ICOMOS

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

Our Ref. GB/EG/1698_Add.Inf

Charenton-le-Pont, 13 October 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 – Additional Information
Sado Island Gold Mines (Japan)

Dear Ambassador,

ICOMOS is currently assessing the nomination of "Sado Island Gold Mines" as a World Heritage property and an ICOMOS technical evaluation mission has visited the nominated property to consider matters related to its protection, management and conservation, as well as issues related to its integrity and authenticity.

ICOMOS would like to remind the State Party that the documents provided to the ICOMOS mission expert during or after the technical evaluation mission, and which may be relevant to the examination of the nomination dossier, must be officially submitted to the UNESCO World Heritage Centre and to ICOMOS so that they can be officially taken into account in the evaluation procedure as part of the nomination dossier.

In order to allow us to further evaluate this property, we would be grateful if the State Party could provide us with additional information on the following points:

Description and history
ICOMOS understands from the nomination dossier that the social and work organisation played an essential role in the functioning of the mining system, and they are also presented as attributes of the proposed justification for inscription. It would very useful for ICOMOS if further details could be provided on how the mines were administered; what the social and work organisation in the mines was and how this was reflected in the layout of the settlements and the mining, as well as the processing activities; what was the provenance of the workforce; what were the working conditions and how the entire system has evolved over the centuries; and how this evolution is reflected in the tangible evidence of the nominated property.

Attributes
Based on nomination dossier, ICOMOS notes that most of the attributes supporting the proposed Outstanding Universal Value refer to archaeological remains or intangible aspects, such as the mining management system, which no longer seems to be functioning. Therefore, ICOMOS would appreciate if the State Party could clarify how intangible attributes are reflected in tangible elements, spatial dispositions and other features of the nominated property.

Composition and conception of the nominated series

ICOMOS understands that other mining sites still survive on Sado Island. Not much information is provided on the other mining sites, nor is it explained how the two nominated areas have been selected to illustrate the unmechanised gold mining and production developed on Sado Island. Hence, ICOMOS would be pleased if the State Party could explain the rationale for the selection of the two areas and related 22 component parts from the several mining sites that can be found on Sado Island. Could the State Party indicate which parameters have been used for selection?

Regarding the composition of the series, ICOMOS notes that the State Party has chosen to break down the property into 22 component parts; this seems to apply particularly to the waterways, of which some sections are quite slim or lacking. This rigorous composition leads to the fragmentation of the serial nomination in which several component parts – essentially separated sections of the waterways – are too limited in size and features to include the attributes that convey the proposed Outstanding Universal Value, which could limit the capacity of some component parts to be able to "*contribute to the Outstanding Universal Value of the nominated property as a whole in a substantial, scientific, readily defined and discernible way*" as per paragraph 137 of the *Operational Guidelines for the Implementation of the World Heritage Convention*. Therefore, ICOMOS would be pleased if the State Party could provide some clarification on this matter. Would the State Party be ready to explore ways to reduce the fragmentation of the nominated component parts?

Protection

It is indicated in the Comprehensive Management Plan that some sections of Nishimikawa Placer Gold Mine "*are to be added to the national Important Cultural Landscape (Scheduled)*" (p. 73). It would be important for ICOMOS to understand what parts of the nominated property or its buffer zones are yet to be protected as national Important Cultural Landscape, and what would be the timeframe for completion of this designation, as well as what is currently protected, and if so, under what protection designations and regimes.

Management arrangements

ICOMOS notes that various agreements between the relevant stakeholders will be reached for appropriate management, public access and use. ICOMOS would appreciate if the State Party could clarify the nature of these agreements, their purpose and whether they are necessary to ensure the implementation of the management system and the Comprehensive Management Plan and, if so, the timeframe by which they should be finalised and implemented.

Development projects

A few projects and interventions that may have an impact on elements contributing to the attributes of the proposed Outstanding Universal Value – such as tree-felling and water pipeline for improving conditions of agricultural activities, are mentioned in the nomination dossier. ICOMOS would be pleased if the State Party could provide some additional information on these projects and any other development initiative or project that may have been proposed in the meantime.

Interpretation

The nomination dossier provides some information on the most recent history of exploitation of the nominated property, from the late 19th until the mid-20th century. However, this information remains rather general and does not address specifically the provenance and working conditions of the miners and mine-related workers. ICOMOS would appreciate if the State Party could provide additional information on this aspect and on the presentation and interpretation programmes in place or under preparation for the nominated property, and whether these cover the entire history of mining on Sado Island and in the nominated property.

We would be grateful if you could provide **ICOMOS** and the **UNESCO World Heritage Centre** with the above information by **Friday 10 November 2023 at the latest.**

ICOMOS appreciates that the timeframe for providing this additional information is short. Brief responses are required at this stage, and can be discussed further with the State Party if needed during the ICOMOS World Heritage Panel.

We look forward to your responses to these points, which will be of great help in our evaluation process.

Please note that the State Party shall submit a copy of the additional information to the UNESCO World Heritage Centre and a copy to ICOMOS so that it can be formally registered as part of the nomination dossier.

We thank you in advance for your kind cooperation.

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

Additional Information on “Sado Island Gold Mines”

This additional information is prepared in response to the letter from ICOMOS on 13 October 2023

November 2023
JAPAN

* Please note that the number of questions in the box is inserted by the State Party.

1. Description and History

Due to the limitation of words in section 2 and 3 of the main text of the nomination dossier, detailed information on this point is described in Appendix 2 rather than in the main document of the nomination dossier. Below are summarised answers to the question based upon the information in Appendix 2, “2-2: Detailed Information on Socio-technical System of History and Development” (from page A2-22 to A2-90).

1-1 How were the mines administrated?

The description below is mainly focusing on the Edo Period (1603-1868), to which the OUV is directly related.

The Sado Magistrate’s Office was constructed by the Tokugawa Shogunate (central government), not by a feudal lord called ‘Daimyo’, as the centre of management, and it directly managed the gold production in the Aikawa-Tsurushi Area and the Nishimikawa Area. The gold and silver mines in Sado were vital for supporting the finances of the Tokugawa Shogunate from the beginning of the Edo Period.

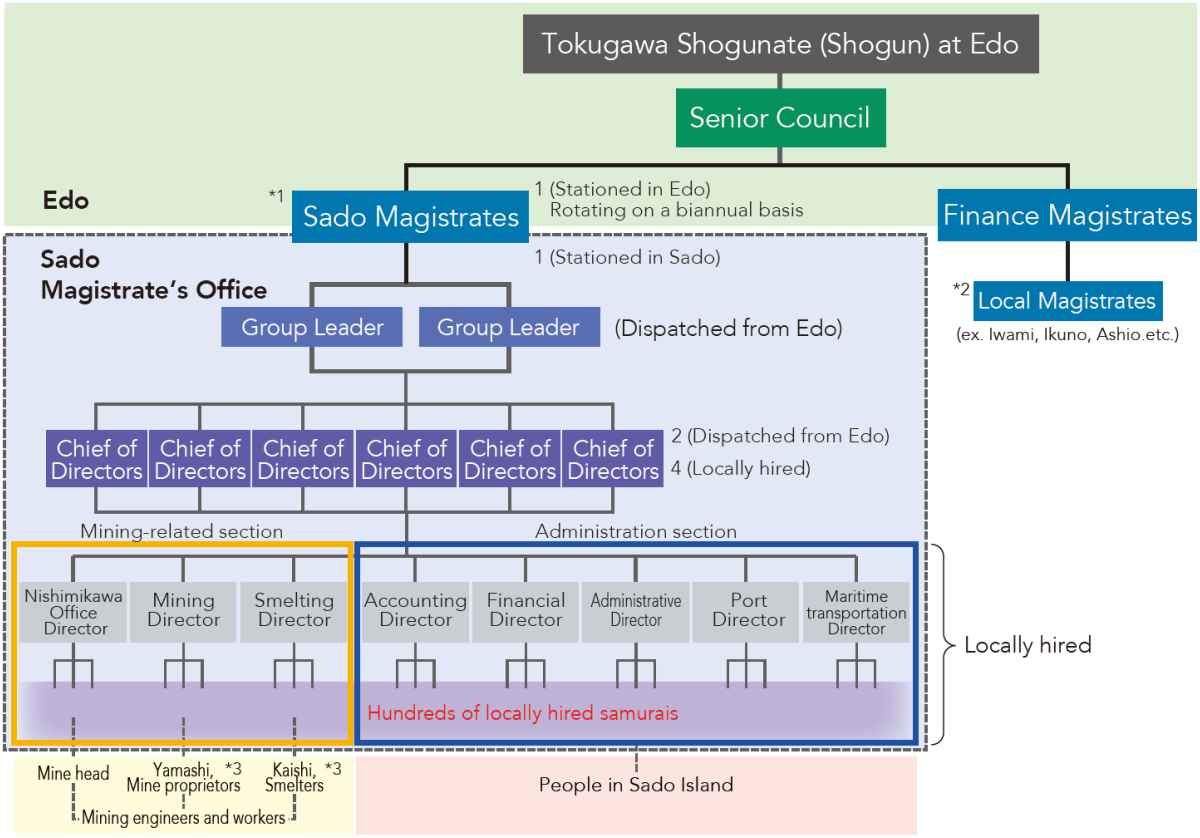
The Sado Magistrate was regarded as one of the high positions in the Tokugawa Shogunate, the same level as the Finance Magistrate who was responsible for the overall finances of the Shogunate [Fig. 1].

The Sado Magistrate’s Office was divided into two sections: one dealing with mine management, the other with the administration of the whole island. In the mine management section, there were three divisions: namely one for the Nishimikawa Placer Gold Mine, another for mining in Aikawa-Tsurushi and the other for ore processing including smelting, minting etc.

The Sado Magistrate’s Office strictly managed the amount of ore and the production of gold and silver, and it also took responsibility to keep sufficient labour conditions of workers in each venue of mining such as improving headraces and drainage tunnels and maintaining mining tunnels. The office also encouraged the long-term continuous production through the improvement of the production technology and production processes by gathering skillful workers from all over Japan, by leaving discretion to the mining experts and workers on site, and by treating them according to the level of the proficiency of their skills.

And it also adopted a system for stable supply of the materials necessary for production at cheaper price by dispatching their officials outside of the island to make cost-effective purchases of large quantities. These materials included iron for mining tool and lead, salt and charcoal for smelting and refining.

The costs for mining gold and silver were covered by a range of taxes collected on the island (tithes), although large-scale improvement of mining - such as the excavation of the Minamizawa Drainage Tunnel - were conducted with the funding from the Tokugawa Shogunate.



*1 : "Sado Magistrate" was one of "the Magistrates of Distant Places" who were dispatched in the important places under direct control of the shogun. Magistrates of Distant Places were placed in Nagasaki, Kyoto, Osaka and so on, including Sado and directly managed them as the financially and politically important cities.

*2 : It was "Local Magistrates" under Finance Magistrates who managed the less important areas under direct control. At other mines than Sado, "Local Magistrates" were usually placed to manage the mines.

*3 : Mine proprietors functioned as officials in the magistrate's office and smelters were placed centrally under the control of the magistrate's office. Thus, they were incorporated as part of organisation in the magistrate's office.

Fig.1 Organisation incorporated chart of the Sado Magistrate's Office

1-2 What was the social and work organisation in the mines and how was this reflected in the layout of the settlements and the mining as well as the processing activities?

1-5 How has the entire system evolved over the centuries; and how is this evolution reflected in the tangible evidence of the nominated property？

This nomination is comprised by two mines: A) Nishimikawa Placer Gold mine and the B) Aikawa-Tsurushi Gold and Silver Mine. They differ significantly in terms of deposits and mining methods. This contrast also brought the difference of a social system between these two areas. Therefore, these two mines will be described separately as follows.

The holistic overview of the transition of production technology, production organisation and management in the Sado Island Gold Mines is attached in the end of this section [Fig. 6].

A) **Nishimikawa Placer Gold Mine (Nishimikawa Area)**

In the Nishimikawa Placer Gold Mine, what is characteristic is that the local villagers carried out mining. The village as a mining organisation consisted of three layers: Mine officials, head of the village named Kaneko Kanzaburo, and villagers.

The mine officials dispatched from the Sado Magistrate's Office were stationed in the village to oversee the production of placer gold and to invest in the maintenance of reservoirs, waterways and other facilities for continuous operation.

Under the supervision of the Mine officials, Kaneko Kanzaburo, whose name was succeeded from generation to generation, coordinated actual works and management of the villagers as a head of the villagers.

Through the coordination by the Kaneko Kanzabro, villagers conducted actual mining activities such as "Onagashi" in a collaborative manner.

Since the social system and technical system were stable in this area, the basic settlement structure remained unchanged.

In terms of placement of settlement, villages moved along with mining sites. After the beginning of the 17th century, when the technology of the "Onagashi" method was established, two mining residential districts (Kinzan and Sasagawa) were formed above the former mining sites. As the gold mine was fully developed, the residential district was formed on the flat land

of a former placer gold mining site. After the late 17th century, due to the decrease of placer gold, those residential districts which had originally functioned as separate villages, came to function as one settlement called the “Sasagawa Juhachimai-mura Village.” The structure, including layout and forms of the premises, has been well kept to this day [Fig. 2] [Photo. 1].

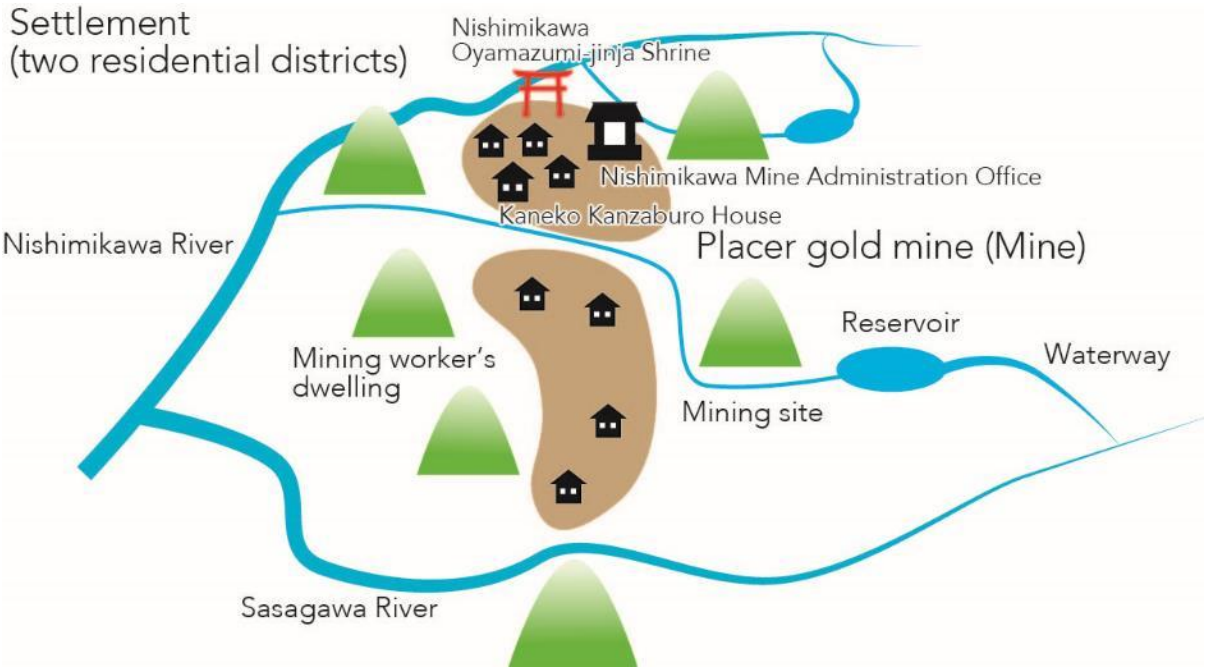


Fig.2 Settlement zone in the Nishimikawa Placer Gold Mine (conceptual diagram)

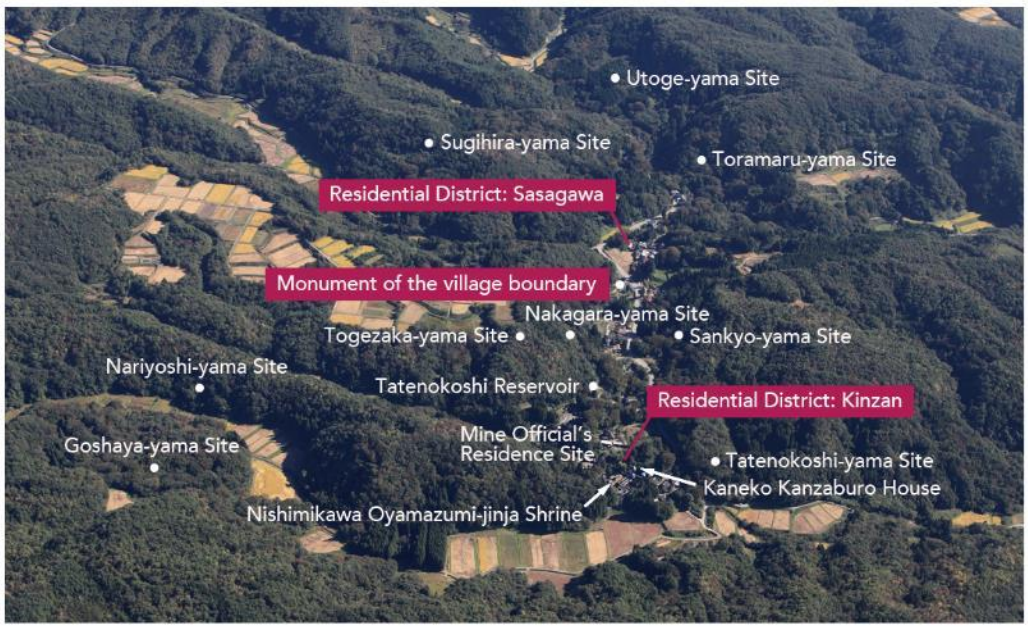


Photo.1 Aerial view of the settlement zone of Nishimikawa area

B) Aikawa-Tsurushi Gold and Silver Mine (Aikawa-Tsurushi Area)

In the Aikawa-Tsurushi Gold and Silver Mine, the development of the social and work organisations can be clearly seen in the locational and chronological transformations. Therefore, it should be described in three developing stages as follows: B-1) Introductory stage, B-2) Early Stage of the Development, and B-3) Further Developing Stage.

