# **Chapter 1**

# A Review of the Evaluation and Examination of the Property "Iwami Ginzan Silver Mine and its Cultural Landscape"

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The 31<sup>st</sup> session of the World Heritage Committee was held in Christchurch, New Zealand between June 23 and July 2, 2007. The discussion items of the meeting included the examination of Japan's nomination of "Iwami Ginzan Silver Mine and its Cultural Landscape" (hereinafter referred to as "Iwami Ginzan") to the World Heritage List. The advisory body of the World Heritage Committee, International Council on Monuments and Sites (ICOMOS) recommended "deferral" of examination of the nomination, but this recommendation was changed to "inscription" by the World Heritage Committee.

### 1. "Recommendation for deferral" by ICOMOS

A. Items indicated in the evaluation report and recommendation by ICOMOS

The evaluation given by ICOMOS\*1, clearly stated 22 points of concern, and these may be generally categorized into four parts: 1) the retainment of authenticity and integrity of the property, 2) the depth of comparative studies with other similar properties, 3) additional evidence for justification of Outstanding Universal Value, and 4) management for adequate preservation and conservation. ICOMOS made the following recommendation for decision by the World Heritage Committee:

ICOMOS recommends that the examination of the nomination of Iwami Ginzan Silver Mine and its Cultural Landscape, Japan, to the World Heritage List be deferred in order to allow the State Party time to:

- · investigate more fully the development and application of technology at the mines;
- investigate the overall impact of the mining enterprises in the region and further afield in order to establish whether the property has the potential to demonstrate outstanding universal value as a site that had a substantial impact outside its own area in terms of technological change, economic leverage and cultural exchange.

ICOMOS also recommends that attention is given to putting in place the

proposed management arrangements, completing the tourism and interpretation plan, and continuing with conservation work on historic structures.

ICOMOS further recommends that a more detailed archaeological strategy is developed to address the consolidation of underground remains vis a vis the encroaching tree cover, and the investigation of water pollution, and that strategies to address new motorways and possible clay mining are adopted.

ICOMOS noted a lack of comparative studies with other similar mining sites and requested that the World Heritage Committee defer the examination of Iwami Ginzan. This recommendation was transmitted to the Government of Japan via the World Heritage Centre, in accordance with Paragraph 168 of the Operational Guidelines for the Implementation of the World Heritage Convention (hereinafter referred to as the "Operational Guidelines"), on May 12, 2007 or six weeks before opening the 31st session of the World Heritage Committee.

#### B. Process of the finalization of the recommendation by ICOMOS

The outline of the process of the evaluation made by ICOMOS before it was transmitted to the Government of Japan is as follows.

#### Submission of the nomination dossier

The Government of Japan submitted a provisional nomination dossier to the World Heritage Center in September 2005; in a format that was pre-evaluated in accordance with the Operational Guidelines. The World Heritage Center informed the government, on October 25, 2005, that the format was satisfactory but the draft did not include sufficient comparative studies. On January 4, 2006, the Government of Japan submitted to the World Heritage Committee, through the World Heritage Center, the finalized version with Appendices related to comparative studies.

#### On-site evaluation mission

The World Heritage Center transmitted the nomination dossier to the ICOMOS headquarters. Mr. Duncan Marshall, a specialist of architecture from ICOMOS Australia, visited Japan for the on-site evaluation mission to Iwami Ginzan between October 17 and October 21, 2006.

The evaluation mission made by Mr. Marshall completely differed from those seen in Japan in previous evaluation missions made by other ICOMOS experts. From the 119 items on the questionnaire, provided beforehand, the following concerns were discussed in detail at the meetings: the adequate quality and quantity of archaeological investigations to demonstrate the evidence of Outstanding Universal Value, appropriateness of the boundary of the property and its buffer zone in terms of authenticity and integrity, comprehensiveness of other mining sites in Japan and other Asian countries comparable to that of Iwami Ginzan, and the reliability of

measures to protect the property. Information used in the meetings were given to the ICOMOS expert during his evaluation mission to "Iwami Ginzan" and sent to the ICOMOS headquarters after the mission as well. However, those resources may not have been reflected in the ICOMOS evaluation report because they were not officially submitted through the World Heritage Center.

