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Dear Mr Peter Shadie  
Director, World Heritage Program  
International Union for Conservation of Nature (IUCN)

Letter of request concerning the IUCN mission for the proposed  
World Heritage Site “Amami-Ōshima Island, Tokunoshima  
Island, northern part of Okinawa Island and Iriomote Island”

On February 1st 2019, the Government of Japan submitted a revised nomination dossier for Amami-Ōshima Island, Tokunoshima Island, Northern Part of Okinawa Island and Iriomote Island (hereafter “Amami-Ryūkyū”) to the UNESCO World Heritage Centre for the inscription of the World Heritage List. IUCN member organizations such as the Nature Conservation Society of Japan (NACS-J), have been proposing for the inscription of the Amami-Ryūkyū Archipelago on the World Heritage list since 1990 and strongly wishing for the conservation of biodiversity by the inscription of Amami-Ryūkyū Islands on the World Heritage list next year.

Though many improvements have been made in terms of nature conservation from the last nomination dossier in 2017, however we still see several problems, in particular with the proposed measures to protect the properties, buffer zones and wider surrounding conservation areas.

In particular;

- 1) There are large scale development plans close to the property,
- 2) Efforts to control invasive alien species are not sufficient,
- 3) Rare and/or native species are smuggled out from the islands,
- 4) Military operation including training which could give negative influence to the environment.

We sincerely hope IUCN and IUCN mission will take our concerns above into account and the best conservation measures which are considered to be appropriate as World Heritage site.

- 1) The “surrounding conservation areas”

We see the changes since the previous nomination dossier, in particular the establishment of buffer areas enclosing the site, as a great step forward, but we also see problems in the measures proposed for conservation within those “surrounding conservation areas”. Examples of large-scale development occurring in areas adjacent to the proposed Heritage sites include; the Japan Self-Defense Force garrison at Sek-ko, quarries, and the new development of hotels and new ports for cruise ship projects on Amami-Ōshima and Okinawa island. With the expansion of military and tourist activity, we foresee progressively increasing trend of large amounts of goods and personnel by aircraft and ship, both military and civilian. As far as the function of the “surrounding conservation areas” goes, there is a huge gap between the intended protection for the Heritage sites and its actual function. We believe that more conservation measure and regulation should be needed and implemented in the surrounding conservation areas.

We also believe that conservation and sustainable use should be promoted in these “surrounding conservation areas”, as well as the buffer zones in order to ensure value of the Heritage site. Regarding the Ogasawara islands inscribed to Natural Heritage in 2011, even the routes taken by ships are now strictly controlled there. We are convinced that similar strict regulation of “surrounding conservation areas” is essential at the Amami-Ryūkyū site.

Further, while the proposal contains detailed procedures for dealing with the invasive alien species already present in the islands, protocols for preventing the introduction of further alien species are not enough. This topic was covered in WCC-2016-Res-020 “Strengthening pathway management of alien species in island ecosystems” (IUCN, 2016).

We believe that, in order to prevent the introduction of further alien species, development in the “surrounding conservation areas” needs to be properly controlled. We hope you will endeavor to develop protocols to combat future invasive alien species throughout the archipelago, and especially in these “surrounding conservation areas”.

## 2) The cruise ship program

The Ministry of Land, Infrastructure, Transport and Tourism (MLIT) aims to create a nationwide network of ports capable of handling large cruise ships, as explained in its document (Mar 30, 2016) “A Tourism Vision to Support the Future of Japan”, with a stated goal of 5 million cruise ship passengers per year from overseas by 2020. The cruise ports planned and currently under construction are heavily concentrated in the southwestern archipelago of the Ryūkyū Islands: not only in the islands included in this Heritage site proposal, Amami-Ōshima Island, Tokunoshima Island and Okinawa Island, but also on the islands neighboring Iriomote Island, Ishigaki Island and Miyako Island

In a positive step for nature conservation, one of those projects, for a cruise port on a relatively untouched coast near the village of Nishikomi in Amami-Ōshima Island, was rejected by the encompassing town of Seto-uchi in August 2019. Nevertheless, even though cruise port projects at other locations are proceeding, there is very little in these programs to prevent the nature conservation problems that cruise ships bring.

