

The Role of Environmental NGOs in the EIA Process in Japan

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Research Summary

This study examines the roles of environmental non-governmental organisations in Japan's Environmental Impact Assessment process following the full implementation of the Japanese EIA Law in 1999.

The new law broadened opportunities for public participation by allowing anyone with an interest in environmental conservation to submit opinions, regardless of place of residence. Although environmental NGOs were therefore expected to become more actively involved in EIA, there had been little empirical research on the roles they actually performed or the difficulties they encountered in practice.

The study uses the Awase Tidal Flats Reclamation Project in Okinawa City as its case study. The Awase Tidal Flats provided an important habitat for migratory shorebirds and diverse marine species. The proposed project involved the reclamation of approximately 187 hectares by a central government agency and Okinawa Prefecture for future urban development. The map included in the paper shows the location of the Awase Tidal Flats, Nakagusuku Bay, nearby reclaimed areas, and the proposed reclamation sections.

The study established three hypothetical roles for environmental NGOs in the EIA process:

Watchdogs, monitoring the quality of baseline surveys, environmental predictions and impact evaluations, as well as whether the EIA process was properly conducted.

Providers of information, supplying project proponents, government bodies, residents and other interested parties with local ecological knowledge and environmental data accumulated through independent research and long-term activities.

Pressure groups, urging proponents and decision-makers to address deficiencies in the EIA, undertake further investigation, reconsider the project and give greater attention to environmental protection.

The research combined a detailed literature review, analysis of EIA and project documents, searches of local and national news sources, and unstructured interviews with project proponents,

Okinawa Prefecture officials, five local NGOs, two national NGOs, researchers and experts. Activities undertaken between 1987 and 2001 were reconstructed chronologically to identify the roles of different actors before, during and after the formal EIA process.

The findings showed that local environmental NGOs possessed considerable technical expertise and valuable local environmental knowledge. For example, while the draft Environmental Impact Statement identified only 18 shellfish species, an independent survey by the Ryukyu Wetland Study Group identified 72 species. After these and other findings became publicly known, the proponents conducted a more comprehensive survey and ultimately identified more than 210 shellfish species, including 25 endangered species.

This demonstrated that environmental NGOs could serve both as watchdogs reviewing the credibility of the proponent's assessment and as providers of scientifically relevant local information. NGOs also questioned the omission of additional survey results from the final EIS and monitored the environmental committee established to examine the relocation of threatened marine plants.

However, the NGOs did not provide most of their information to the proponents through the formal EIA procedure within the legally prescribed timeframe. With the exception of one organisation, they missed the formal opportunity to comment on the draft EIS. Their findings were instead communicated later through a member of the Okinawa Prefectural Assembly and the media.

Although these activities stimulated public discussion and encouraged additional surveys, the late submission of information limited its influence within the formal EIA decision-making process. The study therefore concluded that the NGOs did not adequately fulfil the role of providers of information within the EIA procedure.

Cooperation among environmental NGOs also developed relatively late. Local NGOs formed a stronger network only during the reclamation-permission stage and later cooperated with national organisations such as the Japan Wetland Network and WWF Japan. Together, they approached central government ministries, requested reconsideration of the project and called for the EIA to be repeated.

The NGOs also collected approximately 10,000 signatures in support of a local referendum—more than five times the number legally required. Nevertheless, the Okinawa City Assembly rejected the proposed referendum ordinance. While these activities contributed to greater public awareness and may have influenced the postponement of the reclamation work, the network was formed too late to maximise NGO influence during the main EIA stages.

The study also identified serious shortcomings in the proponent's approach to information disclosure. The draft and final EIS documents were approximately 1,000 pages long, difficult to access and difficult for non-specialists to understand. Opportunities to photocopy or borrow the documents were severely restricted. This lack of openness weakened public trust and limited the ability of residents and NGOs to participate meaningfully.

Overall, the environmental NGOs performed the three proposed roles only partially. Their effectiveness was constrained by limited understanding of the EIA procedure and its deadlines, the late establishment of cooperative networks, and inadequate access to EIA documentation.

The study concludes that environmental NGOs should establish local, national and international networks at an early stage, coordinate their limited human and financial resources, and submit accumulated environmental information through the formal EIA process within the prescribed timeframe.

At the same time, proponents should provide EIA documents in a more open, transparent and accessible manner. Better information disclosure would enable local knowledge to be incorporated into the assessment, strengthen community trust and accountability, and support more meaningful public participation.

The central message of the study is that scientific expertise and commitment alone are not sufficient for effective NGO participation. Environmental NGOs can contribute fully to better environmental decision-making only when technical knowledge is combined with procedural understanding, timely participation, early networking and transparent access to information.