B-1) Introductory Stage

The introductory stage is described as the development of the Tsurushi-Aramachi District in the late 16th century.

As for the composition of this district, the town planning was not clear at this era. It consists of terraces of irregular shapes and layout along with the natural topography. This arrangement can be clearly found on the surface of the land and as archaeological sites in the district. However, the relics and artefacts there reveals that spaces of the mining settlement were allocated according to type of mining activities and livings like ore-dressing workshops, smelting workshops and residential areas [Fig. 3].

And also, the Local Magistrate's Office was located adjacent to this settlement. It carried out the governance of this district in terms mainly of control of labours, working activities, security of this settlement.

At the same time, as shown in the [Fig. 3], the small settlements closest to the mining sites were placed. They are presumed to be the places for temporary hut built for short stay during mining operation cycles. Mine workers dug and made initial dressing of ores there, and they conveyed them to the main settlement.

These elements in this district functioned very well and then the Tsurushi area realised the prosperity at that era. In the meantime, this prosperity brought rapid increase of mine workers in this settlement. This influenced the expansion of the residential zone.

In this way, the socio-technical system in this era was established as the introductory stage.

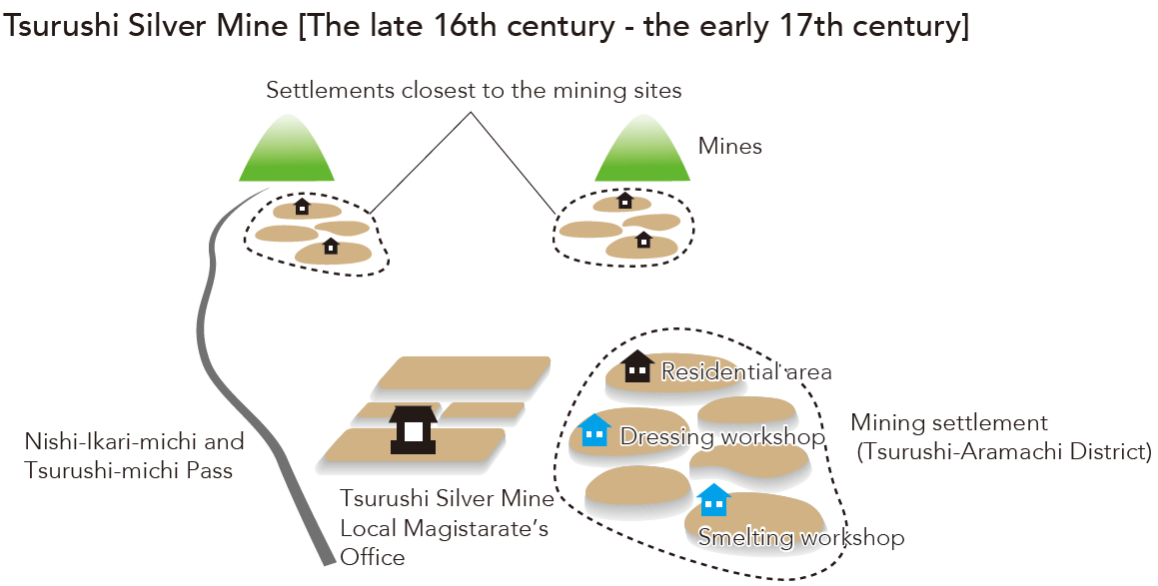


Fig.3 Settlement zone in the Tsurushi Silver Mine (Conceptual diagram)

B-2) Early Stage of the Development

The second stage of the development can be seen in the Kami-Aikawa District from the early 17th century: subdivision and specialisation of each process.

According to the records in the Sado Magistrate's Office, in the early 17th century after the discovery of the gold veins in the Aikawa area, the base of mining development including mining skills and technologies was moved from Tsurushi to Aikawa. One mine proprietor after another came to the mines in Aikawa accompanied by specialists of mining from all over Japan.

At this era, the new residential district, the Kami-Aikawa District, was constructed on the slopes of the hills which were close to the mining areas such as the Doyu-no-warito.

One of the most characteristic aspects at this stage is that the Tokugawa Shogunate set up the Sado Magistrate's Office, which means that the Tokugawa Shogunate carried out the direct governance of Sado island including its major mines.

The other aspect is mine proprietors and specialists. As mentioned above, mine proprietors accompanied by mining specialists organised total gold production group by themselves. They served in a group as overall supervisors of the entire operation, overseeing and managing engineers and mining workers involved in mining, ore-dressing, smelting and refining. Each team carried out the whole production processes consistently from mining to refining. A distribution survey reveals this organisation, as we found a number of artifacts related to ore-dressing and smelting, such as stone mills, pounding stones, tuyere and slags are scattered throughout each ward of the district.

In this circumstance, the Sado Magistrate's Office efficiently took control of these mine proprietor's groups by providing them with the necessary materials, and by encouraging them under the competition of the amount of gold production.

A diary record, called "Umezu Masakage Nikki" * tells that many old ward names in the Kami-Aikawa District derived from the mine proprietors' names in the district at that time [Fig. 4].

In regard to allocated shape in the district, the terrace-like flat lands with rectangular lots were intentionally arranged alongside two parallel main roads running through the district, which was well organised under a solid planning policy. The current Kami-Aikawa District clearly represents this situation of production organisation during the early stage of development, which relics and remains prove.

In short, the Kami-Aikawa District was systematically well-planned as "the early stage of development". At the next stage, the function of the Sado Magistrate's Office strengthened further and this also brought further changes of the socio-technical system as the further development stage.

*Umezu Masakage was a chief retainer of Akita feudal domain, who took part in management of mines in Akita area (northern Japan). His diary depicts various mines at that time in Japan.

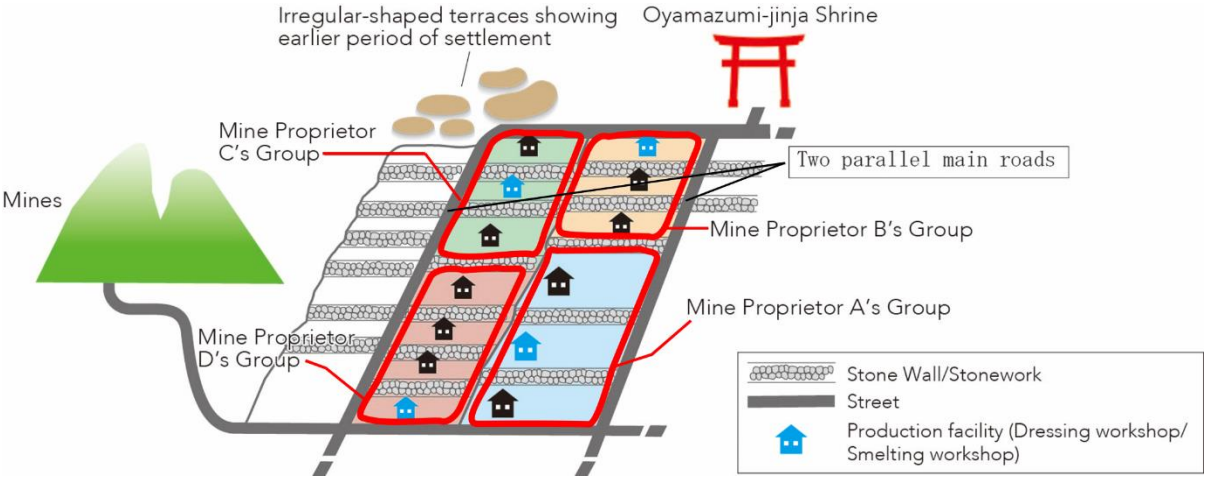


Fig.4 Settlement zone in the Aikawa area: Kami-Aikawa District (conceptual diagram)

B-3) Further Development Stage

The further development stage starts from the middle of the 17th century.

Because of the prosperity of the Aikawa area and the expansion of the number of mine workers at the area, the new town, 'Aikawa-Kamimachi' was created. And then, the base of the settlement of the Aikawa area also moved from the Kami-Aikawa District to the Aikawa-Kamimachi Town.

What is important at this stage is the reinforcement of management of the Sado Magistrate's Office.

The first reinforcement was highly organised and systematic land allotment. The Sado Magistrate led the development of the town in the 17th century by creating terraces and terraced lands on the slope of the ridge and by building high retaining walls with stones to expand the area available for use. The place for working and living, which was arranged by occupation such as management, production and other business, was developed [Fig. 5. Left].

In the vicinity of the Sado Magistrate's Office, there were officials' residences, wholesalers and shops which supported the mine management standing side by side along the road. A group led by mine proprietors resided in the vicinity of Ainoyama and the Kami-Aikawa District and in the area along the Hidarisawa-River as well as on the plateau of Aikawa-Kamimachi.

The miners who were directly employed by the Sado Magistrate's Office resided in "Daiku-machi Ward" (literally miners' town). Historical documents reveal that a town was formed in which workshops and residential places for each gold production process (according to the occupation) were arranged. For example, dressing work that required water was conducted in "Kitazawa-machi Ward" along the Nigorikawa River, and smelting work in "Odokoya-machi Ward" (literally smelters town) in the Aikawa-Kamimachi Town [Fig. 5. Left]. Even now, these names still remain in the Aikawa-Kamimachi Town.

This was to facilitate the gold production, and more efficient management of the mine including the expansion of production systems, and to provide accommodation for a surging population.

The second reinforcement of function of the Sado Magestrate's Office is the centralisation of the mining processes after the middle of the 18th century [Fig. 5. Right].

In 1759, facilities distributed throughout the town related to ore-dressing and smelting were amalgamated and centralised in working plants established inside the Sado Magistrate's Office.

In consequence, residences for Samurais around the Sado Magistrate's Office were re-distributed to the increased ore-dressers and smelters.

This affected the function of the settlement, although the basic physical structure of the settlement remained unchanged, including its roads and land allotment. As a result of this re-distribution, the zoning by occupation in the same lot in the former town in the 17th century ceased and people in various statuses and occupations became to randomly live next to each other in the town [Fig. 5. Right].

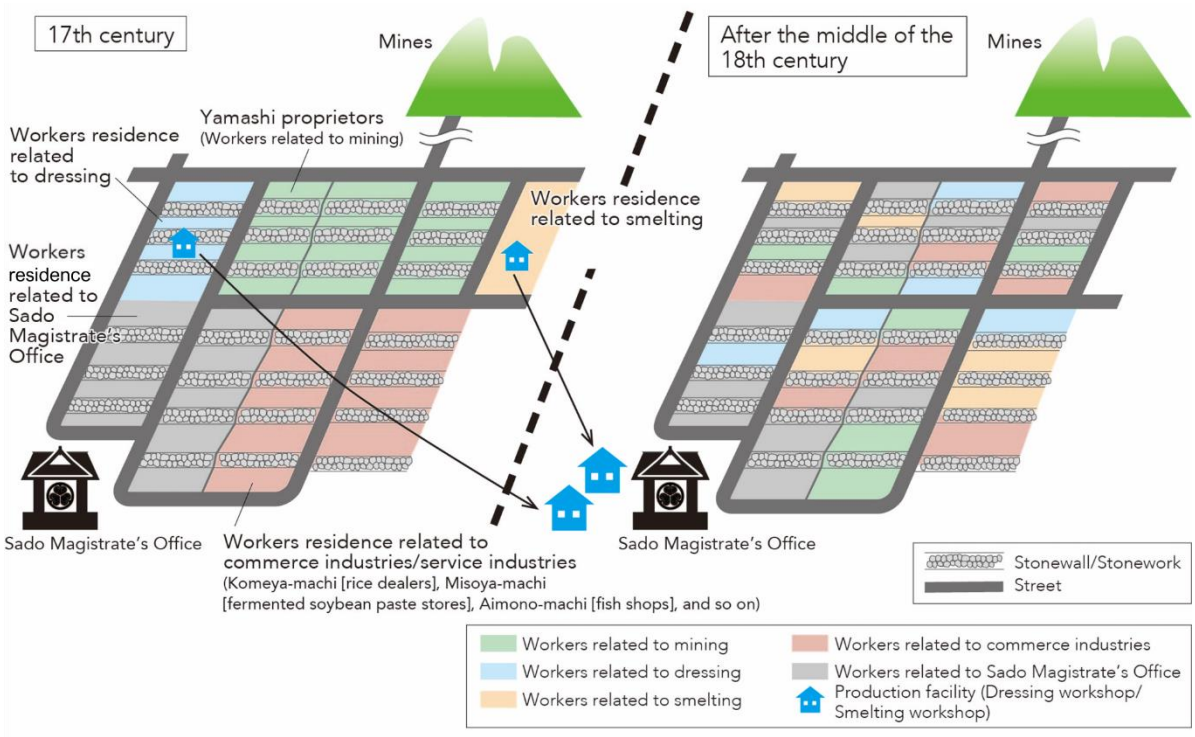


Fig.5 Transition of the settlement structure: Aikawa-Kamimachi Town (conceptual diagram)

