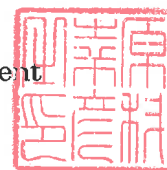


June 15, 2023

RECOMMENDATIONS

To: Tokyo Governor Yuriko Koike regarding
the environmental impact assessment (EIA) of the Jingu Gaien Redevelopment
Plan

From: The Japan Branch of the International Association for Impact Assessment
(IAIA)



Emergency Recommendations

1. The Tokyo Metropolitan Government should invite ICOMOS Japan specialists to the deliberation council and hold a public discussion in order to clarify, from a scientific standpoint, whether there is any false or erroneous data in the EIA.
2. The Tokyo Metropolitan Government should withhold its approval and order the developers to stop any work until the points in questions are cleared up as the advisory body of UNESCO, ICOMOS Japan, has expressed serious concerns about the EIA.

IAIA is the world's leading academic society in the field of EIA, consisting of experts from over 120 nations and regions, which is designated as the representative organization in the field of EIA from the United Nations.

[IAIA The leading global network on impact assessment](#)

Its Japan Branch has serious concerns about the EIA of the Jingu Gaien Redevelopment Plan promoted by the Mitsui Fudosan and other three companies, and makes recommendations to take appropriate measures to secure sustainability, which is the primary objective of EIA.

Concerns on the EIA

• **Flaws in the EIA Framework:** Jingu Gaien is a rare urban park in the world, established in 1926 by the public donating money, trees, and voluntary labor. Ever since, this public space has served as a valuable oasis in central Tokyo, serving not only the citizens of Tokyo but also visitors from both Japan and abroad. The EIA of this redevelopment plan, however, has not assessed the true value of Jingu Gaien. Deliberations at the Chosa Keikakusyo (survey planning) stage of the EIA, equivalent to scoping stage, were inadequate. Important items such as its historical value, which is said to be of UNESCO World Heritage level, the value of the urban green space to be

preserved, biological diversity, etc., were not appropriately assessed. The framework makes it all but impossible to assess the negative impact to sustainability.

• **Lack of Scientific Analysis:** In the deliberation of the Draft EIA Report stage, flaws in the data were pointed out repeatedly with regard to the ecosystems and the avenue of ginkgo trees in the area, but the EIA Report was approved in January 2023 without the developers providing adequate information. Just before that, however, ICOMOS Japan (the Japan committee of ICOMOS, the advisory body of UNESCO), based on detailed on-site investigation, pointed out that the EIA Report contains many false data. Ken-ichiro Yanagi, Chairperson of the Deliberation Council, saying the Council could not give the go-ahead as is, asked the developers to produce counterevidence. The counterevidence by the developers was produced at the general meeting of the Deliberation Council held in April and May, but, without the presence of the ICOMOS Japan experts who pointed out the flaw, the meeting ended up being just a one-sided explanation by the developers, with only perfunctory scientific discussion.

• **EIA Process Management Issues:** ICOMOS Japan, based on the decision of the board of its directors, has provided concrete data for 58 items (according to the answers from the developer) to point out that the EIA Report contains many false data and the developers have the responsibility to produce concrete data as counterevidence. For this to happen, the Tokyo Metropolitan Government office should have withheld the approval of the EIA Report and invite both the ICOMOS Japan experts along with the developers to hold public discussions, but this has not taken place yet.

It is for these reasons that the IAIA Japan Branch has made the Emergency Recommendations above.

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