Summary

of

Independent “Preliminary EIA” and “TOR of EIA”

for

Environmental Impact Assessment of EXPO 2025 OSAKA

-Let’s try advanced style participatory EIA-

31 August 2019

Nature Conservation Society of Osaka (NCSO)
Workshop for Sustainable Community (WSC)

■ Introduction

Nature Conservation Society of Osaka (NCSO) and Workshop for Sustainable Community (WSC) are Japanese NGOs working for Environment conservation and restoration of Osaka bay and seeking for an ideal EIA of EXPO 2025 OSAKA. NCSO and WSC voluntarily prepared “Preliminary EIA” and “TOR of EIA” based on workshops (3 times), site surveys (6 times), and gathered people’s opinion. NCSO and WSC look for the EIA of EXPO 2025 OSAKA as a good practice of future EIA considering SDGs.

■ What is required for the EIA of EXPO 2025 Osaka?

EIA of EXPO 2025 Osaka should be evaluated by SDGs’ policy and ICT should be effectively used for EIA. Because the goals of Expo 2025 Osaka are set as (1) A society that achieves the Sustainable Development Goals (SDGs) set by the United Nations and (2) Achievement of Japan’s national strategy Society 5.0. And EXPO 2025 Osaka will commit to "Designing Future Society for Our Lives."

Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA) are very new and not fully introduced in Japan. EXPO 2015 Milan conducted SA based on SDGs but there is no laws and regulations of SA in Japan. EU is conducting Strategic Environmental Assessment for policies and plans covering economy, culture, and welfare in integrated ways, but Japanese EIA law does not cover policy/ plan and does not fully integrate social and economic issues. Even if it is not required in Japanese laws, EIA of EXPO 2025 must clear the SDG’s targets 17.19 which are “by 2030, build on existing initiatives to develop measurements of progress on sustainable development that complement GDP, and support statistical capacity building in developing countries”. NCSO and WSC are suggesting the advanced style of EIA of EXPO 2025, based on the concept that “Sustainable development will not be achieved without richness of nature and biodiversity (green infrastructure)”.

■ What is the key issues of EXPO 2025?

Following three points should be clearly explained in the EIA process. As far as the EIA is following the ordinance of the Osaka-city, the explanations should be given in the TOR of EIA.

1. Arguable points of the Expo of Yumeshima site

There are some arguable points of the Yumeshima plan.

(1) Insufficient reasons of site selection

There are some candidate locations, such as Expo memorial park, Tsurumi green park, and others, other than Yumeshima area. The comparative review and process of the site selection should be disclosed like the Milan Expo. The reasons of the site selection should be clearly explained and disclosed.

(2) Unfinished reclamation activity

Yumeshima island is unfinished waste disposal site. The disposal activity has not been completed yet and a part of the area is still under the sea. Now Osaka city is allocating big budget for reclamation of the sea area by rock and sand and some part of sea area will be remained as water world. It means the capacity of waste disposal is limited. It is not clear that how to create the lost waste disposal capacity and Environmental Impact of the quarry of rock and sand for quick reclamation.

(3) Development of Niijima

The new reclamation (Niijima island) next to Yumeshima has been started. The figures of Niijima is not shown in the design layout of the Expo Osaka. But it is not clear whether the reclamation is really needed now. If Expo is not planned, the Niijima reclamation might not be required.

(4) Casino resort plan after Expo

Osaka city and Osaka prefecture plan the integrated resort including casino at Yumeshima in 2024 after the Expo. EIA of the casino resort should be objectively conducted including social impact based on the proposed plan. But Osaka city and Osaka prefecture will conduct EIA of the casino resort without basic design in 2020 by themselves before selection of the casino proponent. The EIA will be prepared by Osaka city/prefecture and reviewed by Osaka city/prefecture. The objectivity and fairness of the EIA is suspicious.

