

February 17, 2022

Mr. Lazare Eloundou Assomo
Director
UNESCO World Heritage Centre
7, Place de Fontenoy
75352 Paris CEDEX 07
France

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

Dear Mr. Eloundou Assomo and Mr. Badman:

We, the undersigned groups, write to inform you of our continuing concerns regarding the Northern Part of Okinawa Island or Yambaru forest as locally known (hereafter the World Heritage Yambaru forest), along with Tokunoshima, Amami-Oshima, and Iriomotote Islands, inscribed on the UNESCO's World Natural Heritage list in July 2021 and our plans to help resolve them. Our concerns are related to the U.S. military's Northern Training Area (NTA) located next to the World Heritage Yambaru forest and the "retuned areas," which were parts of the Northern Training Area until 2017 and are now an integral part of the World Heritage Yambaru forest. We have expressed our concerns in our previous letters and documents sent to you since 2017, and we appreciate the actions the IUCN programme has taken to address them.

Meeting with the Japanese Government and Okinawa Prefectural Government

After the inscription of the Yambaru forest on the UNESCO World Heritage list, members of our groups held meetings with the Japanese government and the Okinawa prefectural government to discuss our concerns. On September 21, 2021, we met officials of the Japanese Ministry of the Environment and the Ministry of Defense through the office of National Diet Councilor Mizuho Fukushima. On November 2, we met officials of the Environmental Affairs Department of the Okinawa Prefectural Government. On

November 26, we met officials of the Ministry of the Environment and the Ministry of Defense through the office of National Diet Councilor Yoichi Iha.

While we were encouraged by some positive responses from the officials of the Ministry of the Environment and the Environmental Affairs Department, our concerns remain unchanged. In fact, some of our concerns have been magnified after the meetings. We have come to the same conclusion as before: The Ministry of the Environment and the Ministry of Defense lack the political will to address the U.S. military-related issues while the Ministry of the Environment can certainly carry out effective work on other non-U.S. military-related matters. This situation undermines the status of the Yambaru forest's World Heritage status and the integrity of the UNESCO World Heritage institution. This situation needs to be changed.

Below, we present a summary of our findings through the meetings with references to sections of the Operational Guidelines for the Implementation of the World Heritage Convention (2021) (hereafter Operational Guidelines).

Positive Responses

- In accordance with 38, 39, and 40 of the Operational Guidelines, the Ministry of the Environment assured that they recognize groups like ours who address U.S. military-related issues as important in protecting the World Heritage Yambaru forest. Accordingly, in accordance with 174 of the Operational Guidelines, the Ministry assured that they would consider integrating input from us (see below) in its reports to the World Heritage Centre provided that the Ministry deems the information relevant.

- The Environmental Affairs Department of the Okinawa Prefectural Government acknowledged and expressed their concern that the U.S. military's discarded materials, such as bullet shells and blanks, have been continuously discovered in the World Heritage Yambaru forest. The Environmental Affairs Department told us that the Department intends to address the issue.

Our continuing concerns

- Neither the Ministry of the Environment nor the Ministry of Defense has monitored the noise emitted from U.S. military aircraft in "terrain flight training" over and around the World Heritage Yambaru forest and in the Northern Training Area and examine its impact on the animals, including the endangered Okinawa woodpecker and the Okinawa rail. Neither of the departments is willing to conduct monitoring of the noise. Loud noise is

one of the most identifiable factors that could threaten animals. This particular situation should have been considered as "exceptional circumstances or occurrence that may have an impact on the Outstanding Universal Value of the property or its state of conservation" as stipulated in 169 of the Operational Guidelines. Monitoring of the U.S. military aircraft noise and studies of its impact on the animals must be undertaken.

- The Ministry of the Environment has not taken the issue of the U.S. military's aircraft noise and other aircraft training-related issues such as "down-wash" to the Environmental Subcommittee of the U.S.-Japan Joint Committee. The Ministry cited in its 2019 World Natural Heritage Nomination Document this very Subcommittee for "Cooperation between the United States Government and the Government of Japan at the Northern Training Area" (p.243) to resolve U.S military-related environmental issues. This situation indicates that the Japanese and the U.S. governments have not followed 135 of the Operational Guideline.