Besides the direct destruction of nature caused by the creation of a port such as that planned for Nishikomi, the disturbance caused by both the construction and the subsequent operation of the facilities required to accommodate thousands of visitors at

a time will constantly threaten the natural environment. As the transportation of people and materials increase, the risk of unintended introduction of invasive alien species will increase as well. The Motobu, located in northern Okinawa, is one of the ports scheduled to accommodate cruise ships where development is already underway. If Motobu is to become a center of tourism for the nearby forests of Yambaru, there will need to be strict controls on the numbers of visitors and procedures to prevent the import of invasive alien species.

In addition, there has recently many cases of endemic species being smuggled out of the Ryūkyū islands (Wakao, 2018) and it is believed highly probable that cruise companies' lax checks on hand-luggage are an important factor. It is a fact that Japanese law does not currently have the enough power to prevent this. If controls on the capture and trade of rare species cannot be enacted and enforced such that progress toward protection of this Natural Heritage is kept in parallel with the progress of plans for cruises, those plans need to be revised. It is the duty of those who aim to have this site declared a Natural World Heritage to give overall priority to efforts to preserve the endemic species. They are treasures on a global level which make this natural heritage a "biodiversity asset".

### 3) The environment's carrying capacity

The proposal offers no solution to the problem of the environment's carrying capacity. Okinawa and Kagoshima prefectures need to reassess the number of tourists that the environment can bear. The proposal states that the number of visitors to Okinawa Island rose sharply from 8.6 million in 2016, and to 9.4 million in 2017, while the prefecture of Okinawa has set a new target of 10 million a year. To fulfill this goal a new airport is being built on Ishigaki Island and a second runway is being added to Naha airport (Okinawa), while berths for cruise ships, port infrastructure, resort hotels, rent-a-car facilities and the like are multiplying rapidly.

Unlike the EU, which requires the assessment of cumulative environmental impacts, no such requirements exist in Japan, which means that the synergistic impacts of multiple changes over time cannot be identified and averted. Since each of the nominated four islands is small, there is a need for basic management principles including concrete figures for the carrying capacity based on their individual environmental situation.

While sustainable ecotourism has taken root, and is growing in many areas, it is by no means on a scale to cope with massive increases in tourist numbers. For proposed areas to adopt and expand ecotourism, and to change mass-tourism industry into more sustainable in the "surrounding conservation areas", we believe that we need more specific plans on this issues.

### 4) Environmental assessment associated with the return of the Northern Training Area(NTA)

After the US government returned control of the Northern Training Area in December 2016, residents discovered contamination including drums and shells containing PCBs and other hazardous chemicals. Since the soil and water too may be contaminated, exhaustive environmental assessment and remediation are essential before the site can be consider for evaluation as a potential World Heritage Site.

#### 5) Clarifying the standing of the Northern Training Area

Though the Northern Training Area, which directly borders areas proposed for the World Heritage Site, is expected to act as a buffer zone, its precise standing has not been made clear. Nomination dossier says that under the agreement with the US Marine Corps for co-operation on conservation, the “Integrated Natural Resources and Cultural Resources Management Plan” for Camp Butler specifies that the natural environment of the NTA will be “appropriately managed”, but, since no information has been opened to the public, it is impossible to verify the situation there.

The negative impacts to the wildlife by noise from the Osprey V-22 and by other military operations need to be mitigated. The government of Japan needs to verify that the US Marine Corps are giving the special consideration agreed in the ‘Document Concerning Cooperation with the United States Government in Northern Training Area’. It is also necessary to ascertain whether the contaminants mentioned above (section 4) are still in use, and if so, is necessary to introduce an agreement to prohibit this.

#### 6) The setting up of a management system focused on local community and residential participation.

IUCN evaluations put a high value on voluntary, senior-level participation by the general public and NGOs in the proposal and management of programs, monitoring, conservation of endangered species, etc.. There have been situations where the lack of consultation with the general public and NGOs during the process has been of concern.

Even though the past nominations was withdrawn and start re-nomination process, the framework for information-sharing with NGOs and the public has improved very little. We feel that in order to construct an effective management system and effective participation, disclosure of relevant information is essential.

This is closely related to the setting up of a management system focused on community in terms of management of World Heritage sites. The World Heritage Convention put emphasis on the role of the local community in terms of management of World Heritage sites. Efforts to encourage this local participation are the responsibility of local and national government. It would help the establishment of a plan for the sustainable management of tourism resources, and a comprehensive monitoring system. The importance of those plans were pointed out by past IUCN evaluation report.

