

Opinion Letter  
～on World Heritage Registration of Yanbaru area～

March 21, 2017

The Conservation Network for Forest Ecosystem in Japan  
(CONFE JAPAN)  
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### **Gist of the opinion**

We demand any authorities and organizations related to the deforestation of whole Yanbaru area the following:

All area of Yanbaru should be the protective zone on the occasion of World Heritage Registration,

Stop current deforestation in Yanbaru area and take every measure to protect this area.

### **Reason of the opinion**

#### 1 Preface

In Yanbaru area, the northern area of Okinawa islands, the natural environment has been destroyed especially after 1972, a year of Okinawa's reversion to Japan, through massive public works project including land improvements, dams, forest roads, deforestation and artificial reforestation. Of all these projects, plans for forest road, deforestation and artificial reforestation still exist. Concerning the forest road project, many forest roads have been already built and spread like a net all over Yanbaru area, but the plans are in the resting state because of the rising people's opinion and two lawsuits. (The plans themselves, however, are still valid even after the Naha District Court ruling on March 18, 2015, saying "if the Okinawa prefecture restarts the project for the 5 forest roads at this moment, it would be evaluated as inappropriate under normal social conventions and against the social validity, thus the decision would be evaluated as arbitrary and capricious, an abuse of its discretion. Okinawa prefecture, however, still maintains the plans.)

By contrast, deforestation and forestation are being performed; around 10 hectare areas are clear-cut every year.

This opinion letter focuses on the deforestation issue of Yanbaru area, and states our opinion again.

## 2 Basic structure and current state of the deforestation and environmental NGOs' effort

In Yanbaru area, the deforestation as clear-cutting are taking place in a way that standing trees in forest owned by Kunigami village, the local authority, is sold to Kunigami Village Forest Owner's Cooperative. According to the discussion between Kunigami village and the Cooperative, about 3 areas, about 10 hectares in total, are selected and clear-cut. Only under 1 million yen is paid to Kunigami village for all the areas, so the deforestation itself is unprofitable. However, the central government pays out a great amount of subsidy after the deforestation when planting and artificial reforestation as a project to put "forest" in place. This can be called a negative cycle as the deforestation is aimed at the subsidy.

Please see the pamphlets, Attachment 1 and 2, on the issue and current state of deforestation.

The Conservation Network for Forest Ecosystem in Japan (CONFE JAPAN) is an environmental NGO established in March 2008 aiming at the protection of forest ecological system in Japan. (The former representative late Shoichi Kawano used to be the vice chair (in charge of the North-East Asia district) of the IUCN Committee for Ecosystem Management.)

Yanbaru Dongrees is an environmental NGO established in April 2012 aiming at the protection of Yanbaru area. These two NGOs have been publishing announcement and opinion letter on the deforestation every year in cooperation with other local NGOs, but the deforestation continues.

We state some of the principal issues below.

## 3 Issue 1: Massive destruction of natural environment and lack of a measure for protection

The deforestation takes place in the area crucial to maintain the ecosystem of Yanbaru, in the habitat of rare and endemic species. Totally no scientific assessment is done before the deforestation and only the efficiency of the deforestation is considered, thus even the area of the central core of the Yanbaru ecosystem is deforested.

We must point out that the Yanbaru Natural Park, which should have been the measure for protection, is not effective at all. 1.58-hectare deforestation in Kunigami village Jashiki, 2015, is in the lank 3rd special zone of the National Park, and 4.96-hectares deforestation in Kunigami village Jashiki, 2016, is in the lank 2nd special zone.

Among others, the Yanbaru National Park has too narrow protective zone. Special protective zone with strict regulation, which can be deemed as a protective measure, is only the 2.3 % of whole Yanbaru area. Even if we include the lank 1st special zone, it will be only around 14 % of it, but still in the lank 1st special zone, deforestation is possible. As shown above, in the lank 2nd special zone the massive deforestation took place. Environmental Ministry explains that only the notification to the Ministry

is necessary because the deforestation started around July 2016 while the National Park was designated September 2016. This explanation has no reason because the detailed plan for the Yanbaru National Park is already published in March 2016. Under the Natural Parks Act of Japan, even in the rank 2nd special zone, selective cutting of 30 % or 60% of wood accumulation in a certain area or clear-cutting under 2 hectares is legally possible, and there are exceptions for endorsing clear-cutting more than 2 hectares (Enforcement regulation of the Natural Parks Act article 11, Paragraph 15, item ro, 1.) These exceptions can be easily applied, so there is no regulative measure for massive clear-cutting.