#### Submission of "Additional Information"

After fieldwork, in mid-December of 2006, the ICOMOS headquarters requested the Government of Japan to submit "Additional Information" including sources of comparative studies with mining sites in other Asian countries including those of Central Asia. As such, the Government of Japan replied to this request before their January 15, 2007 deadline. However, we concluded that there was no sufficient case study example of well-investigated mining site comparable to "Iwami Ginzan"

#### Reports from industrial heritage specialists

When ICOMOS makes an evaluation and recommendation to submit to the World Heritage Committee, the following factors are considered: the evaluation mission reports made by the ICOMOS expert, reports concerning the Outstanding Universal Value of the proposed property submitted by the experts of the ICOMOS Scientific Committee relevant to the proposed property, and evaluation reports concerning the Outstanding Universal Value of the proposed property which are submitted by other non-ICOMOS experts' groups. Taking all of these factors into account, an evaluation and recommendation were adopted by the ICOMOS World Heritage Panel. ICOMOS most likely asked the International Committee for the Conservation of the Industrial Heritage (TICCIH) for its considerations and advice on the evaluation of the Outstanding Universal Value of Iwami Ginzan because ICOMOS has always researched industrial heritage properties in collaboration with TICCIH. When European specialists in this field evaluate industrial heritage, they tend to consider how much influence European Industrial Revolution technology had on each place in the world. However, Iwami Ginzan could not be evaluated from this perspective. Before European technology was introduced to Japan, large quantities of silver ore were successfully obtained from the Iwami Ginzan Silver Mine by combining traditional Asian refining and smelting technology with labor-intensive, small-scale production systems. It was presumed that a European-specialists' perspective could not be applied to the Iwami Ginzan Silver Mine site.

#### Making and Sending "Supplementary Information"

As soon as the Government of Japan received the ICOMOS evaluation report and draft of the recommendation on May 12, the Government of Japan reviewed these documents and prepared "Supplementary Information" for further examination for

the property. Accurate and impartial academic studies are required to evaluate a nominated property for World Heritage inscription. Therefore, we provided specific explanations for each of the 22 points, 4 categories included in the ICOMOS evaluation report. The English version of the "Supplementary Information" consisted of 110 pages. Again, most of the information did not provide any further details other than those shown in the nomination dossier and presented in the fieldwork. I would like to insist that the "Supplementary Information" was compiled in order to confirm the intrinsic value of Iwami Ginzan.

### 2. Recommendations for "deferral" changed to "Inscription"

A. Decision by the World Heritage Committee

The World Heritage Committee began examining Iwami Ginzan in the afternoon of June 28, 2007. After 50 minutes of in-depth discussion, longer than usual, the World Heritage Committee agreed to change the recommendation of "deferral" by ICOMOS to "inscription," and Iwami Ginzan was finally inscribed on the World Heritage List. The members of the Committee indicated that:

- 1) The mining management together with the abundant mountain forests is highly valuable. This demonstrated an important aspect of Outstanding Universal Values of the property.
- 2) The property exhibits remarkable value as a cultural landscape to illustrate the combination of component features of the land-use system, consisting of mining towns, transportation routes, shipping ports, port towns, as well as mining sites, in an environment now concealed with mountain forests. In this respect, Criterion iv) could be applicable to this property besides Criterion iii) and v).
- 3) Iwami Ginzan was the first nominated mining site in the Asian region. It was important to put Iwami Ginzan on the World Heritage List in order to lose regional bias.
- 4) It is not reasonable to ask a State Party to make more comparative studies as requested by ICOMOS because some of these were somewhat impractical.

