

July 18, 2021

H.E. Mr. Tian Xuejun  
Chairperson  
UNESCO World Heritage Committee  
7, Place de Fontenoy  
75352 Paris CEDEX 07  
France

Dear Chairperson Tian Xuegun:

We, the undersigned community groups, NGOs, and civil society organizations, would like to congratulate you and the UNESCO World Heritage Committee on the 44th Session of the UNESCO World Heritage Committee meeting. We hope that the 44 Session will be successful. We would also like to direct the attention of the UNESCO World Heritage Committee to our concerns regarding the recommendation of the Northern Part of Okinawa Island (NPOI) in Japan for World Natural Heritage status made by the IUCN World Heritage Programme.

We welcome the IUCN Programme's recommendation that, along with the other nominated sites (the Islands of Amami-Oshima, Tokunoshima, and Iriomote), the NPOI be inscribed as a World Natural Heritage site. We appreciate that both the Programme and the Japanese Ministry of the Environment considered our concerns regarding the issues of the U.S. military's Northern Training Area (NTA) located next to the NPOI in the nomination process. (See Appendix NPOI for UNESCO WNH). We especially value their efforts to obtain a collaboration agreement from the U.S. military for the nomination process and the U.S. military's willingness to collaborate. We hope that the NPOI and the other nominated sites will be inscribed as World Natural Heritage sites at the 44th Session of the UNESCO World Heritage Committee meeting.

However, we believe that the IUCN World Heritage Programme's evaluation and recommendation of the NPOI presented in the *IUCN World Heritage Evaluations 2020 and 2021* should include more explicit language to address the issues of the NTA and the "returned land" of the former NTA now incorporated into the nominated site. Considering the current situations of the NTA and the "returned land," we believe that the IUCN Programme's evaluation and recommendation of the NPOI, as they are, cannot be effective in solving these issues.

To ensure that the NPOI is worthy of UNESCO World Heritage status and that the integrity of the UNESCO World Heritage is maintained without any compromise, we urge the UNESCO World Heritage Committee to recognize the specific issues described below of the NTA and the "returned land" and include effective language to address them in the UNESCO Committee's inscription document.

Sincerely yours,

Contact  
Hideki Yoshikawa  
Director of Okinawa Environmental Justice Project  
Email: [yhideki@gmail.com](mailto:yhideki@gmail.com)

1. Okinawa Environmental Justice Project
2. The Informed-Public Project
3. AKAY Japan
4. All Japan Dockworkers' Union (JDU) Kansai Regional Osaka Branch
5. All Okinawa Council for Human Rights
6. Association of Nightingales, Medical Professionals, and Students for the Protection of Life
7. Civil Action That Connects Okinawa and Fukuoka
8. Diving Team Rainbow
9. Friends of the Earth Japan
10. Fukuoka • Women Against War
11. Gangjeong Peace Network
12. Inter-Island Solidarity for Peace of the Sea Jeju Committee
13. Japan Environmental Lawyers for Future (JELF)
14. Japan International Volunteer Center (JVC)
15. Jyugon no Sato
16. No Helipad Takae Resident Society
17. No Nukes from Shiga
18. NPO **JVJV**
19. NPO Okumagawa Basin Protection Foundation
20. Okinawa Citizens Network for Peace
21. Okinawa Environmental Network
22. Okinawa heno henken wo aoru housou wo yurusanai Shiminyuushi
23. Okinawa Reefcheck and Research Group
24. Okinawa Women Act Against Military Violence
25. **PEACE BOAT**
26. Protect Henoko & Takae! NGO Network
27. Ramsar Network Japan
28. Save the Dugong Campaign Center
29. Shimagurumi Higashi
30. Shimagurumi Kunigami
31. Shimagurumi Ogimi
32. STOP ! Henoko Shinkichikensetsu Osaka Action
33. The Association for military base free peaceful Okinawa
34. The House of Nuchi du Takara: Anti-War Peace Museum
35. The Okinawa Liberty Project
36. Ukwanshin Kabudan
37. Yuntaku Takae
38. Women's Active Museum on War and Peace (WAM)
39. ZENKO, National Assembly for Peace and Democracy

### **1. The Northern Training Area and the "Returned Land" in the Nominated Site**

The Northern Training Area (NTA) (or the Jungle Warfare Training Center) is the U.S. military's training area adjoining the Northern Part of Okinawa Island (NPOI), the nominated site. The NTA is 3,900 hectares, about half the size of the NPOI (7,700 hectares). The NTA and the NPOI share a long winding boundary (see Figure 1).<sup>1</sup>

While the NTA is home to some 30 endangered animal species, including endemic and Japan's "Natural Monuments" the Okinawa rail (*Gallirallus okinawae*) and the Pryer's woodpecker (*Dendrocopos noguchii*), it is used for "jungle warfare training" and low altitude "terrain flight training" of MV-22 Osprey and other aircraft (U.S. Marine Corps Base Camp Smedley D. Butler, MCIPAC Installations Okinawa, Japan 2014).<sup>2</sup> The NTA is utilized in conjunction with other military bases and training areas in Okinawa as the U.S. military conducts flight training between bases and training areas.

The U.S. military has exclusive control over the NTA and other U.S. military bases and training areas in Okinawa under the U.S. and Japan Status of Forces Agreement.<sup>3</sup> The NTA was established in 1957 during the U.S. military's occupation of Okinawa when the U.S. military took over 7,900 hectares of the Yambaru forest and converted it into the NTA.

Meanwhile, the NPOI includes 2,793 hectares of the former NTA or "returned land." The 2,793 ha returned land was part of the 4,000 ha of the NTA, which was returned to Okinawa/Japan from the U.S. military in December 2016. As a former military training area since 1957, the Japanese Ministry of the Environment (2019) acknowledged in its 2019 World Heritage nomination document<sup>4</sup> that the "returned land" presents "the probabilities of soil contamination, water pollution, etc." (p.128).

