

Japan Environmental Lawyers for Future (JELF)
Address(Headquarters):
Akita Gakuen Meieki Bldg. 2F
15-19 Tsubaki-cho, Nakamura-ku, Nagoya City, Aichi Prefecture
453-0015, Japan
Tel: +81-52-459-1753

Email: jelf@green-justice.com
<https://www.jelf-justice.org/>
Representative: Attorney Naoki Ikeda
(Atty: Haruki Nishioka, Attorney at Law)

June 2, 2022

IUCN Japan Commission
Mitoyo Building 2F, 1-16-10 Shinkawa, Chuo-ku, Tokyo 104-0033, Japan
The Nature Conservation Society of Japan
+81 3-3553-4109

Secretariat of the Japanese National Commission for UNESCO
Ministry of Education, Culture, Sports, Science and Technology, 3-2-2 Kasumigaseki,
Chiyoda-ku, Tokyo 100-8959, Japan

Dear Commissioners,

In July 2021 Setouchi Town, located in Oshima County of Kagoshima Prefecture, was designated as a buffer zone for the protection of the nominated area in connection with the inscription of “Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island and Iriomote Island” as a World Natural Heritage site. We had high expectations that the Japanese government would implement a different conservation policy for the area as a World Heritage site. Furthermore, new species have recently been discovered in the Katoku River, attracting the attention of researchers. However, nothing has changed with the Japanese government or Kagoshima Prefecture. The Japanese government values the inscription as a World Natural Heritage site, but does not seem to care about the natural heritage itself. The construction of a concrete seawall on the Katoku coast is being aggressively promoted. This revetment is to be constructed at the mouth of the Katoku River itself. This is contrary to the purpose of the buffer zone, and will have an even more detrimental effect on the precious species that live in the Katoku River and on Katoku Beach. An entry road for the construction of the seawall is about to be built at the mouth of the Katoku River. In view of this situation, professional societies such as the Ecological Society of Japan and the Japanese Society of Benthology have called for an immediate halt to revetment construction. We too oppose the construction of this concrete revetment and call on UNESCO to recommend that the Japanese government and Kagoshima Prefecture reconsider the revetment plan.

1. The Katoku River and Katoku Coast Are Home to a Diverse Ecosystem

(1) The Katoku Coast is an extremely valuable place where endangered loggerhead

and green turtles come ashore to lay their eggs, and where leatherback turtles, an endangered species (IA), have also been observed laying their eggs. In addition, 33 Red List species have been reported, and eight species from Kagoshima Prefecture's Red Data Book have been confirmed. In particular, there are 432 species of shellfish. The existence of these and other species make for an extremely valuable ecosystem.

The Katoku River, which flows along the Katoku Coast, is home to the endangered *ayu* fish (*Plecoglossus altivelis ryukyuensis*) that is included in the Red List of threatened species (IA), while the sand flats and sandy mud bottoms at the mouth of the river are inhabited by a mud shrimp called *yokoya-anajaku* (*Upogebia yokoyai*) and the sand bubbler crab (*Scopimera ryukyuensis*). The riverbed boulder zone is home to *himehirai-somodoki* (*Ptychognathus capillidigitatus*), the pom pom crab (*Ptychognathus barbatus*), *kawasunagani* (*Deiratonotus japonicum*), and other valuable species.

(2) Around February of this year there was a new discovery of a shrimp species (genus *Palaemon*) which lives only in the Katoku River. There are two types (A and B) of *Palaemon* shrimps in Japan with different life histories and morphologies. All 27 individuals collected in the Katoku River this time have different nucleotide sequences from those of the previously identified shrimps, their habitat has been confirmed only in the Katoku River, and they have low genetic diversity. These facts suggest that they are at higher risk of extinction compared to other shrimps.

(3) While it is commendable that the Katoku River and Katoku Coast, along with their diverse ecosystem, have been designated as a buffer zone, we explain below how the construction of a seawall on the Katoku Coast will sever the continuity of the ecosystem and have a serious impact.

