Mr. Peter GERSTMANN,
Managing Director,
JBG Power GmbH and JBG Energy Japan
Kurfürstendamm 52,
10707 Berlin,
GERMANY.

Request for conservation of the biodiversity in tidal flats at Hachi-no-higata, Takehara City, Hiroshima Prefecture, Japan

Dear Mr. GERSTMANN,

The decrease in natural tide flats and decline in the biodiversity of coastal organisms that live in these habitats have been accelerated during the last 50 years in Japan. A large number of these organisms are endangered or have been made extinct in many of the tidal flat areas.

The tidal flats at Hachi-no-higata in Takehara City, Hiroshima Prefecture, Japan (facing the Seto Inland Sea) have miraculously maintained rich natural tidal flat environments, and thus Hachi-no-higata is one of the most significant hot spots for the conservation of the biodiversity of coastal organisms in Japan. More than 70 species — listed in the latest Red List issued by the Japanese Ministry of the Environment (2020), and latest Red Data Book of Hiroshima Prefecture (2011) — currently inhabit the tidal flats or the adjacent sea areas: among them, 16 species are designated as critically endangered or endangered, 19 as vulnerable, and 39 as near-threatened. The IUCN (International Union for the Conservation of Nature) Horseshoe Crab Specialist Group maintains that the Hachi-no-higata is a very important habitat, particularly because it represents the northernmost and easternmost distribution limit of the crab species *Tachypleus tridentatus*, which has been classified as endangered by the IUCN not only in Japan, but in the world. In line with the significance for the conservation of biodiversity, the tidal flats and neighboring waters have been included by the Japanese Ministry of the Environment among the Important Wetlands with High Biodiversity, and Important Marine Areas with High Biodiversity, respectively. (http://www.env.go.jp/en/nature/biodic/kaiyo-hozen/kaiiki/index.html).

Because of its rich biodiversity, Hachi-no-higata attracts both domestic and foreign researchers from prestigious institutions such as the universities of Hiroshima, Hokkaido, Kyoto, Okayama, Kochi, Kyusyu, the Japanese National Museum of Nature and Science, and the Alfred-Wegener-Institut, Helmholtz-Zentrum für Polar- und Meeresforschung. Over 20 scientific studies investigating this ecosystem have been recently published.

Additionally, Hachi-no-higata has been designated by administrative bodies of Hiroshima Prefecture and Takehara City as a destination for students and local people to learn and appreciate the environmental dynamics of the tidal flats and its neighboring seas.

The site for the LNG power plant, recently proposed by your companies, is adjacent to the tidal flats, and the massive sea-based facilities that are to be constructed have the potential to disrupt the natural equilibrium in this region, producing the following negative impacts on the delicate tidal flat ecosystem and on its many endangered organisms:

- The discharge and accumulation of sand, mud, silt and hazardous substances during the construction will impede the feeding and reproductive activities of marine organisms, leading to a decrease in their populations.
- 2: Marine non-indigenous invasive organisms will be introduced via hull-fouling occurring on ocean-going LNG carriers and coastal barges that will visit the area during construction operations, and this will decrease the populations of indigenous threatened organisms through competitive exclusion or predation.
- 3: The discharge of cooling water, if any, which is used in the closed cooling system and will contain hazardous substances, has negative effects on the endangered organisms.
- 4: The ocean-going LNG carriers, with their lengths of ca. 250 m, the LNG floating storage barge, which is 120 m long and 50 m wide, and the landing piers with lengths of over 500 m, will most likely change the direction and volume of tidal streams, coastal flows and discharge from the Kamogawa River, which flows into Hachi-no-higata. As a result, this will cause a severe loss of the balance between the erosion and deposition of sand, mud and silt on the tidal flats, as well as changes in the composition of grain size in the tidal flat substrata, which will inevitably affect the distribution and density of organisms living on and in the tidal flats. For instance, siltation on the substrata will decrease the number or area of spawning sites for horse shoe crabs, which lay eggs on a restricted substratum consisting of sand with a grain size (diameter) between 0.4 and 1.0 mm.
- 5: Mooring of the huge LNG carriers and storage barge in the shallow coastal area will inevitably cause frequent dredging, resulting in the loss of balance between the erosion and deposition of sand, mud and silt on the tidal flats.
- 6: The potential occurrence of marine accidents, such as grounding of the carriers, will severely damage the shallow water ecosystems, including Hachi-no-higata and the adjacent sea areas.

