

# Inevitable Challenges

Implementation of the World Heritage Committee's Decision Via  
Restriction of Tourist Visitation to Iriomote Island



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## Introduction

On July 26, 2021, the World Heritage Committee adopted Decision: 44 COM 8B.5 (referred to “WHC decision” hereinafter) that inscribes Amami-Oshima Island, Tokunoshima Island, Northern part of Okinawa Island, and Iriomote Island, Japan, on the World Heritage List, requests the State Party to take immediate steps to improve the protection and management of the property, and submit to the World Heritage Centre, by 1 December 2022, a report on the steps taken for review by IUCN<sup>1</sup>.

This document refers to the requests specifically related to Iriomote Island, which are included in the WHC decision, as follows:

- a) Capping or reducing levels of tourist visitation from current levels, especially on Iriomote Island, until a critical evaluation of tourism carrying capacity and impacts can be conducted and integrated into a revised tourism management plan
  
- b) Urgently reviewing the effectiveness and strengthening if necessary, the traffic management measures designed to reduce road fatalities of endangered species (including but not limited to Amami Rabbit, Iriomote Cat, and Okinawa Rail)

The Government of Japan (referred to “GoJ” hereinafter) submitted a report<sup>2</sup> to WHC in response to its request accordingly (referred to “GoJ report” hereinafter)<sup>3</sup>. The GoJ report includes the summary of the draft “Iriomote Island Tourism Management Plan”<sup>4</sup> (referred to “summary of the draft plan” hereinafter) and “Review of Existing Measures to Reduce Roadkills and Future Approach”<sup>5</sup> as its annex.

The Japan Tiger and Elephant Fund (JTEF) and Yamaneko Patrol (YP) are members of the “Iriomote Island Sub-committee of the Regional Liaison Committee”, “Taketomi Town Iriomote Island Ecotourism Promotion Council” and “Liaison Committee on Prevention of Roadkill of Iriomote Cats”, which are all arranged by the national and local administrative bodies. JTEF and YP have been very engaged in these various platforms in order to

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<sup>1</sup> Decision: 44 COM 8B.5

<https://whc.unesco.org/archive/2021/whc-21-44com-18-en.pdf>

<sup>2</sup> State of Conservation Report of Amami-Oshima Island, Tokunoshima Island, Northern part of Okinawa Island, and Iriomote Island (Japan) (N1574) in Response to the World Heritage Committee Decision Government of Japan November 2022 44 COM 8B.5

[https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report\\_e.pdf](https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report_e.pdf)

<sup>3</sup> <https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/index.html>

<sup>4</sup> [https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report\\_a-1\\_e.pdf](https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report_a-1_e.pdf)

<sup>5</sup> [https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report\\_b-1\\_e.pdf](https://kyushu.env.go.jp/okinawa/amami-okinawa/world-natural-heritage/reports/pdf/report_b-1_e.pdf)

highlight the significant need for nature protection of Iriomote Island, actively and constructively throughout this process. This document discusses the problems of the GoJ report based on the discussion with the administrative bodies and different stakeholders at many opportunities, including the meeting of the aforementioned platforms, and the experiences obtained in field activities that were conducted to prevent road collisions of Iriomote cats, and makes recommendations to IUCN, which the committee should be informed of.

## **1. Request a) Capping or reducing levels of tourist visitation from current levels**

### **1.1 Critical evaluation of tourism carrying capacity and impacts is not feasible at present**

The summary of the draft plan states, “[...] it is difficult to set the standard figure for the annual number of tourists who can visit the region by evaluating the relation between it and foreseeable impacts from the viewpoint of carrying capacity”.<sup>6</sup> It means that “a critical evaluation of tourism carrying capacity and impacts” are not feasible at present. This would mean that a road to such evaluations won’t be found until the monitoring of various indicators shown in the draft plan<sup>7</sup> progresses in the future.