2. Government Issues Wrong Information

(1) In registering the site as a World Natural Heritage site, the Japanese government said that "the planned revetment on the Katoku coast will ensure that the seawall is "far enough away so as not to adversely affect the river." In registering the site as a World Heritage Site, the government of Japan stated that "the Government of Japan has agreed that the Katoku River, the last remaining free-flowing river on Amami Oshima, will not be subject to construction of any river structures in the future. The government specifically noted that [the proposed construction site of] the coastal levee will ensure sufficient distance to ensure that the river will not be adversely affected."

However, the river mouth changes depending on the time of year, sometimes flowing northward across the beach along the shore and into the northern part of Katoku beach, and this fluctuation contributes to the sand changes of the entire beach. Thus, the Katoku beach is part of the Katoku River. It is impossible for the government to say that the seawall is "far enough away so as not to adversely affect the river." The actual distance is only a few meters.

The Japanese government is sending the wrong message about the location of the Katoku coast and the Katoku River.

(2) Construction Work Falsely Reported as Being Nature-friendly

(a) Kagoshima Prefecture explains that the planned revetment work is a nature-friendly project because sand will be placed over the front of the concrete revetment so that the revetment will not be visible from the outside, and that the sand will be covered with *adan* plants (a species of Japanese knotweed).

(b) However, investigations and analyses by a specialized coastal engineering institution have shown that this explanation by Kagoshima Prefecture is incorrect. In fact, the planned concrete revetment is to be constructed in the fluctuating zone of the sandy beach, which is assaulted by waves during low-pressure storms and typhoons.

Therefore, even if the concrete revetment planned by the prefecture is built, the sand in front of the revetment will be washed away. If, as at present, there is no revetment, the sand will move and change its shape during typhoons and other events, and the sand will return through the coastal process. However, if the planned revetment is built, the waves will bounce off the wall and the sand will not move, leaving the revetment bare. Even if sand is piled on top of the seawall, it will be washed away, and the *adan* will be washed away before it can grow.

Therefore, Kagoshima Prefecture's explanation is wrong. The exposed revetment will, as planned, become the cause of further erosion.

(c) It is evident when examining the situation that the revetment currently planned by Kagoshima Prefecture cannot be called a nature-friendly construction project, and it cannot be considered a disaster-prevention project that takes advantage of natural topography, such as the natural levee or Eco-DRR being adopted around the world.

3. Construction Access Road Planned to Cross the Katoku River

(1) To build the seawall on Katoku beach, there is a plan to build a construction road over a distance of several dozen meters. It is now known that the road "will enter from the Kaneku River side" and that "it will cross the river."

The road will cross at the confluence of the Kaneku River the Katoku River, and it is obvious that its construction will have a direct negative impact on the *Palaemon* shrimp inhabiting the Katoku River and on other ecosystems.

Nevertheless, Kagoshima Prefecture, which is proceeding with the construction of the revetment, is trying to start the construction work in a somewhat high-handed manner.

(2) As such, the impending construction work in the Katoku River watershed will affect the river and its ecosystem.

4. Katoku Coast Dunes Are Recovering, But the Revetment Is Detrimental

On September 11, 2021, a pre-construction survey was conducted by the builder at Katoku Beach. According to the results of this survey, it was found that the ground elevation had risen by up to 1 meter compared to the original design of the revetment, and that the sand (ground surface) had recovered. It is the job of sandy beaches to attenuate waves and prevent storm surges and tsunamis.

On the other hand, this revetment not only has a negative impact on the Katoku River, but there has been no adequate examination of the extent of disaster prevention provided by the revetment, and it has been observed that the negative impact of this revetment is rather large.

If the construction of the revetment goes forward under these circumstances, there will be no turning back, and once the precious natural environment and ecosystem are lost, they will never be restored.

5. Conclusion

Given the diverse ecosystems of the Katoku Coast and Katoku River, and the fact that

the Katoku River was designated as a buffer zone owing to these ecosystems, this revetment project disregards the purpose of the World Natural Heritage. We request that the IUCN and the World Heritage Committee recommend that the Government of Japan and Kagoshima Prefecture immediately halt the construction and reconsider the revetment work.

JELF (Japan Environmental Lawyers for Future)

A handwritten signature in cursive script, reading "Naoki Ikeda", is written over a horizontal line.

Atty. Naoki IKEDA
President