- The Ministry of the Environment has not made fully public the document "Document Concerning Cooperation with the United States Government in the Northern Training Area (the Japan-US Joint Committee)" cited in its 2019 Nomination Annex (5-53), despite our repeated requests through meetings and the Japanese Freedom of Information Act. While this document is one of the most critical documents, only the content part 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, the date of the document, and most critically, the legal status and effectiveness of the document, has not been made public. This situation undermines the intents of 135 of the Operational Guideline. We are now in the process of obtaining it via the U.S. Freedom of Information Act.

- The Ministry of the Environment and the Ministry of Defense have not solved the issues of boundaries between the World Heritage Yambaru forest and the Northern Training Areas: The boundaries remain virtually unmarked on the ground, and the U.S. military's aircraft intrude into the area above the World Heritage Yambaru forest. No proper mechanism has been established to deal with situations in which soldiers in the Northern Training Area or people visiting the World Heritage site mistakenly cross over to the other side.

- The Ministry of the Environment has not provided information on whether or what

restrictions are placed in the "buffer zone" in the Northern Training Area. 104 of the Operational Guidelines stipulates that "a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development in order to give an added layer of protection to the property."

- The U.S. Military's discarded materials such as bullet shells, blanks, unexploded ordinance, and toxic chemicals continue to be found in the "returned areas" (formerly parts of the Northern Training Area until December 2016) in the World Heritage Yambaru forest. They are dangerous and should be appropriately removed and disposed of. Despite our repeated requests, the Ministry of the Environment and the Ministry of Defense have dealt with this issue on an ad-hoc basis. They have not established a comprehensive plan with short-term goals to make the World Heritage Yambaru forest safe.

Moving Forward

For the Yambaru forest to be considered genuinely deserving of the status of UNESCO World Natural Heritage, our concerns need to be addressed and resolved. To that end, we will continue to request the Ministry of the Environment, the Ministry of Defense, and the Okinawa Prefectural Government to address them. We will also request the U.S. military and other relevant U.S. federal agencies to examine our concerns. Moreover, together with local community members, members of our groups will continue to monitor the U.S. military training activities and study the U.S. military's discarded materials in and around the World Heritage Yambaru forest. Furthermore, by incorporating the results of monitoring activities and studies, we intend to prepare and submit a report to the World Heritage Center and the IUCN in December 2022. We believe that our efforts will play a critical role in protecting the World Heritage Yambaru forest.

Thank you for taking the time to read our letter. If you have any questions, please let us know.

Sincerely yours,

Contact

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Okinawa Environmental Justice Project

<http://okinawaejp.blogspot.com/>

Organizations and Groups

1. Okinawa Environmental Justice Project
2. The Informed Public Project
3. Okumagawa Basin Protection Foundation
4. Okinawa Environmental Network
5. No Helipad Takae Resident Society
6. Shimagurumi Kaigi Higashi
7. Shimagurumi Kaigi Ogimi
8. Shimagurumi Kaigi Kunigami
9. Project Disagree
10. Okinawa Citizens Network for Peace
11. Protect Henoko and Takae! NGO Network
12. Yuntaku Takae
13. All Okinawa Council for Human Rights
14. Japan Environmental Lawyers for Future
15. East Asia Community Institute Ryukyu-Okinawa Center
16. Dugong no Sato
17. "No Heliport Base" Association of 10 Districts North of Futamai
18. Save the Dugong Campaign Center
19. Dugong Protection Network Okinawa
20. Save Awasehigata Association
21. Association for Conservation of Marine Communities
22. Ramsar Network Japan
23. AKAY JAPAN
24. New Union Architects and Engineers Kyoto Branch
25. Okinawano Henken wo aoruhouso wo yurusanai shiminyushi
26. Nakano de Henoko shinkichimonndai wo Kangaeru Kai
27. Kowasuna Kenpo! Inochi to Kurashi Shimin demo HYOGO
28. Anpo Kanren Haishi! Shimin no Tsudo!
29. Okinawa Genchi Haken Kikin
30. All Japan Dockworkers' Union (JDU) Kansai Regional Osaka Branch