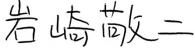
Nevertheless, your companies' construction works are about to be started without a proper environmental impact assessment.

We would strongly urge you to consider that

- 1: scientifically valid environmental impact assessment should be conducted to thoroughly evaluate the impacts of this construction on many endangered and rare species,
- 2: the results of the assessments should be disclosed and evaluated by specialists from a variety of fields, including coastal engineering, hydraulics, conservation biology, benthology and planktology, and
- 3: this plan should be reconsidered or cancelled, if detrimental effects on endangered and rare species are confirmed as likely.
- 4: you should respond to our requests in writing as soon as possible.

We would expect you to exercise your own judgment while considering the challenge of preserving the precious biodiversity of the Hachi-no-higata tidal flats and adjacent sea areas. We believe that an objective judgment on this matter will lead to the correct decision, in line with the current international policy of Sustainable Development Goals (SDG's).

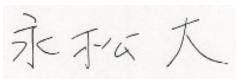
Sincerely,



Keiji IWASAKI, Chairperson of the Committee for the Conservation of Biodiversity, the Malacological Society of Japan, Professor of Nara University, Dr.



Yuji ANKEI, Chairperson of the Committee for Conservation for the Natural Environments, the Society for the Study of Molluscan Diversity, Professor Emeritus of Yamaguchi Prefectural University, Dr.



Gento Shinohara

Minichi Sato

Dai NAGAMATSU, President of the Chugoku-Shikoku Branch of the Ecological Society of Japan, Professor of Tottori University, Dr.

Gento SHINOHARA, President of the Ichthyological Society of Japan,

Senior Curator of the National Museum of Nature and Science, Dr.

Shinichi SATO, Chairperson of the Committee for Conservation of Natural Environment,

The Japanese Association of Benthology, Professor of Shizuoka University, Dr.

Persons to contact:

Keiji IWASAKI,

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Gyo ITANI,

Member of the Nature Conservation Committee, the Chugoku-Shikoku Branch of the Ecological Society of Japan,

Faculty of Education, Kochi University, 2-5-1 Akebono, Kochi 780-8520, Japan E-mail: itani@kochi-u.ac.jp

Enclosed: Photographs of tidal flats at Hachi-no-higata, and a list and photographs of threatened species living in the tidal flats.

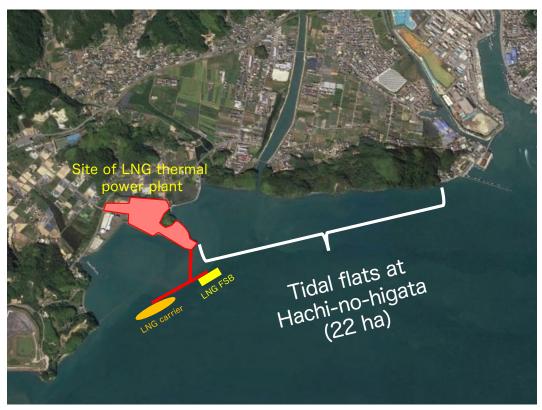
Reference material



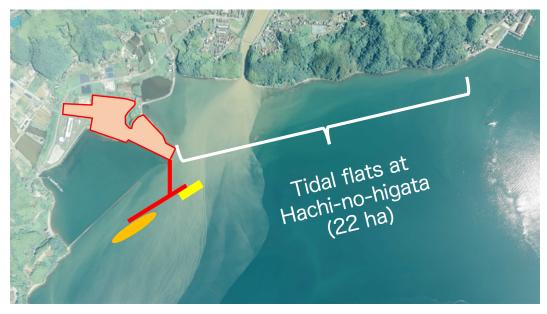
Phot I Tidal flats at Hachi-no-higata (view from land).



Phot 2 Tidal flats at Hachi-no-higata (view from Hachi-iwa reef).



Phot 3 Planned locations for LNG thermal power plant, landing piers, LNG carrier and LNG floating storage barge (FSB) (drawing on an aerial photography from Google Earth).



Phot 4 Planned locations for LNG thermal power plant, landing piers, LNG carrier and LNG floating storage barge (FSB) (drawing on an aerial photography, courtesy of Geospatial Information Authority of Japan).

