the retuned land within the NPOI. There we found there numerous bullet shells, blanks, drums containing liquid, and steel "liner plates" discarded around LZ FBJ.

Meanwhile, through the Japanese Freedom of Information Act, we have obtained information indicating the Japanese Ministry of Defense has been engaging in clean-up efforts as well as monitoring efforts in and around LZ FBJ since September 2019 (see Appendix Doccument),<sup>2</sup> eight months after the Ministry of the Environment submitted its

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<sup>&</sup>lt;sup>1</sup> See the video "Sangiin giing Takara Tetsumi Hokubu kunrenjo henkan atochi shisatsu (National Diet Councilor Tetusmi Takara: Fieldtrip to returned land of the US. Northern Training Area)" https://blog.goo.ne.jp/purpleknight78/e/5d452fbfb13d962abd87cd95183fb5ea

<sup>&</sup>lt;sup>2</sup> The document, *Betten shiryo hokubu kunrenjyo atochi ni okeru tettpan to tekyo hanshuts* [Attached Document: Removal and transfer of steel liner plats and others from the returned land

nomination document in January 2019. This information implies the Japanese government's admission of the need for further clean-up work, and we consider it as a sign of encouraging development. However, there are still unsettling issues. The Environmental Ministry has not presented any long term clean-up plans or restoration plans for the returned land in the NPOI. Also there appears to be a lack of communication among the governmental agencies: the Ministry of the Environment was not informed of details of the Defense Ministry's recent clean-up efforts.<sup>3</sup>

Therefore, we reiterate the following suggestions discussed in our "NGO Evaluation and Suggestions":

The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, create and implement both long and short term plans to clean up materials left by and land contamination caused by the U.S. Military in the returned area of the NTA.

The Ministry of the Environment, in collaboration with the Ministry of Defense, secure financial sources for the cleanup plans in the returned area of the NTA.

The Ministry of the Environment, in consultation with the Ministry of Defense and the U.S. Military, list the Ministry of Defense and the U.S. Military under the category of "Contact Information of Responsible Authorities." This is because the Ministry of Defense has the responsibility to clean up discarded military materials left by the U.S. Military and to construct facilities for the U.S. Military in the NTA, and the U.S. Military uses the NTA for its training.

# On-the-Ground Boundaries between NPOI and NTA

In our NGO Evaluation and Suggestions, we raised our concern over the lack of airspace boundaries between the NPOI and the NTA; however, we did not discuss issues related to boundary-crossing on the ground. We had assumed that the on-the-ground boundaries drawn on the maps should be a sufficient mechanism to deal with such issues. Now we realize otherwise.

During the group's field trip mentioned above, we found numerous U.S. military rations packs on the ground, which appeared to have been discarded recently. This points to the possibility that, without a clear understanding (or physical demarcation) of such boundaries, U.S. soldiers on the jungle training mission might accidentally enter the NPOI

of the Northern Training Area], is one of the contract documents Dr. Masami Kawamura obtained from the Ministry of Defense through the Japanese FOIA in February 2020. The document describes the subcontractor's plans to remove and transfer steel liner plates used for LZ FBJ. Table 2 (1) on page 10, Table 2 (2) on page 11, and Table 2(3) on page 12 show photos of steel liner plates discarded around LZ FBJ. Figure 4 on Page 9 shows an aerial view of LZ FBJ with red dots indicating the locations of discarded steel liner plates.

<sup>&</sup>lt;sup>3</sup> On April 10, 2020, Dr. Masami Kawamura contacted the Environmental Strategy Division of the Ministry of the Environment and made an inquiry about the communication between the two ministries regarding the Defense Ministry's clean up efforts.

or visitors to the NPOI might inadvertently wander into the NTA.

Since we do not know the nature and extent of the U.S. Military's training in the NTA, we are not in a position to ascertain or discuss the impacts of its training on the NPOI. We insist, however, that military training not take place in a World Heritage site and military training not enter the NPOI. Meanwhile, we are concerned with the possibility that visitors who have mistakenly entered the NTA from the NPOI might face not only physical danger from training, but also legal charges under the 1952 Special Criminal Act.<sup>4</sup>

Therefore, we suggest that the Japanese government and the U.S. military create a concrete mechanism to deal with the issues of boundary-crossing between the NPOI and the NTA.

# **Concluding Note**

The Okinawan public has been anxiously following the nomination process of the NPOI, Amami-Oshima Island, Tokunoshima Island, and Iriomote Island. Special attention has been directed to that of the NPOI due to its complex relationship with the NTA. We hope that our new information and suggestions are useful to the IUCN World Heritage Programme and that all these sites will be inscribed as World Natural Heritage at the earliest time. If you have any questions, please let us know.

Sincerely,

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<sup>&</sup>lt;sup>4</sup> The formal English title of this act is "Act to Provide for the Special Criminal Act pertaining to the Enforcement of the Agreement under Article VI of the Treaty of Mutual Cooperation and Security between Japan and the United States of America, regarding Facilities and Areas and the Status of United States Armed Forces in Japan." (The Japanese Ministry of Foreign Affairs).

<sup>&</sup>lt;sup>5</sup> For example, the Ryukyu Broad Casting Company, a local TV station in Okinawa, aired special programs including "Yogosareta kisekino mori sekai isan kohochi no riaru [Disgraced miraculous forest: Reality of the World Heritage nominated site]" in November 2019 and "Yanbaru no mori sekai isan touroku no tameniha [Suggestions for the inscription of Yambaru forest as a World Heritage site]" in April 2020.

# NGO Evaluation and Recommendations regarding The Nomination of NPOI for World Natural Heritage

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#### **NGO Evaluation of the Second Nomination**

In February 2019, the Japanese Ministry of the Environment submitted to UNESCO and IUCN its nomination of Amami-Oshima Island, Tokuno-Shima Island, the Northern Part of Okinawa Island (NPOI), and Iriomote Island for UNESCO World Natural Heritage status. This is the Ministry's second attempt in the last two years. In the following, we present our evaluation of the new nomination of NPOI, describing both improvements and shortcomings, and we propose recommendations to the Ministry of the Environment and IUCN for consideration.

## **Improvements**

In the present nomination dossier, we note improvements from the previous nomination, especially regarding issues of the U.S. Military's Northern Training Area (NTA), which is adjacent to the nominated area of the "Northern Part of Okinawa Island" (NPOI).

We welcome and highlight that the dossier includes information (albeit still limited) on the NTA, a discussion on the collaboration between the Japanese and U.S. governments with the text of the "Document Concerning Cooperation with the United State Government in the Northern Training Area" (the Japan-US Joint Committee) in the Nomination Annexes (pp.5-541), and excerpts of the U.S. Marine Corps' *Integrated Natural Resources and Cultural Resources Management Plan 2014* (INRCRMP) also in the Annexes (pp. 5-489~5-540).

These improvements reflect the renewed determination of the Ministry of the Environment to have the areas inscribed as World Natural Heritage sites. They also attest to the integrity of the IUCN World Heritage Programme, which took on the difficult political issues relating to NTA in its evaluation of the previous nomination and made the necessary recommendations to the Ministry.

Above all, they demonstrate the workings of the collaborative nomination process where onthe-ground information and recommendations provided by local residents and environmental NGOs are properly examined and incorporated by the Ministry and IUCN with a view to a successful inscription of these nominated sites.<sup>1</sup> The collaborative process must be maintained without any compromise.

# **Shortcomings**

Regrettably, in our view, the present nomination has still failed to provide adequate and sufficient information on NPOI and meet some critical components of the IUCN

recommendations made in 2018. As such information deficiency, the IUCN would not be able to evaluate the nomination of the NPOI for World Heritage status properly. Below we provide what we consider as shortcomings of the nomination of NPOI.

# 1. Misleading Information on the Condition of the Returned Land of NTA in NPOI

The Ministry of the Environment's new nomination document describes that much of the returned land of NTA has been incorporated into NPOI for its Outstanding Universal Value. It then states:

"As for the returned land, the Ministry of Defense investigated the history of land use, including the period before its confiscation by the U.S. Forces, and grasped probabilities of soil contamination, water pollution, etc. and then based on these, the Ministry conducted soil contamination surveys, waste treatment, and so on, in accordance with relevant laws and ordinances, mainly in helipad sites, forest roads, locations where helicopters crashed in the past, etc. As a result, the returned land was confirmed to be free from soil contamination and water pollution." (p.128)

This statement is grossly misleading. Considering the entire returned land, the areas surveyed and cleaned up by the Ministry of Defense were too minuscule to make such a sweeping statement.<sup>2</sup> Also, the way the Ministry of Defense conducted surveys and waste treatment is inconsistent with the ways in which similar environmental restoration studies in the U.S. have been conducted under the U.S. Military's Environmental Restoration Program.<sup>3</sup>

In fact, as Akino Miyagi has revealed, many parts of the returned land are still littered with bullet shells, blanks, unexploded ordinance, and other discarded military materials, including toxic chemicals.<sup>4</sup> See figure 1.<sup>5</sup> It is troubling that in the nomination dossier, no plans are proposed to survey further, clean up, and restore the area's environment to the condition in which the Outstanding Universal Value of the Biodiversity is safely monitored and maintained.

## 2. Still No Information on Impacts of NTA on NPOI

The impacts of military training and military facilities in and around NTA on NPOI have not been properly addressed despite NGOs' repeated request for the Ministry of the Environment to do so. Thus, we reiterate our 2017 arguments:<sup>6</sup>

NTA has been used for "jungle warfare training" and low altitude "terrain flight training" of MV-22 Osprey and other aircraft. It has been used in conjunction with other military bases and training areas in Okinawa as the U.S. Military conducts flight training between bases and training areas. See Figure 2.8

Military training-related accidents and incidents, including forest fires and aircraft crashes, occur in and around NTA, damaging the environment and threatening the lives of local residents. On October 11, 2017, for an example, a U.S. Military CH-53 helicopter crashed into the ground near NTA and thus near the NPOI, contaminating the land with chemicals. 10

The U.S. Military in *Integrated Natural Resources and Cultural Resources Management Plan* (*INRCRMP*) 2014 mentions that it been conducting in NTA the monitoring of threatened and endangered protected species monitoring (in support of MV-22 Operations) (p.314).<sup>11</sup> With the return of half of NTA to Japan in 2016, it also acknowledges that the "this transfer of lands places

the same amount of training on a smaller land base, which may create the possibility of increased adverse effects" (p.113). Meanwhile, on September 4, 2019, a US military UH-1Y helicopter landed in the returned land of NTA, which is now part of the Yambaru National Park, for reasons yet to be provided. 12

These facts warrant that the Ministry of the Environment addresses the impacts of military training conducted and facilities constructed and used in and around NTA on NPOI.

# 3. Improper Documentation

The nomination dossier includes the "Document Concerning Cooperation with the United States Government in the Northern Training Area (the Japan-US Joint Committee)" in the Annex. While this document is one of the most critical documents in the dossier, only the text of the document was presented in the Annex. The first page, which should bear the necessary information, including the names of the authorities who signed the document and the date of the document, was missing from the dossier. This improper documentation undermines the legitimacy of the document and the dossier and the nomination process.<sup>13</sup>

NGOs have asked the Ministry of the Environment why the Ministry excluded the first page of the document from the dossier. NGOs have also asked whether this new document was the same as the "basic collaboration agreement (memorandum of December 7 2016)" mentioned in *IUCN World Heritage Evaluations 2018* (p.43). <sup>14</sup> So far, we have not received any answer except its confusing reply that the Ministry "needs to consult with its US counterpart for release of the first page."