As long as a critical evaluation of tourism carrying capacity and impacts is not feasible at present, the levels of tourist visitation should be capped or reduced from current levels (the summary of the draft plan set “the current level” at 290 thousand (290,313) tourists in 2019<sup>8</sup>) in accordance with the WHC decision.

More specifically, considering the recent trend of road collisions of Iriomote cats and tourist visitation to the island (see 2.1 of this document), an allowable limit of the number of tourists should be set, which is to be considerably less than 290 thousand set as the “current level” in accordance with the precautionary principle (until a critical evaluation and integration of it into a revised tourism management plan are ready).

### **1.2 The draft plan intends to allow a yearly increase of tourist visitation to Iriomote Island beyond the “current level” (290 thousand tourists) and even beyond the annual averaged tourist number during the past decade (330 thousand tourists)**

The summary of the draft plan states, “it is necessary to monitor carefully the total number of visitors, so that it will stay within the range of the last 10 years or so”<sup>9</sup> and defines the management criteria for “restricting the number of visitors to Iriomote Island”, so that “the

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<sup>6</sup> Summary of the draft plan, 2.2 (2) (i), pp. 5

<sup>7</sup> Summary of the draft plan, 5.3, pp.15

<sup>8</sup> GoJ report, 2.1.1 (1), pp. 4

<sup>9</sup> Summary of the draft plan, 2.2 (2) (i), pp. 5

annual number of tourists to the region does not increase by 10% or more as compared to that of the previous year”<sup>10</sup>.

Guessing from the premised recognition: “it is difficult to set the standard figure for the annual number of tourists who can visit the region by evaluating the relation between it and foreseeable impacts from the viewpoint of carrying capacity”, the purpose of the management criteria can be understood to allow a yearly increase of tourist visitation to Iriomote Island beyond the “current level” (290 thousand tourists) and ultimately beyond the annual averaged tourist number over the past decade (330 thousand tourists) as long as the increased rate is by less than 10% per year.

This is an idea that denies the concept of tourism capacity; the State Party virtually refuses to abide by the WHC decision. Indeed, if the management criteria are applied, in the case that the total tourist number in 2022 will reach 230 thousand at the end of the year and grow by 9.9% every year thereafter<sup>11</sup>, the tourist visitation will be allowed to arrive at 252,770 in 2023; 277,794 in 2024; 305,295 in 2025 and 335,520 by year 2026. It means the number of tourists can exceed the “current level” and even 300 thousand in 3 years, and 330 thousand in 4 years. The draft plan even intends to step backwards from the management criteria defined by the current “Basic Visitor Management Plan for a Sustainable Iriomote Island”<sup>12</sup> established in January 2020, which states, “a level of annual number of visitors will be set based on the past trend of it; if the actual visitor’s number exceeds the level in the future, the visitor’s number per day will be reviewed and the measures will be expeditiously strengthened”.

### **1.3 No specific measure is planned for capping annual number of tourists within the allowable limit calculated, based on the management criteria (less than 10% of increase from the previous year)**

The summary of the draft plan states, “To calculate the allowable limit for the following year based on the annual number of tourists to the region in the previous year, inform tourism stakeholders about the limit, and request necessary measures”. It means that the decision-making and implementation of the measures are virtually left everything to the tourism industries if tourist visitation gets close to or exceeds the designated allowable limit calculated based on the management criteria (less than 10% of increase from the previous year). Under such circumstances, it can’t be expected that the allowable limit will be effectively secured.