Both Okinawa and Kagoshima prefectures have established “master plans” for sustainable tourism, but for these to be effective they require the understanding and assistance of the local community. We believe, as pointed out in the IUCN evaluation released in May 2018, that for conservation in the long-term, local participation in the whole project is essential, from proposals through to execution and management.

As we have stressed since the 1990s, our hope is that one day the Ryūkyū Islands will be inscribed on the World Heritage list encompassing not only the terrestrial areas but also the marine areas. The current dossier does not propose the inclusion of the marine areas, merely parts of terrestrial areas of several islands, but, in the hope that the inscription of parts will lead to the future expansion of the inscribed area, we

have given our support. However, we are extremely concerned about valuable areas that have been excluded from the heritage area and face the risk of being developed. There is also the risk that weaknesses in the management plan may lead to the degradation and permanent loss of valuable parts of the heritage area. This must be avoided at all costs. These concerns too were implied in the IUCN evaluation report of May 2018.

We implore the IUCN and IUCN mission; to address the concerns we have noted above; to examine the current situation both inside the proposed Amami-Ryūkyū World Heritage site and in its surroundings; and to enable the implementation of a system that will ensure the continuing conservation of this natural heritage.

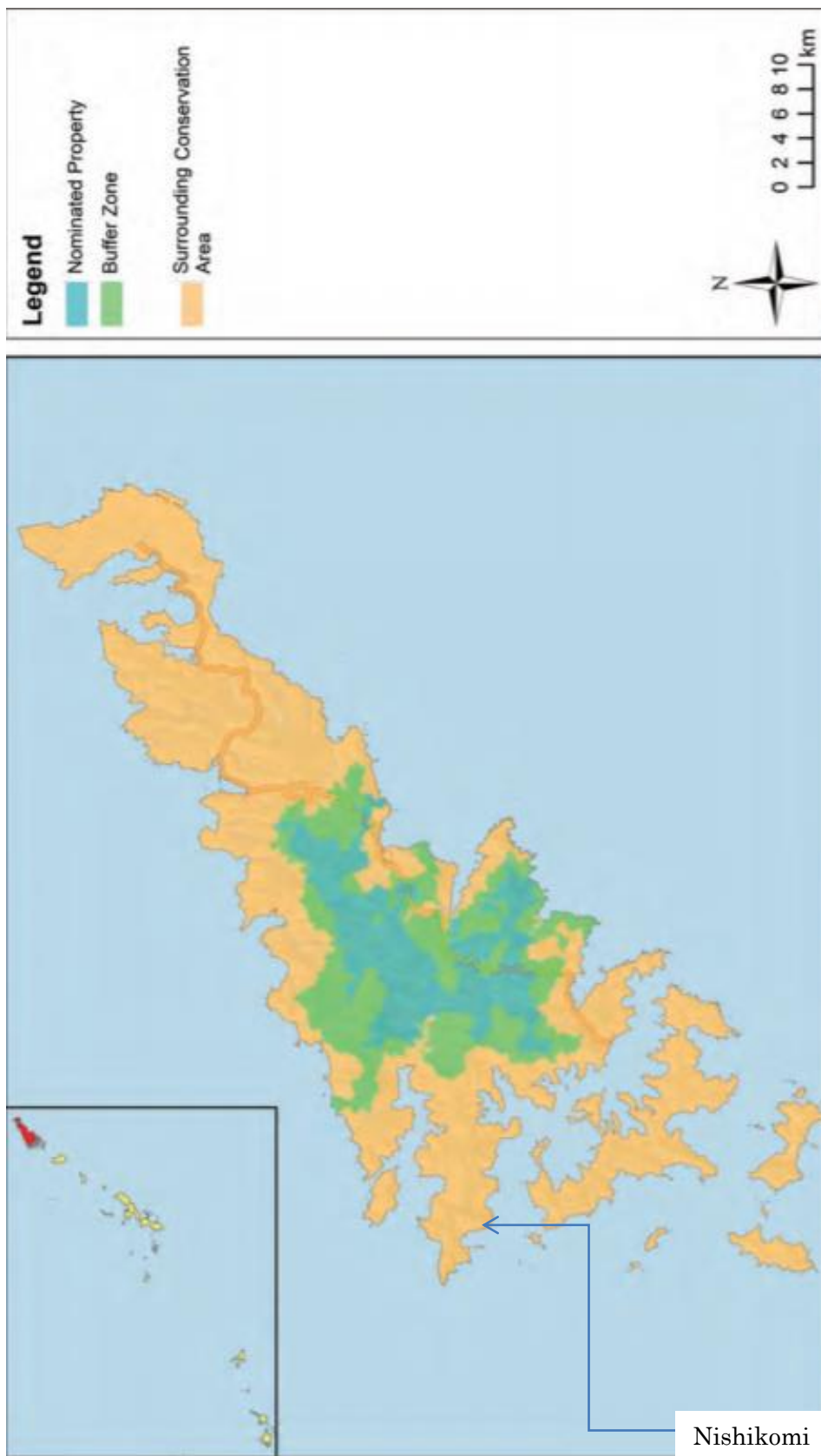


Figure 1 The islands proposed as a World Natural Heritage and locations of major points (Amami-Oshima Island).

