



Freshwater Fish Specialist Group

IUCN SSC/WI Freshwater Fish Specialist Group
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Dear Yoji,

I would be grateful if you could forward this letter to the relevant government officials of Kyoto Prefecture and Kameoka City who are planning the development of the football stadium adjacent to one of only three remaining habitats of a species of freshwater fish, *Parabotia curtus* (previously known as *Leptobotia curta*).

I am writing as a representative three international groups concerned with the conservation and management of freshwater ecosystems and their fishes. I am the Technical Officer for the Freshwater Fish Specialist Group (FFSG) coordinated by IUCN's Species Survival Commission and Wetlands International; in that role I provide assistance to the Global Chair of the group, Dr. Richard Sneider. I am also the co-chair of the Freshwater Task Force of IUCN's World Commission on Protected Areas (WCPA), and I am co-chair of the Freshwater Ecosystem Change Working Group of GEO BON (Group on Earth Observations - Biodiversity Observation Network).

As representatives of FFSG, both Richard Sneider and I are very concerned about the threats posed to *Parabotia curtus* by the development of the football stadium. This species is listed in the Japan Red List as Critically Endangered (CR) – the highest level of threat accorded to a species, following the globally recognized criteria and categories for the threat of extinction defined by IUCN. While the species is listed as Data Deficient in the global Red List, this assessment dates from 1996 and is therefore certainly not as up-to-date as the Japan Red List. I have personally been in communication with Dr. Natori and his colleagues to find funding for us to update the fish assessments global Red List with the more recent, correct information provided in the Japan Red List. I must emphasize that you should consider *Parabotia curtus* to be critically endangered of extinction globally – hence, any threat, however small, to its already restricted distribution, is extremely serious. Moreover, any increase in threat would be in contradiction of the globally recognized Aichi Biodiversity target 12 that “by 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.”

Because of the conservation status of this species, the location where it is found in the vicinity of the proposed football stadium should qualify as a ‘key biodiversity area’. These key biodiversity areas (KBAs) are internationally recognized as “sites that contribute significantly to the global persistence of biodiversity” and are critical components of future planning for Protected Areas around the world. Aichi Biodiversity target 11 emphasizes the importance of conserving “areas of particular importance for biodiversity and ecosystem services ... through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures.” Several of my colleagues from FFSG and the IUCN-WCPA Freshwater Task Force were present at the 2014 World Parks Congress in Australia and an important message that has come out of the Congress is that “global protected areas should include a specific focus on coverage and management of freshwater ecosystems.” There is a global interest in doing a better job at effectively protecting freshwater ecosystems that have special biological importance – such as the habitat for *Parabotia curtus*. I would urge the decision-makers to think very carefully about any infrastructure development close to a region that evidently qualifies as a key biodiversity





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area. Even if the site itself was declared a protected area or a “sanctuary,” it is impossible to predict the potential effects of major infrastructure development right next to it. Under such circumstances, it is wise to show precaution. Indeed, the ‘Precautionary Principle’ is adopted by IUCN in its recommendations for ecosystem conservation and management. IUCN publications state that this precautionary principle should be applied in circumstances where there are reasonable grounds for concern that an activity may cause harm to the environment but where there is uncertainty about the probability of the risk and the degree of harm.

Colleagues of mine in GEO BON, as well as colleagues in the Scientific and Technical Review Panel of the Ramsar Convention on Wetlands of International Importance, are doing a good work to show that urban wetlands can be flagships for conservation in the public community. However, wetland conservation, particularly in sensitive urban areas where habitats are already modified, requires careful planning and a broad, ‘landscape approach.’ This includes an understanding that protection of critical habitats must be buffered beyond their natural borders, to allow for adaptation to future change (whether it be human modifications outside the habitat borders, or climate change). My colleagues in the GEO BON Freshwater Ecosystem Change are currently showing that progress towards meeting our obligations to conserve freshwater biodiversity is dependent on careful monitoring of the existing status of our freshwater ecosystems, and use of that information to plan forwards. I believe that we must do more monitoring of *Parabotia curtus* and its habitat, before we can safely decide that infrastructure development right next to their habitat would not affect their population status.

The issue of the development of the football stadium adjacent to one of the last known breeding ground of *Parabotia curtus* is evidently a point of great regional conservation importance. It does, after all, represent a threat that could cause the extinction of a species. However, if the right conservation decisions are made early on, then this could be a model to demonstrate how sensible, local, and regional decision-making can lead the way for global policy, addressing globally endorsed protocols and targets for conservation and sustainable management of our resources. I urge you to do the right thing by not developing this football stadium at this site.

Sincerely,

Ian Harrison