4. No clear indication of "further development" of the necessary coordination mechanisms IUCN World Heritage Evaluations 2018 recommended that the Ministry of the Environment "further develop the necessary coordination mechanisms to integrate the remaining areas of the Northern Training Area into the overall planning g and management of the nominated property." (p.48). Supposedly in response to the recommendation, the nomination dossier provides a discussion in "5.c.7. The cooperation with the United States Government (USG) for conservation of natural environment at Northern Training Area (NTA)" as evidence for "further development." (Pp.242-243)

In our evaluation, however, what is discussed in 5.c.7. does not constitute "further development." The condition of coordination between the two government discussed in the new nomination dossier is not much different from the one existed prior to May 2018 or at the time of the publication of *IUCN World Heritage Evaluations 2018*. According to the *Integrated Natural Resources and Cultural Resources Management Plan (INRCRMP)* (2009 and 2014), the U.S. Marine Corps had collaborated with the Ministry of the Environment and the Okinawa Prefectural Government and universities in capturing mongooses and feral cats and in conducting environmental surveys and management projects in NTA for some time.<sup>15</sup>

Furthermore, while the inclusion into the dossier of the "Document Concerning Cooperation with the United States Government in the Northern Training Area" (the Japan-US Joint Committee) is critical and welcomed, the inclusion alone cannot be considered evidence of "further development." (especially if this document is the same as the one mentioned in *IUCN World Heritage Evaluations 2018*. "Further development of the necessary coordination mechanisms" requires more than "exchange of information and opinions between the two

governments."

# 4. No demarcation of Airspace Boundaries

While the on-the-ground boundaries between NPOI and NTA are shown on the maps in the nomination dossier, no demarcation has been made in terms of airspace boundaries between them. This lack of such airspace boundaries is problematic, considering that U.S. Military aircraft can fly over both NTA and NPOI while engaging in low altitude flight training. As mentioned above, on September 4, 2019, a U.S. military UH-1Y helicopter landed in the returned area of NTA, which is now part of the Yambaru National Park, for reasons yet to be known.<sup>16</sup>

# 5. Only Okinawa Rail?

In NPOI, only the Okinawa Rail is selected as sole "key indicator" for "the state of conservation" (On Amami-Oshima Island and Tokunoshima Island, the Amami rabbit is chosen, and on Iriomote Island, the Iriomote cat is selected). (p.232). The number of species, just three species, selected as "key indicators" is just too small.

6. No discussion on the deteriorating situation of the quality of life in Takae Community

The return of half of NTA to Japan in December 2016, much of which has been incorporated into the NPOI ever since, was predicated upon that six new landing zones for U.S. military aircraft would be built in environmentally sensitive areas of NTA near the Takae community. With the completion of the new landing zones in December 2016, U.S. Marine Corps aircraft began using them day and night. While the World Heritage nomination process proceeds, the quality of life in the Takae community has been deteriorated as many residents live in fear of aircraft crashes and suffer from aircraft "noise pollution." 18

# Recommendations

For NPOI to be considered for World Natural Heritage status, these shortcomings need to be resolved. Following examples of the successful inscriptions of World Natural Heritage sites in recent years, we propose our recommendations below.

1. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, create and implement both long and short term plans to clean up materials left by and land contamination caused by the U.S. Military in the returned area of NTA.

The Ministry of the Environment, in collaboration with the Ministry of Defense, secure financial sources for the cleanup plans in the returned area of NTA.

- 2. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, address the impacts of U.S. Military's training and facilities in and around NTA on NPOI. If the impacts are determined detrimental to NPOI, mitigation measures such as reducing the level of training be implemented. The Ministry of the Environment report the results of its examination and implementation to IUCN and UNESCO.
- 3. The Ministry of the Environment provide the IUCN and UNESCO with both the "basic 'collaboration agreement' (memorandum of 7 December 2016)" mentioned in the IUCN Evaluation (2018) and the "Document Concerning Cooperation with the United State Government in the Northern Training Area (the Japan-US Joint Committee)" in the nomination dossier in full. The Ministry make these documents accessible to the public.

- 4. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. military, develop a mandatory and routine Environmental Impact Study mechanism for military training and construction of facilities in and around NTA and NPOI. If a study shows impacts on NPOI, remedies such as reducing the level of training and changes in the designs of facilities be proposed and implemented. The results of the study and implementation of remedies be reported to IUCN and UNESCO.
- 5. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, develop a contingency plan for forest fires, hazardous substance spills, and aircraft crashes, including cleanup procedures and notification of IUCN and UNESCO.
- 6. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, establish clear boundaries on the ground and in the airspace so that military training does not enter NPOI.
- 7. The Ministry of the Environment expand the list of species designated as "key indicators" for the state of conservation of biodiversity in NPOI and the other nominated areas.
- 8. The Ministry of the Environment, in collaboration with the Ministry of Defense and the U.S. Military, alleviate the deterioration of the quality of life in the Takae community and other nearby communities. The Ministry recognize that the inscription process of NPOI as a World Natural Heritage site should not infringe the rights of local people to a safe and healthy environment.
- 9. The Ministry of the Environment, in consultation with the Ministry of Defense and the U.S. Military, list the Ministry of Defense and the U.S. Military under the category of "Contact Information of Responsible Authorities." This is because the Ministry of Defense has the responsibility to clean up discarded military materials left by the U.S. Military and to construct facilities for the U.S. Military in NTA and the U.S. Military uses NTA for its training.

# **Concluding Note**

We hope that NPOI and the other three nominated sites will be inscribed as World Natural Heritage sites at the earliest time. For that to take place, we believe, IUCN needs to encourage the Ministry of the Environment to make the necessary amendments to the nomination dossier.

#### Contact:

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<sup>&</sup>lt;sup>1</sup> For discussion on the collaborative nomination process, see Hideki Yoshikawa (2019),

https://sites.google.com/view/okinawa-environmental-justice

Also see these four documents for the Okinawa Defense Bureau's surveys and clean up work at:

https://www.mod.go.jp/rdb/okinawa/07oshirase/kanri/291228hokubukunrenjyo28chosahoukokusho.html

- <sup>3</sup> See *Department of Navy Environmental Restoration Program Manual 2018.* https://www.navfac.navy.mil > Environmental > Restoration > er pdfs > gpr
- <sup>4</sup> See Akino Miyagi's blog site, "LZ2 helipad ato de hajimete kuho yaku 250 patsu wo kakunin kaishu kei 400 patsu wo kaishu [250 bullet shells were found and collected at LZ2 (a former aircraft landing zone) for the first time. In total 400 bullet casings have been collected]" in Japanese.

https://akinotaiinnorinshitaiken.ti-da.net/e11289236.html

Also see Yuri Shimizu, "Two years after its return to Japan, the Northern Training Area remains littered with used flares, un-fired bullets, and the remains of pre-war life." *The Ryukyu Shimpo*, December 24, 2018.

http://english.ryukyushimpo.jp/2018/12/29/29712/

See "Hokubu kunrenjyo ato kara PCB sekai isan suisenchi doramukan hakken chi de [PCB was detected from area where a discarded drum was found in former Northern Training Area and World Heritage nominated site]" in Japanese. *The Ryukyu Shimpo*, March 9, 2019. https://ryukyushimpo.jp/news/entry-886156.html

- <sup>5</sup> Figure 1 was created by Naofumi Nakato and Kaoru Urano based upon Akino Miyagi's information on discarded U.S. Military materials including bullet shells, blanks, and unexploded ordinance in the returned land of NTA. The Informed-Public project took the initiative to create Figure 1 and the copy right of Figure 1 belongs to the Informed-Public Project.
- <sup>6</sup> Our 2017 document "A World Natural Heritage Site next to U.S. Military's Training Area?: The Case of "Northern Part of Okinawa Island" in Okinawa, Japan" was submitted to the IUCN World Heritage Programme in November 2017. It can be accessed at:

https://sites.google.com/view/okinawa-environmental-justice

- <sup>7</sup> For description of military training in NTA, see "Chapter 9-Camp Gonsalves/ Jungle Warfare Training Center" in *Final Integrated Natural Resources and Cultural Resources Management Plan (2014)*, Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan. For description of MV-22 Osprey Aircraft training in NTA, see *Environmental Review for Basing MV-22 Aircraft at MCAS Futenma and Operating in Japan (2012)*, Department of the Navy and the United States Marine Corps and Marine Corps Installation Command Pacific.
- <sup>8</sup> Figure 2 was created by Kaoru Urano.
- <sup>9</sup> See *Okinawa no beigun kichi* [U.S. military bases in Okinawa] (2013), Military Base Affairs Division, Executive Office of the Governor, Okinawa Prefectural Government. See also Miyagi, Akino (2017), "Yanbaruno dobutsu to seibutsu tayosei: Takae Aha de hakkenshita kisho dobutsu to heripado kensetsu ga dobutsu ni ataeta eikyo [Animals and the biodiversity in Yanbaru (Northern Okinawa Island): Rare Animals Found in Takae and Awa areas, Higashi

<sup>&</sup>quot;Hesitant Heritage: US bases on Okinawa and Japan's Flawed Bid for Yambaru forest World Heritage status." *The Asia-Pacific Journal: Japan Focus*, Volume 17, Issue 8, Number 2. https://apjjf.org/2019/08/Yoshikawa.html

<sup>&</sup>lt;sup>2</sup> See Okinawa Defense Bureau and IDEA Consultants, Inc. (2017). Hokubu kunrenjyo (29) kahan henkan ni tomonau shisho jyokyoni kakaru shiryo chousa to chosa hokokusho [Report: Surveys on waste materials found in the returned land of the Northern Training Area] in Japanese. The original document has been uploaded at:

Kunigami, Okinawa and Actual Damages on the Animals by Construction of Osprey Pad[s]]" in Nihon no kagakusha /Journal of Japanese Scientists, 52 (4), pp. 192-197.

<sup>10</sup> Rich, Motoko, "U.S. Helicopter Crashes on Okinawa, Adding to Safety Concerns," *The New York Times*, October 11, 2017.

https://www.nytimes.com/2017/10/11/world/asia/us-helicopter-crash-okinawa.html

- <sup>11</sup> See "Chapter 9-Camp Gonsalves/ Jungle Warfare Training Center" in *Final Integrated Natural Resources and Cultural Resources Management Plan (2014)*, Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan.
- <sup>12</sup> "Researcher spots U.S. military helicopter landing on former NTA land in Ada, Kunigami Village." *The Ryukyu Shimpo*, September 4, 2019.

http://english.ryukyushimpo.jp/2019/09/10/30977/

- <sup>13</sup> Given the lack of the first page, it is impossible even to cite the document. See https://www.govinfo.gov/content/pkg/GPO-STYLEMANUAL-2016/pdf/GPO-STYLEMANUAL-2016.pdf
- <sup>14</sup> "There is also a basic 'collaboration agreement' (memorandum of 7 December 2016) between the Government of Japan and the US government on their cooperation for nature conservation especially IAS control and species monitoring in the remaining Northern Training Area which neighbors the nominate property on Okinawa."
- <sup>15</sup> In Appendix J: Invasive Species Management Plan of *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014), it is stated that organizational collaboration is required to "maximize effectiveness and collaboration on invasive species issues among MCBJ, GOP (Government of Japan), OPG (Okinawa Prefectural Government) and local municipal governments."
- <sup>16</sup> "Researcher spots U.S. military helicopter landing on former NTA land in Ada, Kunigami Village." *The Ryukyu Shimpo*, September 4, 2019.

http://english.ryukyushimpo.jp/2019/09/10/30977/

<sup>17</sup> Tanaka, Miyo, "Okinawa base critics say helipad construction a sign of things to come," *The Japan Times*, December 23, 2016.

https://www.japantimes.co.jp/news/2017/02/03/national/okinawa-base-critics-say-helipad-contraction-tactics-sign-things-come/#.WiMCOhRU8tA

"Higashi Village Assembly demands nearby U.S. military helipads to be removed, claiming, the training is increasing, residents live in fear" *The Ryukyu Shimpo*, June 21, 2019. http://english.ryukyushimpo.jp/2018/06/28/28982/

# YANBARU, OKINAWA: Future World Natural Heritage and the U.S. Military's Northern Training Area le Island 5 km (3.1 miles) HENOKO district TAKAE residential district Yanbaru National Park (land area, 13,622 ha) Yanbaru National Park (coastal area, 3,670 ha) World Natural Heritage Nominated Property (7,721ha) Buffer Zone (3,398ha) Coordinates of the "northern part of Okinawa Island" or Yanbaru (N26°42'54" E128°13'47") (provided by the Japanese government in its Tentative List for World Natural Heritage Sites) U.S. Military's Northern Training Area (4,010 ha) Former Northern Training Area / Returned Land (3,987 ha) Landing Zones before SACO New Landing Zones Route for TERF (Terrain flight training at altitudes from 50 to 200 ft. above ground level) Proposed road to connect new landing zone and new coastal training area Land and water area provided to U.S. military for amphibious training in 1998 Sep. 2019, Okinawa Environmental Justice Project & Kaoru Urano

# Residues of Military Activity/Training in the Northern Part of Okinawa Island: Clean Up, Decontamination, and Restoration Are Needed.