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<sup>10</sup> Summary of the draft plan, Table, pp. 9

<sup>11</sup> In 2022, 183,079 tourists visited Iriomote Island between January and October while the number came to 48,146 in total for November and December of 2019. Taketomi Town website: <https://www.town.taketomi.lg.jp/administration/toukei/kankonyuiki/>

<sup>12</sup> [https://jglobal.jst.go.jp/en/detail?JGLOBAL\\_ID=202102228230344380](https://jglobal.jst.go.jp/en/detail?JGLOBAL_ID=202102228230344380)

**1.4 An allowable limit per day of tourist number, which is set exclusively for distributing tourist visitation evenly through a year, does not contribute to keeping annual tourist visitation within the “present level”**

The draft plan sets the daily number of tourists visiting Iriomote Island at 1,200 people/day as the management standard, based on its clean water supply capacity; the daily number of tourists is controlled at or below the current visitation level by encouraging individual travelers to visit the island during the off-season and by tourism businesses' voluntary coordination on visiting periods of group tours<sup>13</sup>.

However, this number allows 438,000 visitors per year (1,200 people x 365 days) in theory, which is more than 1.5 times of 290 thousand visitors: the “current level” set by the draft plan and even when compared to historic record high number<sup>14</sup>. Such setting of management standards won't contribute to capping or reduction of tourist visitation on a yearly basis.

Incidentally, with this daily number plan, which encourages individual tourists and tourism businesses to voluntarily rearrange the tour schedule, won't even succeed in evenly distributing tourist visitation throughout a year, because the liner transportation capacity between Ishigaki Island and Iriomote Island actually has enough room for 2,500 people<sup>15</sup>, more than twice of the allowable limit set as the management standard. Moreover, the heavy tourist seasons at regular times are based on customer's demand in terms of timing for visitation that is generally inflexible. The working generation cannot rush to Iriomote Island other than during their summer vacation period and the long national holiday seasons; most of the retirement generation is commonly fascinated in the island as a mass-tour site to escape cold winter seasons in Northern Japan.

**1.5 It is difficult to achieve a tourist visitation within tourism carrying capacity of the whole Island (ultimately of the whole WH area) by setting a limitation of visitation to only a small part of the WH site**

As aforementioned, the draft plan shows that a critical evaluation of tourism carrying capacity and impacts is not feasible at present, and does not establish any measures to effectively restrict tourist visitation into the Island. Instead, the draft plan “designate the relevant areas as specified natural tourism resources under the Overall Concept for Promoting Ecotourism (Ecotourism Promotion Act) and limit the number of people who enter the designated areas by introducing a prior approval procedure for entry to these areas”<sup>16</sup>. The intention is to set an allowable limitation of tourist visitation not to the entire island but to

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<sup>13</sup> GoJ report, 2.1.1 (3) (ii), pp. 6

<sup>14</sup> 405,646 tourists were recorded in 2007. Taketomi Town website: <https://www.town.taketomi.lg.jp/administration/toukei/kankonyuiki/>

<sup>15</sup> Draft plan, pp.10, Document 2-2 distributed at the third meeting of the Iriomote Island Taskforce for Tourism Management (June 7, 2022) (in Japanese)

<sup>16</sup> Summary of the draft plan, Table, pp. 9

a part of individual tourist sites (located inside heritage area). Specifically, an allowable limitation of tourist numbers per day will be set in tourist sites and a legally binding regulation to enforce the limitation will be in place<sup>17</sup>. In this case, however, regulation over all the tourist sites that are or could be over-utilized and even a measure for preventing tourists from switching from the regulated sites to other sites are required. In other words, such approach is much more open to abuse, comparing with the option of limited the number of people entering the island.

In fact, though the area used for nature experience-oriented tours and/or ecotourism are widely distributed throughout Iriomote Island, where 27 places on land and the whole sea area are used, of which 20 places are located in the heritage area<sup>18</sup>, the draft plan targets only five tourist sites including three sites, where over-utilization has not yet occurred. The other tourist sites that are over-utilized or may become so (e.g. Omija River and Yutun River<sup>19</sup>) are not being considered for any regulatory measures. Though regulated access to sites may have tour guides/tourists simply shift to the other non-regulated sites, there has been no consideration by the GoJ in the report, for urgent countermeasures to prevent such conduct by them.