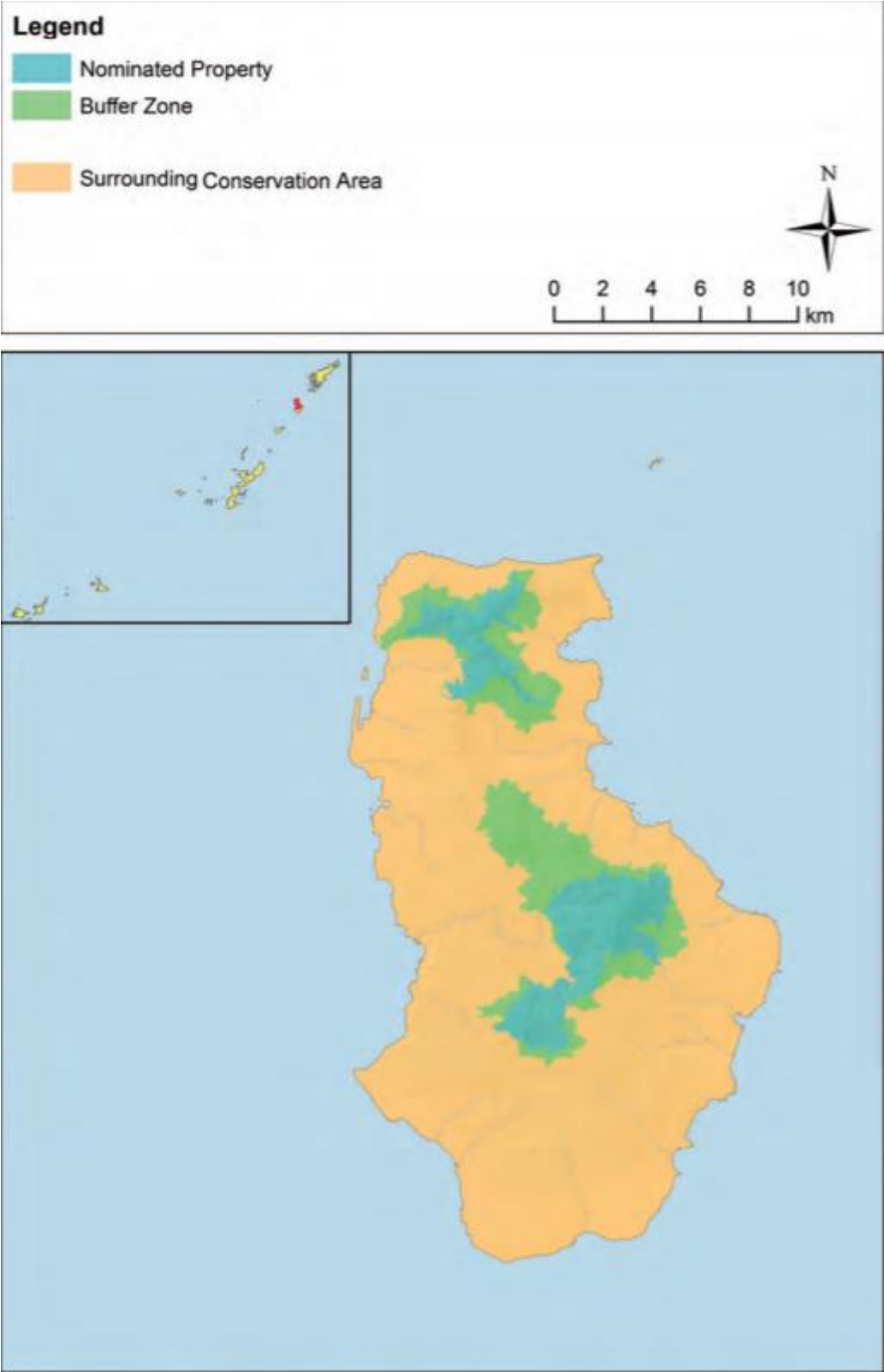


Figure 2 The islands proposed as a World Natural Heritage of Tokunoshima Island

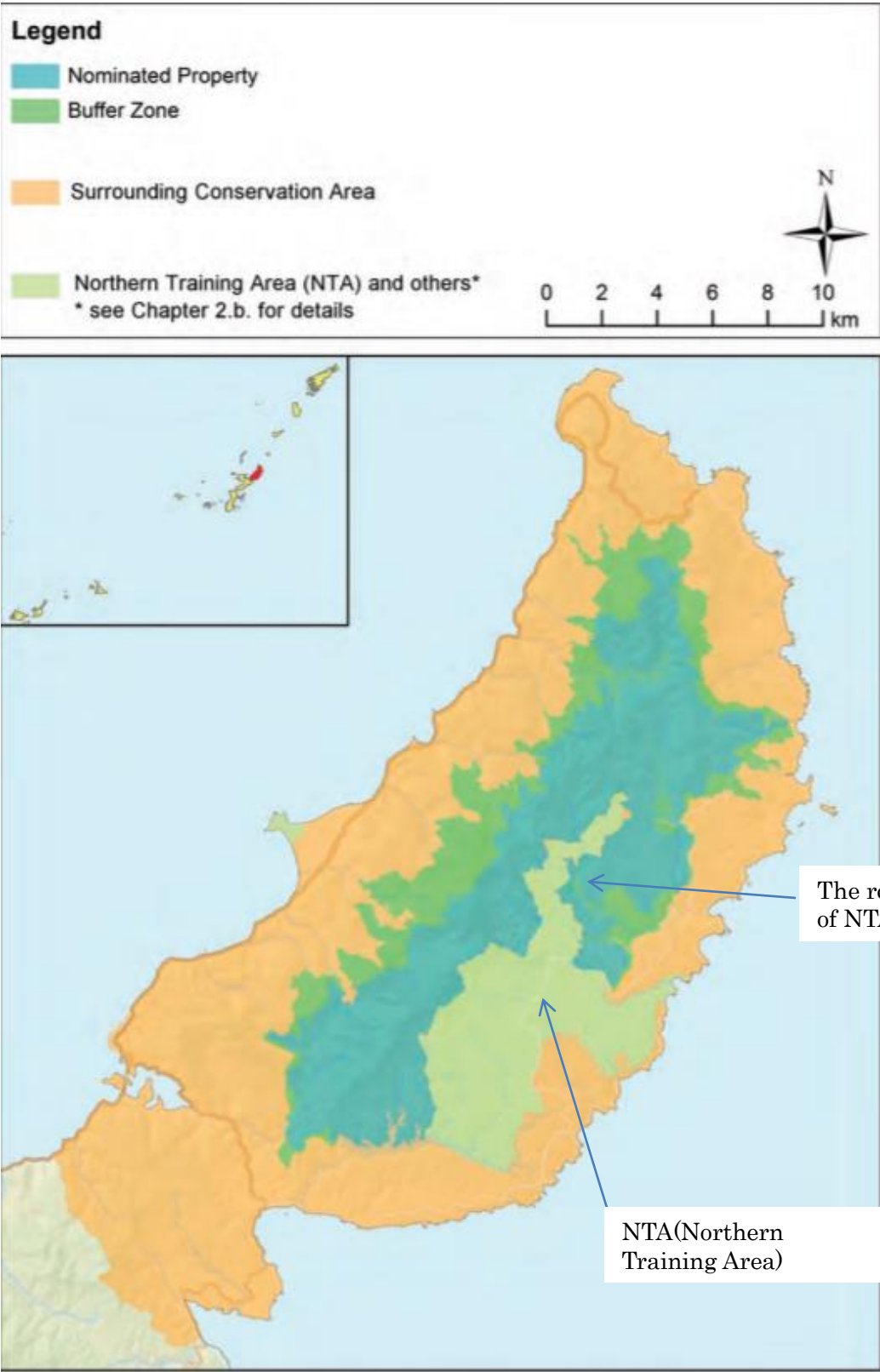


Figure 3 The islands proposed as a World Natural Heritage and locations of major points of Northern part of Okinawa island. Motobu is located out of this map



