

ICOMOS

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CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/TA/1698/IR

Charenton-le-Pont, 19 December 2023

H. E. Mr Atsuyuki Oike
Ambassador Extraordinary and
Plenipotentiary, Permanent Delegate
Permanent Delegation of Japan to UNESCO
100, avenue de Suffren
75015 Paris

World Heritage List 2024

Sado Island Gold Mines (Japan) – Interim report and additional information request

Dear Ambassador,

As prescribed by the *Operational Guidelines for the Implementation of the World Heritage Convention* and its Annex 6, the Advisory Bodies are requested to submit a short interim report for each nomination by 31 January 2024. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation procedure.

The ICOMOS technical evaluation mission to “Sado Island Gold Mines” was carried out by Ms. Jane Harrington (Australia) in August 2023. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organisation and implementation of the mission.

On 13 October 2023, an additional information letter was sent by ICOMOS to request further information regarding the description and history of the nominated property, the correlation between intangible and surviving tangible attributes, the composition and conception of the nominated series, protection, management arrangements, development projects and interpretation. Please convey our thanks to all the officials and experts for the additional information you provided on 10 November 2023 and for their continued cooperation in this process.

At the end of November 2023, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2024. The additional information provided by the State Party, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2024.

We thank you and your Delegation for your availability and your participation in the meeting held on 25 November 2023 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During this last part of the meeting, the Panel has identified areas where it considers that further information is needed.

The ICOMOS Panel has appreciated the illustrations and graphics included in the nomination dossier; they have greatly facilitated the understanding of how the geological conditions and the different forms of metal ore have influenced the mining methods used during the Tokugawa Shogunate (or Edo period).

Indeed, the existence of the archival documentation and historical illustrations contained in the Illustrated Scrolls of gold and silver mines represent a precious source of information to retrieve information on the mining and processing of the gold and silver ore on Sado island during the Tokugawa Shogunate, guide investigations on site and visually reconstruct the mining system and its articulation.

ICOMOS is thankful for the additional information provided in November 2023, which has assisted the ICOMOS Panel in clarifying various questions. ICOMOS, however, has identified areas needing further clarification and information.

Additional information on the nominated property and its component parts

The nomination dossier mentions that mining activity greatly developed in the Edo period thanks to more efficient technological methods imported from China and the Korean Peninsula in the late 16th century. The nomination dossier provides an extensive explanation of the mining methods and some explanations and illustrations of the processing methods, but not much is said about the origins of the mining and mining-related methods in use in Sado. ICOMOS would be interested to better understand what methods were imported, from where, and how they have been further developed in Sado Island nominated mines during the Tokugawa Shogunate.

ICOMOS understands that the nomination focuses on the period when unmechanised mining was implemented at a large scale, during the Tokugawa Shogunate. ICOMOS also understands that mining continued after the Edo period until the late 20th century, thanks to a shift to mechanised mining, but the post-Edo periods have not been considered for nomination, as the outcomes of mechanised mining at Sado would not differ significantly from other mining sites and would not seem to exhibit potential for demonstrating outstanding significance worldwide.

As the area of the mining activities seems to be largely the same in the Edo and post-Edo periods, ICOMOS would like to receive further information accompanied by cartographic documentation that could explain more clearly the pattern of exploitation of the metal ore in the Edo and the post-Edo periods, including the areas for mining and processing and what survives within the nominated property that dates back to the post-Edo period. It would also be useful to understand what changes were brought about by the new mining methods to previous tangible layers of mining use.

Clarification of the rationale for delineating the boundaries of the nominated component parts

ICOMOS noted a different approach in defining the boundaries for the nominated component parts in relation to the documented mining zones.

For the Nishimikawa component part, boundaries are clearly identified and related to the described sites, documented through archaeological investigations. A more broad-brush approach seems to have been adopted in the other two areas. In the Tsurushi Area, maps presented in the nomination dossier offer an idea of several detected surface mining sites, although only a few seem to have been documented through archaeological excavations and investigations.

The Aikawa Area component part, on the other hand, is mapped all as an area of exploitation, but only a limited number of sites seem to have been identified, and a smaller number seems documented through archaeological investigations. The Aikawa area is also the area where exploitation continued in the post-Edo periods; therefore, a better understanding of the potential overlapping of exploitation between the two periods and potential modifications to earlier Edo-period structures and remains would be important.