Taking these points into consideration, the World Heritage Committee decided to inscribe Iwami Ginzan on the World Heritage List and adopted the following decision:

The World Heritage Committee,

(1) Inscribes Iwami Ginzan Silver Mine and its Cultural Landscape, Japan, on the World Heritage List under criteria ii), iii), and v).

#### **Outstanding Universal Value**

Iwami Ginzan Silver Mine pioneered the development of silver mines in pre-

Modern Asia. It had contributed to exchange of values between East and West by achieving the large-scale production of high quality silver through the development of the Asian cupellation techniques transferred from China through Korea and the Japanese unique assemblage of numerous labor-intensive small businesses based upon manual techniques in the 16th century. The exceptional ensemble, consisting of mining archaeological sites, settlements, fortresses, transportation routes, and shipping ports represents distinctive land use related to silver mining activities. As the resource of silver ore was exhausted, its production came to an end, leaving behind, in the characteristically rich nature, a cultural landscape that had been developed in relation to the silver mine.

#### **Criterion ii):**

During the Age of Discovery, in the 16th and early 17th centuries, the large production of silver by the Iwami Ginzan Silver Mine resulted in significant commercial and cultural exchanges between Japan and the trading countries of East Asia and Europe.

#### **Criterion iii):**

Technological developments in metal mining and production in Japan resulted in the evolution of a successful system based on small-scale, labor-intensive units covering the entire range of skills from digging to refining. The political and economic isolation of Japan during the Edo Period (1603 to 1868) impeded the introduction of technologies developed in Europe during the Industrial Revolution and this, coupled with the exhaustion of commercially viable silver-ore deposits, resulted in the cessation of mining activities by traditional technologies in the area in the second half of the 19th century, leaving the site with well-preserved archaeological traces of those activities.

#### Criterion v):

The abundant traces of the silver production, such as mines, smelting and refining sites, transportation routes, and port facilities, that have survived virtually intact in the Iwami Ginzan Silver Mine Site, are now concealed to a large extent by the mountain forests that have reclaimed the landscape. The resulting relict landscape, which includes the surviving settlements of the people related to the silver production, bears dramatic witness to historic land-uses of outstanding universal value.

(2) Recommends that attention is given to putting in place the proposed management arrangements, completing the tourism and interpretation plan, and continuing with conservation work on historic structures.

- (3) Further recommends that a more detained archaeological strategy is developed to address the consolidation of underground remains vis a vis the encroaching tree cover, and the investigation of water pollution, and that strategies to address new motorways and possible clay mining are adopted.
- (4) Also Requests that in accordance with paragraph 147 of the Operational Guidelines, a thematic study of the Iwami site and other mining sites in the region be done in collaboration with such concerned States Parties and the Advisory Bodies.
- B. Background of changing the recommendation of "deferral" by ICOMOS to the decision of "inscription" by the Committee

Up until now I have detailed how Iwami Ginzan was inscribed on the World Heritage List in spite of the original recommendation "deferral" made by ICOMOS. I will now give special prominence to the following four aspects related to this change.

#### Submission of the "Supplementary Information" as academic aspects

After the World Heritage Committee session, some Japanese media reported that Japan's diplomatic pressure, or power, was behind the successful inscription of Iwami Ginzan on the World Heritage List. It is true that there was an effective diplomatic impact. Before and during the World Heritage Committee meetings, the Ministry of Foreign Affairs, the Permanent Delegation of Japan to UNESCO, and the Agency for Cultural Affairs continuously had dialogues with the World Heritage Committee representatives and experts. However, it should be noted that the accurate "Supplementary Information" including academic explanations responding to the items raised by ICOMOS maximized this diplomatic performance.

For only one month after May 12, we cooperated with the Shimane Prefectural Board of Education and the Ohda City Board of Education in preparing the "Supplementary Information" document including additional figures, photographs, and information. The "Supplementary Information" as mentioned above consists of 110 pages in English. We provided precise and detailed information, so that the World Heritage Committee approved of inscription of Iwami Ginzan on the World Heritage List from the scientific point of view. The information sources are the product of many years of academic research on Iwami Ginzan conducted by the Shimane Prefectural Board of Education and the Ohda City Board of Education. These resources show the great effort that the Iwami Ginzan Silver Mine Investigation and Maintenance Committee has made to support the academic research of the property. Without these efforts, Iwami Ginzan would never have been inscribed on the World Heritage List.