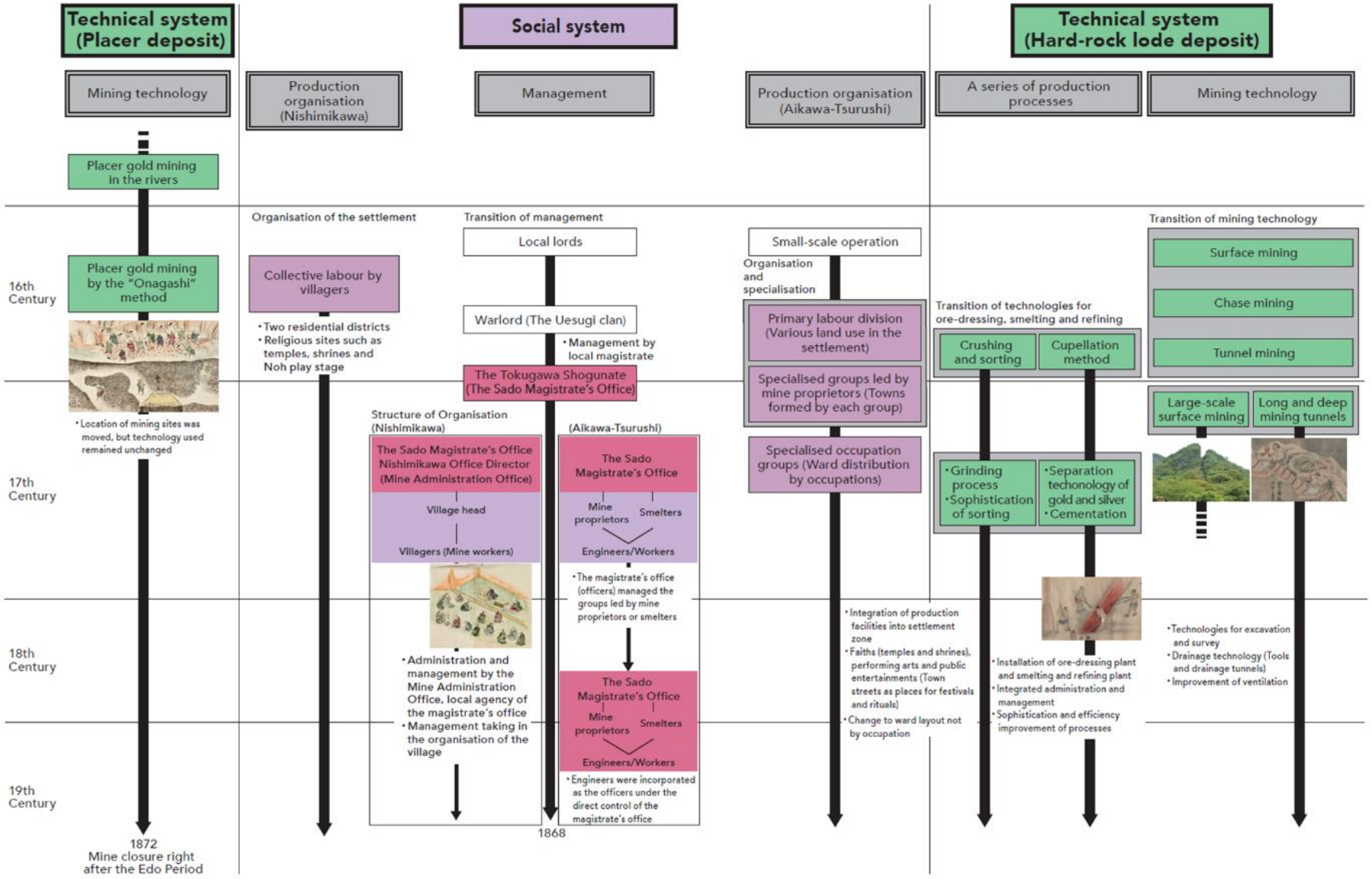


Fig.6 Transition of production technology, production organisation and management in the Sado Island Gold Mines

1-3 What was the provenance of the workforce？

According to the records, a number of Samurais and mine proprietors as well as mine workers migrated from all over Japan, especially from the end of the 16th century to the first half of the 17th century when the Aikawa area was developed vigorously. However, due to the national seclusion policy of the Tokugawa Shogunate, their origins were limited to within Japan.

In the period of the control of Uesugi (a lord in Echigo province) in the late 16th century, there were many samurais from Echigo (present Niigata prefecture excluding the Sado Island). In the period of the first Sado Magistrate Okubo Nagayasu's control at the beginning of the 17th century, there were many Samuraisand mine proprietors from Kai (present Yamanashi prefecture), where Okubo was born and gold mines were vigorously developed. Following that there were officials from the Iwami Silver Mine who were requested to come over to Sado by Okubo [Fig. 7].

Mine proprietors also migrated from various places: Kai, Echigo, Yamato (present Nara prefecture), Bizen (present Okayama prefecture) and so on in the peak period [Fig. 7].

As for mine workers, one of the most important historical documents on workers migrated to Sado island is "register rolls" in temples. According to these documents, it can be found that the mine workers mainly came from nearer part of mainland Japan such as Etchu (present Toyama prefecture), and that the other workers were from almost all over Japan.

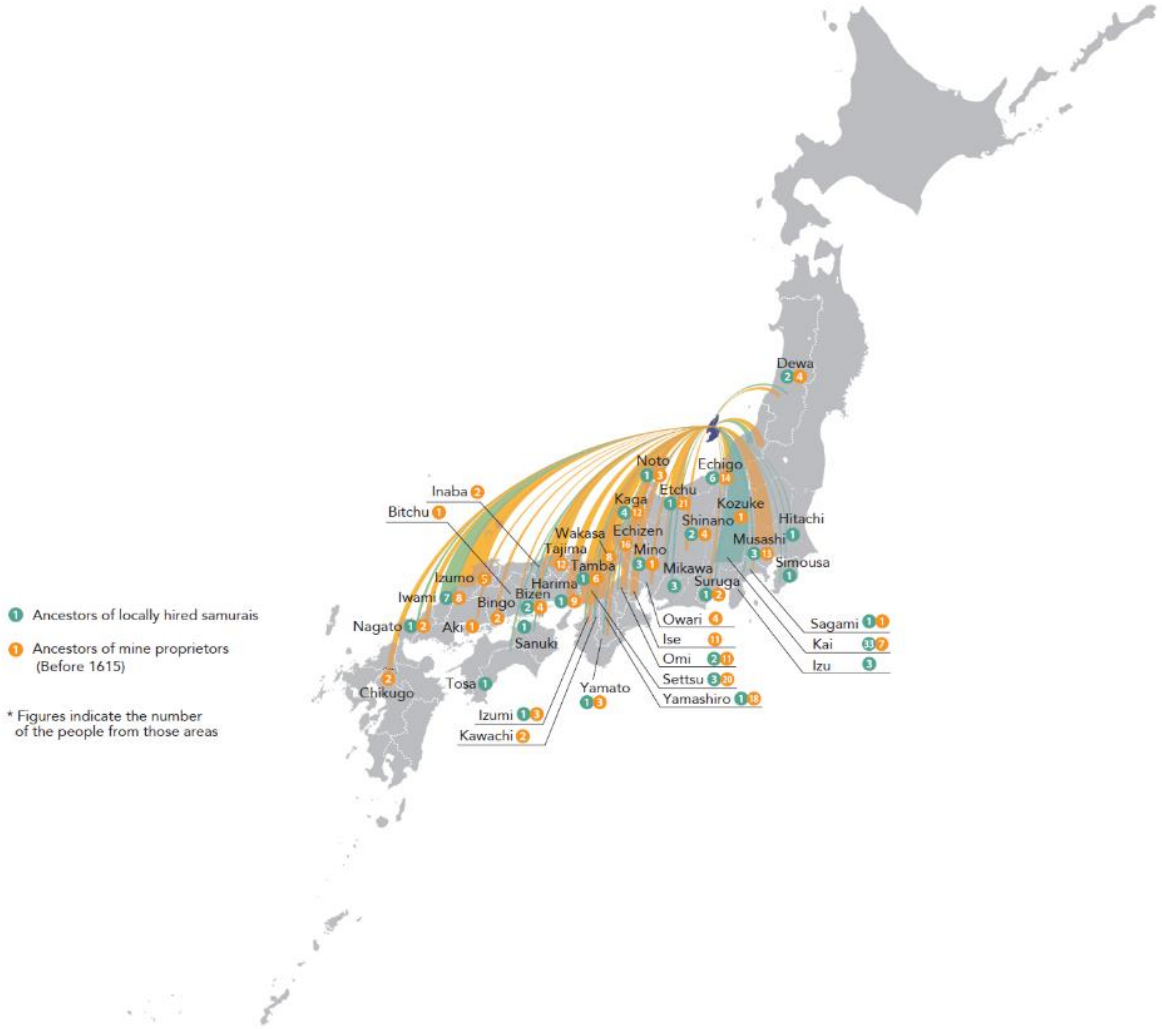


Fig.7 Birthplaces of the ancestors of locally hired Samurais in Sado and those of the mine proprietors

1-4 What were the working conditions？

Due to the differences in the deposits and the production technologies, there are significant differences in working conditions between the two mines.

A) Nisimikawa Placer Gold Mine (Nishimikawa Area)

The mining in this area is an activity of village. This means that villagers collaboratively worked there in principle.

To give more details, it is presumed that almost all households in the residential district were engaged in placer gold mining. The “Onagashi” was conducted in collaboration by mainly male workers, while female workers were engaged in farming and making tools for mining. Villagers were assigned their own mining sites and each site had a group of five to six workers. Each group resided close to its mining site. It is understood that they paved narrow mountain paths and went to each mining site through them. Therefore, the current residential districts leave the traces formed reflecting the unit in each mining site.

Placer gold mining using “Onagashi” was carried out every month. Until about the 25th or 26th of each month, miners scraped the strata of the mountainsides and washed away unwanted dirt with the force of water from the reservoir. By repeatedly removing sand gravel and stones, they increased the amount of sediment containing placer gold left at the riverbed. During the last five days of the month, they collected placer gold from the sediment left after the operation.

The daily work was carried out from six in the morning to six in the evening. When the mountain stratum was scraped and water was released from the reservoir, experienced workers stood as guards and confirmed the safety of the site.

B) Aikawa-Tsurushi Gold and Silver Mine (Aikawa-Tsurushi Area)

As for safety and the working condition inside mining tunnels, the Sado Magistrate’s Office played a major role.

The government officials periodically inspected the working conditions, taking necessary measures to ensure safety and efficiency. For example, in places susceptible to collapse in mining tunnels, the workers under direct command of the Sado Magistrate’s Office conducted “Yamadome”, reinforcement of tunnels using timber. This kind of maintenance was consistently

carried out within the tunnels in order to keep safety of the workers. Measures were also taken to improve ventilation in the tunnels, including excavation of ventilation tunnels and the use of winnowing fans called “Tomi” to supply fresh air from the outside.

The mining process was conducted by specialised and subdivided groups led by mine proprietors who were admitted as supervisors of the whole operation by the Sado Magistrate’s Office. The mining work was basically carried out in eight-hour shifts over a twenty-four-hour period and workers took a rest after each four-hour work.

In some large mining tunnels, various types of miners worked. For example, on-site managers called “Kanako” employed “Kanahori daiku”, expert miners, to excavate ore. These miners were highly professional and skilled workers who were paid the highest wages among the various occupations. Another type of miners called “Horiko” was in charge of carrying ore out from the mines, disposing of tailings, and delivering or sharpening cold chisels.

A task of draining water was mainly carried out manually at the Edo Period. During the initial prosperous period, many people gathered for drainage work from within the island as seasonal work. However, due to the hard work and gradually decreasing wages compared to other mining works, the number of local applicants decreased, so work of draining water was assigned to villages on the island. Furthermore, the Tokugawa Shogunate employed “Mushuku-nin” for this work. These were people who had been excluded from the population registry due to various reasons. While they were under strict control of the Sado Magistrate's Office, it is said that those who worked diligently for a certain period could obtain re-registration.

Concerning workers outside tunnels, such as processes of crushing and grinding ore, extracting gold and silver, and smelting and refining the extracted gold and silver, were subdivided and skilled engineers and mining workers were assigned for each process. The work of initial dressing ore brought out of the tunnels was conducted by skilled women in a hut constructed in the vicinity of the portals. Women were also involved in tasks such as transporting selected ore to the workplace and conducted “Neko-nagashi” (Wash in sluice) using gravity concentration. The processes of dressing and smelting of the selected ore were operated under the supervision of dressers or smelters called "Kaishi." Such works were basically conducted in eight-hour shifts from 8:00 AM to 5:00 PM.

As for income for mining workers in general, it is believed that workers gained rather good earnings compared to farmers in the Edo Period.

2. Attributes: ICOMOS would appreciate if the State Party could clarify how intangible attributes are reflected in tangible elements, spatial dispositions and other features of the nominated property.

Table 2-1 in page 20 of the nomination dossier demonstrates the relationship between the intangible attributes and the tangible elements. For example, management system which is referred in the questionnaire from ICOMOS is associated with Attribute 1, as is shown in page 21 of the dossier.

Attribute 1;

A) **Nishimikawa Placer Gold Mine (Nishimikawa Area)**

The management system in the Nishimikawa Area is reflected on the tangible elements as follows; under the direction by the mine official sent from the Sado Magistrate's Office, who stayed in Mine Official's Residence Site, the head of the village, Kaneko Kanzaburo who resided in Kaneko Kanzaburo House, managed the mining activities at the mining sites such as the Goshaya-yama Site, Toramaru-yama Site and Tatenokoshi-yama Site. Houses of villagers were formed on small flat lands filled with unwanted stones etc. left after the mining activity. Thus, the irregular shapes and layouts were established in the Residential Districts: Kinzan / Sasagawa [Fig. 8].

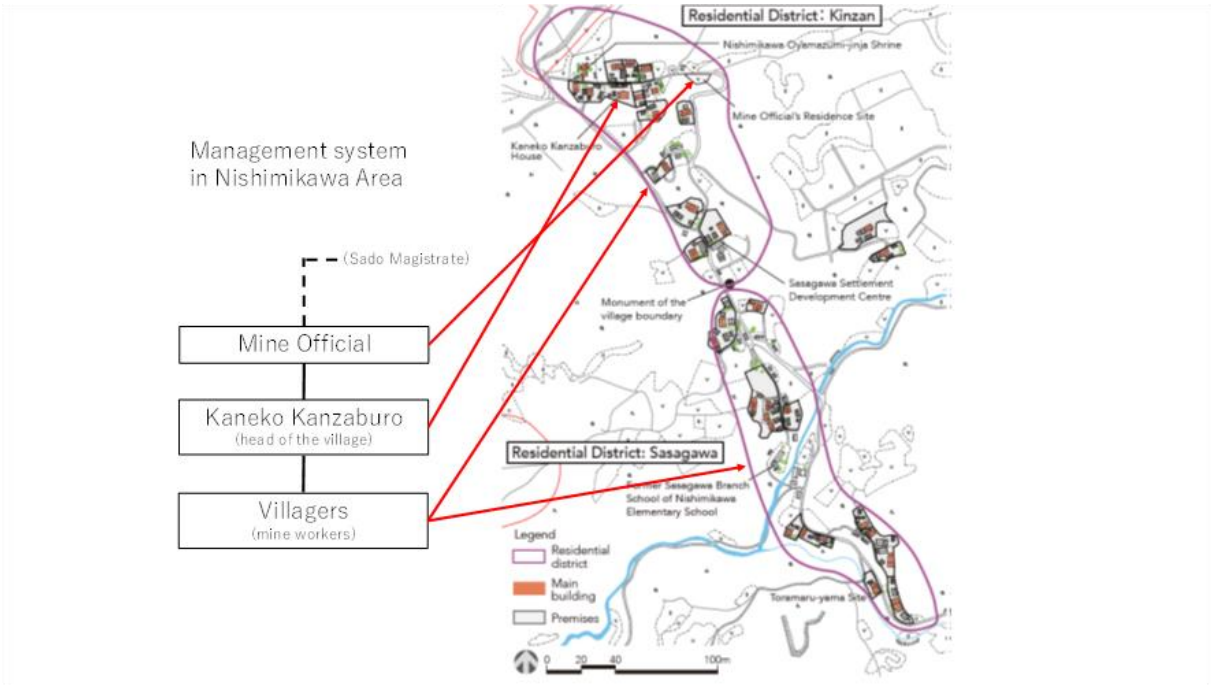


Fig.8 Tangible elements which represent the intangible attributes in Nishimikawa Area

B) **Aikawa-Tsurushi Gold and Silver Mine (Aikawa-Tsurushi Area)**

In the Tsurushi area, the Local Magistrate's Office was located at the entrance of the area along the main pass of the transportation, which managed the personnel and the products from the mines.