Despite the claim by the Japanese Ministry of the Environment that "the returned land (of the U.S. Military's Northern Training Area) was confirmed to be free from soil contamination and water pollution," many parts of the returned land are still littered with bullet shells, blanks, unexploded ordinance, and other discarded military materials, including toxic chemicals. The land is in need of clean up, decontamination, and restoration.

#### Former FBJ Landing Zone

Unused grenade-type warning flare (1)
Unused parachute-type flares (2)
Unused and undetonated blanks (897)
Other types of used flares

Field ration bags, drums, sandbags, steal plates, concrete rubble, rubber sheets

# A point northeast of former Landing Zone-1

Drums containing PCB, DDT

Unused training projectiles (2)

Vehicle parts, batteries, metal equipment, bottles, chains

#### Former Landing Zone-1

Unused blanks (discarded after land return) (342) Unused and undetonated blanks (344)

Unused parachute-type flare (1)

Drums contaminated with PCB, ammunition boxes, battery cells, batteries, infusion bags, field ration bags, clothes, concrete rubble, rusted bolts and nuts, other daily waste materials including clothes discarded by Japanese

#### Former Landing Zone-2 Unused blanks (262)

Former Landing Zone-21

Unused and undetonated blanks



lew unused blanks at former Landing Zone



Drums found at former Landing Zone-1, soil surrounding the drums was found contaminated with PCB



Unused blanks shells found at former Landing Zone-1

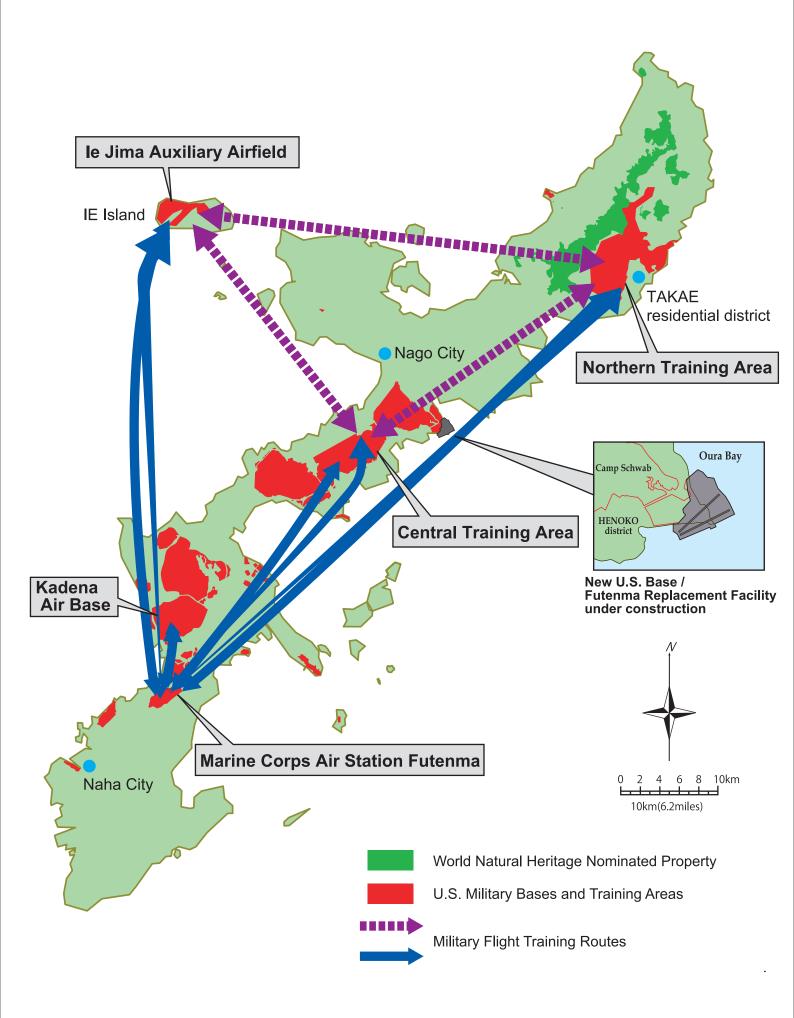


Smoke flares found at former Landing Zone-1

Research & Photo by Akino Miyagi Research (PCB) by Dr. Yutaka Tashiro Map by Kaoru Urano © IPP (Informed-Public Project, Okinawa) & Nakato Naofumi Oct.2019



# U.S. Military Bases and Training Areas and World Natural Heritage Nomination in Okinawa



# A World Natural Heritage Site next to U.S. Military's Training Area?: The Case of "Northern Part of Okinawa Island" in Okinawa, Japan

Hideki Yoshikawa
Okinawa Environmental Justice Project
Save the Dugong Campaign Center (IUCN NGO)

Dr. Masami Kawamura
The Informed Public Project
IUCN Commission on Ecosystem Management

In February 2017, the Japanese government nominated the Northern Part of Okinawa Island (NPOI), along with Amami-Oshima Island, Tokunoshima Island, and Iriomote Island for UNESCO's World Natural Heritage status. In October 2017, IUCN's field mission team visited the nominated areas and held meetings with stakeholders. Now the evaluation process of the nominated areas enters a new phase as IUCN's World Heritage Program begins evaluation of the nominated sites.

We at the Okinawa Environmental Justice Project and the Informed Public Project hope that all the four nominated sites will be inscribed as World Natural Heritage sites in the earliest time. We are concerned however that the nomination of NPOI faces serious issues for two reasons. First, NPOI is located next to U.S. military's Northern Training Area (NTA); second, the Japanese government failed to address in its nomination dossier submitted to UNESCO the presence and operation of NTA. We takes the position that unless facts and issues regarding NTA and the dossier are addressed during the World Heritage Panel discussion and remedies are suggested and adopted in the following phases, the nomination of NPOI is destined to fail.

Therefore, we would like to provide IUCN's World Heritage Panel with the following facts and issues for consideration. We would also like to provide the Panel with our suggestions on how to resolve these issues.

# Northern Training Area (NTA)

- The U.S. military's 3,900 hectares "Northern Training Area" (NTA) is located next to NPOI. See Figure 1. NTA was established in 1957 as the U.S. military took over 7.900 hectares of the Yanbaru forest and converted it into NTA. It has been argued this constitutes violations of the indigenous rights of the Okinawan/Ryukyuan people.<sup>1</sup>
- NTA is used for "jungle warfare training" and low altitude "terrain flight training" of MV-22 Osprey and other aircraft. NTA is used in conjunction with other military bases and training areas in Okinawa as U.S. military conducts flight training between bases and training areas. See Figure 2.
- NTA is home to many endangered species including endemic and Japan's "Natural Monuments" Okinawa rail (*Gallirallis okinawae*) and the Pryer's woodpecker (*Sapheopipo noguchii*). The U.S. military regularly conducts survey and monitoring on the environment of NTA and has various management plans.<sup>3</sup> See Figure 3.
- Military training related accidents and incidents, including forest fires and aircraft crashes, occur in and around NTA, damaging the environment and threatening the lives of local

- residents.<sup>4</sup> Most recently, on October 11, 2017, a U.S. military CH 53 helicopter crashed into the ground near NTA and thus near the World Natural Heritage nominated area.<sup>5</sup>
- In December 2016, amidst protest, the construction of six new aircraft landing zones was completed in environmentally sensitive areas of NTA.<sup>6</sup> Environmental impacts on areas outside NTA from the construction and operation of the new landing zones have been reported.<sup>7</sup>
- In December 2016, the U.S. military returned 4,000 hectares of land, formally used as part of NTA, reducing the area of NTA to the present 3,900 hectares. The U.S. military notes however that "this transfer of lands places the same amount of training on a smaller land base, which may create the possibility of increased adverse effects (p.113)."

# The U.S. Military's Control over NTA

- The U.S. military has exclusive control over NTA and other U.S. military bases and training areas in Okinawa under the U.S. and Japan Status of Forces Agreement. This means, when a forest fire or an aircraft crash occurs in NTA, the Japanese government and local governments are denied entry to NTA to carry out fire fighting operation or damage survey.
- The U.S. military has exclusive control over its properties under the U.S. and Japan Status of Forces Agreement. This means, when a military training related accident occurs <u>outside</u> the U.S. military' bases and training areas, the Japanese government and local governments are often denied entry to the accident site. In fact, when a U.S. military CH-53 aircraft crashed in October 2017, near NTA and thus near the World Natural Heritage nominated area, the Japanese government, the Japanese police and local governments were denied entry to conduct proper damage survey.<sup>11</sup>
- It is unknown whether and how the U.S. military's exclusive control over NTA affects the Japanese government's management of NPOI as a World Natural Heritage site.

### **IUCN Efforts and Results**

- In IUCN Recommendation 2.72, IUCN requested the Japanese government to nominate the Yanbaru forest (northern part of Okinawa Island) for World Natural Heritage status. The Japanese government fulfilled this part of the recommendation as it nominated NPOI for World Natural Heritage in February 2017.
- In IUCN Recommendations 2.72 and 3.114, IUCN requested the Japanese and U.S. governments to conduct proper Environmental Impact Assessment (EIA) for the construction of landing zones in NTA. The Japanese government conducted its EIA and the U.S. military conducted an "Environmental Review" (ER) regarding the operation of MV-22 Osprey aircraft in NTA. These EIA and ER have been challenged by experts and NGOs. In fact, in November 2016, Okinawa Prefectural Government, Higashi village and Kunigami village together requested the Japanese government to redo EIA regarding the construction of the landing zones. The Japanese government has declined to redo so.
- Dr. Leslie F. Molly, an IUCN expert on World Natural Heritage and Protected Areas, has visited the Yanbaru forest and written two reports; A report to the Japanese ministry of the Environment and the Japan Wildlife Research center on the likelihood of Natural World Heritage values in the Ryukyu islands" and "Report on visit to the Amami and Ryukyu Islands, Japan. The Japanese Ministry of the Environment Ministry is withholding the reports despite NGO's requests for release of them via Japan's Freedom of Information Act. 14

#### **Problem of Silence**

• The Japanese government's World Natural Heritage nomination dossier failed to properly address the facts and issues mentioned above, undermining the scientific values and validity of

#### **FACTSHEETS**

the dossier itself and making it extremely difficult for IUCN and UNESCO to conduct proper evaluation regarding NPOI.

- The dossier failed to incorporate NTA-related documents produced by the U.S. military including Integrated Natural Resources and Cultural Resources Management Plan (2014), Final Environmental Reviews for Basing MV-22 Aircraft at MCAS Futenma and Operating in Japan (2012), and Survey on Okinawa Rail at Jungle Warfare Training Center (2010). These documents contain important information on the natural environment of NTA and on the U.S. military's management efforts although the primary objective of these documents are to help support the U.S. military's training.
- The Japanese environment ministry told NGOs that it did not include the facts and issues mentioned above in the dossier because "the Japanese government has no control or jurisdiction over NTA." The U.S. military collaborates with the Japanese government as well as local governments and universities in environment survey and management projects in NTA. 17
- It is not clear to what extent the Japanese environment ministry and the Japanese government have access to the U.S. military's information on the environment of NTA. For example, the Japanese government was provided a redacted version of *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014) by the U.S. government while a fuller version of the same document was provided to NGOs through U.S. Freedom of Information Act. See for Figure 4 and 5 for comparison. It is not clear which version, the redacted version or the fuller version, the Japanese government can use as its "official" version.
- The U.S. military and the U.S. government have not made public their stances on the World Natural Heritage nomination of NPOI in relation to NTA despite NGOs requests: It is not known whether they support the nomination or not.<sup>18</sup> See Appendix "NGOs' Letter to US Military."