(5) Limited affected area

Affected area of Milan Expo covered whole Lombardy state in the Sustainability Assessment. SA of Osaka Expo also should cover wider area than normal EIA in Japan.

2. History of Nature restoration challenge of Osaka bay

In the past years the water edge of Osaka bay had been developed. All the tide land and natural beach were lost, and reclamation land was a pollution source. After the grass-

roots movements for recovering the natural Environment, Nanko bird park, Symbiosis Forest and other green areas were developed at the sea-side area. Yumeshima area and Nanko bird park are now designated as A rank Biodiversity Hotspot by Red List of Osaka prefecture 2014, because of returned noble wildlife.

Considering the recovery process of biodiversity in Osaka bay area, Expo Osaka have to respect the progress and accelerate the recovering the natural Environment. The biodiversity of Osaka bay should be carefully monitored in long span from before construction and after Expo.

3. People's concern

Local citizens are worrying about the following three safety and security issues. EIA should cover this people's concern.

(1) Pollution from the disposed toxic waste

Disposed waste in Yumeshima includes toxic waste. There is a risk of scattering or leakage of the toxic substance during construction, operation, and removal. Not only the impact on people but also the impact on wildlife are anticipated.

(2) Natural disaster

Osaka area was severely affected by typhoon No.21 in 2018. There is a risk of Tsunami and liquefaction by Nankai megathrust earthquakes. EIA have to consider this kind of risk assessment.

(3) Casino

In addition to the Casino resort operation from 2024, Formula 1 car race plan in the public road of Yumeshima was proposed by the governor of Osaka city. Increasing gamble like activities might accelerate criminal rate and gangs.

■ Suggestion to the EIA of Osaka Expo

1. Actions of relevant Organizations

NCSO and WSC will propose following actions by relevant organizations.

① **Ministry of Economy, Trade and Industry (METI)** and **Ministry of the Environment (MOE)** will prepare a new experimental Outline of EIA as a social trial before the next amendment of EIA law. The Outline will be applied for Japan Association for the 2025 World Exposition.

② **Japan Association for the 2025 World Exposition** will add voluntary pre-EIA process on EIA process based on Osaka municipal bylaw. Japan Association for the 2025 World Exposition will explain and discuss with people about the site-selection and project design in the pre-EIA process like Expo 2005 Aichi Japan.

③ **Japan Association for the 2025 World Exposition** will prepare TOR/EIA using the evaluation axis of SDGs and include the evaluation target as ecological recovery of Osaka bay. The monitoring plan covering construction, operation, dismantle and closure, and after closure will be included in the TOR/EIA.

④ **Osaka prefecture** and **Osaka city** will be responsible for the conservation of biodiversity of Yumeshima, which is rank A of Biodiversity Hotspot of "Osaka prefecture Red List 2014". Multiple impact of Expo and Casino Resort on Biodiversity Hotspot will be examined in the EIA.

⑤ **BIE** will understand the concerns in this paper and will suggest and support Japanese government and Japan Association for the 2025 World Exposition for fulfilling the requirement as an International Registered Exhibition.

⑥ **All relevant organizations** will make effort for information disclosure and public involvement in various project stages including pre-EIA, TOR/EIA, EIA preparation, and post-monitoring stage.

2. TOR/EIA will include

NCSO and WSC propose following actions in the EIA and designing process.

① Examine the historical baseline change from the SDGs points of view including development, pollution, nature activity, and landscape. List up current issues and risk of baseline. Evaluate the biodiversity as a part of Green Infrastructure in the whole Osaka bay based on the detail and wide range of biodiversity survey. Plan the restoration biodiversity first and adjust the design and mitigation plan to the restoration biodiversity plan.

② Monitor and reduce CO2 emission during construction, operation, and dismantle activities. Expanding green area could be an offset of CO2 emission. Examine the negative impact on wildlife and habitat by air pollution, water pollution, noise, and light pollution.