The Tsurushi-Aramachi District was formed through the rapid increase of mine proprietors and workers by adding irregularly shaped terraces which utilised the original topography [Fig. 9]. Small terraces can be 16ecognized as remains of settlement sites in the immediate vicinity of mining sites, which indicates that the mine workers established small temporary huts or 'camps' and conducted some parts of the ore-dressing processes, such as classification of ores or rough sorting in the mining zone to lighten the burden of transporting the ore and thus to reduce costs.

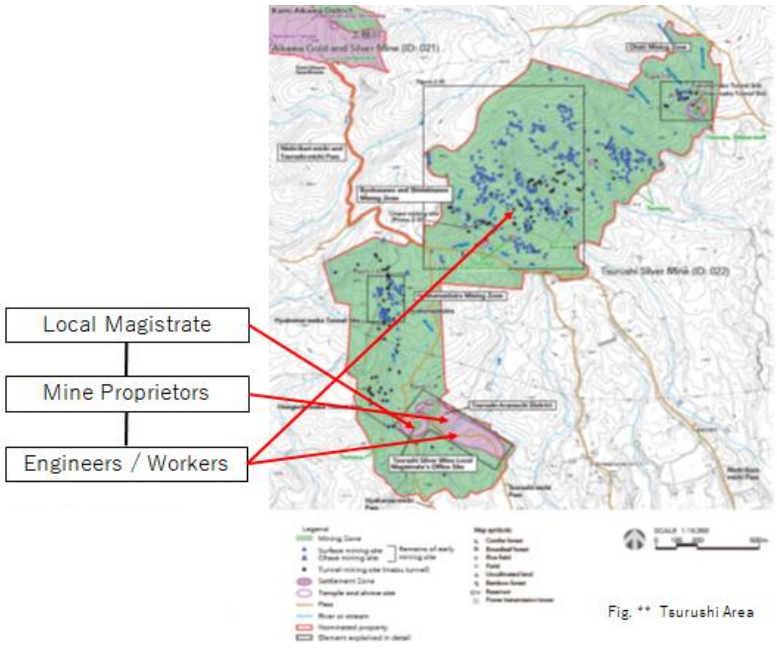


Fig.9 Tangible elements which represent the intangible attributes in Tsurushi Area

At the time of the formation of the Kami-Aikawa District, specialists led by mine proprietors formed each unit of residence. Mine proprietors, as supervisors of the whole operation, managed all of the technical experts and workers who were in charge of mining, ore-dressing, smelting and refining. The Kami-Aikawa District was constructed on the slopes of the hills which were close to the mining areas such as the Doyu-no-warito Opencut [Fig.10].

The residential district of Aikawa-Kamimachi was built on the ridge and was developed with highly standardised and systematic land allotment along a main road connecting the Sado

Magistrate's Office and the mines. At first, the place for working and living, which was arranged by occupation such as management, production and other business, was developed in order to facilitate an increased output of gold, more efficient management of the mine including the expansion of production systems, and to provide accommodation for a surging population. After facilities distributed throughout the town related to ore-dressing and smelting were amalgamated and centralised inside the Sado Magistrate's Office in order to realise more efficient production, the town zoning became disorganised and people in various statuses and occupations lived next to each other [Fig.10].

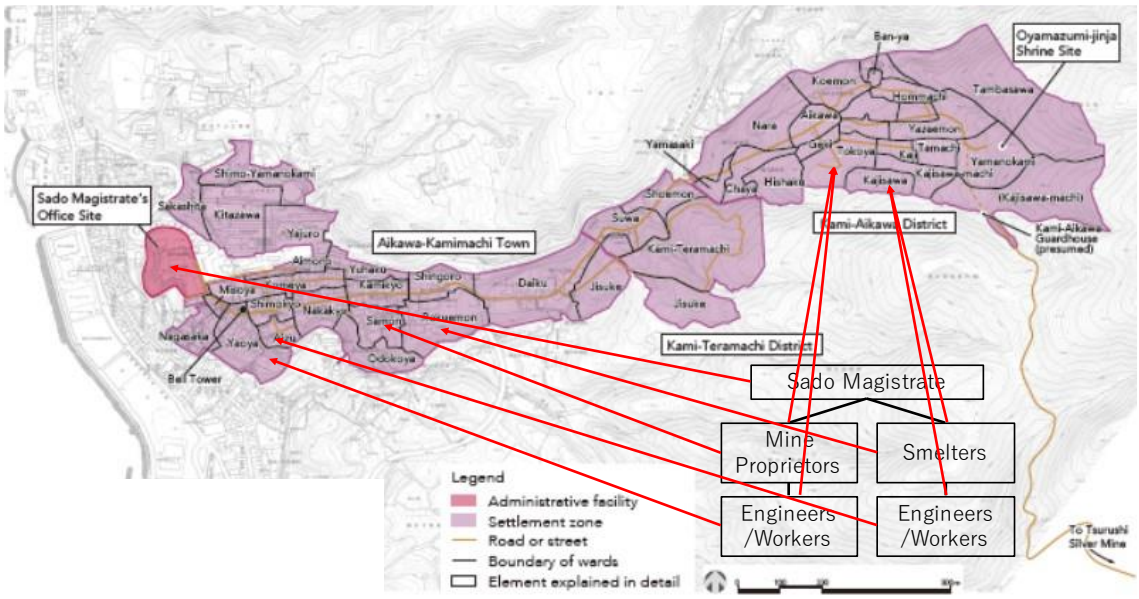


Fig.10 Tangible elements which represent the intangible attributes in Aikawa Area

Attribute 2;

Another example can be recognised in Attribute 2, which represents the "Mining culture nurtured in the mining community."

In the Nishimikawa Area, there are the Nishimikawa Oyamazumi-jinjya Shrine and Noh play stage within the precinct. A deity of mining has been enshrined here, wishing for the prosperity of the placer gold mining and the safety of the mining operations [Fig.11].

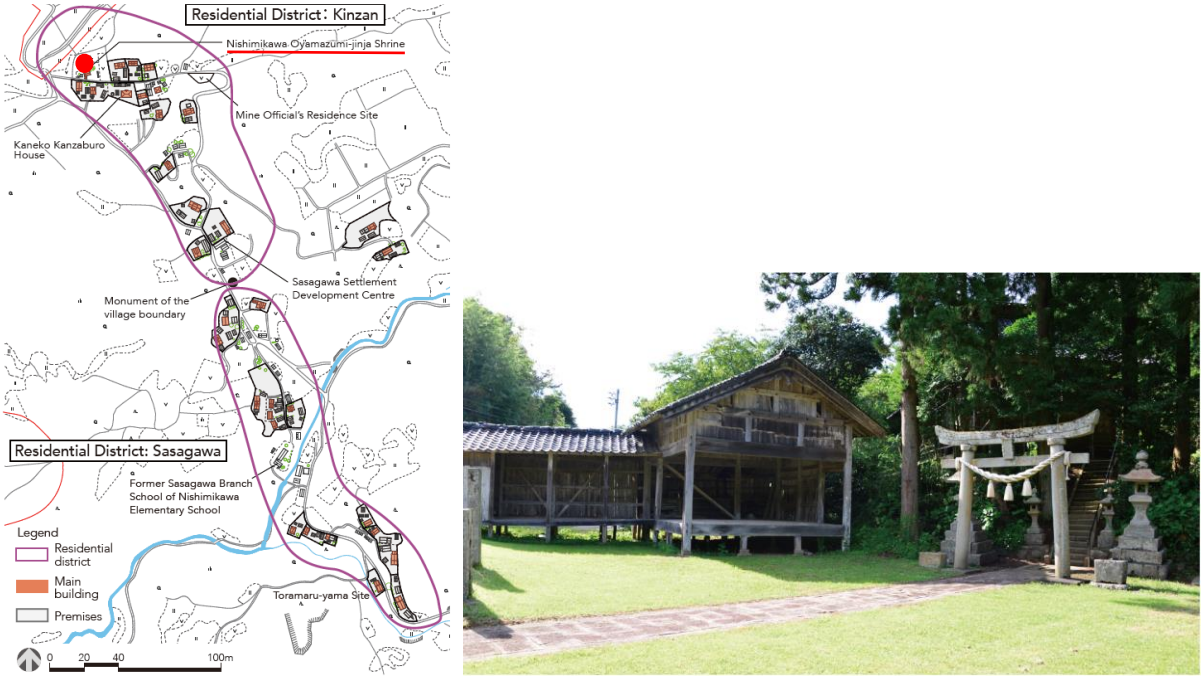


Fig.11 Tangible elements which represent the intangible attributes in terms of the Attribute 2

The Shinto shrine which enshrines the same deity was also located at the top of the Kami-Aikawa District in the Aikawa area. This means that the sacred site for mining was established at the highest place where he can watch over the village.

On the main street of the Aikawa-Kamimachi Town, there has been a traditional festival by the community people, which means that the street is the tangible element representing the intangible attribute [Fig.12].

Fig.12 Main street in the Aikawa-Kamimachi Town where the traditional festival has been held

Another important and characteristic example is “Yawaragi” traditional performance. It is a song performance to pray for soothing the deity of the mine and for softening the hard veins of gold. Traditionally, it was performed inside mining tunnels [Photo 2].

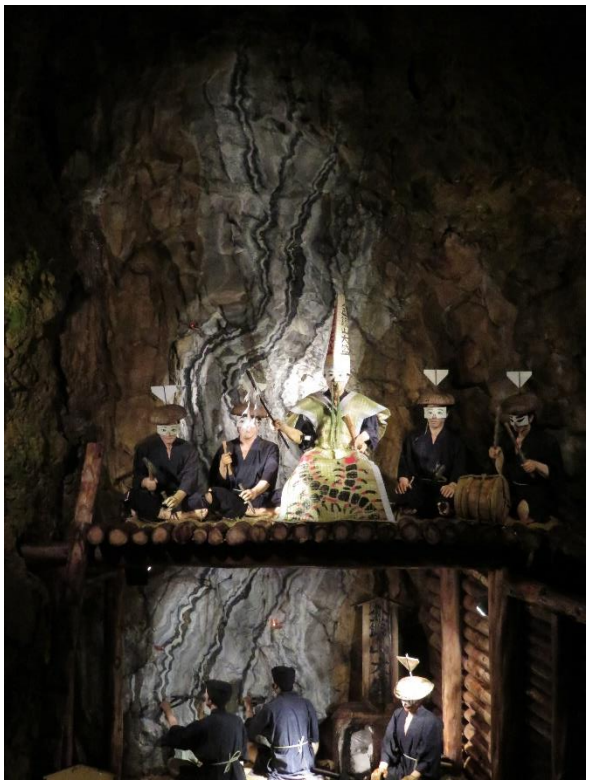


Photo 2 “Yawaragi” traditional performance

3. Composition and conception of the nominated series

3-1 As for the rationale for the selection of the two areas and related 22 component parts from the several mining sites that can be found on Sado Island, could the State Party indicate which parameters have been used for selection?

As shown in the Table 3-3 of the Chapter 3, on pages 163, 165 and 166 in the nomination dossier, the rationale for selecting the two areas in Sado Island is mainly based on the following aspects;

1) Physical evidence: whether they demonstrate enough technical system and social system in good condition

2) The control of the Tokugawa Shogunate: whether production activities of the mining were carried out under the direct control of the Tokugawa Shogunate.

We can find firm physical evidences only in the two areas selected for this nomination in Sado island. In other sites, some of them can only demonstrate just one part of the technical system. And some of them do not have enough archaeological remains. Therefore, they cannot sufficiently convey the OUV of the nomination.

“The mines under direct control of the Tokugawa Shogunate” refers to those that were managed directly by the Sado Magistrate's Office ("Ojiki-yama"), where officials stationed at the site and deeply involved in mining operations. They closely monitored the amount of gold production, maintained facilities and provided materials and other items necessary for production. Of all the mines on the island, only the Nishimikawa Placer Gold Mine and the Aikawa-Tsurushi Gold and Silver Mine remained under direct management throughout the Edo Period.

The other mines on the island were privately financed mines ("Uke-yama"), which were permitted by the Sado Magistrate's Office on the condition that a tax be paid according to the amount of silver, lead and others produced. The island's merchants and farmers invested in the production and operation of the mines. Most of the mines had small-scale production and operated intermittently or for short periods of time. Thus, they cannot be seen as evidence neither for technical aspect nor for social aspect of the OUV.

3-2 Regarding the composition of the series, ICOMOS notes that the State Party has chosen to break down the property into 22 component parts; this seems to apply particularly to the waterways, of which some sections are quite slim or lacking. This rigorous composition leads to the fragmentation of the serial nomination in which several component parts – essentially separated sections of the waterways – are too limited in size and features to include the attributes that convey the proposed Outstanding Universal Value, which could limit the capacity of some component parts to be able to "contribute to the Outstanding Universal Value of the nominated property as a whole in a substantial, scientific, readily defined and discernible way" as per paragraph 137 of the Operational Guidelines for the Implementation of the World Heritage Convention. Therefore, ICOMOS would be pleased if the State Party could provide some clarification on this matter. Would the State Party be ready to explore ways to reduce the fragmentation on the nominated component parts?

The waterways included in this nomination is constructed basically along the natural topography, not by constructing artificial structure such as stone bridges.

The Operational Guidelines states "the delineation of boundaries is an essential requirement in the establishment of effective protection of nominated properties. Boundaries should be drawn to incorporate all the attributes that convey the Outstanding Universal Value and to ensure the integrity and/or authenticity of the property" (paragraph 99). Therefore in order to incorporate all the attributes and to ensure the authenticity of the nominated property, we drew the boundaries of the waterways depending on whether or not the physical evidence exists.

Concerning the width of the waterways, we secure sufficient distance from the property to the boundary lines of the property. For example, the boundary lines of a waterway is 5 meters from the centre of waterway to both sides. It is more than double compared to the width of the waterways, and we believe that such arrangement is enough to protect the value of the concerned property [Fig.13].

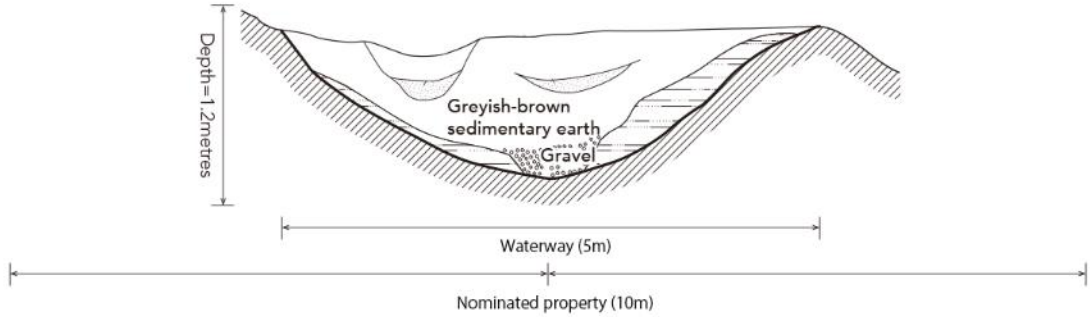


Fig.13 Schematic section of the waterways

* Explanatory video is attached for you to visualize the waterways. In fact, archaeological remains of waterways are embedded in approximately 50 cm from the soil surface.

As for the question on the fragmentation of the waterways, we have selected areas where physical evidence still remains in good condition, in accordance with the Operational Guidelines, while excluding areas where no actual remains of waterways left due to conversion to farmland, road construction or landslide. When we look at the remains of the waterways which still exist in good condition, it still covers 81% of the whole waterways. Therefore, we are confident that the OUV is clearly demonstrated as a series of waterways for mining at the Nishimikawa area as a whole.

In terms of the protection measure for the sites, all the waterways as a whole from intake points to reservoirs including the areas where no actual archaeological remains left, that is not selected as the nominated area, are covered by the protection measures as the Important Cultural Landscape under the Law for the Protection of Cultural Properties and so forth. This means that we secured holistic conservation of waterways by legal means and that there is no real difference even though such areas are not included in the nominated areas from the protection perspective.