Furthermore, as for the measures for preventing new tourist sites (other than the existing 20 sites) from being created, only voluntary rules exist. Additionally, the “Taketomi Town Iriomote Island Ecotourism Promotion Council” comprised by the WH administrative organs and stakeholders launched a research project subsidized by the Tourism Agency on “Promotion of low-impact nature experience activities in sea and coastal areas” for promoting stay-type tourism by establishing a combination of camping and sea-kayaking/trekking at the southern beach of Iriomote Island, where Taketomi Town has curtailed such activities in the past<sup>20</sup>.

The conclusion is as follows. In the first place, it is not easy to achieve a tourist visitation within tourism carrying capacity of the whole Island and ultimately, of the whole WH area by

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<sup>17</sup> Serious over-utilization has become obvious in Hinai River and Nishida River amongst the five tourist spots. The other three spots (Komidake, Urauchi River headwaters and Mr. Tedo are intrinsically not so popular for general tourists, so they are not the case. See the Table (Summary of the draft plan, pp. 9).

<sup>18</sup> Summary of the draft plan, 2.1, pp. 2

<sup>19</sup> JTEF&YP. 2017. A review on Nomination of Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island and Iriomote Island for inscription on the World Heritage List: What is the “holistic approach” to address increasing tourism/visitors pressure in Iriomote Island?, 2.3 and 2.4, pp. 20–26

<https://www.jtef.jp/en/wp-content/uploads/2019/06/171125-Iriomote-holistic-approach-FINAL.pdf>

<sup>20</sup> Summary of the Pilot Project on Sustainable Tourism and the Promotion of Nature Experience Planning, Document 2 distributed at the meeting of Taketomi Town Iriomote Island Ecotourism Promotion Council (September 7, 2022) (in Japanese)

Tourism Agency website [https://www.mlit.go.jp/kankocho/page05\\_000182.html](https://www.mlit.go.jp/kankocho/page05_000182.html)

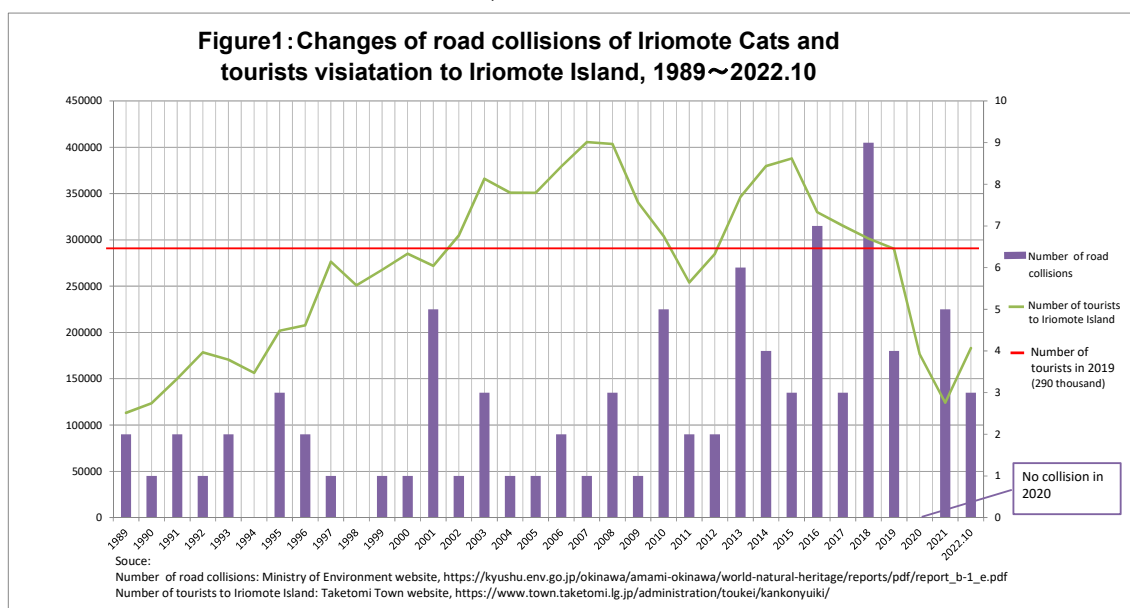


setting a limit of visitation to only a part of the heritage area. Moreover, the proposed measures included in the draft plan are obviously insufficient and ineffective for the above reasons.