#### Requirement of balanced evaluation perspective

It is sometimes pointed out that "the mine living with nature" was the key word to the approval of World Heritage inscription. It is true that Iwami Ginzan was "the mine living with nature" because deforestation within the Ginzan Sakunouchi in Mt. Sennoyama was prohibited; and villages in the surrounding areas supplied charcoal for refining and smelting throughout the mining period. However, this is a small part of the Outstanding Universal Value of the property. The most remarkable point of the value is that the cupellation technique was brought and developed in Iwami Ginzan from the Asian Continent between the 16th and 17th centuries, long before modern industrial technology was introduced to Japan from Europe. Under the laborintensive, small-scale production system, the Iwami Ginzan Silver Mine made up onethird of the world's silver production. In addition, this property represents unique features of land use related to silver production. The sites of fortress are defensive facilities showing the political struggles over the silver mine, the routes and ports were key to the transportation of silver ore, materials, and goods, and the mining towns and port towns are still part of contemporary lives and livelihoods developed from mining enterprises and transportation. The characteristic mountain-forest management system, where nearby villages supplied charcoal for refining and smelting, is one of the distinctive mining management methods in Japan. In other words, Iwami Ginzan should be evaluated in terms of its cultural landscape related to mining and refining, achievement of producing a large amount of silver ore with unique mining and refining techniques and methods of the Asian region, not with innovative technology brought by the European Industrial Revolution. These points are identified in the citations of Criteria ii), iii), and v) applied for justification of the Outstanding Universal Value of the property.

The short-term actions to persuade the members of the World Heritage Committee and to promote inscription were made more effective by the use of a catchphrase, "the mine living with nature," and by focusing on points demonstrating commonly understood values. Simple explanation is the key to understanding. However, focusing exclusively on these commonly understood values would show only a small part of the Outstanding Universal Value of Iwami Ginzan; which would not be precisely evaluated without a balanced explanation.

#### Property that only people with an eye can judge

There are some properties that only people who have an eye for their value can judge. I think that Iwami Ginzan is one of such properties. As shown above, the Shimane Prefectural Board of Education and the Ohda City Board of Education have investigated Iwami Ginzan for many years and have published the results. They invited many researchers, including the specialists of mining and archaeology from Japan and overseas, hosted forums and symposiums, and continued to make efforts to

share the value of Iwami Ginzan with local citizens. Dr. Henry CLEERE, a mining archeologist in the United Kingdom and a long-term former World Heritage Coordinator of ICOMOS, was one of those researchers. Dr. CLEERE is an old friend of Mr. TANAKA Migaku, the former Director-General of the Nara Research Institute of Cultural Properties and the chairperson of the Iwami Ginzan Silver Mine Investigation Maintenance Committee. At the Iwami Ginzan Forum organized in September 1996, Dr. CLEERE made a notable speech for Iwami Ginzan, as a World Heritage candidate based on the in-depth field work, and also contributed to formulate the "Discussion Items and Conclusions" focusing on the Iwami Ginzan Silver Mine at the "International Specialist Seminar Concerning the Outstanding Universal Value and Conservation Management of Mine Sites," organized in June 2005. He is a prominent archaeologist in the United Kingdom and a World Heritage specialist. It was verified that, through his eyes, the value of Iwami Ginzan could meet a world standard. Iwami Ginzan would not have been nominated for World Heritage Listing if Dr. CLEERE, from the United Kingdom, the birthplace of the Industrial Revolution, had strongly considered the impact of technology developing from the Industrial Revolution, had not fairly evaluated traditional mining and refining techniques in the different regions of the world, and had no point of view to judge unique value and assets of the surviving sites. Iwami Ginzan exhibits the property value that only specialists with wide-range viewpoints could see, based on appropriate fieldwork and accurate information.