# **Suggestions to World Heritage Panel**

- In accordance with Article 11.3 of the UNESCO World Heritage Convention and Section 135 of the Operational Guideline for the World Heritage Convention, we suggest that, in its evaluation process of nomination of NPOI for World Natural Heritage status, the World Heritage Panel consider the U.S. military and the U.S. government as important stakeholders.
- We also suggest that the World Heritage Panel request the Japanese government to call on the U.S. military and U.S. government to take part in and to support the evaluation process of nomination of NPOI for World Natural Heritage status.
- We also suggest that the IUCN World Heritage Panel request the Japanese government to provide information it has on NTA for its evaluation process of nomination of NPOI for World Natural Heritage status.

#### Contact:

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Website: http://okinawaejp.blogspot.jp/

Dr. Masami Kawamura Director, The Informed Public Project

Email: mamikw@nifty.com Website: http://ipp.okinawa/ \_\_

http://imadr.org/wordpress/wp-content/uploads/2017/04/UPR28\_Japan\_Joint-Submission\_Indigenous-Right-to-Self-Determination-of-the-People-of-Ryukyu-Okinawa\_2017.pdf

- <sup>2</sup> For general description of military training in NTA, see "Chapter 9-Camp Gonsalves/ Jungle Warfare Training Center" in *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014), Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan. For description of MV-22 Osprey Aircraft training in NTA, see *Environmental Review for Basing MV-22 Aircraft at MCAS Futenma and Operating in Japan* (2012), Department of the Navy and the United States Marine Corps and Marine Corps Installation Command Pacific.
- For example, see "Chapter 9-Camp Gonsalves/ Jungle Warfare Training Center" in *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014), Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan; *Survey on Okinawa Rail at Jungle Warfare Training Center* (2010), Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan.
- <sup>4</sup> See *Okinawa no beigun kichi* [U.S. military bases in Okinawa] (2013), Military Base Affairs Division, Executive Office of the Governor, Okinawa Prefectural Government.
- <sup>5</sup> Rich, Motoko, "U.S. Helicopter Crashes on Okinawa, Adding to Safety Concerns," The New York Times, October 11, 2017.
- https://www.nytimes.com/2017/10/11/world/asia/us-helicopter-crash-okinawa.html
- <sup>6</sup> Tanaka, Miyo, "Okinawa base critics say helipad construction a sign of things to come," *The Japan Times*, December 23, 2016.
- https://www.japantimes.co.jp/news/2017/02/03/national/okinawa-base-critics-say-helipad-cont raction-tactics-sign-things-come/#.WiMCOhRU8tA
- Miyagi, Akino 2017, "Yanbaruno dobutsu to seibutsu tayosei: Takae Aha de hakkenshita kisho dobutsu to heripado kensetsu ga dobutsu ni ataeta eikyo [Animals and the biodiversity in Yanbaru (Northern Okinawa Islanad): Rare Anmials Found in Takae and Awa areas, Higashi KUnigami, Okinawa and Actual Damages on the Aimals by Construction of Osprey Pad[s]]" in Nihon no kagakusha /Journal of Japanese Scientists, 52 (4), pp. 192-197.
- <sup>8</sup> Burke, Mathew M and Chiyomi Sumida, "US formally returns large swath of land on Okinawa," Stars and Stripes, December 22, 2016.
- https://www.stripes.com/news/us-formally-returns-large-swath-of-land-on-okinawa-1.445693
- <sup>9</sup> See "Chapter 9-Camp Gonsalves/ Jungle Warfare Training Center" in *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014), Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan.
- Article II-I (a) of the Status of Armed Forces Agreement (SOFA) between the U.S. and Japan stipulates that "[t]he United State is granted, under Article VI of the Treaty Mutual Cooperation and Security, the use of facilities and areas in Japan." Article III of SOFA stipulates that "[w]ithin the facilities and areas, the United States may take all the measures necessary for their establishment, operation, safeguarding and control."

http://www.mofa.go.jp/mofaj/area/usa/sfa/pdfs/fulltext.pdf

- KYODO, "U.S. military will ground CH-53E helicopters in Japan after chopper accident in Okinawa," *The Japan Times*, October 12, 2017.
- https://www.japantimes.co.jp/news/2017/10/12/national/okinawa-gov-takeshi-onaga-visits-site -u-s-military-chopper-accident/#.WiMU0GSFgy4
- See Environmental Review for Basing MV-22 Aircraft at MCAS Futenma and Operating in Japan (2012), Department of the Navy and the United States Marine Corps and Marine Corps

All Okinawa Council for Human Rights and International Movement Against All Forms of Discrimination and Racism (IMADR), 2017, "Human rights Situation in Japan with special focus on the rights of self-determination of indigenous people of Ryukyu/Okinawa" (a statement submitted to Universal Periodic Review (UPR) 28<sup>th</sup> Session in November 2017.

Installation Command Pacific.

"Osprey haibino tekkai oyobi hokubu kunrenjyo helicopter chakurikutai shisetsu ni tomonau kakyoeikyohyoka no saijishi ni tsuite [On Deployment of Osprey Aircraft and Redo of Environmental Impact Assessment on Helicopter Landing Zones] (November 21, 2016), formal request to the Japanese government by the Okinawa Prefectural Government, Higashi Village, and Kunigami Village.

http://www.pref.okinawa.jp/site/chijiko/kichitai/chijihatugen/documents/161121\_yousei\_hokub u.pdf

<sup>14</sup> See Kawamura, Masami, 2017, "Report No.7 hokubu kunrenjyo naki "yanbaru": amami ryukyu no sekaisizenisan touroku ni kansuru mondai [Report No.7 "Yanbaru" without Northern Training Area: Issues of the nomination of Amami Ryukyu Islands for World Natural Heritage Status]." The Informed Public Project.

http://ipp.okinawa/2017/10/11/report-007/

- <sup>15</sup> See *Survey on Okinawa Rail at Jungle Warfare Training Center* (2010), Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan.
- Article III of SOFA between the U.S. and Japanese governments states "[w]ithin the facilities and areas, the United States may take all the measures necessary for their establishment, operation, safeguarding and control."

http://www.mofa.go.jp/mofaj/area/usa/sfa/pdfs/fulltext.pdf

- <sup>17</sup> In Appendix J: Invasive Species Management Plan of *Final Integrated Natural Resources and Cultural Resources Management Plan* (2014), it is stated that Organizational Collaboration is required to "maximize effectiveness and collaboration on invasive species issues among MCBJ, GOP (Government of Japan), OPG (Okinawa prefectural Government) and local municipal governments."
- <sup>18</sup> See Yoshikawa, Hideki, "U.S. military must not jeopardize Okinawan forest's bid for World Heritage Status." *The Japan Times*, February 1, 2017.

https://www.japantimes.co.jp/community/2017/02/01/voices/u-s-military-must-not-jeopardize-okinawan-forests-bid-world-heritage-status/#.WdqN-2K0My4

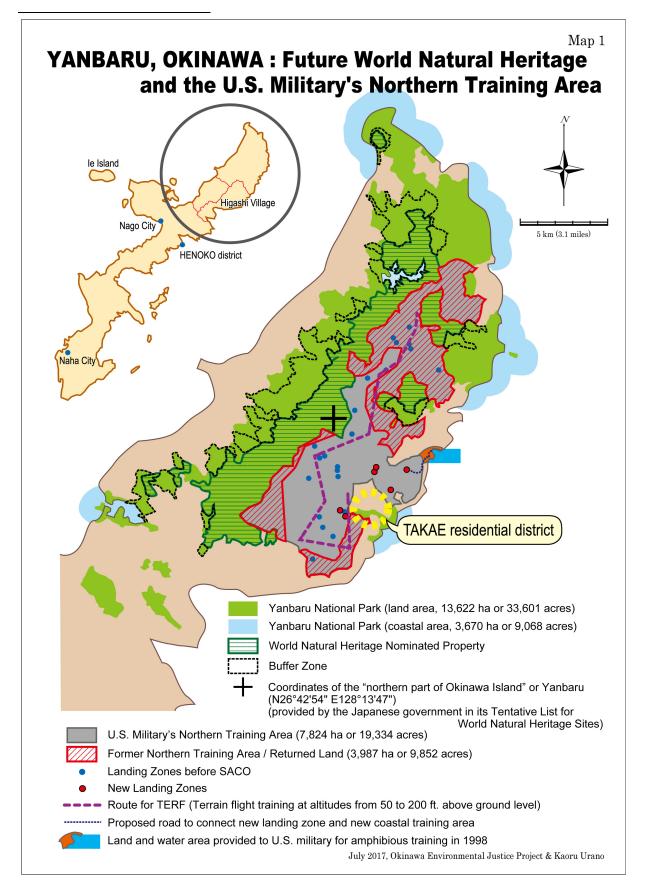


Figure 1: YANBARU, OKINAWA: Future World Natural Heritage and the U.S. Military's Northern Training Area.

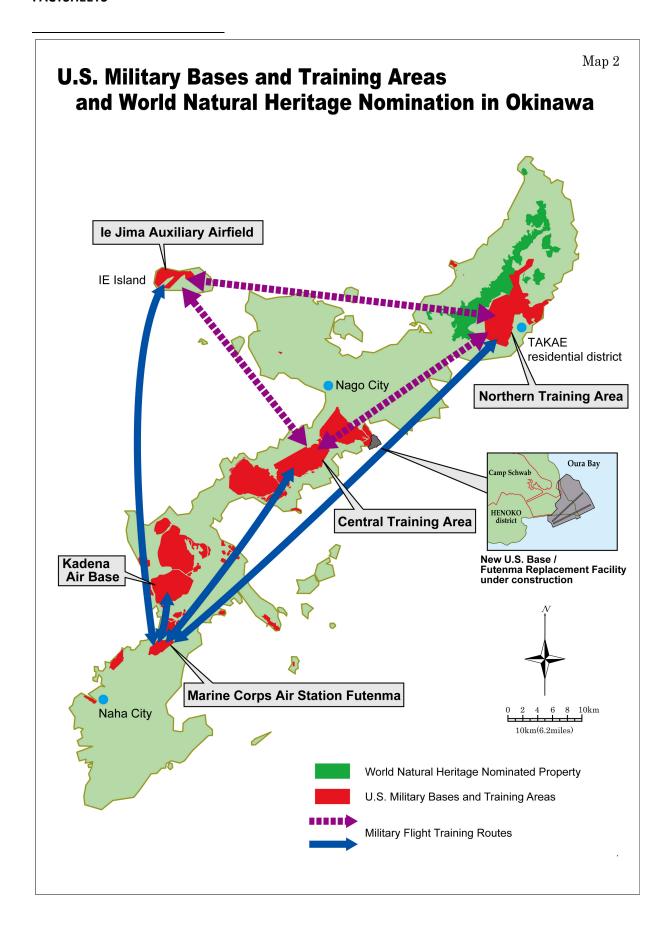


Figure 2: U.S. Military bases and Training Areas and World Natural Heritage Nomination in Okinawa

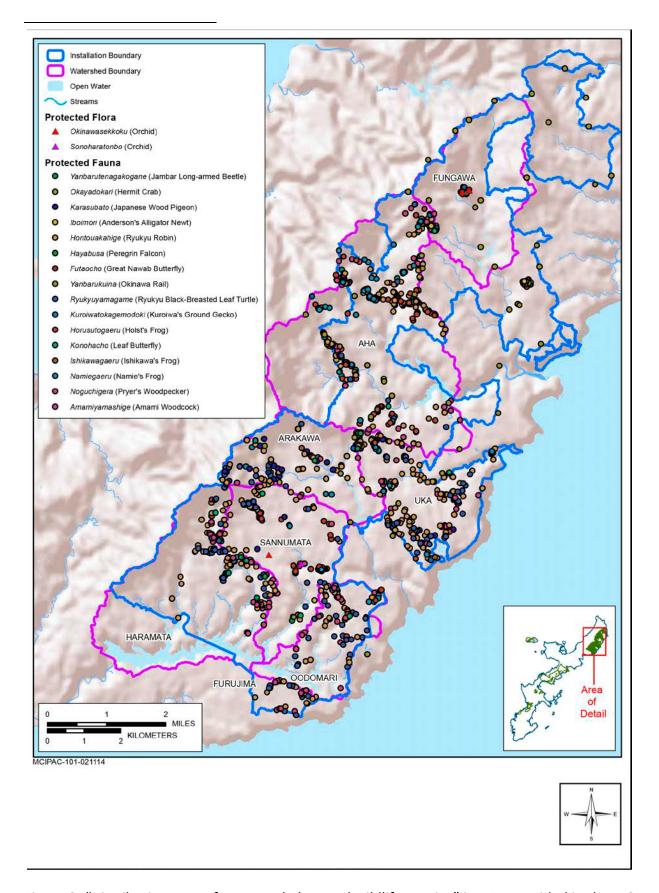
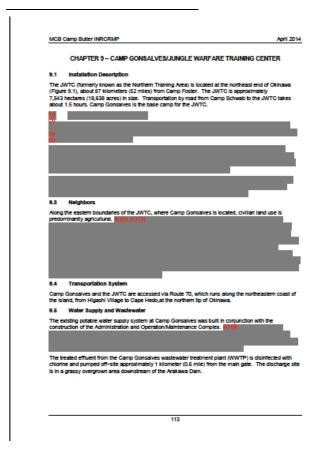


Figure 3: "Distribution map of protected plant and wildlife species" in NTA provided in the U.S. military's *Integrated Natural Resources and Cultural Resources Management Plan* (p.122) (2014).