③ Prevent sea water pollution by dumped soil and rock. Evaluate the risk of leakage of stored polluted water by high tide. Assess the risk of earthquake, Tsunami, gusty wind and high tide and conduct simulation of peoples' evacuation.

④ Gather and examine the success and failures cases of the past mega events. Use the lessons and learns to sustainable planning.

3. Challenge the participatory approach

Even if it is not required by current laws and regulations, NCSO and WSC propose the participatory approach to the EIA process.

① Prepare pre-EIA and TOR/EIA collaborate with NGOs.

② Collaborate and communicate with NGOs through survey, prediction, assessment, and monitoring.

③ Use ICT for interactive communication and discussion with local people.

■ Excerpt of the site survey report on 17 Jun 2019

Birds list (24 species)

Anas platyrhynchos, Anas poecilorhyncha, Aythya ferina, Aythya fuligula, Tachybaptus ruficollis, Columba livia, Streptopelia orientalis, Phalacrocorax carbo, Ardea cinereal, Ardea alba, Gallinula chloropus, Fulica atra, Charadrius dubius, Sternula albifrons, Milvus migrans, Falco tinnunculus, Corvus corone, Corvus macrorhynchos, Alauda arvensis, Hirundo rustica, Cisticola juncidis, Sturnus cineraceus, Passer montanus, Motacilla alba lugens

Possible breeding species at the site

Anas poecilorhyncha: fledging birds and adult bird

Tachybaptus ruficollis: Nest with eggs

Gallinula chloropus: confirmed individuals at the possible breeding habitat

Charadrius dubius: confirmed individuals at the possible breeding habitat

Sternula albifrons: Three individuals at the possible breeding habitat, Feeding individuals

Alauda arvensis: chirps at the possible breeding habitat

Cisticola juncidis: chirps at the possible breeding habitat

Survey: NCSO Supervisor: Dr. Gaku Wada, Chief Curator of Osaka Museum of Natural History

■ Workshops and site survey (March to July 2019)

Name	Date	Location	Remarks
Preparation Meeting	26 Mar 2019	NCSO	➢ Participants: 9 persons ➢ Kick-off meeting
1st Workshop	10 May 2019	NCSO	➢ Participants: 20 persons ➢ Discussion about concerned issues and site survey and site visit
Site visit	11 May 2019	Yumeshima	➢ Participants: 12 persons
1st Site survey	16 Jun 2019	Yumeshima	➢ Participants: 4 persons ➢ Bird survey
2nd Workshop	22 jun 2019	Osaka Municipal Lifelong Leaning Center	➢ Participants: 22 persons ➢ Lecture: "EIA of Yumeshima" Prof. Yoshihito Natsuhara (Graduate school of Nagoya Univ.) ➢ Lecture: "Record of restoration ecology at Kyosei Forest" Kiyoko Okuda (NPO Kyosei Forest) ➢ Group discussion and voting game
2nd Site survey	9 Jul 2019	Yumeshima	➢ Participants: 4 persons ➢ Plants
3rd Site survey	11 Jul 2019	Yumeshima	➢ Participants: 2 persons ➢ Birds
4th Site survey	15 Jul 2019	Yumeshima	➢ Participants: 4 persons ➢ Wildlife of water edge
5th Site survey	26 Jul 2019	Yumeshima	➢ Participants: 4 persons ➢ Insects

Name	Date	Location	Remarks
Upload the suggestion paper on the web	15 Jul 2019	-	➢ Suggestions invited until 20 Aug 2019
3rd Workshop	27 Jul 2019	Naniwa Eco Square	➢ Participants: 27 persons ➢ Discussion about the suggestion paper ➢ Adviser: ➢ Professor Emeritus Susumu Ymochi (Osaka City Univ.) ➢ Counselor. Ryohei Yamanishi (Nishinomiya Shell Museum) ➢ Professor Emeritus Akira Yamada (Nagoya City Univ.)
6th Site survey	29 Jul 2019	Yumeshima	➢ Participants: 5 persons ➢ Insects