## 2. Request b) Reviewing and strengthening of the traffic measures

### 2.1 Changes of road collisions of Iriomote cats and tourist visitation to Iriomote Island

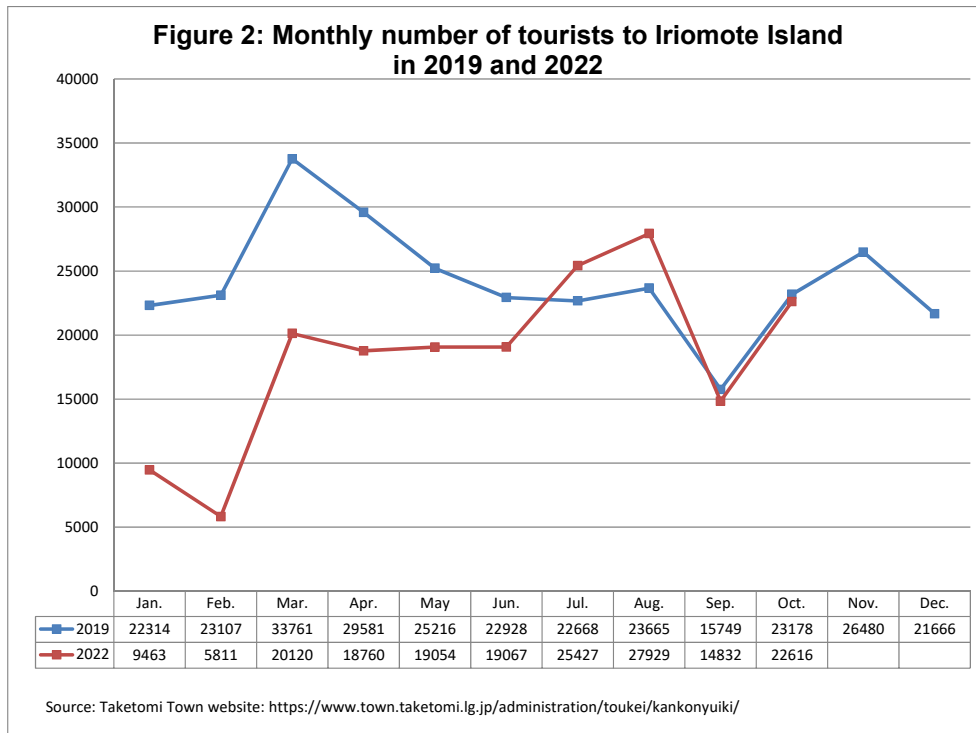
Figure 1 shows the changes of road collisions of Iriomote cats and tourist visitation to Iriomote Island from 1989<sup>21</sup> to October, 2022.