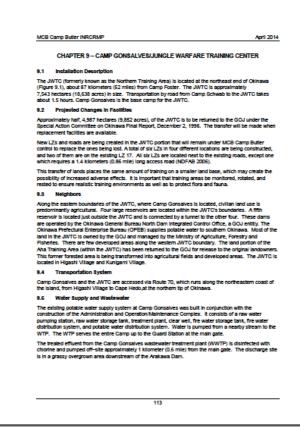


Figure 4: Comparison between two versions (redacted and fuller) of Page 113 of *Integrated Natural Resources and Cultural Resources Management Plan* (2014).



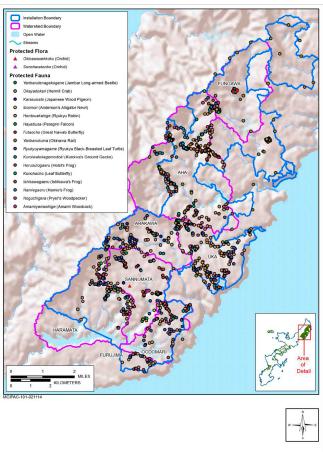


Figure 5: Comparison between two versions (redacted and fuller) of Page 122 of *Integrated Natural Resources and Cultural Resources Management Plan* (2014).

Ms Inger Andersen Director General of IUCN

Mr Tim Badman Director, IUCN World Heritage Programme

Dr Piero Genovesi Chair, IUCN SSC Invasive Species Specialist Group(ISSG)

Dr Kathy Mackinnon Chair, World Commission on Protected Areas

# Request concerning the IUCN field mission of proposed World Heritage sites in Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island, and Iriomote Island

Akira Kameyama, Chairman, Nature Conservation Society of Japan (NGO)
Hideki Yoshikawa, Representative, Okinawa Environmental Justice Project
Tsunenari Tokugawa, Chairperson WWF Japan
Yutaka Umisedo, Representative, Save The Dugong Campaign Center
Hitoshi Sato, Managing Director, Wild Bird Society of Japan
Motokazu Ando, President, Japan Wildlife Conservation Society
Yoshino Ando, Minoru Kashiwagi, Masayuki Kurechi, Ryoichi Hori, Seiji Maekawa,
Joint Representatives, Ramsar Network Japan

On February1st 2017, the Japanese government submitted to UNESCO its proposal for the islands of Amami-Oshima and Tokunoshima, the northern part of Okinawa Island and Iriomote Island to be inscribed on the World Natural Heritage list.

Japanese environmental NGOs have repeatedly sought the inscription of these islands of the Nansei Islands chain as World Heritage list since 1990. And in 2000, at IUCN World Conservation Congress held in Jordan, IUCN adopted a recommendation urging the Japanese government to consider the nomination of northern Okinawa Island as a World Natural Heritage site.

The northern part of Okinawa Island is home to the Okinawa rail (*Gallirallus okinawae*), the Pryer's woodpecker (*Sapheopipo noguchii*), the Yambaru long-armed scarab beetle (*Cheirotonus jambar*) and other endemic species. It is also an outstanding example of the natural environment of the Ryukyu Arc, demonstrating the evolutional processes of ecosystems and the succession and evolution of biological communities. With its universal values, it deserves to be protected internationally. Having advocated the area for inscription on the World Natural Heritage list, we environmental NGOs are delighted to see this latest proposal.

However, from a nature conservation point of view, there are several serious problems with the content of this proposal. To ensure that inscription as a World Heritage site helps to preserve the value of the site and make sure it is not degraded in future, we request you to direct attention to the following five points when the IUCN experts conduct their field later this year (2017).

#### Points for attention

- (1) We request that experts in the area of invasive species accompany the IUCN field mission. We have a number of concerns regarding the measures proposed to prevent the introduction of invasive alien species (IAS) into the Ryukyu and Amami Islands (See section e) below). In order to determine whether the proposed prevention measures meet global standards and are appropriate for a World Heritage site, we request that experts from the Invasive Species Specialist Group (ISSG) accompany the IUCN field mission. These concerns were raised at the 6th World Conservation Congress in 2016. However, in our view, the Japanese government has shown so far no intention of making improvements.
- (2) Additional sites for field mission in Okinawa

We request that the following sites outside the proposed World Heritage sites also be inspected:

- 1) Takae, in the village of Higashi, for the reasons given in b) and c) below,
- 2) Henoko and Oura Bay, for the reasons given in e) below.

These sites were the subjects of the three recommendations adopted by the IUCN, in 2000, 2004, and 2008, and should be inspected to evaluate the progress made there.

(3) Additional sites for field mission in Amami-Oshima Island and Tokunoshima Island
For the reasons given in a) and e) below, we request that the quarries around the proposed
World Heritage sites on Amami-Oshima Island and Tokunoshima Island also be inspected, in
particular, those areas which ship material off the islands.

(4) We hope opportunities will be arranged for the exchange of opinions with citizens.

It is reported that when the Ogasawara Islands were inspected in 2010 prior to being inscribed as a World Heritage site, discussions were also held between IUCN experts and citizens. We hope that similar arrangements will be made for the Amami-Ryukyu proposal.

- (5) We would like to suggest the inspectors to contact the following experts for expert information.
- (1) On alien species and related issues
  - (a) Takeshi Sasaki(\*1).

Specialist on insects and spiders at the Museum of the University of the Ryukyus, "Fujukan."

(b)Mizuki Tsuji(Dr.) (\*2).

Entomologist at the Faculty of Agriculture, University of the Ryukyus.

(c) Masatsugu Yokota (Dr.)(\*3).

Specialist in plants and alien species problems at the Faculty of Agriculture, University of the Ryukyus.

These three experts were consulted, under the Okinawa prefecture's land reclamation program, on the matters of invasive alien species in land reclamation material for the Naha Airport runway extension project, .

- (2) On Yambaru Forest and related issues:
  - (a)Tsutomu Kanaiduka(Dr.)(\*4).

Representative of CONFE, the Conservation Network for Forest Ecosystem in Japan. Specialist on the forest ecosystems of northern Okinawa Island.

# (b)Akino Miyagi (\*5).

Specialist of the ecology of the insects of northern Okinawa Island. She spent more time than any other insect specialists in the field of Yambaru forest. Member of Lepidopterological Society of Japan.

## (c)Yafuso Masako (Dr.)(\*6).

Member of the Japan Scientists Association. Former Associate professor at the university of the Ryukyus. Specialist on insects and studied the relationship between insects that belong to the genus *Drosophilidae* and host plants.

# (d)Hidetoshi Ohta (Dr) (\*7)

Specialist in ecology and classification of the reptilian and amphibian animals. Former professor of the University of the Ryukyus, he now belongs to the Museum of Nature and Human Activities, Hyogo prefecture.

# (e)Yoshiyasu Iha (\*8).

Former high school biology teacher. He has been studying the environmental changes in the Yambaru forest more than 30 years.

#### (f) Chosei Tamaki(\*9).

Specialist on *Lecanorchis japonica* and on the ecology of the Yabaru forest including the Takae area.

# (3) on Military base related land contamination issues

Masami Kawamura(Dr.)(\*10),

Director of the Informed Public Project, Specialized in land contamination issues related to US military bases. International sociologist. Member of IUCN Commission on Ecosystem Management(CEM).

#### Problems and background

The following statements provide background information on the requests.

#### a) Buffer zones are required as resolved at the IUCN World Park Congress

The area of the northern part of Okinawa Island proposed for World Heritage inscription has no buffer zone on most of the eastern edge, so that the property is unprotected at several points, (Fig, 1). On Amami-Oshima Island and Tokunoshima Island, there are numerous places where the property has a very limited buffer zone, or none at all. (Fig 2,3)

Inscription as a World Heritage site is often followed by an abrupt increase in tourists and pressure from development of the surrounding areas. The buffer zones indicated in the current proposal are insufficient to provide protection against current or future development pressure. At the 4th IUCN World Park Congress in February 1992, UNESCO and the IUCN held a World Heritage workshop and resolved that preserving the property required not only buffer areas but also the creation of a World Heritage Management Area with a program to protect the site against property development nearby (Mishra and Ishwaran 1992, Yoshida 2012). Followed by the meeting held by UNESCO, IUCN and ICOMOS, the World Heritage Committee adopted a resolution with the same content as the resolution adopted in 1992 (UNESCO 2009).

In Japan, a World Heritage site must first be a National Park as defined by the national parks law in Japan, which is how conservation secures. As mentioned above, the settings of the buffer zones and the World Heritage Management Area are not sufficient for the proposed property.

# b) The environment inhabited by endemic species should be included in the proposed World Heritage area for the maintenance of integrity for the World Heritage Sites

The Yambaru forest in the northern part of Okinawa Island covers large area of 34,000 hectares as a whole, and is home to 5,400 animal and 1,000 vascular plant species. The forest has a high proportion of endemic species found in only this area including the Pryer's woodpecker (Sapheopipo noguchi), Okinawa rail (Gallirallus okinawae), the Yambaru long-armed scarab beetle (Cheirotonus jambar), and Okinawa spiny rat (Tokudaia muenninki) found only in this area. Many of these species are designated Japanese 'Natural Monuments' and more than 170 of them are endangered species included in the Environment Ministry's Red List. On the other hand, the national park and the World Heritage proposal cover only parts of the extensive natural habitat (Fig. 1-1). To prevent the extinction of endemic species, as much as possible of the appropriate environment should be conserved.

It appears that the proposed sites for World Natural Heritage do not reflect the actual distribution of endemic species, but were chosen for human convenience. It is difficult to conceive that creatures that show diverse behavior such as Pryer's woodpecker (Sapheopipo noguchii), Okinawa rail (Gallirallus okinawae), the Yambaru long-armed scarab beetle (Cheirotonus jambar) and Okinawa spiny rat (Tokudaia muenninki) limit their distribution within the proposed areas. Takaé in Higashi village is home to many rare and endangered species and is a biodiversity hotspot. However some part of Takae is located within the U.S. Marine Corps Northern Training Area and there the construction of helipads for U.S. military is now under way. In fact, 29 nesting sites of Pryer's woodpecker, Japan's Natural Monument, as well as numerous rare insect species including the butterflies Pithecops corvus and Ypthima riukiuana have been confirmed in Takae. However, this area is not included in the World Heritage proposal.

Therefore, there is a possibility that the proposed site does not include all important sites for conservation. And there is a concern that many of the important areas are in fact located inside of "unreturned NTA" as discussed below. Takaé, is a mere 8 km from the proposed World Heritage site (Figure 4). If the whole of the Yambaru forest is not conserved as a single unit, the integrity of the site will be compromised.