Above is the clarification of the rationale behind the delineation of the property of the waterways in the nomination dossier.

Having said that, we are ready to discuss further on possible approaches on this issue, if the ICOMOS considers that our selection of component parts as the waterways mentioned above might be insufficient for conveying the OUV. In that case, we would like to know whether selecting areas with no archaeological remains left as nominated properties does not pose any problem.

4. Protection: What parts of the nominated property or its buffer zones are yet to be protected as national Important Cultural Landscape, and what would be the timeframe for completion of this designation?

At the time of the submission of the nomination dossier, the eastern part of the Nishimikawa Placer Gold Mine, including property areas and buffer zones, was still in the process to be protected as national Important Cultural Landscape.

However, all the necessary procedures for this completed on the 28th of September 2023. Consequently, all the protection schemes concerning this nomination have been implemented.

The table on the next page is the revised list of the official designation notices (Appendix 3, page A3-3).

Fig. 14

Appendices 3-2 List of the official designation notices (revised)

Area	Name of Designation	Date of designation	Content	Category of Cultural Heritage under the World Heritage Conventon
Nishimikawa Area	Rural Landscape from Placer Gold Mining at Nishimikawa, Sado	21 September 2011	Selection as National Important Cultural Landscape under the LPCP	Site
		28 September 2023	Additional selection ~~(scheduled)~~	
	Sado Gold and Silver Mine Site	7 October 2015	Additional designation as National Historic Site under the LPCP	
Aikawa-Tsurushi Area	Aikawa Mine Site	22 March 1958	Designation as Niigata Prefecture Historic Site	Site
	Sado Gold and Silver Mine Site	24 May 1994	Designation as National Historic Site under the LPCP	
		7 February 2011	Additional designation (Tsurushi Silver Mine), Name change	
		27 March 2013	Additional designation (Kami-Aikawa District)	
		6 October 2014	Additional designation (Kami-Teramachi District)	
		10 March 2015	Additional designation (mining zone)	
		11 October 2021	Additional designation (Nishi-ikari-michi and Tsurushi-michi Pass)	
	Cultural Landscape of the Mines and Mining Towns in Aikawa, Sado	7 October 2015	Selection as National Important Cultural Landscape under the LPCP	

* LPCP stands for the Law for the Protection of Cultural Properties

5. Management arrangements: ICOMOS would appreciate if the State Party could clarify the nature of these agreements, their purpose and whether they are necessary to ensure the implementation of the management system and the Comprehensive Management Plan and, if so, the timeframe by which they should be finalised and implemented.

On page 217 of the nomination dossier, it states “a variety of agreements will be reached”. The word “agreement” in this context does not necessarily mean a written contract for the registration of world heritage. Based upon the legal frameworks in Japan, consents by the owners are the foundation of the management scheme of the nominated property.

In this regard, we confirm that all consents which are needed to preserve, manage, and utilise the nominated property have already been arranged.

The explanation of the ‘agreement’ for each stakeholder is below;

- Regarding the publicly owned land, Niigata Prefecture and Sado City who have established the Comprehensive Management Plan (CMP) have the responsibility to preserve the nominated property and have played the most important role to manage and utilise it. The national government has to conduct the activities to conserve cultural heritages with the highest conscientiousness, which is determined in the paragraph 3 of the Law for the Protection of Cultural Properties;
- As for the private land, the community including the local residents has agreed with the designation and protection of its land as the cultural heritage in a written format, before the designation or selection based on the Law.
- And also, the representatives of the community have been the members of the committee to establish the conservation plan for the nominated property, which means that they have committed substantially for the CMP in its implementation as well as its formulation.

The management system which ensures the protection of the nominated property has already been put in place based on the “agreements” as mentioned above. The CMP will, strictly speaking, start functioning at the same time when the property is inscribed on the World Heritage List. However, the management and monitoring activities indicated in chapter 6 of the CMP have already been carried out by Niigata Prefecture and Sado City.

6. Development projects: A few projects and interventions that may have an impact on elements contributing to the attributes of the proposed Outstanding Universal Value – such as tree-felling and water pipeline for improving conditions of agricultural activities, are mentioned in the nomination dossier. ICOMOS would be pleased if the State Party could provide some additional information on these projects and any other development initiative or project that may have been proposed in the meantime.

The nominated property has been designated as the national cultural property such as Historic Sites and Important Cultural Landscape. Therefore, development activities to alter the current status are not allowed without permission from the national government. On designation as a national cultural property, etc., Sado City has explained to the land owners and the managers that projects of altering the status quo will be restricted, and it has obtained written agreement.

In addition, Niigata Prefecture and Sado City continue to make efforts to enhance the protection of the nominated property, by providing the developers with the opportunity to know about the protection system of cultural properties and show their opinions annually. Therefore, the development that may affect the Outstanding Universal Value will be judged appropriately from the World Heritage perspective as well as from the perspective of the national legal system.

As for possible tree-felling within the nominated property, there is no concrete plan by the forest manager for it at this moment. As already mentioned above, it cannot be implemented without obtaining the permission to alter the status quo of the Historic Sites. Niigata Prefecture and Sado City are always to consult with the forest manager in the preparing stage of felling plan in order to ensure that the plan will not result in the loss of the value of the property.

Regarding the installation of water pipeline mentioned in the nomination dossier, it has already been implemented without damage to the property by taking the landscape-friendly construction method, as well as by organising an adequate consultation. The installation has already been completed [Photos 3, 4]. Therefore, we have no plan of additional installation at this moment.

In addition, currently, there is no other development project which may affect the Outstanding Universal Value of the nominated property.

Photo 3 Before the installation of the pipeline

Photo 4 After the installation of the pipeline

7. Interpretation

The nomination dossier provides some information on the most recent history of exploitation of the nominated property, from the late 19th until the mid-20th century. However, this information remains rather general and does not address specifically the provenance and working conditions of the miners and mine-related workers. ICOMOS would appreciate if the State Party could provide additional information on this aspect and on the presentation and interpretation programmes in place or under preparation for the nominated property, and whether these cover the entire history of mining on Sado Island and in the nominated property.

1. Additional information on the provenance and working conditions of the miners and mine-related workers from the late 19th until the mid-20th century[1]

- As mentioned on page 94 of the nomination dossier, after the end of the Edo Period in 1868, cutting-edge Western mechanised technologies were introduced to the Sado mines by foreign advisors and engineers. There is a document indicating that they came from the U.K., the U.S., and Germany, bringing various expertise such as ore processing, engineering, mine opening, and mining.
- It is also indicated that there were 1,885 miners and mine-related workers as of January 1890, about 1,000 of whom were from various parts of Japan other than Sado Island.
- Concerning the provenance of the workers, based on the list compiled from documents mainly during the Taisho Period (1912-1926), it is indicated that the number of workers and their place of origin from the top 5 were Nagano (184 workers), Niigata (165), Sado (96), Ishikawa (71), Toyama (52), and for those from outside of mainland Japan, 21 were from Korea.
- The Japanese government restricted the travel of workers from the Korean Peninsula to mainland Japan in 1934 due to unemployment issue in the mainland. Later, as the Sino-Japanese War broke out in 1937 and dragged on, the national government established laws and measures to secure the necessary labor force in important industrial sectors including mining. Based on these laws and measures, the national government sought to secure labor not only from mainland Japan, but also from its overseas territories including the Korean Peninsula.
- In mainland Japan, the National Mobilization Law was promulgated in April 1938, and in July of the following year, the National Requisition Ordinance based on the said Law was promulgated and a requisition policy was introduced. However, this Ordinance was not initially applied to the Korean Peninsula, and other recruitment methods were introduced.

[1] Note: This section contains information quoted from the relevant documents, which do not necessarily represent the official position of the Japanese government.

First, ”Open Recruitment” was introduced in September 1939, then ”Official Placement” in February 1942. ”Requisition” was introduced at the last stage in September 1944 and lasted for seven months until March 1945[2].

- It is found in historical documents that the Sado mines also secured labor force from mainland Japan and the Korean Peninsula during the war based on the above-mentioned national policy. A document referring to the history of the Sado mines states that the “Open Recruitment“ was carried out in February 1940 for the first time and a total of 1,519 civilian workers moved to the Sado mines by the end of the war. Regarding the ratio of workers from the Korean Peninsula to those from mainland Japan, a historical document indicates that the number of workers from the Korean Peninsula was 584 while 709 workers were from mainland Japan (0.82 worker from the Korean Peninsula for every 1 worker from mainland Japan) as of the end of May 1943.
- In response to the question on the working conditions, there is an official document that shows the recruitment and employment policy during this period. In the official document on the policy for “Open Recruitment” from the Korean Peninsula, non-discrimination was explicitly demanded between those from the Korean Peninsula and those from mainland Japan, as well as adequate consideration of welfare facilities. In addition, the various provisions for the protection of worker’s rights stipulated in the laws and regulations concerning “Requisition“ made no distinction between them, and both were equally subject to the provisions. A historical document tells that non-discrimination was the policy in the actual operations in Sado mines and that wages and benefits were provided as below.

(i) Wages

- Wages for miners, regardless of their origin, were paid according to their actual work, based on a pre-determined contracting unit price depending on the type and difficulty of the work, taking into consideration their age and experience, etc.
- In April 1943, the average wage of workers from the Korean Peninsula was 83.88 yen[3], the average savings was 5.56 yen, and the average remittance was 14.6 yen.

(ii) Benefits

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[2] “Open recruitment" and "Official placement" are similar in that neither imposes labor obligations by the law, but there are differences in procedure. “Open recruitment" is conducted under the responsibility of the private employers, who recruited workers after receiving approval and permission from the Government-General of Chosen, an administrative organ in the Korean Peninsula established by Japan. "Official placement" was conducted by the Government-General of Chosen through municipal governments after it received an application from the private employers. In contrast, "Requisition" was conducted under the National Requisition Ordinance, which obliges workers to engage in specific tasks.

[3] To give an idea of the wage rates for other occupations in Japan during a similar period, the starting salary for a new graduate in banks in 1943 was 75 yen, that for a police officer in 1944 was 45 yen, and that for an elementary school teacher in 1941 was 50-60 yen.

- Married workers were allowed to bring their family members with them, and company housing was provided free of charge for the families. Dormitories were provided free of charge for single workers.
- Food and daily necessities were rationed at low cost for the married workers while single workers were provided with food at 0.5 yen per day (a company paid the difference when the actual cost exceeded it).
- Those who had worked for the company for three months or more were covered by group life insurance, with all insurance premiums paid by the company.

2. Additional information on the presentation and interpretation programmes in place or under preparation for the nominated property and whether these cover the entire history of mining on Sado Island and in the nominated property.

(1) Japan's view on the interpretation of the Sado Island Gold Mines as a world heritage site

- Japan considers that the core purposes of interpretation of the world heritage sites are to promote public understanding and appreciation of the OUV of the heritage, as well as to contribute to promoting public awareness and engagement in the need for the protection and conservation of the heritage, based on which we have set up our approach to the presentation and interpretation of the Sado Island Gold Mines.

(2) The OUV of the Sado Island Gold Mines and its presentation and interpretation programmes which cover the entire history of the nominated property

- As mentioned in the nomination dossier, the OUV of the Sado Island Gold Mines is in the gold production system, which illustrates the final advanced development stage of the unmechanised traditional gold mining from the late 16th to the mid-19th century. During that period, a comprehensive gold production system existed in Sado: from the mining to the casting of the 'Koban' (oval) under government quality control. As a result, the unmechanised traditional gold mining skills enabled the production of both a large amount of gold and high-purity gold, especially in the 17th century; the Sado mines produced around 10% of gold in the world and the purity was 99.54% at maximum.
- In the period from the late 19th century onward, the gold production system in Sado mines became highly mechanised, but the scale of facilities, production volume, and technology of the gold production were not competitive enough to be listed as the World Heritage, compared to the mechanised mining industries of other countries that had reached world-class standards by then. In addition, physical evidence such as remains in this period can be seen widely and generally in the world, and no outstanding characteristics distinctive to Sado mines can be found.
- Moreover, it has to be noted that the mechanised gold production system introduced after the late 19th century did not complete within Sado Island, which only had ore dressing

facilities in that period. The ore dressed in Sado was mainly sent by ship to Naoshima, one of the island located at Kagawa prefecture for the remaining processes from smelting to casting.

- For these reasons, the mechanised gold production system in Sado Island after the late19th century does not constitute the OUV of the nominated property.
- Based on Japan's view explained in (1) above, and within the limited spatial resources available, we have been so far planning and implementing presentation and interpretation programmes, taking into account how closely it is related to the OUV and to what extent it contributes to promoting public awareness and engagement in the need for the protection and conservation of the component parts as required by the World Heritage Convention and its related documents. Accordingly, we have selected the most effective contents and methods.
- Indeed, there are various exhibitions in place as part of our presentations and interpretation strategy, including the history of the mines from the late 19th until the mid-20th century as described below. These exhibits will deepen the public's understanding of how the Sado Islands Gold Mines have changed over the years, not only during the Edo period (1603-1868), the period covered by the OUV, but also in the "entire history" including the periods before and after the Edo period. We hope that these presentations will contribute to a better understanding by visitors of the OUV of the Sado Island Gold Mines and the importance of protecting and conserving the site.
  - Entire history: Exhibition on the major history of the Nishimikawa Placer Gold Mine and the Aikawa-Tsurushi Gold and Silver Mine from the 12th century to the 20th century.
  - Mine management: Exhibition on changes of the mine management system from the Edo period to the 20th century, which contributes to a better understanding of the Attribute 1.
  - Settlement area and mining facilities: Exhibition that enables visitors to compare the townscape and mining conditions of Aikawa in the Edo period when traditional unmechanised mining took place, with those in the modern period when mechanised mining was introduced, all of which contributes to a better understanding of the Attribute 1 and 4.
  - Mining culture: Exhibition related to the mining culture nurtured in the mining community in the Edo period and having been inherited to date (Noh play, Yawaragi ritual, Mining Festival in Aikawa, etc.), which contributes to a better understanding of the Attribute 2.
  - Production technology: Exhibition that allows visitors to compare how the traditional mining technology was mechanised in each process (mining, transportation, ore

dressing, and smelting), which contributes to a better understanding of the Attributes 3 and 4.

- For your reference, there is also a facility exhibiting the mechanised history after the late 19th century, which includes the explanation that civilian workers from the Korean Peninsula moved to mainland Japan during the wartime (1939-1945). This exhibit is intended to provide background information on the period after mechanisation, although it is not directly related to the OUV and is therefore made in a different context from the World Heritage nomination.
- Japan is ready to continue to review the presentation and interpretation programmes of the Sado Island Gold Mines in accordance with the above position.
- The above is our view over interpretation and presentation including entire history. It will be very helpful for us to learn about ICOMOS' views on this point more precisely. In this regard, Japan is looking forward to further dialogue with ICOMOS, including through the occasion of ICOMOS World Heritage Panel.

The Second Additional Information on

“Sado Island Gold Mines”

This additional information is prepared in response to the Interim report from ICOMOS on 19 December 2023.

February 2024
JAPAN

1. Additional information on the nominated property and its component parts

1-1 What methods were imported, from where, and how they have been further developed in Sado Island nominated mines during the Tokugawa Shogunate

Concerning this issue, the overall development is described in the nomination dossier (2.b.2.3.1 Technical system, pp.101-102).

In the early stages of this site, two types of processing method such as Cementation method (early 17c., original unknown) and Cupellation method (the latter half of 16c., from China) were introduced. Basic measurement technique was also introduced (16c., from China via the Korean Peninsula). On a subsequent occasion, several technical knowledge related to mining such as Plane-table surveying (measurement) technique was also introduced (unknown period, from the Netherlands).

Other techniques such as waterwheel (early 17c., from China via the Korean Peninsula) or Mercury amalgam method (early 17c., from Portugal) were tried but given up shortly due to lack of sufficient material, in this case water and mercury.

As mentioned in the nomination dossier, the strict national seclusion policy was enforced by the Tokugawa Shogunate. Therefore, these new techniques were introduced by means of documents, rather than experts coming to the island. Furthermore, a series of new knowledges was acquired fragmentarily, rather than in a whole package. Under these circumstances, new techniques were introduced selectively, and further developed in Sado.