### **2. Issue of Boundary between the NPOI and the NTA**

The boundary between the NTA and the NPOI is indicated on the map; no physical demarcation has been established on the ground. *The IUCN World Heritage Evaluations 2020 and 2021* describes the boundary relation between the two<sup>5</sup>, "There is an anomaly in the configuration of the Okinawa component part of the nominated property, with a long strip of the JWTC [NTA] protruding into the nominated property, but not included in it" (p.7-8).

Given the "protruding" characteristics of the boundary and the lack of physical boundary demarcation, there are possibilities of accidental boundary crossing by U.S. soldiers and/or nature visitors. Given that extensive jungle warfare training takes place within the NTA, including shooting exercise with training bullets,<sup>6</sup> such accidental crossings need to be avoided by all means. This is especially true because those who enter the NTA are subject to punishment according to Japanese law.

NGOs have argued that a transparent institutional mechanism should be established to deal with the issue of accidental boundary crossing because it is impractical to set up physical demarcation between the two on the ground. *The IUCN World Heritage Evaluations 2020 and 2021* does not have language to address this critical issue.

### **3. Impacts of U.S. Military's Training**

While the U.S. military routinely conducts training in the NTA day and night, there is no clear and transparent mechanism to monitor the impact of the training on the environment and the local communities and no effective mitigation mechanisms to deal with them. While in the U.S., the U.S. military provides the public with its monitoring reports and opportunities to submit public comments,

such reports have hardly been made public and such opportunities have rarely been presented to the people of Okinawa.

Our particular concern is the U.S. military's flight training involving MV-22 Osprey and other helicopter-type aircraft.<sup>7</sup> The military's flight training utilizes the 17 landing zones in the NTA, many of which are located in the most environmentally sensitive areas of the Yambaru forest. The U.S. military's aircraft fly over the NTA and the World Heritage nominated NPOI while engaging in low altitude "terrain flight training." The aircraft emit high levels of noise and low-frequency sound and produces "downwash." They have adverse impacts on the animals and the plants, including the endangered Pryer's woodpecker (*Dendocopos noguchii*) and the local communities.

As NGOs have long insisted, it is imperative that a clear and transparent mechanism to monitor the impact of the training on the environment needs to be established and effective mitigation mechanisms to deal with such impacts also need to be implemented. *The IUCN World Heritage Evaluations 2020 and 2021* lacks language to address this critical issue.

#### **4. Discarded military materials in the former NTA incorporated in the Nominated site**

The Japanese Ministry of the Environment stated in its 2019 nomination document<sup>8</sup> that "the Ministry of Defense conducted [in the returned land] 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 claim has been proven false, however.

Many parts of the returned land are still littered with bullet shells, blanks, unexploded ordinance, and other discarded military materials, and some parts have been contaminated with chemicals<sup>9</sup> (see figure 1).

Although the Japanese government appears to be making some efforts to clean up discarded materials, the government has not made public its clean up plans to clean up. This lack of transparency has generated commotion in Okinawa and beyond. For example, in June 2021, the Police raided the house of a biologist who took the discarded materials to the U.S. military stationed at the NTA as a form of protest and call for clean up.<sup>10</sup>

As NGOs have repeatedly argued, it is critical that the Japanese government establishes plans for cleaning up and restoration of the environment with appropriate financial backups. *The IUCN World Heritage Evaluations 2020 and 2021* does not have language to address this crucial issue.

---

<sup>1</sup> Figure 1 was created in 2019 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 copyright of Figure 1 belongs to the Informed-Public Project.

<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.

---

<sup>3</sup> 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> (Accessed July 8, 2021)

<sup>4</sup> The Japanese Ministry of the Environment (2019). *Nomination of Amami-Oshima Island, Tokunoshima Island, Northern Part of Okinawa Island, and Iriomote Island for inscription on the World Heritage List, Government of Japan, January, 2019.*

<http://www.env.go.jp/press/files/jp/110737.pdf> (Accessed on July 6, 2021).

<sup>5</sup> The IUCN World Heritage Programme (2021). *IUCN World Heritage Evaluations 2020 and 2021: IUCN Evaluations of nominations of natural and mixed properties to the World Heritage List.*

<https://whc.unesco.org/archive/2021/whc21-44com-8Binf2-en.pdf>

(Accessed on July 9, 2021)

<sup>6</sup> The United States Marine Corps. "Jungle Warfare Training Center, 3rd Marine Division, Camp Gonzalves, Okinawa, Japan."

<https://www.3rdmardiv.marines.mil/Units/Jungle-Warfare-Training-Center/> (Accessed on July 7, 2021)

<sup>7</sup> 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> The Japanese Ministry of the Environment (2019). *Nomination of Amami-Oshima Island, Tokunoshima Island, Northern Part of Okinawa Island, and Iriomote Island for inscription on the World Heritage List, Government of Japan, January, 2019.*

<http://www.env.go.jp/press/files/jp/110737.pdf> (Accessed on July 6, 2021).

<sup>9</sup> See Akino Miyagi's blog post "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> (Accessed on July 7, 2021).

See also "Okinawa police blasted for searching home of researcher exposing U.S. military waste issues." *The Mainichi*, June 15, 2021. (Accessed on July 7, 2021).

See also 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/> (Accessed July 7, 2021)

<sup>10</sup> "Okinawa police blasted for searching home of researcher exposing U.S. military waste issues." *The Mainichi*, June 15, 2021.

<https://mainichi.jp/english/articles/20210615/p2a/00m/0na/019000c> (Accessed on July 7, 2021).