For proper management of a World Heritage site, it is a basic principle that the proposed area must be selected according to the distribution of each species (with particular emphasis on rare species), designating core areas used for reproduction and other basic functions, and surrounded with habitat of the same type as a buffer zone.

It is imperative that a World Heritage site be selected according to the distribution of each species (with particular emphasis on rare species), include core areas used for reproduction and other basic functions, and be surrounded with a buffer zone. As a principle, these important natural environment areas needs be managed as a World Heritage site.

Many environmental NGOs have long sought the inscription of a wide area of northern Okinawa Island as a World Heritage site. We have proposed a site for World Heritage which includes both terrestrial and coastal water areas of the northern Okinawa Island, the Yambaru area. In the environment of small islands like Okinawa, it is crucial to protect both terrestrial and coastal water areas and their relationship. As the coastal area of northern Okinawa Island is habitat for the northernmost population of the dugong (*Dugong dugon*), an endangered species, (Kasuya and Abe, 2015), as the area of Henoko and Oura Bay, Nago City is habitat for 5,334 marine species including 262 endangered species, and as Takae is habitat for Pryer's woodpecker (*Sapheopipo noguchi*) and Okinawa Rail (*Gallirallus okinawae*), they should be included in the proposed site for World Heritage site. Wider area should be included to proceed effective conservation so that it would become World Heritage in a true meaning.

# c) To preserve the integrity of the environment, the U.S. Marine Corps Northern Training Area should be included in the World Heritage Management Area

Since 1957 until very recently, approximately 7,800 hectare of the northern part (Yambaru forest) of Okinawa Island were used as the U.S. Marine Corps Northern Training Area (NTA). About 4,000 hectares of the NTA were returned to Japanese control in December 2016: however the remainder of the NTA is still used for training by the U.S.military. While the returned area is expected to be considered for future inclusion for World Heritage site, it is not included in the proposed World Heritage site (Figure 1-2). The remaining NTA is also not included in the proposed site either. However, it is conceivable that endangered species and other rare species inhabit and use a wide area of the Yambaru forest including the NTA.

Figure 6-1 and 6-2 shows that, in the returning of the NTA, a large part of Pryer's woodpecker's habitat, including Nishime yama, Terukubi-dake, and west part of Yonaha dake, has also been returned to Japanese control. However, a large part of their habitat remains in the unreturned NTA. Also, not all Pryer's woodpecke's habitat is included in the proposed World Heritage site (Figure 6-2). Moreover, while there is high possibility that rare and endangered species inhabit intact forests, it is pointed out that much of such intact forests is now in the NTA (Ito et al.2000). Thus, the protection of biodiversity in the Yambaru forest requires consolation with U.S. military and securing environmental protection measures applicable to the NTA.

Both the returned area and unreturned area of the NTA are continuous natural environment and it is hard to divide them (Miyagi 2016). To preserve the 'integrity' of the environment, both returned and unreturned areas should be included in the World Heritage Management Area and in its overarching conservation management plan.

In addition, given that the NTA is used for a variety of military exercises, it is hard to imagine that the noise from aircraft, soil pollution from dumped military waste, crashed aircraft and the like, have no impact on the surrounding areas. However, the proposal documents the Japanese government has presented to UNESCO does not have even a single map showing the location of the NTA. Nor do they contain discussion on the impacts of the NTA on the environment. We request you to confirm in your field mission what kind of conservation measures are taken to secure 'integrity' and whether consultation between the Japanese and U.S.

governments takes place. With regard unreturned part of NTA, we request IUCN to ask the U.S. government to provide information on environment, such as the status of endangered species. Then based on that information please judge if 'integrity' of the site is secured or not.

As discussed above, Amami-Oshima Island and Tokunoshima Island require enlarged buffer zones and other improvements. The selection of the proposed site in northern Okinawa Island ignores the continuous natural environments. UNESCO defines 'integrity'. as 'a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes'. In our view, this proposal has not resolved the issues of 'integrity'. Thus the proposal should be improved in this regard.

# d) Discussions with local citizens should be arranged.

In connection with sections a) to c) above, in preparing to select sites and content for the World Heritage proposal, the Japanese government has not made sufficient effort to hear the opinions of all stakeholders such as local communities and NGOs.

In the northern part of Okinawa Island, many stakeholder residents were not consulted regarding selection of sites and buffer zones for World Heritage, plans of helipads construction and relationship between returning of NTA and World Heritage inscription process. As decisions were made top-down, local residents who live nearby the helipad construction site continue to engage in protest against the construction, and concern has been raised over whether nomination of the northern part of Okinawa for World Heritage was a trade-off for helipad construction.

On Amami-Oshima Island and Tokunoshima Island, despite quarries are located outside of the proposed World Heritage sites, people who live around the quarries and people who own quarries are stakeholders for the reasons discussed below (section e). They were however not provided opportunities to know the detail of the selected areas for World Heritage and say opinion however.

On In Iriomote-Island, the Iriomote subcommittee has been organized by the Ministry of the Environment and in the year 2016 to 2017, seminars and preparation meetings were held. However, until February 2017 official discussion on the action plan were held only twice, and local people were allowed to participate only as observer.

We sincerely hope that, as part of the IUCN field missnon, the experts will meet with local experts and residents to hear their concerns.

# e) An extensive land reclamation project is planned in close proximity to the proposed site for World Heritage, for which large quantities of rock and soil will be imported from quarries outside Okinawa prefecture. A program for the control of invasive alien species is essential.

In the area of Henoko, Nago city in northern Okinawa Island, just south of the proposed area for World Heritage site (Fig. 4), the construction of a U.S. military base, Futenma Replacement Facility, is now under way. This project requires 21 million cubic meters of landfill, 17 million cubic meters of which will be supplied from seven sites in six different prefectures outside Okinawa (Fig 5). Two of those quarries are located on islands which are within the boundaries of the proposed World Heritage site: Amami-Oshima Island (5.3 million cubic meters) and Tokunoshima Island (0.1 million cubic meters). The quarries themselves are excluded from the proposed site, as is the area to be land reclaimed at Henoko. The distance separating the construction site and the proposed World Heritage area is a mere 16 km.

The climate and ecosystems of the seven quarries in six different prefectures differ from those of Okinawa, and the quarry at Setouchi is known to contain the Argentine ant (*Linepithema humile*), an invasive alien species (IAS) listed in the Environment Ministry's "*List of Regulated Living Organisms under the Invasive Alien Species Act.*" Each of the islands has its own endemic species and ecosystem, and its own process of evolution, one of the very reasons why they are nominated as candidates for World Heritage. There is a huge risk that moving large quantities of rock and soil from one island to another will disturb the different ecosystems and disrupt the processes of evolution and succession under way there. Strict measures and management are required.

To conserve the biodiversity and endemic species of the four islands in the proposed World Heritage Amami-Ryūkyū areas, there is an urgent need for programs to cull invasive species already present and to prevent the introduction of more.

These concerns were addressed in IUCN Resolution WCC-2016-Res-020-EN, "Strengthening pathway management of alien species in island ecosystem" adopted at the 6th World Conservation Congress and came into force in September 2016. In the same resolution, it was mentioned that even the domestic movement of people and goods is something that needs to be addressed. Meanwhile the Japanese government's construction plan gives no suggestion whatsoever that the government has taken these matters into consideration.

Moreover, while the Japanese government's World Heritage proposal mentions the issue of the mongoose as an alien species on Amami-Oshima Island and Okinawa Island, there is little discussion on other alien species and measures to control them. The issue of invasive alien species is not necessarily restricted to currently designated invasive alien species. It is quite possible that, once introduced and reproducing, other alien species may subsequently be found difficult to control. The World Heritage proposal has no mention of policy to be adopted in such instances. Though invasive alien species are recognized worldwide as a serious problem, in our assessment, the Japanese government's understanding of the problem may not be on par with that of its counterparts.

In fact, despite the Naha Airport runway extension project is being carried out under the restrictions of the Law on Invasive Species and Okinawa prefectural ordinances on the handling of soil, invasive alien species have been confirmed near quarries which supply land reclamation material for the project. Work there has not been stopped, even temporarily. Nor appropriate measures have been taken. In effect, land reclamation material is being imported with no guarantee that it does not include invasive alien species.

With inscription of these sites as World Heritage list, an increase in tourism can be expected to follow, and the movement of people and goods is bound to cause problems. We hope that the IUCN experts will examine whether the conservation plan includes prevention measures, early-stage counter-measures, and a management system that incorporate local communities, all appropriate for World Heritage sites.

# The way the islands with World Heritage areas should be

We would like to direct your attention to the following issues as well.

Okinawa prefecture and Kagoshima prefecture need to reconsider their islands' carrying capacity. At present, 8,610,000 tourists visit Okinawa annually and Okinawa prefecture makes it its goal to have 10,000,000 visitors annually. To achieve this goal, a new airport is build on Ishigaki Island; an additional runway is being constructed at the Naha airport; new ports are also being built so that cruise ships carrying a large number of tourists could berth; and the number of resort hotels and rental cars are also steadily increasing.

Given that the sizes of the four islands nominated for World Heritage are small and that the areas that people could utilize for their daily life are also limited, we are concerned that impacts from all these developments will exceed and overwhelm the islands' carrying capacity.

On Iriomote Island, one of the proposed area for World Heritage, the number of traffic accidents involving Iriomote cat (Prionailurus bengalensis iriomotensis), which is endemic to the island, is increasing. This is largely due to an increase in the number of tourists who drive and run over Iriomote cats with their rental cars. The Japanese government's World Heritage proposal states recognizes the impacts of human activities such as road kill on the environment. However, it does not discuss effective measures to counter these impacts. Consideration should be given to the environmental pressure and impacts caused by tourists' activities.

In Amami City of Amami-Oshima Island, projects to construct large industrial waste disposal facility (42,650m²) construction project and a base for construction project Japanese Self-Defense Force are being planned. However, consensus building between the government and local residents has been problematic and these projects have become social problems.

On Okinawa Island, many social problems have arisen from lack of consensus building and subsequent environmental destruction associated with the construction of the Futenma Replacement Facility project in Henoko and Oura Bay and helipads for U.S. military at Takae. In our view, on these islands with proposed World Heritage sites, any human activities, which are deemed to be unsustainable and could impact the proposed World Heritage sites, need to be reviewed, revised and be countered with adequate and coordinated measures brought about by all stakeholders including local stakeholders.

We request you to investigate whether existing frameworks and systems are adequate and can accommodate the predicted increase in tourist numbers for the future World Heritage area of the Amami Ryukyu islands.

#### CC:

Mr Sean Southey, Chair, Commission on Education and Communication
Ms Angel Andrade, Chair, Commission on Ecosystem Management
Ms Kristin Painemilla Walker, Chair, Commission on Environmental, Economic and Social Policy
Mr Jon Paul Rodriguez, Chair, Species Survival Commission Benjamin, Antonio, Chair, World
Commission on Environmental Law

#### The following organizations support this letter.

Association to Protect the Northernmost Dugong
Dugong Network Okinawa
"No Heliport Base" Association of 10 Districts North of Futamai
Society of No Base in Oura Bay/Residents of Villages North of Futami
Diving Team Rainbow-The Conference Opposing Heliport Construction
The Save-Awase-Higata Association
Association for Protection of Marine Communities (AMCo)
The Nature and Cluture conaservation group of Amami (NCA)

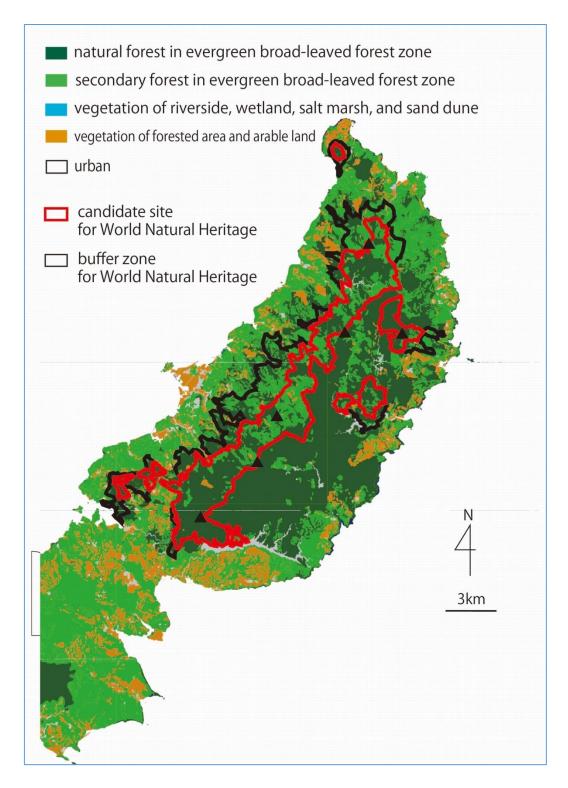


Figure 1-1. The relationship between the vegetation and the location of the World Heritage site in the northern part of Okinawa Island.