In addition, the zoning is arbitrary if we see it from the ecological knowledge, as areas with high biodiversity where endemic trees', *Quercus miyagii*, habitat should be protected (discovered by environmental NGOs' investigation), is designated as an area for development. The zoning should have been done based on the scientific assessment to decide the scope of forest necessary for maintaining the populations, like *Sapheopino noguchii*, rare endemic species of woodpecker, but this kind of scientific investigation has never been done. As a result, the Yanbaru National Park would lead to the isolation and disjunction of populations, and injury of biodiversity.

Please see the opinion letter, Attachment 3, on the issue of the Yanbaru National Park, and the announcement, Attachment 4, on the deforestation in 2016. The opinion letter, Attachment 3, drafted by the ecologist Tsutomu Kanaizuka, the representative of CONFE, is based on the natural scientific knowledge.

- 4 Issue 2: The deforestation is fully approved by government and local authorities  
The government (Environmental Ministry) and local authority (Okinawa Prefecture and Kunigami village), who promote World Heritage registration, have an obligation to regulate or stop the deforestation. The deforestation, however, is based on "Regional Forestry Plan" and "Implementation for Yanbaru Forestry", both published by Okinawa Prefecture, and thoroughly driven by Kunigami village. At the national level, Forestry Agency pays a great amount of subsidy for artificial reforestation. Environmental Ministry approved the National Park enabling the development plan and gives silent approval to the deforestation by not making any administrative direction.

There is a contradiction in administrations which approve the deforestation while promoting World Heritage registration. Moreover, the public bodies aim to continue the current development project under the guise of the harmony with natural conservation.

- 5 Issue 3: There is no economic rationality and contribution to the local economy  
The cut trees will turn to be cheap wooden chip. The payment to Kunigami village is very cheap, but the deforestation is aimed at obtaining subsidy paid for later artificial reforestation. There is no economic activity like the private forest owners grow and harvest from the forest, as easily understood from the fact that the

deforestation takes place in the publicly owned forest. The deforestation only provides temporary laboring work place, thus turns to be one of the public works project. The deforestation is destroying local precious heritage and has no contribution to and even harmful for local economy. This is against the principle of sustainable development as well.

## 6 In the end

In July 2009, IUCN Committee for Ecosystem Management chair, Piet Wit, visited Yanbaru and pointed out the problems of clear-cutting and claimed the importance of maintaining the ecological system. Please see the newspaper article, Attachment 5. Despite the surging public opinion and the alarm from environmental NGOs, the deforestation takes place.

It is crucial to shift to the policy to protect Yanbaru forest and to wisely utilize natural resources while stopping deforestation with no sustainability. World Heritage registration can be the momentum for this move. Our organizations demand any authorities and organizations related to the deforestation of whole Yanbaru area the point shown in the gist of the opinion.

【Accompanying sheet】 Pictures on 2016 deforestation in Kunigami village Jashiki (in the tank 2 special zone of Yanbaru National Park), Ura, and Hentona

【Attachment 1】 Pamphlet (March 1, 2009)

【Attachment 2】 Pamphlet (October 6, 2014)

【Attachment 3】 Opinion Letter: the issue on the Plan for Yanbaru National Park (March 22, 2016)

【Attachment 4】 Announcement (February 22, 2017)

【Attachment 5】 Newspaper Article (Asahi Shinbun, August 3, 2009)

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End

## 希少種の宝庫・新緑の謝敷



謝敷・智津気原 1249-1 〈定点撮影〉  
撮影：2016年（平成28年）3月15日  
撮影から5ヶ月後に皆伐された。

## 平成28年度国頭村林産物払い下げ立木伐採（皆伐）事業



謝敷・智津気原 1249-1 〈定点撮影〉  
面積4.96ha 林班：33林班 ろ  
撮影：2016年（平成28年）10月16日  
前方に与那霸岳遠望。左に国立公園特別保護と1種特別保護区を遠望

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8,160,480円

宇良・与俣原317-15

面積2.40ha

撮影：2016年（平成28年）12月30日

育成単層林整備・人工造林（新植）委託事業（新植植樹イヅュ、センダン）



辺土名

面積1.50ha 林班：33林班 3

撮影：2016年（平成28年）12月30日