

**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 on-the-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.¹ 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.² 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.³

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.⁴ See figure 1.⁵ 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:⁶

NTA has been used for "jungle warfare training" and low altitude "terrain flight training" of MV-22 Osprey and other aircraft.⁷ 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.⁹ 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).¹¹ 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.¹³

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).¹⁴ 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 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.¹⁵

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.¹⁶

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.¹⁷ 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.

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¹ For discussion on the collaborative nomination process, see Hideki Yoshikawa (2019),

“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://apjif.org/2019/08/Yoshikawa.html>

² See Okinawa Defense Bureau and IDEA Consultants, Inc. (2017). Hokubu kunrenjyo (29) kahan henkan ni tomonau shisho jyokiyoni kakaru shiryō chōsa to chōsa hōkoku [Report: Surveys on waste materials found in the returned land of the Northern Training Area] in Japanese. The original document has been uploaded at:
<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/291228hokubukunrenjyo28chosahoukoku.html>

³ See *Department of Navy Environmental Restoration Program Manual 2018*.
https://www.navfac.navy.mil/Environmental/Restoration/er_pdfs/gpr

⁴ See Akino Miyagi’s blog site, “L22 helipad ato de hajimete kuho yaku 250 patsu wo kakunin kaishu kei 400 patsu wo kaishu [250 bullet shells were found and collected at L22 (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>

⁵ 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.

⁶ 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>

⁷ 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.

⁸ Figure 2 was created by Kaoru Urano.

⁹ 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), “Yanbaru no dobutsu to seibutsu tayōsei: 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

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.

¹⁰ 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>

¹¹ 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.

¹² “Researcher spots U.S. military helicopter landing on former NTA land in Ada, Kunigami Village.” *The Ryukyu Shimpō*, September 4, 2019.

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

¹³ 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>

¹⁴ “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.”

¹⁵ 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.”

¹⁶ “Researcher spots U.S. military helicopter landing on former NTA land in Ada, Kunigami Village.” *The Ryukyu Shimpō*, September 4, 2019.

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

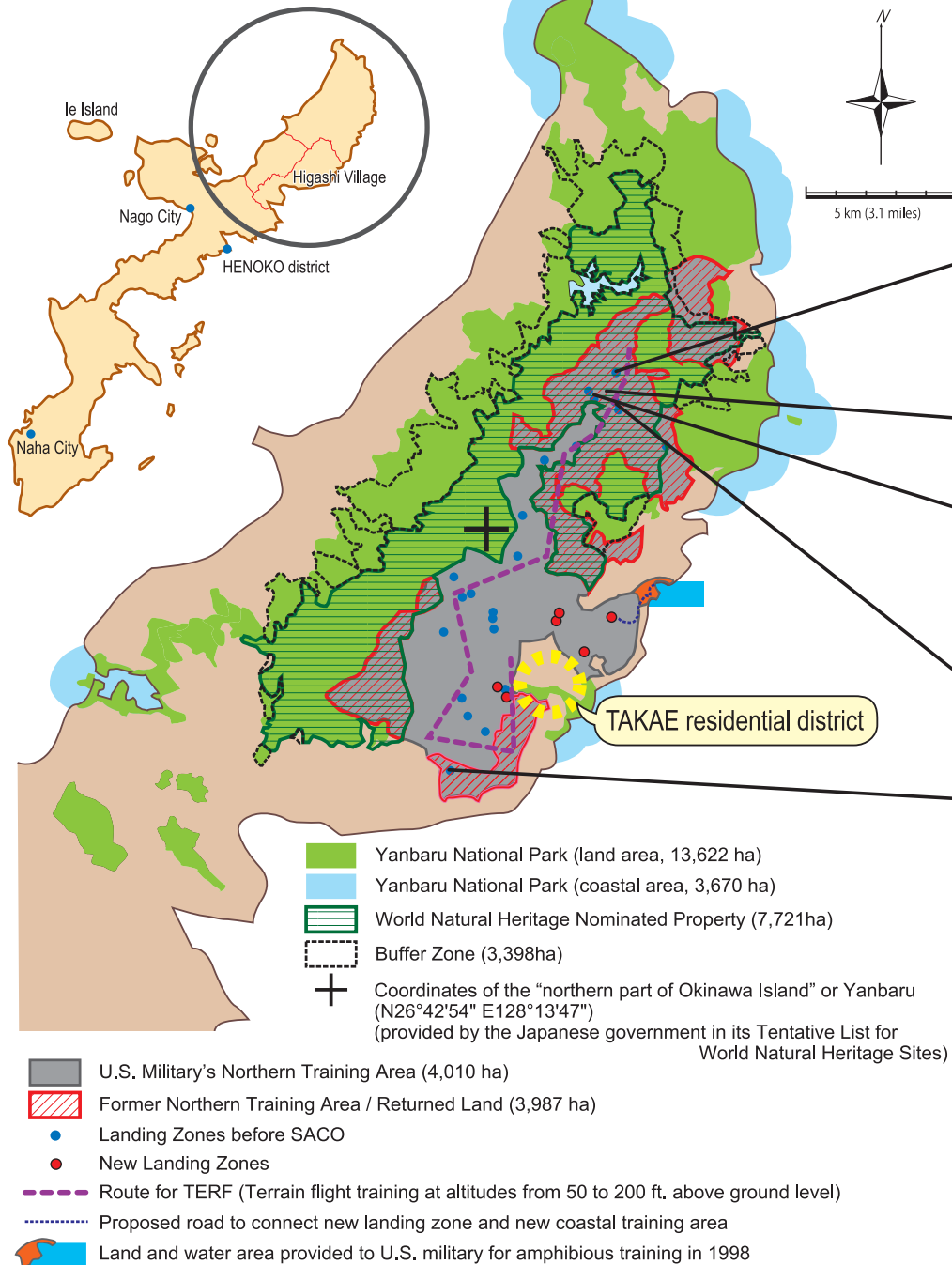
¹⁷ Tanaka, Miyo, “Okinawa base critics say helipad construction a sign of things to come,” *The Japan Times*, December 23, 2016.

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

¹⁸ “Higashi Village Assembly demands nearby U.S. military helipads to be removed, claiming, the training is increasing, residents live in fear” *The Ryukyu Shimpō*, 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



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



New unused blanks at former Landing Zone-1



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



Unused blank 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

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& Nakato Naofumi Oct.2019



Figure 2

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