One of the cultural landscape specialist participating in the 31<sup>st</sup> session of the World Heritage Committee pointed out that both archaeological and cultural landscape perspectives were required to evaluate Iwami Ginzan, and only specialists who had both could make an accurate and fair judgment for the property. He also mentioned that Criterion iv) could be justifiable because Iwami Ginzan had a facet of the cultural landscape model. His indications should be fully considered although he included some different points of view from those in our nomination dossier.

#### How much information is enough to demonstrate value?

The ICOMOS Evaluation Report revealed that ICOMOS did not deny any Outstanding Universal Value of Iwami Ginzan. Acknowledging the potential, ICOMOS indicated that more research was required to demonstrate its value. The point is whether or not the submitted nomination dossier and Additional Iinformation represented enough research results to verify the value. ICOMOS concluded that, in order to illustrate pioneering roles fulfilled at silver mine areas in terms of mining and refining technology developments, more archaeological investigations and comparative studies are needed to show how the mining and refining techniques at the Iwami Ginzan Silver Mine had developed and how each process had an impact outside its own area. However, we argued against ICOMOS as we had already demonstrated that the

mining and refining techniques transferred from the Asian continent had been uniquely developed at the Iwami Ginzan Silver Mine, by comparing and contrasting geographical research results through the topography and fieldwork and extremely precise results of the archeological research that has been undertaken in a carefully-screened, minimized area. It was unfair to request only one State Party for more precise comparative studies because research on mining sites in the Asian region is lacking and it was not feasible to conduct more research.

In this World Heritage Committee session, when the restoration of Mughrabi Ascent in the cultural heritage of "Old City of Jerusalem and Its Wall" was reviewed, the merits and demerits of archaeological excavation were discussed; archaeological excavation was an effective method to find evidence showing the value of the property; however, it might result in losing the value if not properly planned. Also, the World Heritage Committee criticized ICOMOS' unreasonable request of more comparative studies to one State Party. Thus, agreements on archaeological excavation standards and agreements on the extent of comparative studies have not been established.

#### 3. Future points of consideration

The inscription of Iwami Ginzan on the World Heritage List has raised many issues regarding future World Heritage Listing. Finally, I summarize and conclude with the following five key ideas.

A. Trends of ICOMOS evaluation

#### Influence of trends to restrain a new inscription

In 2000, the World Heritage Committee adopted the decision to restrain new inscriptions of nominated properties on the World Heritage List, and since 2004, has limited the annual number of nominations to be examined. Following these resolutions, ICOMOS tended to evaluate nominations more strictly than before, and its attitude most likely influenced the examination for Iwami Ginzan. Mining sites as industrial properties have been discovered throughout the world as well as Asia, and are evaluated by how technological developments resulting from the Industrial Revolution in Europe had affected the properties. There is a possibility that this perspective had a negative impact on the evaluation for Iwami Ginzan. Therefore, it is needed to have a special consideration regarding the points mentioned above when proposing industrial heritage properties for World Heritage inscription.

#### How much comparative study should be demanded?

In general, the essence of value examination is to clarify the assets of concerned properties from a global perspective, based on comparative studies with other similar properties. Therefore, extremely precise comparative studies are necessary. However, as indicated above, there are no other mining sites in Asia, in which many investigations and studies have been undertaken. In spite of this circumstance,

ICOMOS still required more comparative analysis from Japan. The World Heritage Committee requested that a thematic study of Iwami Ginzan and other mining sites in the region be done in collaboration with States Parties concerned. However, a comparative study that a State Party makes for proposing a property for World Heritage inscription is intrinsically distinct from a thematic study that ICOMOS makes from a worldwide viewpoint. When the Government of Japan implements the study requested by the World Heritage Committee, it is important to clarify its distinct responsibility from ICOMOS and conduct research to strengthen Outstanding Universal Value of Iwami Ginzan.