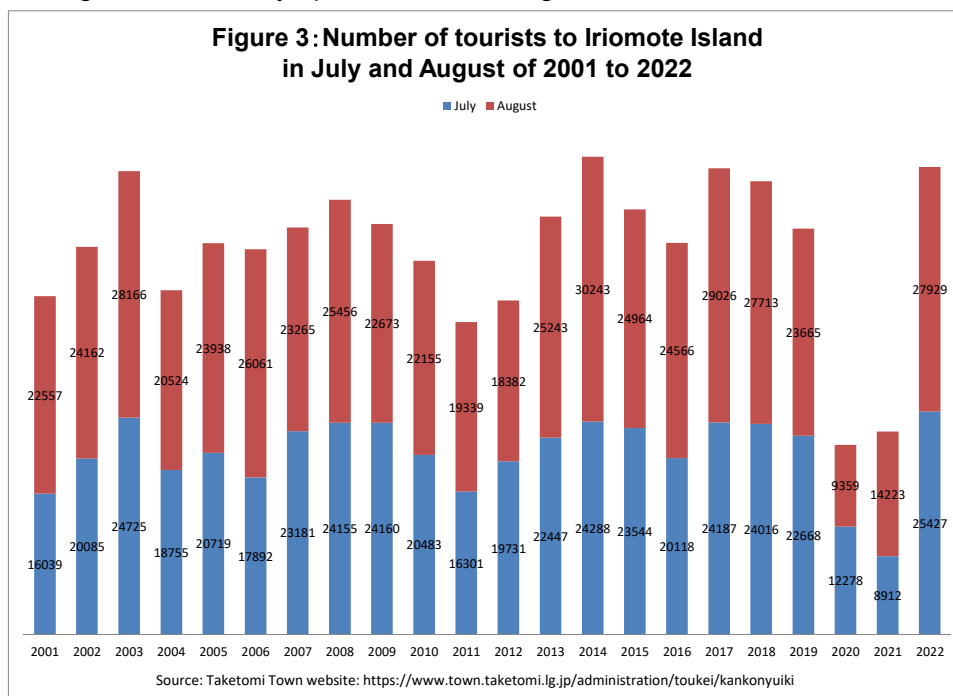
Road collisions of Iriomote cats since 2001 showed a trend that they would decrease next or after the next year, after many collisions occurred, and increase after those years again, and they started increased overall since 2001; Five collisions were recorded for the first time in this year as well<sup>22</sup>. The number of tourists who visited Iriomote Island exceeded 300 thousand for the first time in 2002 and stayed over 300 thousand until 2018 (except for in 2011 and 2012, when the Great East Japan Earthquake affected tourism). In 2018, the record high of nine collisions was recorded. In 2020, no case was recorded. It is not strictly unreasonable that the number of cases significantly decreased this year because of the high rate in the previous year, however, zero collision was seen for the first time in 22 years. The number of tourists decreased from 2019 to 2020 by 40% due to the Covid-19 pandemic, so that it went below 200 thousand (176 thousand) for the first time in 25 years. This event could have influenced the lack of collisions. In 2021, tourist visitation further declined, but it began to recover in 2022.

<sup>21</sup> The annual data on the number of tourists who entered in Iriomote Island are available on the Taketomi Town website since 1989. <https://www.town.taketomi.lg.jp/administration/toukei/>

<sup>22</sup> JTEF&YP. 2017, 1.2, pp.14  
<https://www.jtef.jp/en/wp-content/uploads/2019/06/171125-Iriomote-holistic-approach-FINAL.pdf>



The recovery of tourist visitation in 2022 has become significant since around February and gradually got close to the record in 2019, which is defined as the “current level” by GoJ report (Figure 2). In July and August of this year, a flood of tourists finally rushed into the Island and exceeded the record of 2019 probably because virtual travel restrictions by the national state of emergency due to Covid-19 pandemic were lifted, in the summer vacation season for the first time in two years, and because the significantly increased vaccination rate had hedged the risk of symptomatic worsening.



The number of tourists in July and August of 2022 was the second largest of the past 20 years (Figure 3). On August 1 and 2, a kitten of Iriomote cats was killed in a road collision on each day<sup>23</sup>. They were the first back-to-back fatalities in road collisions since the data.

The number of tourists who will visit Iriomote Island in 2022 is anticipated to reach to 230 thousand accounting for about 80% of the record of 2019 at the end of December<sup>24</sup>. It will further increase in the future because of full-fledged visitation of inbound tourists to Japan will begin soon, so that tourism-related traffic inside the Island will increase significantly. It is gravely concerning that road fatalities of Iriomote cats could be more serious than ever.