For instance, aforementioned Plane-table surveying technique was introduced without the idea of 360 degree or a trigonometrical function, and further developed to have higher precision by using 480-direction compass. Such precision is seen in Minamizawa Drainage Tunnel. Concerning the processing method, the development in Sado Island Gold Mines was mainly sophistication, such as repetition and increasing efficiency rather than introducing new method, which leads to the high-quality gold production.

1-2 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.
What changes were brought about by the new mining methods to previous tangible layers of mining use.

In the Nishimikawa Area, there were no mining activities in the post-Edo period. In the Tsurushi area, although very minor re-exploitation was tried in few places in the post-Edo period, there was almost no impact on the archaeological remains or topography.

In the Aikawa area, it is shown in the documents such as picture maps or plans that the main exploitation areas in the Edo period are different from those in the post-Edo period. Therefore, except some tunnels re-used in the post-Edo period, tunnels in the Edo period has been kept intact. Furthermore, since alteration on re-used tunnels was limited to expansion of their section, the underground skeleton in the Edo period has been kept until now [Fig. 1, 2].

Regarding modern buildings and structures related to mining, there is no overlap of built areas with the mining zones in the Edo period, except in Kitazawa District.

Furthermore, there was no major processing facilities on Sado island in the post-Edo period because smelting and casting were conducted outside the island. Since construction of huge facilities for processing are limited, archaeological remains of facilities in the Edo period are kept in a good condition [Fig. 3].

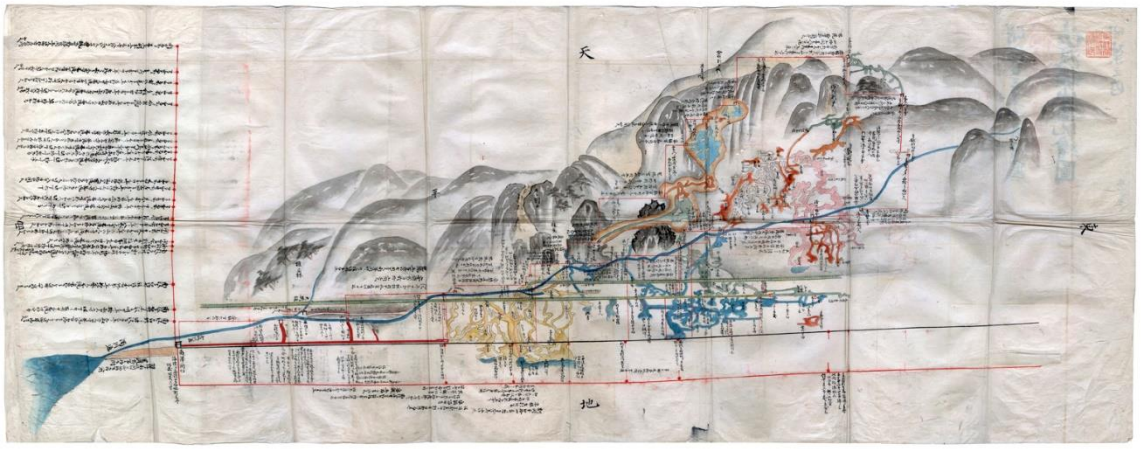


Fig. 1 Historical drawing on Aikawa area
(*Sashu aikawa souginzan shikioka kouge furikane ezu*)

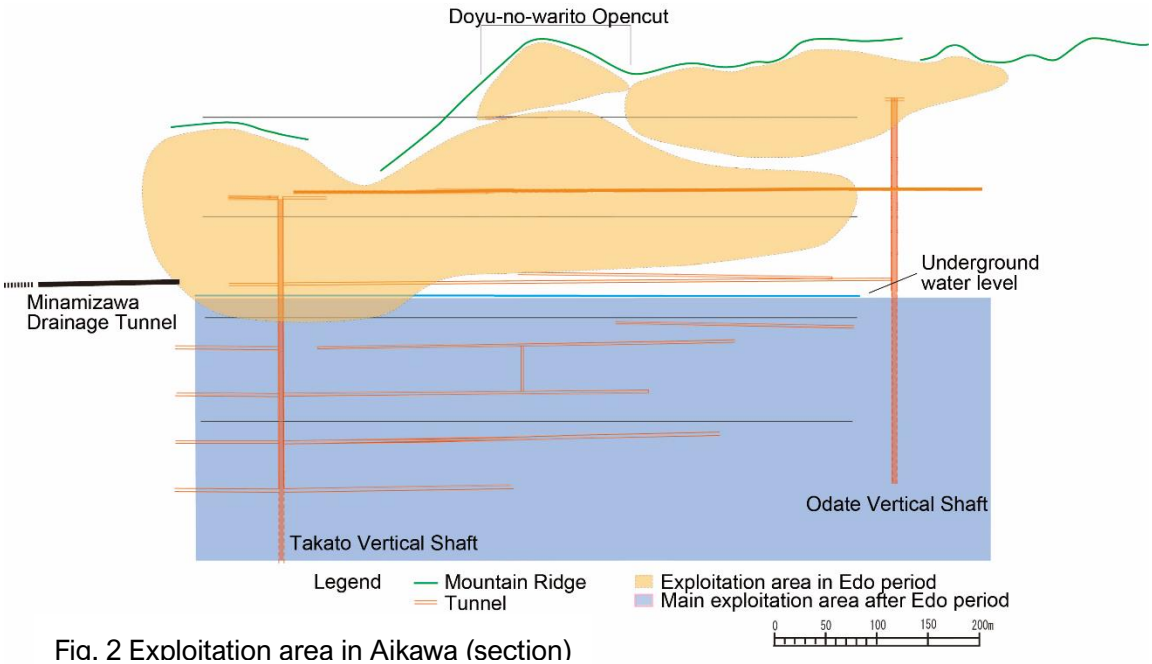


Fig. 2 Exploitation area in Aikawa (section)

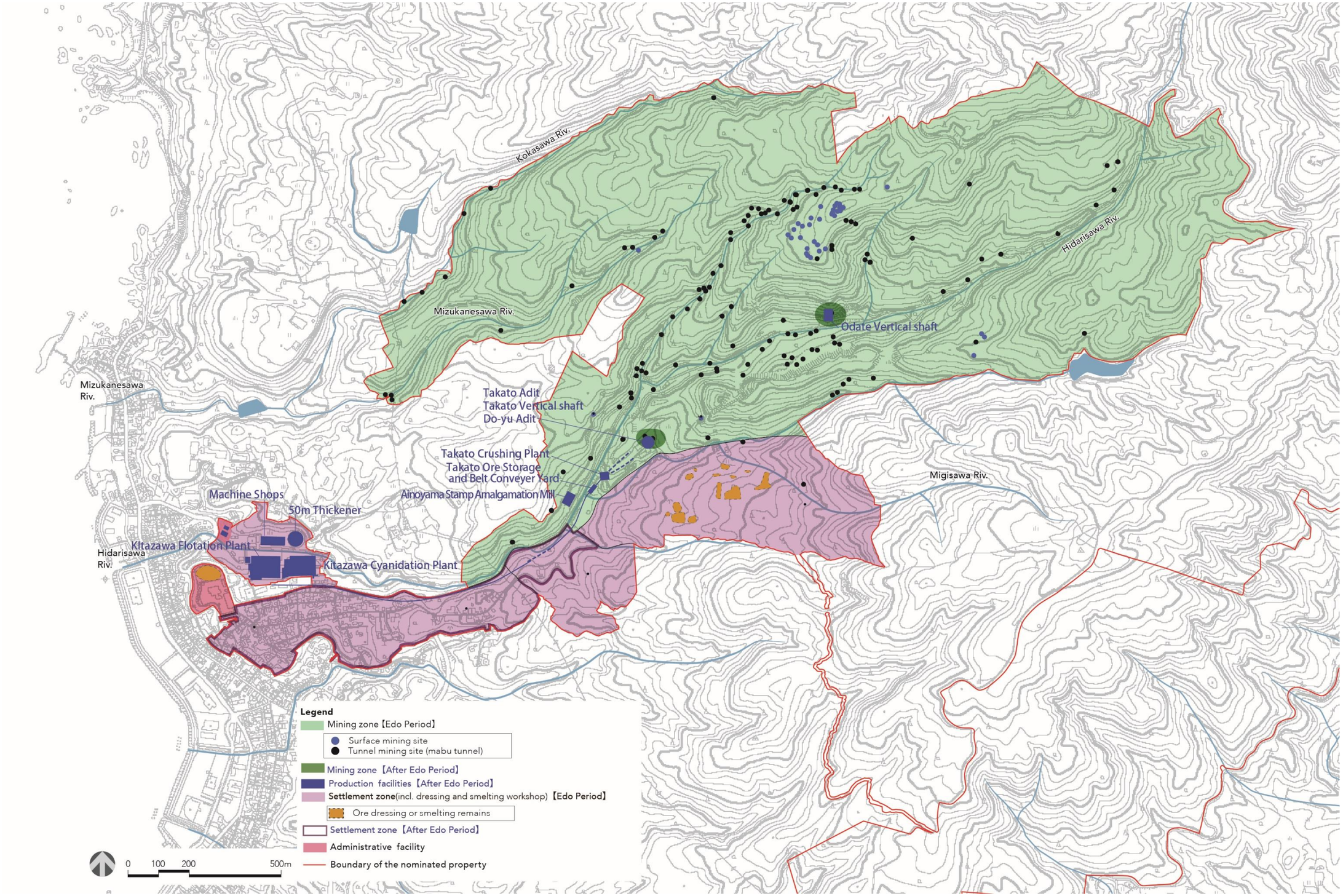


Fig. 3 Placement of mining facilities in the Edo period and the post-Edo period

2. Clarification of the rational for delineating the boundaries of the nominated component parts

2-1. 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.

According to the picture scrolls, it is known that Shimo-Yamanokami, Sakashita, Kitazawa, and Yajuro are the wards where “Kaishi” (ore smelters) collectively lived and where smelting work was conducted from the late 16th century to the middle of the 18th century [Fig. 4, 5]. Archaeological remains such as stone mills have been excavated from the archaeological layers of the unmechanised period, and a certain extent of remnants in the unmechanised period is expected to remain. These are the evidence which demonstrates how the wards were zoned according to the types of occupation for the management of the mine in the Aikawa-Kamimachi Town. In this context, these four wards contribute to the potential OUV as explained in the nomination dossier (pp.105-106), and are thus included in the nominated area in accordance with the Operational Guidelines (paragraph 100).

Concerning this district, Sado City understands the importance of acquiring more precise information of the Edo period, thus an archaeological survey in this area will be assigned higher priority (see 3-3).

On the surface, there are elements related to the gold production in post-Edo period, such as the remains of a thickener, a flotation plant and a thermal power plant. Since they were constructed after mechanisation, they have no relation with the chosen narrative [Fig. 6, 7].

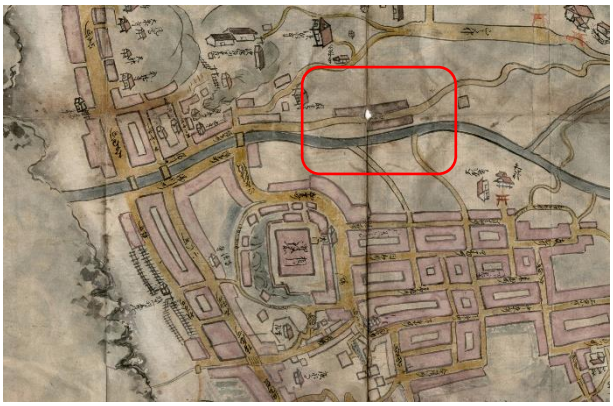


Fig. 4 Kitazawa in 18c. (*Aikawa machi ezu)*

Fig. 5 Kitazawa at present

Fig. 6 Remains of Kitazawa Flotation Plant

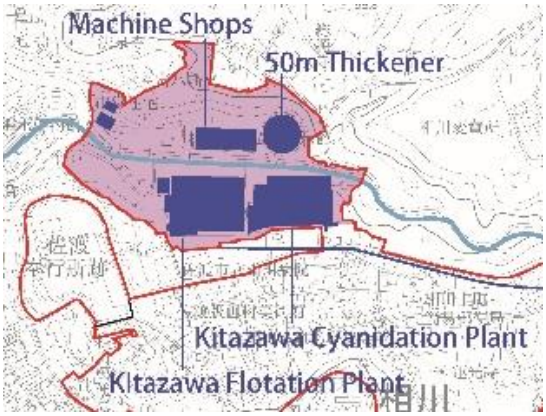


Fig. 7 Structures in the post-Edo period in Kitazawa

2-2. 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.

In the Nishimikawa Area and the Tsurushi area, there is no elements associated with gold production after mechanisation.

In the Aikawa area, there are some facilities that constructed in the mechanisation period, namely, Odate Vertical Shaft [Fig. 8], Takato Vertical Shaft, Takato Crushing Plant, Takato Ore Storage and Doyu Adit site [Fig.3].

There are some points dug through a part of the horizontal tunnel of the unmechanised period in Odate Vertical Shaft or Doyu Adit. However, such parts are quite limited compared to the whole extent of the Mabu Tunnels such as Ogiriyama Mabu Tunnel or Doyu Mabu Tunnel, and they do not disturb the understanding of Mabu Tunnel stretch or mining techniques at the unmechanised period.

Former facilities in Takato district are located on the surface above the archaeological remains of the unmechanised period, so there is no spatial overlap between mechanised elements and the remains during the unmechanised period [Fig. 9].

Fig. 8 Odate Vertical Shaft

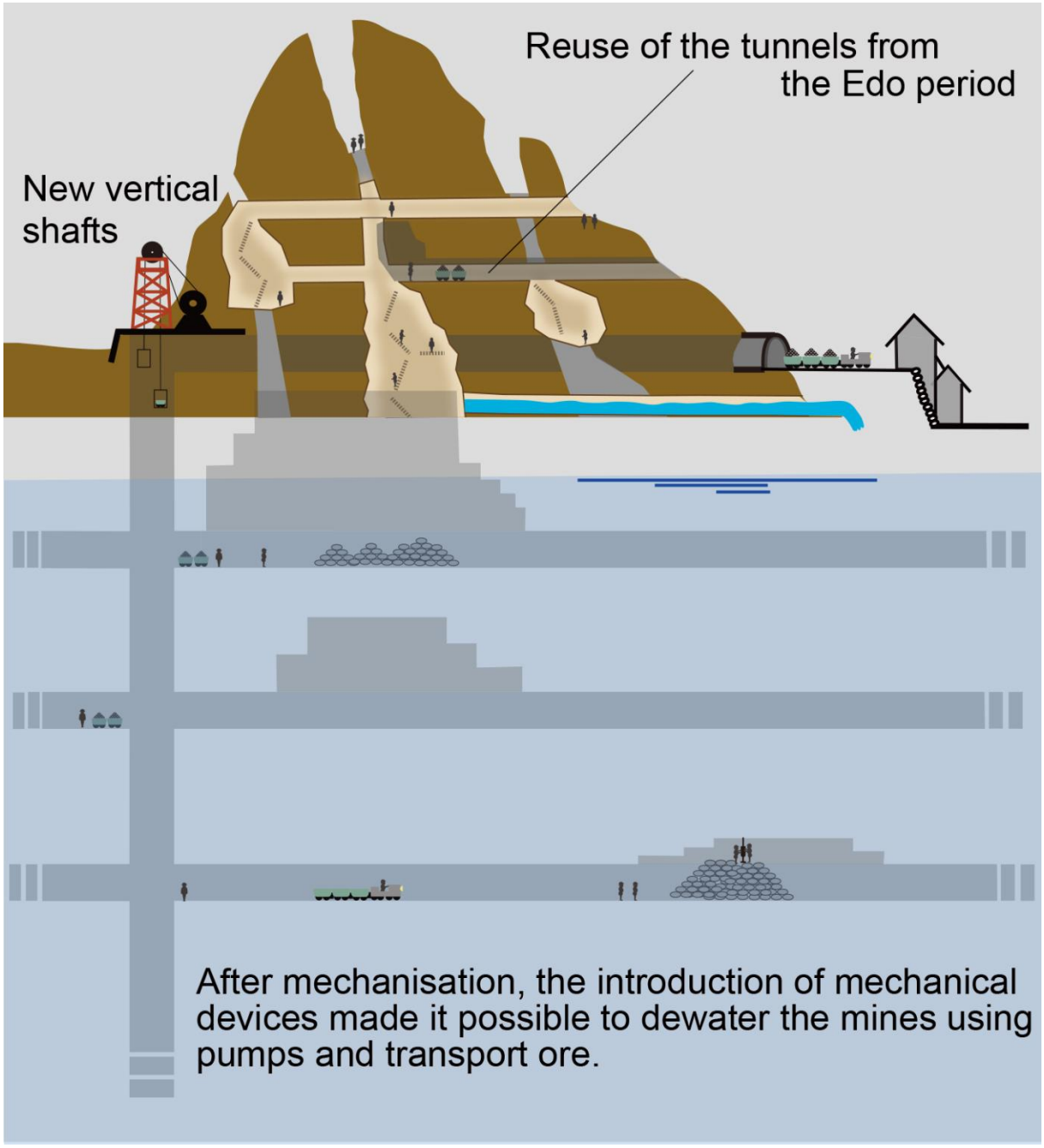


Fig. 9 Schematic section about the relationship between remains of Edo period and post-Edo period

3. State of the art of the research, including archaeological investigations

3-1 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.