#### **Application of Criterion ii)**

ICOMOS revealed that Criterion ii) would be applied when it was proved that the development of design and technology in a certain area had a significant impact on other regions; however, there was little possibility to illustrate how the cupellation technique used in the Iwami Ginzan Silver Mine had affected other mining sites, so there was much less possibility of applying Criterion ii) than Criteria iii) and v). Criterion ii) is to evaluate the exchange of value between regions during a certain period of time, in terms of architecture, science technology, monuments, city planning, and landscape design, not just economic influence. In other words, in the case of a mining site, Criterion ii) could not be applied unless exchange of value in terms of a mining principle and tradition is demonstrated. If so, how could exchange of value between the West and the East that resulted from circulating money minted of the silver ore in the Iwami Ginzan Silver Mine be evaluated as an aspect of a World Heritage property? There is no way to clarify how Iwami Ginzan affected the exchange of value except for demonstrating that the Iwami Ginzan Silver Mine is the only site to show the unique mining technology that resulted in exchange of value between the West and the East.

# B. Nomination dossier based on the international agreement: The International Specialist Seminar

As indicated above, at the "International Specialist Seminar" organized in June 2005 before submitting the nomination dossier to the World Heritage Centre, specialists in this field discussed Outstanding Universal Values and preservation and conservation management of mining sites\*2. Justification of the Outstanding Universal Value of Iwami Ginzan to be represented in the nomination dossier, and application of criteria and their citations for World Heritage inscription were finalized based on the items agreed to at the Seminar. On the basis of an indication at this Seminar, the proposed title of the nomination was changed from the "Iwami Ginzan Silver Mine" to the "Iwami Ginzan Silver Mine and its Cultural Landscape." Thus, all efforts were made to reach agreement among the participants.

However, as shown in the ICOMOS evaluation and recommendation, there was a big gap in evaluation perspectives between ICOMOS and Japan. Although it is not easy to make the gap smaller, more efforts are required to reach mutual understanding and agreement.

#### C. Understanding of "not all nominations are inscribed"

More discussions are required as to whether or not it is adequate to tend to restrain new inscriptions, such as the limited annual number of nominations to be examined. It is natural that the number of nominations increases because of the expansion of the fields of properties that may have Outstanding Universal Value. However, the World Heritage Committee keeps a position on choosing a typical or representative case and strictly defining the Outstanding Universal Value of a concerned property although an evaluation viewpoint of a State Party is not necessarily consistent with the World Heritage Committee. ICOMOS used to recommend "inscription" on the World Heritage List for all cultural properties which the Government of Japan had nominated, and the World Heritage Committee had decided "inscription" of all of them on the List, based on the ICOMOS' recommendation. Hereafter, it may need to be recognized that not all nominations are inscribed on the World Heritage List.

#### D. How to evaluate mining sites in Japan

In a thematic study which should be conducted in collaboration with State Parties concerned and the Advisory Bodies, based on the request by the World Heritage Committee, a discussion including integration of properties in multiple countries in terms of representation and typicality may be needed as comparative research with other mining sites in Asia is carried out. To make this possible, comparative studies with other mining sites within the country are deepened, the diffusion process of characteristic technology throughout Asia is considered, and a viewpoint of property integration and choice is developed. We need this point of view in order to proceed with the investigations, and these investigations are an aspect of strengthening the Outstanding Universal Value of Iwami Ginzan.

Recently, Japan has nominated "Hiraizumi – Cultural Landscape Associated with Pure Land Buddhism Cosmology," for World Heritage inscription and the ICOMOS expert completed the on-site evaluation mission between August 26 and August 30, 2007. Based on the lessons learned from the process of evaluation and examination of Iwami Ginzan, the Government of Japan will need to make every possible effort to promote the World Heritage inscription by providing appropriate information to ICOMOS.