(Created by NACS-J based on data from the Ministry of the Environment's national survey on the natural environment.)

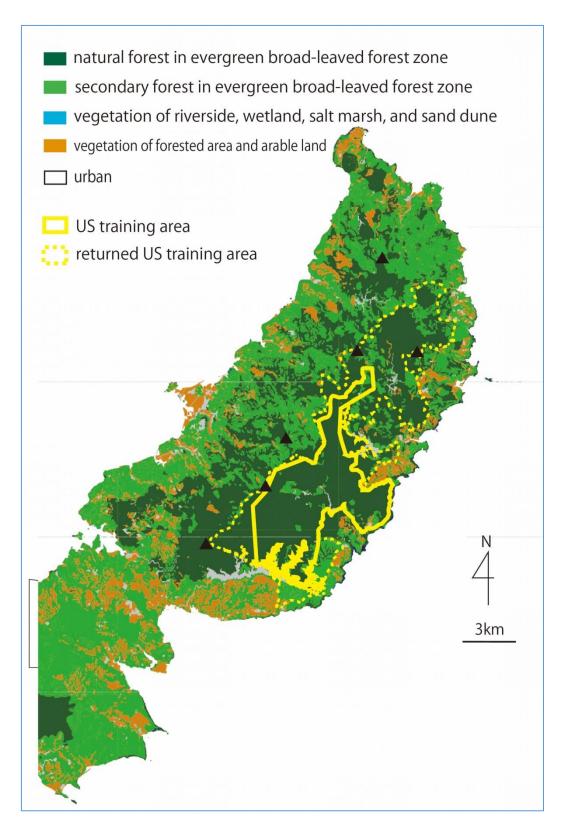


Figure 1-2. The relationship between the vegetation and U.S. Training Area (Created by NACS-J based on data from the Ministry of the Environment's national survey on the natural environment.)

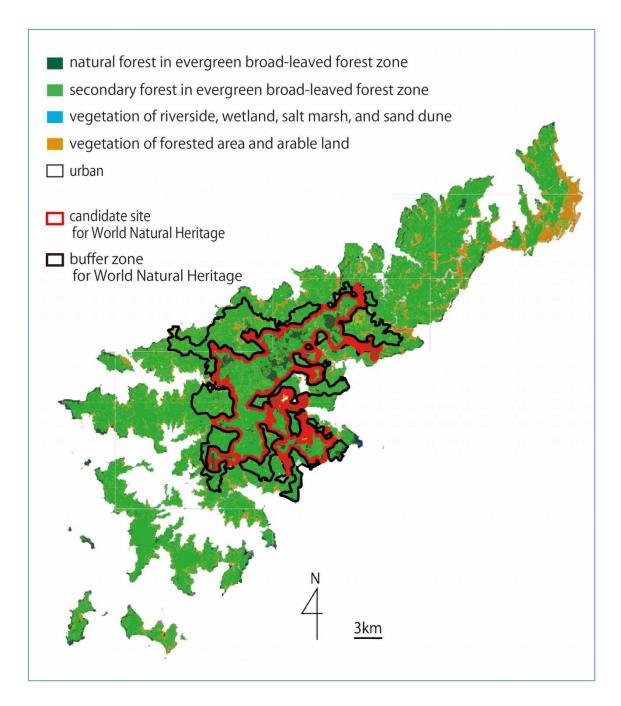


Figure 2. The relationship between the vegetation and the location of the World Heritage site in Amami-Oshima

(Created by NACS-J based on data from the Ministry of the Environment's national survey on the natural environment.)

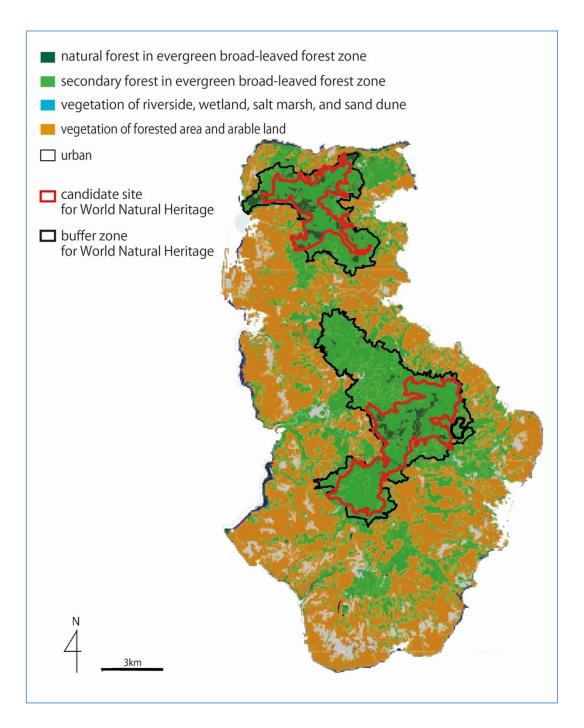


Figure 3. The relationship between the vegetation and the location of the World Heritage site in Tokunoshima Island

(Created by NACS-J based on data from the Ministry of the Environment's national survey on the natural environment.)

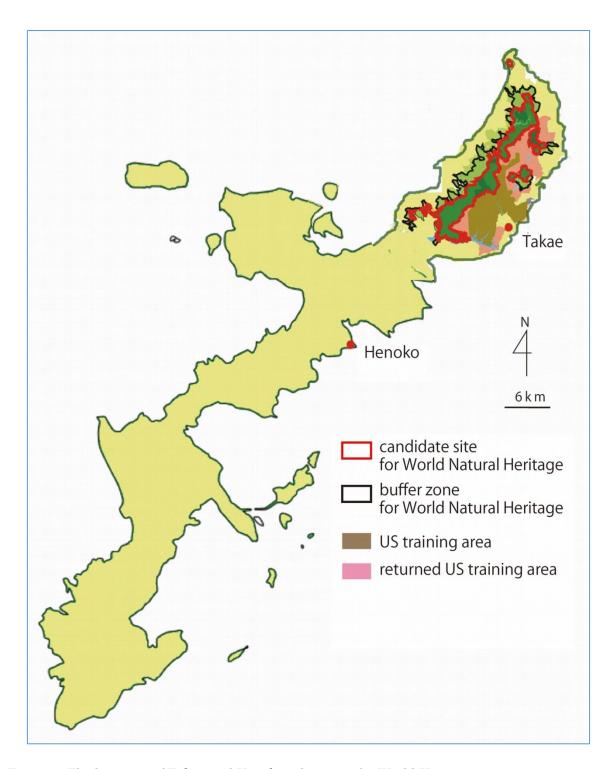


Figure 4. The locations of Takae and Henoko relative to the World Heritage site. (Created by NACS-J based on Yambaru National Park Plan and Amami Islands National Park Plan)

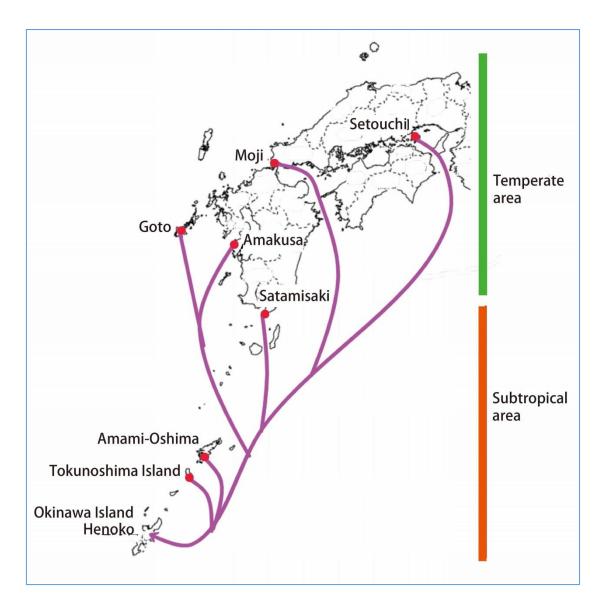


Figure 5. Planned sources of landfill material for the Futenma Air Station Replacement Facility. (Created by NACS-J based on information on the locations of quarries and transportation routes from the landfill application for Futenma Replacement Facility Construction Project (Okinawa Defense Bureau, 2013)

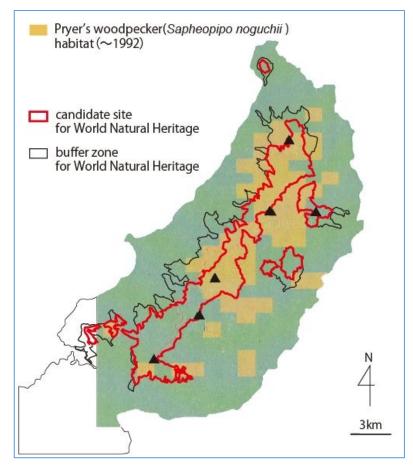


Figure 6-1. The relationship between the habitat of Pryer's woodpecker (*Sapheopipo noguchii*) and the World Heritage site in northern part of Okinawa Island (Created by NACS-J based on

data from the World Heritage proposal, 'Nature Conservation' No 392, published in 1995 by

NACS-J)

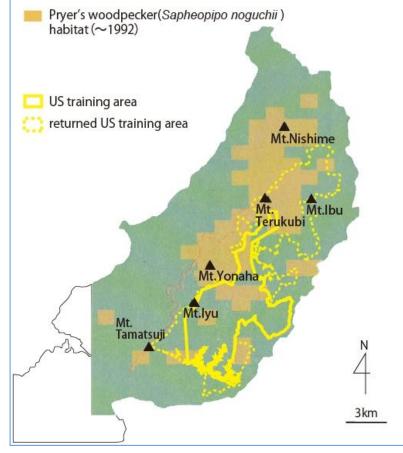
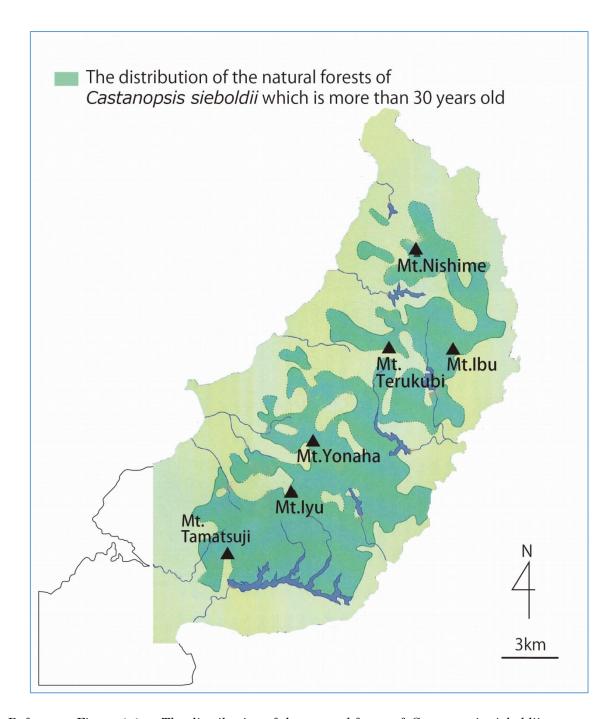
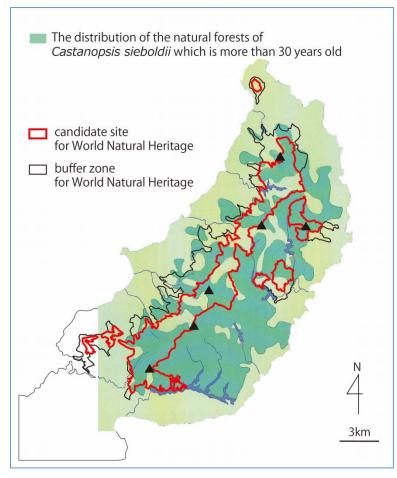


