

December 6 2016

Thomas Bach
President
International Olympic Committee
Château de Vidy
1007 Lausanne Switzerland

An Open Letter to the International Olympic Committee

Dear Mr. Bach:

Re: Risk of illegal and unsustainable tropical timber use for the Tokyo 2020 Olympics

We, the undersigned organizations, are writing to express our grave concern about the social and environmental footprint of the Tokyo 2020 Olympics and related construction projects. There is a high risk that Tokyo's new Olympic National Stadium and other projects planned for the Olympic Games will use illegal and unsustainable tropical timber from the endangered rainforests of Malaysia and Indonesia, with devastating consequences for biodiversity, climate change, and local communities who have rights to and rely on the forests for their livelihoods. Efforts by the Japanese Government and the Tokyo Olympic organizersⁱ to mitigate these serious risks have been woefully inadequate. We urge the International Olympic Committee (IOC) to take immediate action to ensure the sustainability aspirations of the Olympics are met and the timber used for Olympic construction does not leave a legacy of human rights violations and environmental devastation.

Despite Japan's commitment to make the Tokyo 2020 Games sustainable and environmentally friendly,ⁱⁱ the lack of effective procurement safeguards and reality of timber procurement in Japan presents a significant risk that the timber used for Tokyo Olympic construction projects, including the Olympic National stadium, will be illegal, unsustainable, and linked to human rights violations.

Japan is the world's biggest importer of plywood from tropical rainforests, nearly 90% of which comes from Malaysia and Indonesia, where logging practices continue to be associated with illegality, violation of indigenous rights, destruction of valuable forest ecosystems, and corruption.ⁱⁱⁱ The situation is particularly dire in the state of Sarawak, Malaysia, which supplies nearly half of Japan's imported plywood and is the predominant supplier of plywood used for concrete formwork in Japanese construction projects. Independent investigations have linked plywood used by Taisei Corporation, which will build the new Olympic Stadium, to a biodiversity hotspot in Sarawak that is experiencing one of the highest rates of deforestation in the world due to extremely destructive logging practices.^{iv}

The Tokyo Olympic organizers have recognized these risks in Japan's timber supply chain and taken some steps to address them. However, current measures are inadequate. The wood procurement policy adopted by the Tokyo Organising Committee of the Olympic and Paralympic Games in June 2016 commits to procuring timber that is legal and harvested in consideration of the environment, indigenous rights, and worker safety.^v Unfortunately, the policy makes an exception for concrete formwork plywood by allowing the use of wood that

was not harvested sustainably or with respect for indigenous rights as long as it satisfies the legality criteria.^{vi} In addition, it allows legality to be verified on the basis of the Japanese Government's Green Purchasing Law^{vii}, despite significant evidence that this law provides no assurance of legality.^{viii}

Moreover, the minimal safeguards established by the Tokyo Organising Committee will not apply to all the construction projects associated with the Tokyo Olympics. The policy will not apply to construction of the new Olympic National Stadium nor permanent buildings under the authority of the Tokyo Metropolitan Government. Both the Olympic Stadium and Tokyo Government buildings will in practice only be required to satisfy the above-mentioned Green Purchasing Law, which has no requirement on sustainability and inadequate safeguards on legality.^{ix} This presents a significant risk that illegal tropical timber linked to rainforest destruction and human rights violations will be used for construction of all permanent Olympic projects. Such an outcome would be a major step backward for the Olympic commitment to sustainability and a tragic legacy at a time when protecting the remaining tropical forests and respecting human rights is more urgent than ever.

To ensure the Tokyo Olympics upholds the IOC's commitment to include sustainability in all aspects of the Olympic Games,^x we urge the IOC to immediately take the following steps:

- 1) Ensure all relevant Tokyo Olympic construction projects follow a uniform standard that requires the use of legal and sustainable wood that is free of human rights violations. This must apply to concrete formwork plywood with no exceptions.
- 2) Require the Tokyo Olympic organizers to conduct a thorough and independent, risk assessment of the legality and sustainability of timber supply chains for all relevant construction projects, and publicly report on the methodology and results of the assessment.
- 3) For all timber products evaluated to be of medium or high risk of illegality or unsustainability, require the Tokyo Olympic organizers to establish full traceability of timber back to the forest, obtain credible independent verification of the legality and sustainability of the timber used, and publicly report on measures taken to mitigate the risks.
- 4) Prohibit the use of timber that derives from rainforests that are intact or otherwise of High Conservation Value. Such timber cannot be considered sustainable.
- 5) Require timber to be derived from forestry operations that respect indigenous and local communities' legal and customary rights to land, forests, and natural resources, and require verification of their Free, Prior and Informed Consent to logging operations.