Due to the overlapping of the area of exploitation, ICOMOS understood that some post-Edo period mining-related facilities or structures are contained within the boundaries of the nominated property. For instance, in Aikawa-Kamimachi Town, the nominated area includes Shimo-Yamanokami, Sakashita, Kitazawa, and Yajuro zones. ICOMOS would like to know more about these elements, whether they have retained tangible features of the Tokugawa Shogunate period, what these are and how they contribute to illustrating the narrative of the unmechanised mining system and reflect the proposed justification for inscription, or whether they include structures/facilities of the post-Edo periods and, if this is the case, where they are located and how these contribute to the chosen narrative.

Concerning the point raised above, ICOMOS would also like to better understand whether other structures or elements that do not belong to the Tokugawa Shogunate have been included within the boundaries of the nominated component parts, what they are, and what their spatial relationship with the Tokugawa Shogunate mining system.

State of the art of the research, including archaeological investigations

ICOMOS would also appreciate receiving further information on what extent archaeological investigations on other sites within the nominated component parts have been carried out – they could be excavations or application of non-destructive methods – and the level of knowledge developed about other mining or settlement zones that have not been described in detail in the nomination dossier.

Also, it would be interesting to understand whether studies have been carried out on the impacts of the mining activity on nature and the vegetation cover and whether these have been used to understand the extent of mining activities within the nominated component parts.

Finally, ICOMOS would be interested in receiving additional information and details on any archaeological research strategy that may be in place.

Protection and management

The ground might still preserve archaeological vestiges important for understanding the socio-technical system of gold/silver mining; furthermore, forest cover is important also for stabilisation of potential areas subject to landslips; finally, forest management may interfere with the conservation of the below-ground remains; therefore, a more precise understanding of how forest management within the nominated property and its buffer zone is regulated would be very useful. ICOMOS would be grateful to receive more precise information on whether forests within the nominated component parts and their buffer zones have already been cultivated and replanted and, if so, where, when, and what methods of planting and cultivation have been used in the past (e.g., tree-cutting, whole-tree harvesting). Such information may be usefully complemented by maps indicating forest cover already subject to cultivation and replanting.

ICOMOS would appreciate further clarification about protection mechanisms that may be in place regarding the wider setting: if any development activity with a potential negative impact on the nominated property would occur outside the buffer zone, what are the mechanisms to prevent such negative impacts from happening?

This is particularly important for the marine buffer zone for which ICOMOS would suggest an expansion to reduce potential visual impacts from offshore wind farms, the development of which seems to be expected in relation to decarbonisation policies in place.

Since mining rights are still in place, further clarifications would be useful about their regulation, for instance, what are the procedures and requirements to issue licences for mining exploitation, and whether there are still valid mining licences for exploitation within the nominated property or its buffer zone.

Finally, the nomination dossier states that Golden Sado, the main mining rights holder, has agreed to remain non-operational; receiving a copy of such an agreement would be useful for the evaluation process.

Reduction of the fragmentation of the series

ICOMOS is grateful for the explanations presented in the additional information received in November 2023 about the rationale for delineating the boundaries of the sections of the water channels. Following the reception of the technical evaluation mission report and internal discussion, ICOMOS considers that such fragmentation would negatively impact the smaller components' capacity to reflect the proposed justification for inscription in a substantial and discernible way. Therefore, ICOMOS confirms its request made to the State Party in the October 2023 letter for additional information to explore ways to reduce the fragmentation of the nominated component parts and secure the integrity of the nominated series.

We look forward to your responses to these points, which will greatly help our evaluation procedure.

We would be grateful if you could provide **ICOMOS** and the **World Heritage Centre** with the above requested information by **28 February 2024 at the latest**, the deadline set out in paragraph 148 of the *Operational Guidelines for the Implementation of the World Heritage Convention* concerning additional information on nominations to be received. Please note that any information submitted after this statutory deadline will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any additional information submitted within the statutory deadline, it will not be possible to properly evaluate a completely revised nomination or a large amount of new information submitted at the last minute. ICOMOS would therefore be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation procedure.

Yours faithfully,



Gwenaëlle Bourdin
Director
ICOMOS Evaluation Unit

Copy to Office for International Cooperation on Cultural Heritages,
Cultural Resources Utilisation Division, Agency for Cultural Affairs
World Heritage Inscription Promotion Office, Culture Division,
Department of Tourism, Culture and Sports, Niigata Prefecture
UNESCO World Heritage Centre