Table I. Threatened animals living in or near the Hachi-no-higata Tidal Flats and listed in the Red List 2020 of the Japanese Ministry of Environment (JMERL), Red List of Marine Organisms of JME (JMERL,*), and Red Data Book 2011 of the Hiroshima Prefecture (HiroshimaRDB). CR+EN: critically endangered or endangered, VU: vulnerable, NT: near threatened, DD: Data Deficient, NA: need attention, ©: the species whose type locality is Hachi-no-higata. The species with underlined bold letters indicate that their photographs are in the reference material. The period of investigation from 2004 to 2020.

CR+EN	HiroshimaRDB CR+EN	Taxon Fish	Scientific name Taenioides cirratus (Blyth, 1860)
		Fish	
CR+EN CR+EN	NT		Gymnogobius scrobiculatus (Takagi, 1957)
	-	Fish	Anguilla japonica Temminck & Schlegel, 1847
CR+EN	CR+EN	Horseshoe crab	<u>Tachypleus tridentatus (Leach. 1819)</u>
CR+EN	NA	Lugworm	Chaetopterus cautus Marenzeller, 1879
CR+EN		Snail	Paratectonatica tigrina (Röding, 1798) ○
CR+EN	_	Snail	Reticunassa hiradoensis (Pilsbry, 1904)
CR+EN	_	Snail	Amathina tricarinata (Linnaeus, 1767)
CR+EN	_	Clam	<i>Tegillarca granosa</i> (Linnaeus, 1758) ○
CR+EN	_	Clam	Pegophysema bialata (Pilsbry, 1895)
CR+EN		Clam	
	·····		Borniopsis ariakensis Habe, 1959
CR+EN		Clam	<u>Devonia semperi (Ohshima, 1930)</u>
CR+EN		Clam	<u>Platomysia rugata Habe. I 95 L</u>
CR+EN		Clam	Basterotia gouldi (A. Adams, 1864)
CR+EN	CR+EN	Flatworm	Ectoplana limuli (lijima & Kaburaki, 1916)
VU	_	Fish	Pseudogobius masago (Tomiyama, 1936)
VU*	NT	Lancelet	Branchiostoma japonicum (Willey, 1897)
VU	NT	Crab	<u>Uca lactea (de Haan, 1835)</u>
	~~~		
VU	NA	Snail	Cipangopaludina cf. laeta (Martens, 1861)
VU	_	Snail	<u>Finella pupoides A. Adams. I 860</u>
VU	_	Snail	Stosicia annulata (Dunker, 1860)
VU	_	Snail	Assimineidae gen. sp.
VU	·····	Snail	Naticarius concinnus (Dunker, 1860)
VU		Snail	Melanella tanabensis Takano, Tanaka & Kano, 2019
		*****************************	
VU		Snail	Mucronalia exilis A. Adams. 1862
VU	_	Snail	Engina menkeana (Dunker, 1860)
VU		Snail	Syrnola tenuisculpta (Lischke. 1872)
VU		Snail	Melanochlamys fukudai Cooke. Hanson. Y. Hirano. Ornelas-Gatdu
٧٠		JIIdii	Gosliner. Chernyshev & Valdés. 20 I 4
VU	_	Snail	Cvlichnatvs vamakawai (Yokovama, 1920)
VU	_	Clam	Fragum carinatum (Lynge, 1909)
VU	_	Clam	Borniopsis tsurumaru Habe. 1959
VU		Clam	
			Thracia concinna Reeve, 1859
VU		Clam	<u>Solen kikuchii</u> Cosel. 2002
NT	NT	Fish	Hyporhamphus intermedius (Cantor, 1842)
NT	NT	Fish	Periophthalmus modestus Cantor, 1842
NT*	_	Spoon worm	Sipunculus nudus Linnaeus, 1766
NT*	_	Spoon worm	Siphonosoma cumanense (Keferstein, 1867)
NT*	NIT	*************************	
	NT	Spoon worm	<u>Ikeda taenioides (Ikeda. 1904)</u>
NT*		Spoon worm	Arhynchite hayaoi Tanaka & Nishikawa, 2013 ◎
NT*	_	Spoon worm	<i>Ikedosoma gogoshimense</i> (Ikeda, 1904)
NT	_	Snail	Patelloida conulus (Dunker, 1861)
NT	_	Snail	Umbonium moniliferum (Lamarck, 1822)
NT	_	Snail	Plesiothyreus sp.
NT		Snail	Batillaria multiformis (Lischke, 1869)
NT			
		Snail	<u>Vitrinella sp.</u>
NT	_	Snail	Nozeba ziczac (H. Fukuda & Ekawa. 1997)