Figure 6-2. The relationship between the habitat of Pryer's woodpecker (Sapheopipo noguchii) and US Training area

(Created by NACS-J based on data from the World Heritage proposal, 'Nature Conservation' No 392, published in 1995 by NACS-J)



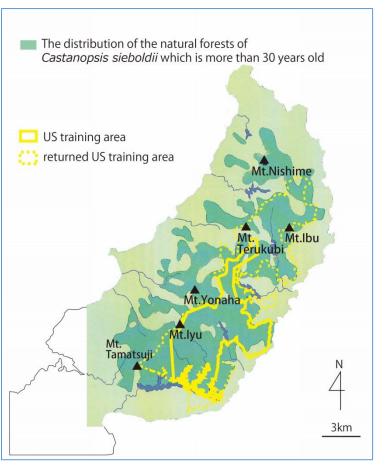
Reference Figure 1-1. The distribution of the natural forest of *Castanopsis sieboldii*. (Created by NACS-J based on data from the World Heritage proposal, 'Nature Conservation' No 392, published in 1995 by NACS-J)



Reference Figure 1-2. The relationship between the distribution of the natural forest of *Castanopsis sieboldii* and the World Heritage site.

(Created by NACS-J based on data from the World Heritage

proposal, 'Nature Conservation' No 392, published in 1995 by NACS-J)



Reference Figure 1-3.

The relationship between the distribution of the natural forest of *Castanopsis sieboldii*. (Created by NACS-J based on data from the World Heritage proposal, 'Nature Conservation' No 392, published in 1995 by NACS-J) and US Training area

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The Yanbaru forest has been nominated for UNESCO World Natural Heritage status, along with the islands of Iriomote, Okinawa Prefecture, and Amami-Oshima and Tokunoshima, both in Kagoshima Prefecture. | KYODO

VOICES | HOTLINE TO NAGATACHO

# U.S. military must not jeopardize Okinawan forest's bid for World Heritage status

ARTICLE HISTORY | FEB 1, 2017

Dear Mr. Jason P. Hyland (Charge d'Affaires ad interim, U.S. Embassy in Japan) and Lt. Gen. Jerry P. Martinez (Commander, United States Forces Japan):

We write to express our concern regarding the U.S. military's continued use of the Northern Training Area (NTA) in northern Okinawa's Yanbaru forest, in light of the fact that the forest has been formally nominated for UNESCO World Natural Heritage status, along with the islands of Iriomote, Okinawa Prefecture, and Amami-Oshima and Tokunoshima, both in Kagoshima Prefecture.

As you are well aware, the 27,800- hectare (68,695-acre) Yanbaru forest is the oldest subtropical rain forest on the island of Okinawa and one of the richest areas in terms of biodiversity in Japan. It is home to some 5,400 species of fauna and over 1,000 species of

vascular plants. Among these are 170 endangered species included on the Japanese Environment Ministry's Red List. Endemic and endangered species and Japan's "Natural Monuments," such as the Okinawa woodpecker and the Okinawa rail, are the best-known inhabitants of the forest. It is most appropriate that the Yanbaru forest is now being considered for UNESCO World Heritage status.

However, since 1957, when 7,800 hectares (19,274 acres) of the Yanbaru forest were taken over by the U.S. military and converted into the NTA, U.S. forces have been conducting jungle warfare training and low-flying aircraft training missions there. There are also "landing zones" for military aircraft, including six new ones completed in December 2016 in the face of strong local opposition, as well as other training facilities within the NTA.

Loud noise emitted from aircraft, land contamination from disposed materials and crashed aircraft, logging and the construction of logging roads to serve the local forest industry continue to present significant environmental challenges to the forest. The U.S. military's return of 4,000 hectares of the training area to Japan in December has not eliminated these challenges. Instead, it is likely to result in intensification of the impact of training on the environment, as the U.S. military claims that "the same level of training is now conducted in a smaller region."

World Heritage requires sites seeking certification to have "integrity," which is defined by UNESCO as "a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes." The NTA, which is under U.S. jurisdiction, is located in a sensitive part of the forest, just next to the Special Protection Zone of the newly established Yanbaru National Park. We are concerned that the presence of the NTA and the training of U.S. forces in the forest greatly hinder the nomination process.

Regrettably, there is no evidence that the U.S. military has participated in or given proper consideration to the Yanbaru World Natural Heritage nomination process. None of the U.S. military's documents available to the Okinawan public acknowledges the nomination process.

Given that U.S. Forces Japan closely follows developments in Okinawa in general, especially ones associated with U.S. military facilities and areas, we have difficulty understanding why they have been silent on this issue. We do not know whether the U.S. military is simply ignoring the nomination process or if the Japanese government has properly informed the U.S. authorities of it. Either way, the lack of cooperation from the U.S. military further hinders successful inscription of the Yanbaru forest as a World Natural Heritage site.

Section 135 of the Operational Guideline for the World Heritage Convention, to which the U.S. is a signatory state, stipulates: "Wherever possible, trans-boundary nominations should be prepared and submitted by States Parties jointly in conformity with Article 11.3 of the Convention. It is highly recommended that the States Parties concerned establish a joint management committee or similar body to oversee the management of the whole of a trans-boundary property."

And the UNESCO World Heritage Convention Article 11.3 states: "The inclusion of a property in the World Heritage List requires the consent of the state concerned. The inclusion of a property situated in a territory, sovereignty or jurisdiction over which is claimed by more than one State, shall in no way prejudice the rights of the parties to the dispute."

We do not believe that the U.S. military and government would like to be seen as an obstacle in the way of the World Heritage nomination process in an allied country.

Also, we understand that, under the current U.S. National Historical Preservation Act (NHPA) (Section 402), the law that addresses matters related to the World Heritage Convention, while the U.S. military is required to take into account the effects of its undertakings — whether it be training or construction of facilities — on World Heritage sites and properties in foreign countries, it is not required to do so in relation to World Heritage nomination processes. We believe, however, that the spirit and intention of the NHPA is for the U.S. military to take into account the effects of allowing construction of landing zones and training in the Yanbaru forest.

Therefore, in accordance with Article 11.3 of the UNESCO World Heritage Convention, Section 135 of the Operational Guideline for the World Heritage Convention and the spirit and intent of 402 of the U.S. National Historical Preservation Act, we request that the U.S. military, in consultation with local communities, prefectural and national (Japanese) government and relevant NGOs, do the following:

- Conduct an assessment regarding the impact of allowing the construction of landing zones and the conduct of aircraft and other types of training in the Yanbaru World Natural Heritage inscription process.
- While conducting this assessment, cease issuing entrance permits to the Okinawa Defense Bureau for purposes of further facility construction and suspend its aircraft and other types of training.
- Involve relevant U.S. government agencies, including the Advisory Council on Historical Preservation and the Office of the Assistant Secretary of Fish and Wildlife and Parks, in the assessment process.

### HIDEKI YOSHIKAWA

Director Okinawa Environmental Justice Project

This is an edited version of a longer original letter signed by 40 environmental and civic organizations on Dec. 1. Send your comments or submissions (addressed to local or national politicians, officials or other groups) here:

community@japantimes.co.jp (mailto:community@japantimes.co.jp)

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vascular plants. Among these are 170 endangered species included on the Japanese Environment Ministry's Red List. Endemic and endangered species and Japan's "Natural Monuments," such as the Okinawa woodpecker and the Okinawa rail, are the best-known inhabitants of the forest. It is most appropriate that the Yanbaru forest is now being considered for UNESCO World Heritage status.

However, since 1957, when 7,800 hectares (19,274 acres) of the Yanbaru forest were taken over by the U.S. military and converted into the NTA, U.S. forces have been conducting jungle warfare training and low-flying aircraft training missions there. There are also "landing zones" for military aircraft, including six new ones completed in December 2016 in the face of strong local opposition, as well as other training facilities within the NTA.

Loud noise emitted from aircraft, land contamination from disposed materials and crashed aircraft, logging and the construction of logging roads to serve the local forest industry continue to present significant environmental challenges to the forest. The U.S. military's return of 4,000 hectares of the training area to Japan in December has not eliminated these challenges. Instead, it is likely to result in intensification of the impact of training on the environment, as the U.S. military claims that "the same level of training is now conducted in a smaller region."

World Heritage requires sites seeking certification to have "integrity," which is defined by UNESCO as "a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes." The NTA, which is under U.S. jurisdiction, is located in a sensitive part of the forest, just next to the Special Protection Zone of the newly established Yanbaru National Park. We are concerned that the presence of the NTA and the training of U.S. forces in the forest greatly hinder the nomination process.

Regrettably, there is no evidence that the U.S. military has participated in or given proper consideration to the Yanbaru World Natural Heritage nomination process. None of the U.S. military's documents available to the Okinawan public acknowledges the nomination process.

Given that U.S. Forces Japan closely follows developments in Okinawa in general, especially ones associated with U.S. military facilities and areas, we have difficulty understanding why they have been silent on this issue. We do not know whether the U.S. military is simply ignoring the nomination process or if the Japanese government has properly informed the U.S. authorities of it. Either way, the lack of cooperation from the U.S. military further hinders successful inscription of the Yanbaru forest as a World Natural Heritage site.

Section 135 of the Operational Guideline for the World Heritage Convention, to which the U.S. is a signatory state, stipulates: "Wherever possible, trans-boundary nominations should be prepared and submitted by States Parties jointly in conformity with Article 11.3 of the Convention. It is highly recommended that the States Parties concerned establish a joint management committee or similar body to oversee the management of the whole of a trans-boundary property."

And the UNESCO World Heritage Convention Article 11.3 states: "The inclusion of a property in the World Heritage List requires the consent of the state concerned. The inclusion of a property situated in a territory, sovereignty or jurisdiction over which is claimed by more than one State, shall in no way prejudice the rights of the parties to the dispute."

We do not believe that the U.S. military and government would like to be seen as an obstacle in the way of the World Heritage nomination process in an allied country.

Also, we understand that, under the current U.S. National Historical Preservation Act (NHPA) (Section 402), the law that addresses matters related to the World Heritage Convention, while the U.S. military is required to take into account the effects of its undertakings — whether it be training or construction of facilities — on World Heritage sites and properties in foreign countries, it is not required to do so in relation to World Heritage nomination processes. We believe, however, that the spirit and intention of the NHPA is for the U.S. military to take into account the effects of allowing construction of landing zones and training in the Yanbaru forest.

Therefore, in accordance with Article 11.3 of the UNESCO World Heritage Convention, Section 135 of the Operational Guideline for the World Heritage Convention and the spirit and intent of 402 of the U.S. National Historical Preservation Act, we request that the U.S. military, in consultation with local communities, prefectural and national (Japanese) government and relevant NGOs, do the following:

- Conduct an assessment regarding the impact of allowing the construction of landing zones and the conduct of aircraft and other types of training in the Yanbaru World Natural Heritage inscription process.
- While conducting this assessment, cease issuing entrance permits to the Okinawa Defense Bureau for purposes of further facility construction and suspend its aircraft and other types of training.
- Involve relevant U.S. government agencies, including the Advisory Council on Historical Preservation and the Office of the Assistant Secretary of Fish and Wildlife and Parks, in the assessment process.

### HIDEKI YOSHIKAWA

Director Okinawa Environmental Justice Project

This is an edited version of a longer original letter signed by 40 environmental and civic organizations on Dec. 1. Send your comments or submissions (addressed to local or national politicians, officials or other groups) here:

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