The construction of several permanent Olympic buildings has already begun, and construction of the Olympic Stadium is scheduled to begin in December of this year. We therefore urge the IOC to take these measures as a matter of urgency.

In addition to timber, there are several other commodities that carry similar risks of illegality, deforestation, and human rights violations. These include products made of pulp & paper, palm oil, soy, rubber, as well as beef. We urge the IOC to ensure similarly robust due diligence measures are taken when procuring these commodities.

We look forward to working with you to ensure the Tokyo Olympics safeguards the Olympic values and contributes a lasting legacy that is beneficial to future generations.

Sincerely,

ARA, Germany - Wolfgang Kuhlmann, Director
Avobo, Japan - Youki Mikami, Managing Director and President
Biofuelwatch, UK/US - Almuth Ernsting, Co-director
Blue Dalian, China - Sun Li, Office Manager
Bob Brown Foundation, Australia - Jenny Weber, Campaign Manager
Bruno Manser Fund, Switzerland - Lukas Straumann, Executive Director
Center for International Environmental Law, US - Melissa Blue Sky, Senior Attorney
Centre for Environmental Law & Community Rights / Friends of the Earth Papua New Guinea, Papua New Guinea - Peter Bosip, Executive Director
Denkhausbremen, Germany - Peter Gerhardt, Director
Environmental Investigation Agency, US - Alexander von Bismarck, Executive Director
FERN, Europe - Rudi Kohnert, FLEGT SE Asia campaign
Friends of the Earth Australia, Australia - Franklin Bruinstroop, International Liaison Officer
Friends of the Earth Japan, Japan - Junichi Mishiba, Executive Director
Friends of the Siberian Forests, Russia - Andrey Laletin, Chair
Global Environmental Forum, Japan - Yuki Sakamoto, Director of Planning and Research
Greenpeace - Yuko Yoneda, Executive Director, Greenpeace Japan
Haburas Foundation / Friends of the Earth Timor-Leste, Timor Leste - Virgilio da Silva Guterres, Executive Director
HaKi, Indonesia - Deddy Permana, Program Director
Japan Tiger and Elephant Fund, Japan - Masayuki Sakamoto, Executive Director
Japan Tropical Forest Action Network, Japan - Akira Harada, Director
Jaringan Masyarakat, Gambut Jambi, Indonesia - Rudiansyah, Coordinator
Jikalauhari, Indonesia - Woro Supartinah, Coordinator
Keruan, Sarawak, Malaysia - Balang Nalan, CEO
Link-AR Borneo, Indonesia - Agus Sutomo, Executive Director
Markets For Change, Australia - Peg Putt, CEO
More Trees, Japan - Ryuichi Sakamoto, Representative
National Wildlife Federation, US - Barbara Bramble, Vice President, International Conservation and Corporate Strategies
Padi, Indonesia - Ahmad Sja, Director
Pro Public/ Friends of the Earth Nepal, Nepal - Prakash Mani Sharma, Executive Chair
Pro REGENWALD, Germany - Hermann Edelmann, Coordinator
Rainforest Action Network, US - Lindsey Allen, Executive Director
Rainforest Foundation Norway, Norway - Nils Hermann Ranum, Head of Policy and Campaigns Department
Rainforest Rescue / Rettet den Regenwald, Germany - Reinhard Behrend, Director
Russian Social Ecological Union / Friends of the Earth Russia - Andrey Laletin, Co-chair
Sahabat Alam Malaysia / Friends of the Earth Malaysia, Malaysia - Meenakshi Ramen, Honorary Secretary
Sarawak Campaign Committee (SCC), Japan - Tom Eskildsen, Steering Committee Member
Sarawak Dayak Iban Association (SADIA), Sarawak, Malaysia - Nicholas Mujah, Secretary General
SAVE Rivers, Sarawak, Malaysia - Peter N. J. Kallang, Chairman
Scale Up, Indonesia - Hary Oktavian, Executive Director