## **2.2 Necessity of strengthening the traffic measures and the points for them: a new approach focusing on “increased traffic”**

According to the draft plan and GoJ report, the current level of risk on fatal traffic accidents involving Iriomote cats due to “increased traffic” and “excessive speed” on roadways<sup>25</sup> has been high and on the rise<sup>26</sup>. Accordingly, based on the WHC decision, the current traffic measures should be determined as not being sufficiently effective and need to be strengthened.

As aforementioned, the risk factors that the draft plan shows are both a combination of “increased traffic” and “excessive speed”. However, specific measures that the plan presents are only various activities that counteract “excessive speed”<sup>27</sup>.

These activities of trying to reduce “excessive speed” have been implemented and continually improved on by the administrative bodies and stakeholders including JTEF&YP for a long time. Indeed, the result of monitoring by JTEF&YP on traffic speed during night-time, when road fatalities frequently occur, shows that traffic speed trends towards a decrease recently<sup>28</sup>. While these efforts are essential to be continued, that alone is clearly not enough to keep the risk on rise of collisions at bay. This conclusion is strongly demonstrated by the fact that road collisions of Iriomote cats hit a record high in 2018, just before tourist visitation dramatically decreased due to Covid-19 pandemic. That means a completely different approach from the existing measures focused on “excessive speed” is required in order to “strengthen” the traffic measures for preventing road fatalities of Iriomote

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<sup>23</sup> Iriomote Wildlife Conservation Center (Ministry of Environment) website (the information is available in Japanese only) <https://iwcc.jp/iriomotecat/map/>

<sup>24</sup> See note 11.

<sup>25</sup> Summary of the draft plan, Table, pp. 6

<sup>26</sup> Summary of the draft plan, Table, pp. 6; GoJ report, 2.1.1 (2) (iii), pp. 5

<sup>27</sup> Summary of the draft plan, Table, pp. 9 and “Review of Existing Measures to Reduce Roadkills and Future Approach”

<sup>28</sup> 2020 report on activities by Yamaneko Patrol, Document 6 distributed at the meeting of Liaison Committee on Prevention of Roadkill of Iriomote Cats (December 17, 2021) (in Japanese)

cats. This should be the approach countering “increasing traffic”, which is listed as another risk factors of road fatalities in the draft plan and the GoJ report.

### **2.3 Specific traffic measures to counter “increased traffic”**

Since the residential population of Iriomote Island has fluctuated between 2,000 and 2,500 since 2005<sup>29</sup>, the main factor for large increases of traffic is considered to be tourist visitation. As general measures to counter the increased traffic caused by increased tourist visitation, build-up of public transportation/reduction of tourist visitation can be considered. But, the former option won't be effective in the case of Iriomote Island because tourists who participate in some tour programs arranged by tourism businesses will be transported by the cars owned by the tour operators/guides or tourist coaches prepared for group tours, and other tourists will prefer a rent-a-car that is free from limitation of places for getting on and off. In fact, though a bus transportation provided by a private company that receives public subsidies is available for the main road in question, tourists have not used it much. Accordingly, when tourism increases, the number of tourism businesses in the Island and their cars will increase. Additionally, the number of rent-a-cars driven by tourists may increase, too (200–300 rent-a-cars have been registered in Iriomote Island over the last decade<sup>30</sup>; the number per-capita is five to nine times larger than the one of entire Okinawa Prefecture<sup>31</sup>). After all, the only way to reduce the increased traffic caused by increased tourism will be to control the overall tourist visitation to the Island.

Thus, it is essential to set an allowable limit to entry of tourists within the tourism capacity of the Island and regulate the entry of them based on the limit in order to implement not only the request of the WHC: a) capping or reducing tourist visitation but also the request b): strengthening traffic measures to prevent road fatalities of Iriomote cats.