Since the nominated area covers a wide area, the first step for archaeological investigations is to obtain precise understandings of the topographical configuration and to carry out a distribution survey. Then, archaeological excavations are conducted based upon the aforementioned survey as well as the knowledge from historical documents. Current progress of the surveys in each area is as follows.

- Nishimikawa Area
  - Mining zone
    - Distribution survey (whole area)
    - Topological measurement (whole area)
    - Detailed topological measurement in Goshaya-yama Site
    - Archaeological excavations in Goshaya-yama and Tatenokoshi-yama Site
  - Settlement zone
    - Distribution survey (whole area)
    - Topological measurement (whole area)
    - Precise survey on the architectures of Kaneko Kanzaburo House
    - Archaeological excavations in the site of Kaneko Kanzaburo House

- Tsurushi Area
  - Mining zone
    - Distribution survey (whole area)
    - Topological measurement (whole area)
    - 3-D laser measurement on the tunnels in Byobusawa and Shidekisawa Mining Zone
  - Settlement zone
    - Distribution survey (whole area)
    - Topological measurement (whole area)
    - Detailed topological measurement in Tsurushi-Aramachi District
    - Archaeological excavations in the Local Magistrate's Office Site and the Tsurushi-Aramachi District
    - Analysis of component ingredients of artifact from the Local Magistrate's Office Site and the Tsurushi-Aramachi District

- Aikawa Area
  - Mining zone
    - Distribution survey (whole area)
    - Topological measurement (whole area)
    - 3-D laser measurement on the Ogiriyama-mabu Tunnel Site and Minamizawa Drainage Tunnel Site
  - Settlement zone
    - Distribution survey on Kami-Aikawa District and Kami-Teramachi District
    - Archaeological excavations on the Sado Magistrate's Office Site, Kami-Aikawa District
    - Archaeological excavations on several site in the Aikawa-Kamimachi Town
    - Analysis of component ingredients of artifact from the Sado Magistrate's Office Site

3-2 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.

It is understood that the nature and the vegetation of the nominated site has not been changed considerably by the mining activities, because there are no physical traces of large-scale felling within the nominated property. Some historical picture maps support this fact [Fig.10]. Furthermore, even in the area where its vegetation was affected by the mine activities, almost all the area has now recovered by vegetation [Fig. 11].

Detailed studies on the impacts of the mining activity on nature and the vegetation cover have not been carried out, and thus such information has never used to understand the extent of mining activities. Sado City in collaboration with various stakeholders, will take such dimensions into account throughout the mid-term prioritised action.

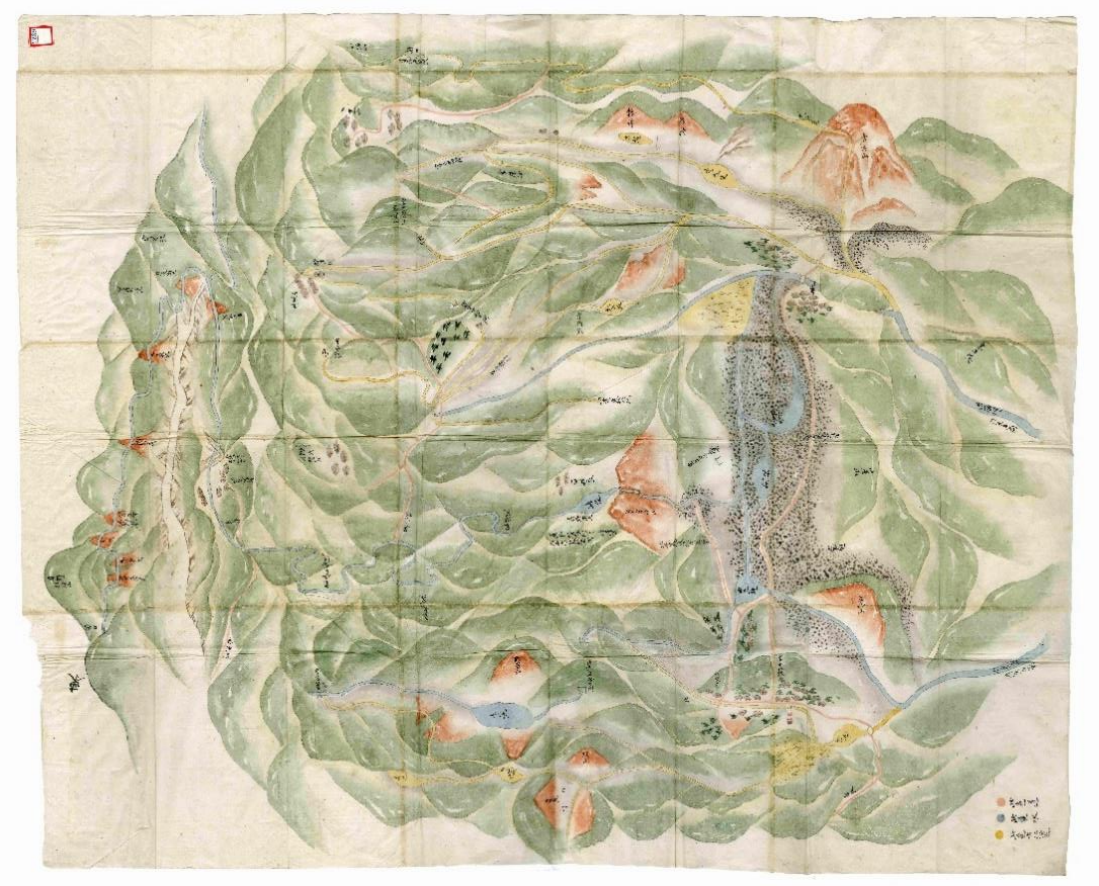


Fig. 10 Picture map of Sasagawa village, mountains showing red have lost vegetation during the Edo period (*Sasagawa kinzan ezu, mid-18c.)*

Fig. 11 Current situation of Sasagawa village and surrounding mountains

3-3 Additional information and details on any archaeological research strategy that may be in place.

Based upon “Sado Gold and Silver Mine Historic Site Preservation and Management Plan Phase 2”, necessary activities for conservation and interpretation of the site including archaeological research are listed [Fig. 12].

Among such activities, following archaeological researches in three areas are planned in the next five years considering necessity of conservation or interpretation.

- Kaneko Kanzaburo House in the Nishimikawa Area: if necessary in relation to the conservation works of architectures.
- Hyakumaidaira District in the Tusrushi area: in order for visitors to understand more clearly original shape of the surface mining remains.
- Kami-Aikawa District in the Aikawa area: based upon the knowledge from historic pictures and distribution surveys, archeological excavations will be conducted to acquire more precise information.

In addition to the above, an archaeological survey in the Kitazawa District will be conducted considering necessity to acquire more detailed information on this area (see 2-1 also).

Please note that this plan will be adjusted, if necessary, according to budget constraints as well as new knowledge acquired regarding the site.

Area	Project	Fiscal Year (April - March)											
		2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Nishimikawa	Kaneko Kanzaburo House												
	Gosyaya-yama												
Tsurushi	Local Magistrate's Office Site								Open to the public				
	Ootaki Mining Zone	Tunnel Survey											
	Tsurushi-Aramachi District								Open to the public				
	Hyakumaidaira Mining Zone												
Aikawa	Kami-Aikawa District										(a)	(b)	
	Kami-Teramachi District												
	Nishi-Ikari-michi and Tsurushi-michi Pass									Measurement			

▲ Revision of the Plan

Area	Project										
		2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Nishimikawa	Kaneko Kanzaburo House	(c)									
	Gosyaya-yama										
Tsurushi	Local Magistrate's Office Site										
	Ootaki Mining Zone										
	Tsurushi-Aramachi District										
	Hyakumaidaira Mining Zone		(d)								
Aikawa	Kami-Aikawa District	(b)									
	Kami-Teramachi District							Survey on Stone Objects			
	Nishi-Ikari-michi and Tsurushi-michi Pass										

▲ ▲ Review of the Plan

Excavation　Interpretation　Editing report　Other activities

Mentioned in the main text

(a) Distribution Survey / Interpretation
(b) Distribution Survey / Measurement
(c) Excavation if needed due to the conservation works of the architecture
(d) Excavation / Interpretation

Fig. 12 Surveys and interpretation activities in the nominated site (2012 – 2033)

4. Protection and management

4-1. 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.

As mentioned in 3-2, the condition of forests during the unmechanised period had not been changed considerably by the mining activities.

In some former mining and settlement zone in Tsurushi Area, Japanese cedar cypresses or red pines were planted in order to produce building materials after people abandoned such places as residential area. As a result, the forests today have been formed [Fig. 13, 14].

According to the regional forest plan and the action plan related to the national forest, there is no plan of major cultivation or replanting in the nominated property at this stage, mainly because timbers are not used and price of timbers are less than its felling cost. Thus, only minor management activities are expected such as liberation cutting of dead or fallen trees for safety.

Although the “area for afforestation on public forest by government”, mentioned in the nomination dossier (p.185), was originally planned to be partially felled in order to produce timbers, such area is also under the strict control based on the Law for the Protection of Cultural Properties now. According to the law, even if a major tree-cutting is planned, the permission by the Commissioner of the Agency for Cultural Affairs should be required. The Commissioner would never permit an action which might negatively affect the value of the nominated property.

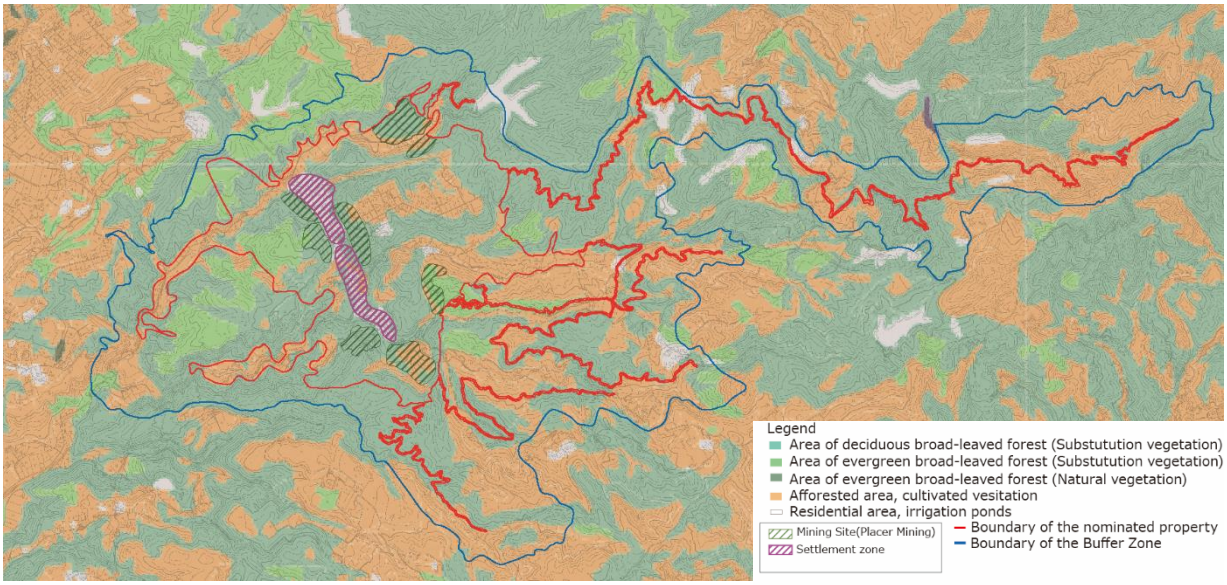


Fig. 13 Current vegetation zone map, Nishimikawa Area

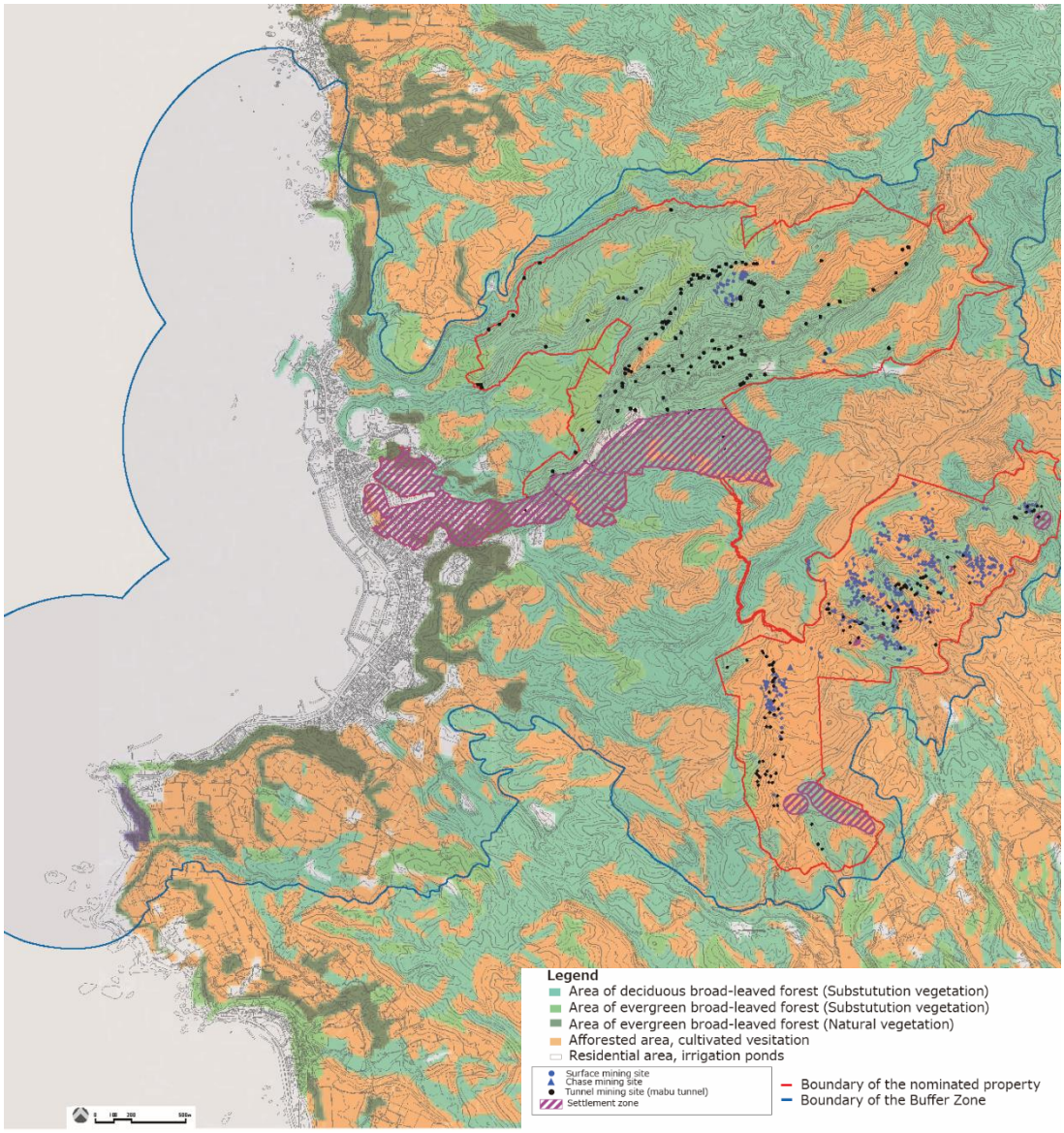


Fig. 14 Current vegetation zone map, Aikawa-Tsurushi Area

4-2. 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?