This is a revised version of "A Review of the Evaluation of "Iwami Ginzan Silver

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- \*1) UNESCO World Heritage Center. http://whc.unesco.org
- \*2) Gekkan Bunkazai, the Feburary 2006 number 509. Daiichi Houki

## Main points in the observations by ICOMOS

		1	
Authenticity	The boundaries of ports and	The flanking ranges (mountainside forests) surrounding the settlement of the Omori-Ginzan District are not included in the boundary of the property.	
	settlements are insufficient.	The historic landing area (mooring place) of the harbour in the Yunotsu District is excluded from the boundary of the nominated property.	
	The "kaido" in particular has a fragmentary authenticity.	Sections of the historic routes ("kaido") that were dug up in later eras and have consequently lost their original surface cannot be designated as national Historic Sites and therefore were excluded from the boundary of the nominated property.	
	There is not enough information about the groups of buildings in the settlements at the height of mining activity.	Many of the settlement buildings date from periods after the height of mining activity. The authenticity of the property is consequently diminished.	
Comparative analysis	There is not enough information on studies involving comparison with other historical mine in other countries in the same geo-cultural region.	There has apparently not been any studies involving comparison with other historical mines in Central and East Asia.	
	There is not enough evidence of the relationship between the characteristics of the method of cupellation "haifuki" and the propery.	No material evidence is provided to demonstrate how cupellation (haifuki) arrived and spread in Japan, and there is no description of the origins of the technology used in Japan or its relationship with the cupellation method known of in the West in ancient times.	
property	The nomination dossier does not justify the Outstanding Universal Value.	Criterion ii) The nomination dossier does not present detailed evidence showing how the Iwami Ginzan Silver Mine exhibits an important interchange of human values over a span of time in both the same geo-cultural region in question and the entire world.	
		Criterion iii) There must be more detailed research to justify that the property is unique or at least exceptional testimony to a cultural tradition or civilization which has disappeared.	
		Criterion v)  There is a need for more detailed research to show how the mining activity formed an outstanding landscape, and to justify that the property is an outstanding example of traditional human settlements or interaction with the environment.	

Factors affecting the property	Pollution due to mining activity	The nomination dossier does not present the current levels of cadmium and other heavy metals as well as lead and zinc, which are potentially hazardous elements.	
	Vacant houses in settlements	This is an issue viewed from the standpoints of preservation of the settlements, and vitality and sustainability of the local society.	
	Influence of tree roots on relict features	The nomination dossier must present measures for stronger protection of the relict features (underground structures and masonry retaining walls), which are being penetrated by proliferating tree roots, as well as management guidelines and methodology for observation of progress.	
	Modern structures	The port areas have undergone alteration because of modern facilities such as concrete piers and wharves.	
	Extraction of clay for roof tiles	Strategy must be presented for the risk in the buffer zone.	
	Motorways	There is a need for additional information.	
	Repair and restoration of buildings and structures	There are structures in danger of collapse in the Yunotsu District and others in need of repair in the Tomogaura District. Stone stairs on the historical route of the "kaido" require repair. There is also a need for monitoring of the condition of masonry features.	
	Monitoring	It is necessary to prepare plans for proactive and regular monitoring to replace the optimistic monitoring arrangements presented in the nomination dossier.	
	Plan for excavation study	The nomination dossier must present detailed strategy for excavation studies, in relation to justifying the value of the property.	
	Decision-making process	There are some apprehensions that the procedure for adjustments regarding the operation is complex, and will hinder the unity and effectiveness of decision-making. There are also apprehensions that the setup for management will function only after inscription of the property on the World Heritage List.	
	Tourism plans	There is a need for the formulation of strategy for proper management of tourism, inclusive of draw and accommodation capacity, transport, and circulation.	
	Forest plans	The nomination dossier must present perspectives on the management of natural changes affecting the forested landscape and on changes induced in regard to proper understanding of the fossil landscape related to mining.	
	Other issues	The nomination dossier must present perspectives on the negative impacts by the power poles and cabling, the rise in sea-level due to climate change, and the risk-preparedness for earthquakes.	