NT		Snail	Voorwindia cf. paludinoides (Yokoyama, 1927)
NT	_	Snail	Cryptonatica adamsiana (Dunker, 1860)
NT	—	Snail	Eunaticina papilla (Gmelin, 1791)
NT		Snail	Gennaeosinum bathyraphe (Pilsbry, 1911)
NT			
		Snail	Nassarius livescens (Philippi, 1849)
NT	_	Snail	Hemifusus tuba (Gmelin, 1791) ○
NT	_	Snail	<u>Pvrgulina shiqeyasui (Yokoyama, 1927)</u>
NT	_	Snail	Tiberia dunkeri (Dall & Bartsch, 1906)
NT	_	Snail	Turbonilla scrobiculata Yokoyama, 1922
NT		Snail	Turbonilla kuraenohamana Hori & H. Fukuda, 1999
NT		Snail	<u>Turbonilla teganumana Yokoyama. 1922</u>
NT		Snail	Laemodonta exaratoides Kawabe, 1992
NT		Clam	Solemya pusilla Gould. 1861
		Clam	Atrina japonica (Reeve, 1858)
NT			Pinna attenuata Reeve. 1858
NT		Clam	
NT NT			
NT NT NT		Clam	Mactrotoma angulifera (Reeve, 1854)
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NT NT NT NT NT		Clam Clam Clam	<u>Mactrotoma angulifera (Reeve. 1854)</u> Nipponomysella subtruncata (Yokoyama, 1927) <u>Peregrinamor ohshima</u> i Shôji, 1938
NT NT NT NT NT NT		Clam Clam Clam Clam	Mactrotoma angulifera (Reeve. 1854) Nipponomysella subtruncata (Yokoyama, 1927) Peregrinamor ohshimai Shôji. 1938 Pseudogaleomma japonica (A. Adams, 1862) Coecella chinensis (Deshayes, 1855)
NT NT NT NT NT NT NT NT		Clam Clam Clam Clam Clam Clam Clam Clam	Mactrotoma angulifera (Reeve. 1854) Nipponomysella subtruncata (Yokoyama, 1927) Peregrinamor, ohshimai Shôji, 1938 Pseudogaleomma japonica (A. Adams, 1862) Coecella chinensis (Deshayes, 1855) Nitidotellina hokkaidoensis (Habe, 1961)
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NT N	VU	Clam Clam Clam Clam Clam Clam Clam Clam	Mactrotoma angulifera (Reeve, 1854) Nipponomysella subtruncata (Yokoyama, 1927) Peregrinamor, ohshimai Shôji, 1938 Pseudogaleomma iaponica (A. Adams, 1862) Coecella chinensis (Deshayes, 1855) Nitidotellina hokkaidoensis (1861) Nitidotellina minuta (Lischke, 1872) Solen roseomaculatus Pilsbry, 1901 Mya japonica Jay, 1857 Dolicrossea sp. Neophocaena phocaenoides (G. Cuvier, 1829) Ammodytes personatus Girard, 1856
NT		Clam Clam Clam Clam Clam Clam Clam Clam	Mactrotoma angulifera (Reeve. 1854) Nipponomysella subtruncata (Yokoyama, 1927) Peregrinamor, ohshimai Shōji, 1938 Pseudogaleomma japonica (A. Adams, 1862) Coecella chinensis (Deshayes, 1855) Nitidotellina hokkaidoensis (Habe, 1961) Nitidotellina minuta (Lischke, 1872) Solen roseomaculatus Pilsbry, 1901 Mya japonica Jay, 1857 Dolicrossea sp. Neophocaena phocaenoides (G. Cuvier, 1829)

Photos of threatened animals living on or in tidal flats at Hachi-no-higata (No. I). CR + EN: critically endangered or endangered by the Red List 2020 of the Japanese Ministry of Environment.



Photo 5 Horse shoe crab Tachypleus tridentatus (CR+EN)



Phot 6 Nassariid snail *Reticunassa* hiradoensis (CR+EN)

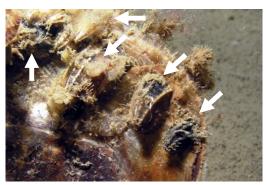


Photo 7 Amathinid snail *Amathina tricarinata* (CR+ EN)



Photo 8 Lucinid clam *Pegophysema* bialata (CR+EN)



Photo 9 Lasaeid clam *Borniopsis* ariakensis attached to a sea cucumber

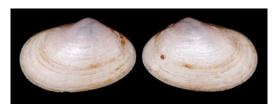