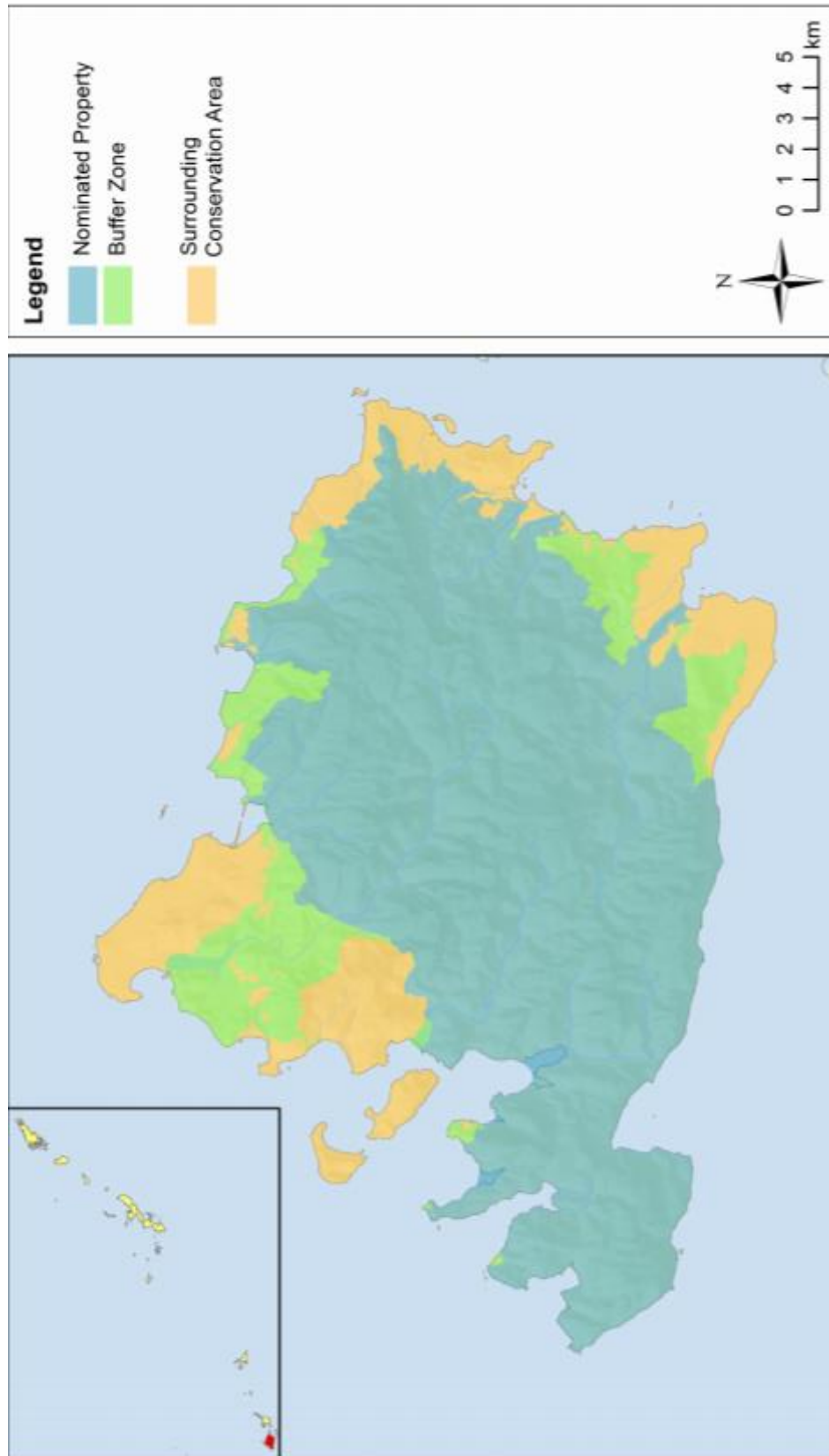


Figure 4 The islands proposed as a World Natural Heritage of Iriomote Island

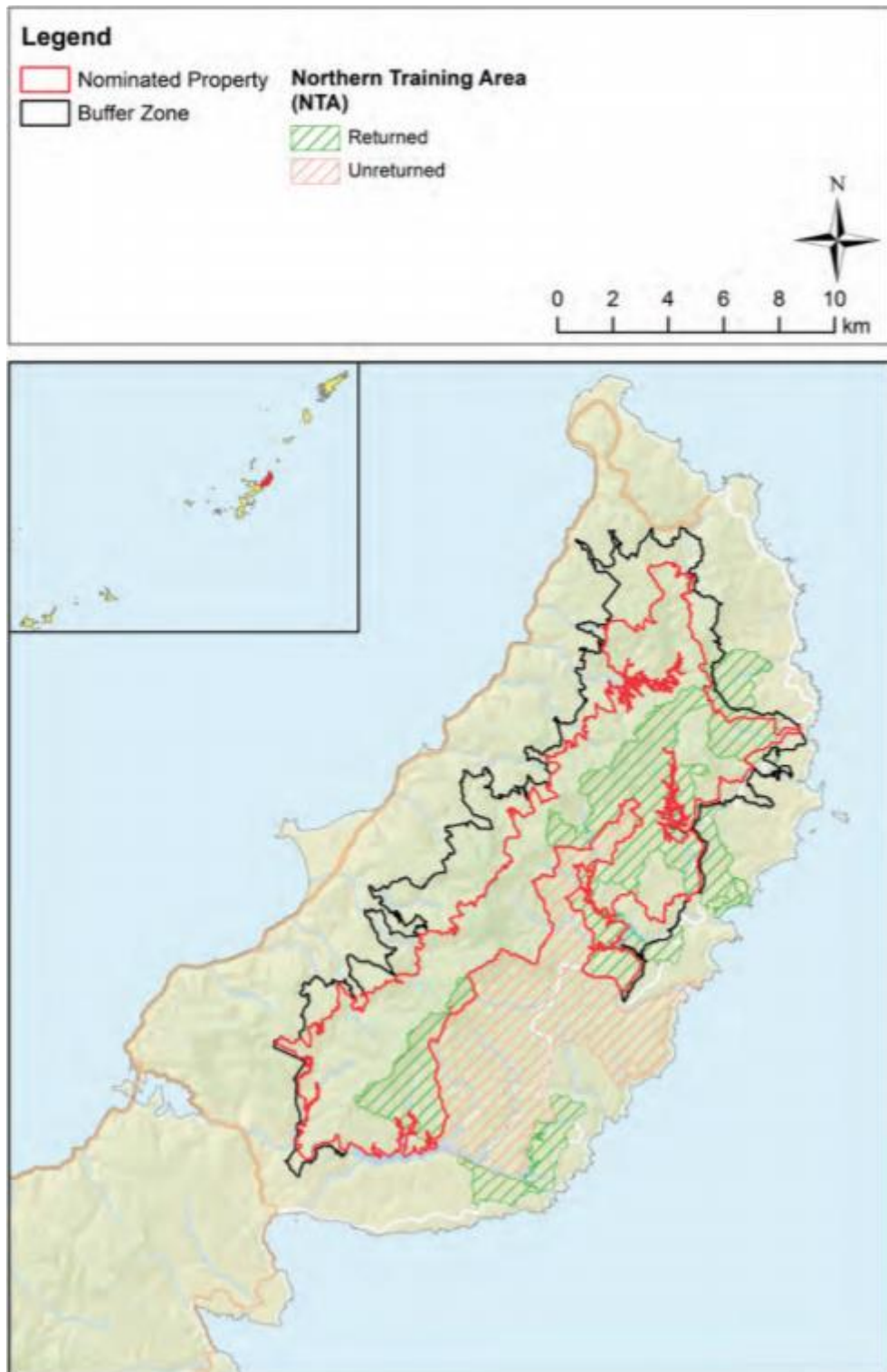


Figure5 The location of Northern Training Area(NTA) and the return of NTA

**Note**

All figures are from the nomination dossier by the Ministry of the Environment, Japan.

**References**

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(3) Wakao (2018) Illegal trade of endemic species of amphibian and reptile of Nansei shotou (Japanese). TRAFFIC BRIEFING

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