There is no plan of major development project at this moment, except the ones which are mentioned on pp.184-185 in the nomination dossier. When a development project which might negatively affect the nominated property is planned, a Heritage Impact Assessment will be required as described on pp.95-97 in the Comprehensive Management Plan.

Regarding the land area, the Landscape Plan based on the Landscape Act is applied to all over the Sado Island including outside the buffer zone. When someone intends to conduct such activity as constructing a building larger than 10m^2, putting a tower higher than 10m, establishing a fence higher than 1.5m and wider than 10m, or whole-tree harvesting larger than 1,000 m^2, a notification must be submitted to the Sado City prior to such project implementation.

There are also a variety of codes, regarding development, such as the location of construction (a structure should be located as further as possible from the road), vegetation (planting should be done at the boundary of the road and structure site), height of buildings (a building should be lower than 13m or a structure should be lower than 1.5m), colour and materials that are used for the building facade, etc.

The Sado City Landscape Council which consists of experts advises whether a relevant development plan meets the codes or not. If the plan does not meet the codes, the Mayor of Sado City shall guide, advise, recommend, or order the developer to meet the codes. The Mayor, based upon the Landscape Plan, controls to avoid an inappropriate development project.

4-3. 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 decarbonization policies in place.

Concerning offshore wind farm construction, decision by the Governor of Niigata Prefecture and/or the Mayor of Sado City is needed based upon relevant legal framework.

Considering the importance of protecting the OUV of the nominated property, the Governor of Niigata Prefecture and the Mayor of Sado City would never advance any development activity such as offshore wind turbines which might negatively affect the nominated property.

Furthermore, considering the importance of the relevant control for the sea area near the property, we also consider, if necessary, an expansion of the buffer zone to further strengthen the protection measures.

4-4. 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 licenses for mining exploitation, and whether there are still valid mining licenses for exploitation within the nominated property or its buffer zone.

Mining rights are defined in the Mining Act which was established in 1950. Those who intend to obtain mining rights must submit their application for permission to the Minister of Economy, Trade, and Industry, with the necessary documents such as a mining action plan. The Minister shall grant mining rights if the applicant is satisfied several criteria mentioned in the Act, e.g., considered to be able to keep mining from the financial and technological perspectives, to have social credibility and not to have an experience of deprived mining rights before. The Golden Sado Inc. has succeeded the mining rights, which are still valid, within the boundary of the nominated property and buffer zone.

The mining action plan must include the measures to avoid the mining pollution. Based upon the plan, the Golden Sado Inc. has implemented its obligation such as managing the mining site for safety or discharging the mine water after neutralisation.

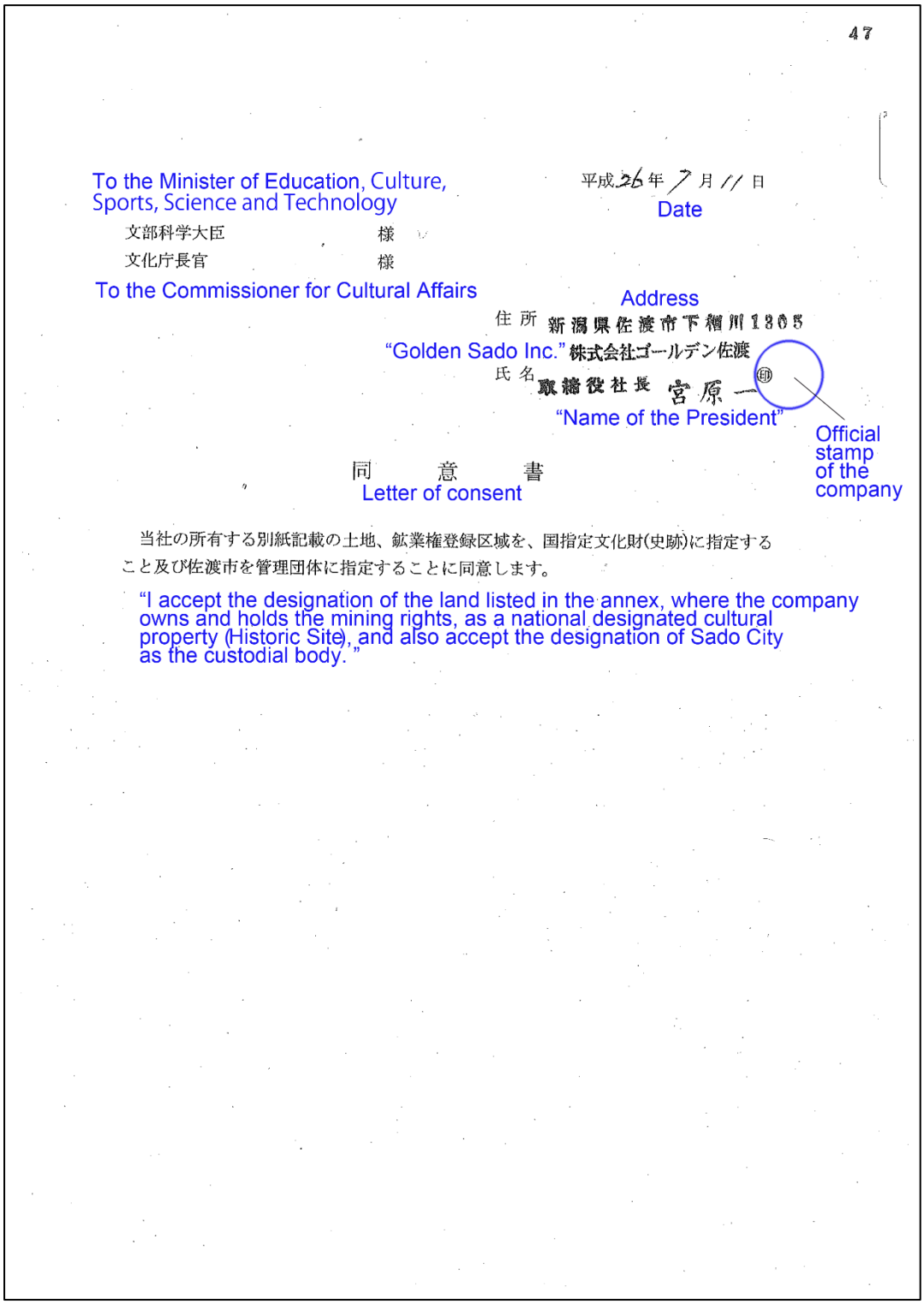
In other words, the mining rights include the obligations for the rights holder to ensure necessary actions to avoid the mining pollution.

4-5. 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.

As clearly explained on pp.182-183 in the nomination dossier, the Golden Sado Inc. has no intention to resume the mining activities.

In addition, the nominated property has designated as Historic Site under the Law for the Protection of Cultural Properties, thus strict restrictions have functioned. The Golden Sado Inc. has agreed designation of its owned land as a Historic Site under the Law in written form, with the clear understanding that the mining rights are also under restrictions by the designation. The consent paper explicitly shows that the restriction is also effective concerning the mining rights [Fig. 15, 16].

Even if the company planned to resume any mining operation, any alteration in the Historic Site would require permission by the Commissioner of the Agency for Cultural Affairs based upon the Law, and the decision would be taken mainly considering the protection of its OUV.



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To the Minister of Education, Culture, Sports, Science and Technology

平成26年7月11日
Date

文部科学大臣　様
文化庁長官　様

To the Commissioner for Cultural Affairs

Address
住所 新潟県佐渡市下相川1305

"Golden Sado Inc." 株式会社ゴールデン佐渡
氏名 取締役社長 宮原一 ㊞

"Name of the President"

Official stamp of the company

同　意　書
Letter of consent

当社の所有する別紙記載の土地、鉱業権登録区域を、国指定文化財(史跡)に指定すること及び佐渡市を管理団体に指定することに同意します。

"I accept the designation of the land listed in the annex, where the company owns and holds the mining rights, as a national designated cultural property (Historic Site), and also accept the designation of Sado City as the custodial body."

Fig. 15 Paper of consent to accept designation as Historic Site (page. 1)

（別紙） (Annex)

土　地　　Land

1. 新潟県佐渡市下相川　1305番　　Name of the place
2. 新潟県佐渡市相川宗徳町　1番4
3. 新潟県佐渡市相川庄右衛門町　1番
4. 新潟県佐渡市相川庄右衛門町　18番
5. 新潟県佐渡市相川清右衛門町　9番

鉱業権登録地域 Area of mining rights

1. 新潟県佐渡市下相川　2番1　　Name of the place
2. 新潟県佐渡市下相川　2番2　のうち、実測 380.86 ㎡ Part of the land lot (380.86m²)
3. 新潟県佐渡市下相川　2番3
4. 新潟県佐渡市下相川　2番5
5. 新潟県佐渡市下相川　3番1
6. 新潟県佐渡市下相川　3番2
7. 新潟県佐渡市下相川　3番3
8. 新潟県佐渡市下相川　3番4
9. 新潟県佐渡市下相川　3番5
10. 新潟県佐渡市下相川　3番6
11. 新潟県佐渡市下相川　3番9
12. 新潟県佐渡市下相川　3番14
13. 新潟県佐渡市下相川　3番15
14. 新潟県佐渡市下相川　3番16
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23. 新潟県佐渡市下相川　3番25
24. 新潟県佐渡市下相川　24番
25. 新潟県佐渡市下相川　25番5
26. 新潟県佐渡市下相川　42番1

Fig. 16 Paper of consent to accept designation as Historic Site (page. 2)

5. Reduction of the fragmentation of the series

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.

As explained in the nomination dossier and in the Additional information submitted in November 2023, the boundary of the nominated component parts is delineated based upon the existence of physical evidence along with the Operational Guidelines.

However, carefully considering the point raised during dialogue with ICOMOS, we have decided to modify the boundary of the component parts in Nishimikawa Area in order to reduce the fragmentation of the nominated component parts and secure the integrity of the nominated site. All the waterways are connected and integrated into one component part [Fig. 17]. Boundaries of the parts of waterways that have been newly added to the component part are carefully delineated based upon the geographical features such as contour, with the historical picture maps and current cadastral map which indicates the existence of the waterways in the past. The outer delineation of the buffer zone for Nishimikawa Area remains unchanged. As mentioned in the previous additional information, the Law for the Protection of Cultural Properties legally protects all the waterways including the additional parts as the Important Cultural Landscape. More precisely, any alteration within the waterways can be regulated through the detection by such means as landowner's prior notification or regular monitoring of Sado City depending on the situations of waterways.

As a consequence of this modification, component parts 002-020 are integrated into component part 001, and component parts 021 and 022 are changed to 002 and 003 respectively. The revised areas of nominated property and proposed buffer zone are as follows.

Revised Table 1-1 of the nomination dossier (p.2)

ID	Name of the Component part	Region /District	Coodinates of the cedntral point		Area of nominated component Part (ha)	Area of the Buffer Zone (ha)	Map No.
			Latitude	Longitude			
001	Nishimikawa Placer Gold Mine	Nishimikawa Area	N37° 54' 35"	E138° 19' 31"	294.9	574.4	(Revised)
002	Aikawa-Tsurushi Gold and Silver Mine - Aikawa area	Aikawa-Tsurushi Area	N38° 02' 27"	E138° 15' 28"	289.2	886.2	Fig. 1-7 Fig. 1-8 Fig. 1-9
003	Aikawa-Tsurushi Gold and Silver Mine - Tsurushi area		N38° 01' 34"	E138° 15' 57"	173.3		
Total area (in hectares)					757.4	1460.6	

Revised Table 1-3 of the nomination dossier (p.4)

Nominated property (ha)	757.4
Buffer zone (ha)	1,460.6
Total (ha)	2,218.0

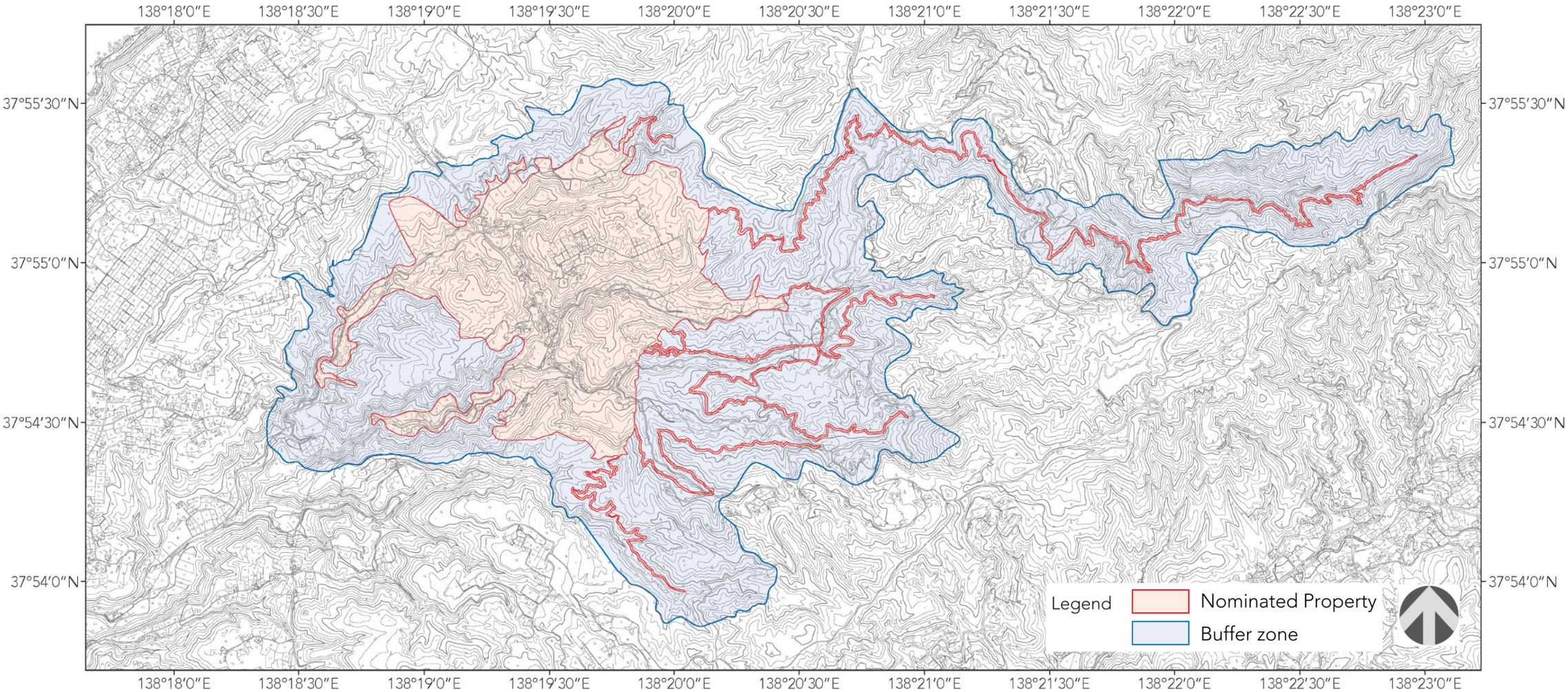

Fig. 17 Revised nominated component parts in Nishimikawa Area (CP 001)