

To UNESCO World Heritage Center  
(Cc to IUCN world heritage program)

**Urgent Report on the Problem of mobile phone communication base Development  
at Shiretoko World Natural Heritage Site, Hokkaido, Japan**

We, The Nature Conservation Society of Japan and the Nature Conservation Society of Hokkaido, urgently report on the situation at the Shiretoko World Natural Heritage Site, in relating to para 174 of the Operational Guideline for World Heritage Convention.

A mobile phone operator, with the support and permission of the Government of Japan, is about to embark on a project to build a mobile phone communication base and solar power facility, and we express our strong concerns about the impact of this on Outstanding Universal Values of Shiretoko.

We understand that this new construction is required for notification under paragraph 172 of the Operational Guidelines, and this issue should be communicated and resolved between the World Heritage Center, together with its advisory body IUCN, and Government of Japan.

1. Overview of the plan for the development of mobile phone communication bases

The sinking of a tourist boat in April 2022 killed 20 people and left six missing. In response to local requests, the Ministry of Internal Affairs and Communications (MIC) and the Ministry of the Environment (MOE) have therefore been trying to promote the strengthening of mobile phone communications on and around the Shiretoko Peninsula and have already provided financial support and permission to the plan for development of four mobile phone communication bases and solar power facilities (hereinafter “the plan”). The permission according to the Natural Parks Law was issued around early 2024. However, the fact is that the Ministry of Land, Infrastructure, Transport and Tourism (MLIT) excludes mobile phones as a means of emergency communication for ships, and there are alternatives such as satellite phones.

Of the four planned development sites, the most problematic one is the plan in the Cape Shiretoko Lighthouse area.



**Location:** World Heritage Area A (previously called the Core Area), Special Protection Zone under Natural Parks Law (the area that needs to be strictly protected) and Forest Ecological Protection Area.

**Plan:** Construction of 264 solar panels and a solar power generation facility (including associated facilities such as storage batteries and other related facilities), a 2 km underground power transmission cable, and an antenna on the wall of the Cape Shiretoko Lighthouse. The total area of the construction site is 26,094 m<sup>2</sup>, including a land alteration area of 3,970 m<sup>2</sup>.

**Current status of the construction:** Material delivery had started in May 2024, but was temporarily suspended when researchers pointed out the presence of a white-tailed eagle nesting site. The Ministry of the Environment conducted a breeding status survey on 23 May. On 7 June, the Scientific Committee was informed the details of the project and a report from the survey that no breeding had been confirmed in relation to white-tailed sea eagles from the MOE, then discussed the impact on OUV. The Committee requested the Ministry of the Environment and the operator to suspend construction and study the impact on vegetation and breeding white-tailed sea eagles and also requested local stakeholder to reconsider the need for the plan.

## 2. Concerns about potential impacts on Outstanding Universal Values

- 1) While there have been reports of sightings of behavior suggesting breeding this year, one day of field observations is insufficient. The solar power generation facility is considered to be in a high use area by breeding pairs, and there are concerns that construction work may disturb foraging behavior. In addition, there is concern that the frequency of human access for maintenance and management is expected to increase after construction, which could have a negative impact on breeding and habitat conditions for white-tailed sea eagles, and that nesting pairs may disappear from the area.
- 2) The main problem is that the operator did not conduct necessary interviews with experts and survey about wildlife and habitat including the white-tailed sea eagle beforehand and that the Ministry of the Environment granted the permission without a thorough and adequate environmental impact assessment.
- 3) As mentioned above, despite the area is designated as a special protected zone by the



MOE and a forest ecosystem protection area by the Forestry Agency, land alterations amounting to 3,970 m<sup>2</sup> will be carried out. These permissions would be a worst case of distorting the operation of the protected area system in the future.

- 4) The plan also has the risk of fire caused by the solar panels and fire spread due to the harsh weather conditions and poor accessibility of Cape Shiretoko, which would have a significant impact on the OUV of Shiretoko World Heritage Site in the future.

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