Photo IO Lasaeid clam *Borniopsis* ariakensis (CR+EN)



Photo II Lasaeid clam *Devonia semperi* (CR+EN) attached to a sea cucumber



Photo I2 Lasaeid clam *Devonia semperi* (CR+EN)



Photo I 3 Lasaeid clam *Platomysia rugata* (CR+EN) attached to a sipunculid worm



Photo I5 Basterotiid clam *Basterotia* gouldi (CR+EN)



Photo 17 A crowd of the fiddler crab  $Uca\ lactea\ (VU)$ 

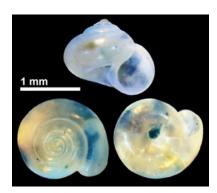


Photo I9 Assimineid snail Assimineidae gen. sp.(VU)



Photo I 4 Lasaeid clam *Platomysia rugata* (CR+EN) attached to a sipunculid worm



Photo 16 Branchiostomid lancelet Branchiostoma japonicum (VU)



Photo 18 Scaliolid snail *Finella pupoides* (VU)



Photo 20 Naticid snail *Naticarius concinnus* (VU)

Photos of threatened animals living on or in tidal flats at Hachi-no-higata (No. 3). VU: vulnerable by the Red List 2020 of the Japanese Ministry of Environment.



Photo 21 Eulimid snail *Melanella tanabensis* (VU)



Photo 22 Eulimid snail Mucronalia exilis (VU)



Photo 23 Pyramidellid snail *Syrnola* tenuisculpta (VU)



Photo 24 Aglagid sea slug *Melanochlamys* fukudai (VU)



Photo 25 Cylichnid snail *Cylichnatys* yamakawai (VU)



Photo 26 Lasaeid clam *Borniopsis tsurumaru* (VU)



Photo 27 Lasaeid clam *Borniopsis* tsurumaru (VU)

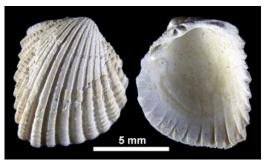


Photo 28 Cardiid clam *Fragum carinatum* (VU)

Photos of threatened animals living on or in tidal flats at Hachi-no-higata (No. 4). VU: vulnerable, NT: near threatened by the Red List 2017 for Marine Organisms and Red List 2020 of the Japanese Ministry of Environment.



Photo 29 Thraciid clam Thracia concinna (VU)



Photo 30 Solenid bivalve Solen kikuchii (VU)



Photo 31 Proboscis of Sipunculid worm *Ikeda taenioides* (NT)



Photo 32 Trochid snail *Umbonium* moniliferum (NT)



Photo 33 Tornid snail Vitrinella sp. (NT)



Photo 34 Elachisinid snail Nozeba ziczac (NT)



Photo35 Pyramidellid snail *Pyrgulina* shigeyasui (NT)



Photo 36 Pyramidellid snail *Turbonilla* scrobiculata (NT)

Photos of threatened animals living on or in tidal flats at Hachi-no-higata (No. 5). NT: near threatened by the Red List 2020 of the Japanese Ministry of Environment.



Photo 37 Pyramidellid snail *Turbonilla teganumana* (NT)



Photo 39 Solemyd bivalve *Solemya pusilla* (NT)



Photo 41 Pinnid bivalve *Pinna attenuate* (NT)



Photo 43 Lasaeid bivalve *Peregrinamor* ohshimai (NT) symbiotic with a mud shrimp



Photo 38 Mactrid bivalve *Mactrotoma* angulifera (NT)



Photo 40 Solemyd bivalve *Solemya pusilla* (NT)



Photo 42 Pinnid bivalve *Pinna attenuate* (NT)



Photo 44 Solenid bivalve *Solen roseomaculatus* (NT)

Photos of threatened animals living on or in tidal flats at Hachi-no-higata (No. 6). NT: near threatened by the Red List 2020 of the Japanese Ministry of Environment.



Photo 45 Tellinid clam *Nitidotellina* minuta (NT)



Photo 46 Solenid clam *Solen roseomaculatus* (NT)

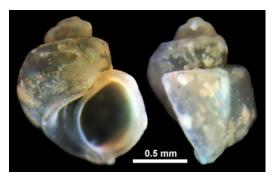


Photo 47 Elachisinid snail *Dolicrossea* sp. (DD)

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