### **3. Measures for controlling tourism exploitation of Iriomote cats, which is connected to road fatalities**

Frequent occurrences of Iriomote cats on the highway, which have become acclimated to human beings and roads are mentioned as one of the factors that contributes to the recent

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<sup>29</sup> Taketomi Town website <https://www.town.taketomi.lg.jp/administration/toukei/jinko/doutai/>

<sup>30</sup> Draft plan, pp.11, Document 2-2 distributed at the third meeting of the Iriomote Island Taskforce for Tourism Management (June 7, 2022) (in Japanese)

<sup>31</sup> The number of rent-a-cars comes to one per six to ten residents in Iriomote Island while the ratio comes to one per 56 residents in Okinawa Prefecture as a whole.

- According to Japan Rent-a-car Association, there were 26,296 rent-a-cars in Okinawa in March 2022.

<https://www.rentacar.or.jp/wp-content/uploads/2022/08/7c8efea4907c0f9a15cb06caaad58287.pdf>

- According to Okinawa Prefecture, its population came to 1,468,634 in January 2022.

[https://www.pref.okinawa.jp/toukeika/estimates/estimates\\_suikei.html](https://www.pref.okinawa.jp/toukeika/estimates/estimates_suikei.html)

increase of road collisions of Iriomote cats<sup>32</sup>. It was discussed that viewing/filming by tourist and night-tour guides could facilitate the acclimation at the meeting of Sub-committee on the Plan for Protection and Recovery Program of Iriomote Cat, the Committee on Reviewing the Measures for Conservation of Wildlife, Ministry of Environment. Recently, “Overall Concept for Promoting Ecotourism”<sup>33</sup> flagged this problem<sup>34</sup>.

JTEF&YP has repeatedly recommended Taketomi Town to investigate the actual situation and introduce a local regulation to viewing/filming of Iriomote cats. In 2017, this problem was raised at Taketomi Town Assembly; the Town official in charge stated, “such regulation could be introduced by amending the Ordinance on natural environment protection”<sup>35</sup>. However, no action has been taken toward introduction of regulatory measures on viewing/filming of Iriomote cats up to now.

It is easily anticipated that experience-oriented tourism will be developed with diversification; it is likely that Iriomote cats with the highest name value will be targeted by such tourism. Investigation on the actual situation of viewing/filming of Iriomote cats in the field, and a subsequent consideration of regulatory measures on it are urgently required.

#### **4. Recommendations**

JTEF&YP recommend that IUCN makes the recommendations to the World Heritage Committee to request the State Party (Japan) to take the following measures.

- a) Setting a specific allowable limit of the number of tourists to Iriomote Island in accordance with precautionary principle, which is to be considerably less than 290 thousand (until a critical evaluation and integration of it into a revised tourism management plan are ready, based on the results of monitoring on various indicators);
- b) Establishing an effective measure for securing the allowable limit mentioned in a) into the revised tourism management plan together with the limit and implementing them urgently; and
- c) Investigating the actual situation of viewing/filming of Iriomote cats in the field, and considering a regulatory measure based on the result of the investigation.

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<sup>32</sup> JTEF&YP. October, 2019. A review on Nomination of Amami-Oshima Island, Tokunoshima Island, the northern part of Okinawa Island and Iriomote Island for inscription on the World Heritage List: Emerging Problems Tarnish the Modest Progress on Protecting OUV of Iriomote Island, 2.1.2, pp.9

[https://www.jtef.jp/en/wp-content/uploads/2020/02/191003-E\\_JTEFYF-report.pdf](https://www.jtef.jp/en/wp-content/uploads/2020/02/191003-E_JTEFYF-report.pdf)

<sup>33</sup> Summary of the draft plan, Table, pp.9

<sup>34</sup> Overall Concept for Promoting Ecotourism, pp.14 (in Japanese)

Ministry of Environment website: [https://www.env.go.jp/press/press\\_00910.html](https://www.env.go.jp/press/press_00910.html)

<sup>35</sup> The answer by the Town to the question from assembly member Katsumi Mitsumori at the Taketomi Town Assembly in September 20, 2017

<https://www.youtube.com/watch?v=eeBpwFPdxak>