Wahana Lingkungan Hidup Indonesia (WALHI) / Friends of the Earth Indonesia, Indonesia -
Khalisah Khalid, Head of Campaign and Network Development
WALHI East Kalimantan, Indonesia - Fathur Roziqin Fen, Executive Director
WALHI West Kalimantan, Indonesia - Anton P Widjaya, Executive Director
Wetlands International, Netherlands - Jane Madgwick, CEO
Yayasan PUSAKA, Indonesia - Y.L. Franky Samperante, Director

Attachments:

Mainichi Shimbun, *New National Stadium: A mechanism that cannot exclude illegally harvested timber* (unofficial translation), October 6, 2016.

cc:

John D. Coates, Vice President and Chair of Tokyo 2020 Coordination Commission, IOC
H.S.H. Prince Albert II of Monaco, Chair of Sustainability and Legacy Commission, IOC
Michelle Lemaitre, Head of Sustainability and Olympic Legacy, IOC
David Stubbs, IOC Advisor
Kazumi Ohigashi, President, Japan Sport Council
Yuriko Koike, Governor, Tokyo Metropolitan Government
Tamayo Marukawa, Minister in charge of the Tokyo Olympic and Paralympic Games,
Government of Japan
Yoshiro Mori, President, Tokyo Organising Committee of the Olympic and Paralympic
Games
Tokyo 2020 Olympic Sponsors

ⁱ Tokyo Organising Committee of the Olympic and Paralympic Games, Tokyo Metropolitan Government, and Japan Sport Council

ⁱⁱ Tokyo 2020 Candidate File, <https://tokyo2020.jp/jp/games/plan/data/candidate-section-5-JP.pdf>. See also <https://tokyo2020.jp/en/games/sustainability/>

ⁱⁱⁱ See, for example, Global Witness, *Two Worlds Collide*, December 2014, www.globalwitness.org/olympics/; Indonesian Anti-Corruption Commission, *Preventing State Losses in Indonesia's Forestry Sector*, October 2015, <http://acch.kpk.go.id/images/tema/litbang/pengkajian/pdf/Executive-Summary-Preventing-State-Loss.pdf>

^{iv} The investigation showed the plywood came from a mill that sources from six logging concessions in Sarawak, including two large concessions located in the Heart of Borneo. See Global Witness, *Japan's Links to Rainforest Destruction in Malaysia: Risks to a sustainable 2020 Tokyo Olympics*, December 2015, www.globalwitness.org/en/reports/shinyang/

^v Tokyo Organising Committee of the Olympic and Paralympic Games, *Criteria for Sustainable Procurement of Wood*, 2016, <https://tokyo2020.jp/jp/games/sustainability/data/sus-wcode-timber-JP.pdf> (English translation available upon request)

^{vi} Id., Criteria 2 (The exception applies to concrete formwork plywood that has already been used once. Such plywood is typically used two or three times and then discarded.)

^{vii} Available at: www.env.go.jp/en/laws/policy/green/.

^{viii} See, for example, Global Witness, *Wilful Ignorance*, May 2016, www.globalwitness.org/en/reports/wilful-ignorance/; TRAFFIC Japan, *Goho-wood: Verification of legality and sustainability*, December 2015, www.trafficj.org/publication/15_Goho-wood_legality_and_sustainability_in_Japan.pdf; Chatham House, *Trade in Illegal Timber: The Response in Japan*, November 2014, www.chathamhouse.org/publication/trade-illegal-timber-response-japan.

^{ix} The Tokyo Government's procurement policy stipulates that the city must limit the use of tropical wood, and otherwise ensure tropical wood used is both legal and derived from sustainably managed forests. See www.toshiseibi.metro.tokyo.jp/seisaku/recy/pdf/recy_10.pdf. However, in practice, the Tokyo Government has relied entirely on the Green Purchasing Law to satisfy their procurement criteria.

^x The Olympic Agenda 2020, December 2014, Recommendations 4 & 5.