

EXHIBIT No. 2990

(42)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

-vs-

IRAKI, Sadao, et al

Sworn Deposition (Translation)

Deponent: YOSHIDA, Hidemi

Having first duly sworn an oath as ^{shown} an attached sheet and in accordance with the procedure followed in my country I hereby depose as follows.

1. My name is YOSHIDA, Hidemi. I was formerly a captain in the Japanese Navy and from October 10, 1941 to the end of March, 1945 was assigned to the First Section of the Naval Affairs Bureau in the Navy Ministry. My duties were concerned exclusively with matters relating to naval facilities and equipment including planes, ships and the defense installations on the Mandated Islands. Prior to taking over this position I spent two months with my predecessor, Captain MIWA, now deceased, in concentrated study of all ^{of} the intricate details concerned with the work of this office. This involved the study of a tremendous volume of documents which supplied me with a necessary background on the work I was to perform.
2. I wish to speak briefly about the view of the Naval Affairs Bureau concerning the question of strengthening facilities on the Mandated

Islands. It was our contention that the South Sea Islands were so situated geographically as to constitute the bulwark of sea defense for Japan and hence we termed it the first line of defense for our country. We felt that if these islands fell into the hands of an enemy it would have meant certain defeat for Japan. Hence it was but natural that the Navy was desirous of installing on these islands or some of them such military defensive measures as would satisfy our need for security.

Were it not for treaty restrictions we would have carried out defensive constructions on these islands with no hesitation. This matter was discussed at various occasions and the overwhelming opinion was that we could not place fortifications upon these islands because ^{of} the existing treaty restrictions. And weighing the security of our country against the existing treaty restrictions it was definitely concluded that we must remain faithful to the treaty obligations.

3. Therein lay the most serious problem facing the Navy - namely, the necessity of refraining from installing defensive constructions on the Islands in peace time and yet to be ready for any eventuality during those threatening times. It was along this line and facing this problem that I carried on my study.
4. The question as to whether certain installations on the Mandated Islands were cultural or industrial in nature or whether they were military was sometimes difficult to settle. It is true that many installations capable of full usage during peace times were later converted into war time assets. The South Sea Islands were under the administration of the

South Sea Board. The said Board, in 1935, laid down the ten year program for the development of these islands. It was in pursuance of that program that construction of cultural and industrial facilities had been started. The Navy gave its assistance somewhat along the following lines:

(1) In 1933 the Navy carried out a survey of the farms developed by the Bureau on the islands of Saipan and Pagan to ascertain whether or not they might serve as forced landing fields for planes. Beginning in 1934 the Bureau started program of opening aerial communications between the Islands with the sole view of facilitating rescue work in case of shipwreck, together with assisting fishermen in locating schools of fish, etc. But since the available facilities in that region were quite inadequate the Bureau came to the Navy for assistance. In response to that request and because the Navy regarded the industrialization of those Islands as materially valuable, the Navy took the part of extending what help it could insofar as it could be done without violating the relevant treaties and without interfering with the Navy's proper function.

As a matter of fact, even the Navy's efficiency in that direction was at a low ebb since it was heavily burdened with duties in connection with operations in China and accordingly little assistance was available. It was only after the China Incident came to more or less of a standstill that we were able to give some assistance in the way of ~~technics~~, materials, labor and transportation.

I speak from personal knowledge since, as I said before, I made an extensive study of the available records in the office and currently was concerned with the matters of which I speak.

In this connection, since it dealt with the nature of airfields to be employable for cultural and industrial uses and which could be converted into military aids in the event of war, we carried out a study to determine whether or not the assistance we were to give to the Bureau could be construed as contrary to existing treaty requirements thereby subjecting us to international criticism. It was our conclusion, as a result of that study, that the conveniences rendered by the Navy for the extension of cultural and industrial projects could not be subject to criticism as purely military installations and therefore not counter to existing treaty limitations. The immediate use to which the aviation facilities were put were purely cultural in nature and there was actual use for them. Therefore, it was the Navy's view that the airfields per se did not constitute military establishments.

The over-all picture of these airfields and the progress of their construction, based upon my research into the matter, is shown in the following table which contains the history of thirteen airfields, four of which are seaplane ramps and nine are land facilities.

- (1) On the island of Palau there was one runway and one ramp. The ramp was started in 1934 and virtually completed in 1936. The runway was started in 1938 and completed in 1940.

- (2) On the island of Saipan one ramp was started in 1935 and completed the same year. One runway was started in 1934 and completed in 1935.
- (3) On the island of Pagan one runway was started in 1941 and completed the same year.
- (4) On the island of Tinian one runway was started either in 1939 or 1940 and the time of completion is unknown by me.
- (5) On the island of Truk one runway was started in 1935 and completed in 1941. There was one ramp but I do not have the available dates.
- (6) On the island of Ponape there was one runway started in 1939 and completed in 1941.
- (7) On the island of Wotje there was one runway started in 1940 and completed in 1941.
- (8) On the island of Kwajalein there was one runway started in 1940 and completed in 1941.
- (9) On the island of Jaluit there was one ramp started in 1940 and I do not have available statistics as to its completion.
- (10) On the island of Taroa there was one runway started in 1940 and completed in 1941.

The term "completed" as applied to these installations actually means they were virtually completed.

- (2) ^{the} ~~Having~~ South Sea Board sensed insufficiency in harbor facilities as the industrial development of the Islands went apace very rapidly, ^{they} ~~the~~ South Sea Board began harbor construction around 1935 on Saipan and Palau and later on at Ponape. It made some progress on the work of the first two islands but did not get beyond the paper plan stage at Ponape.
- (3) Wireless Stations - These facilities were constructed by the Navy when they first occupied the Island during World War I. And since these installations were absolutely necessary as cultural or industrial assets to the Island they were turned over to the Bureau for management and supervision. The principal wireless stations were located on Saipan, Truk, Ponape, Jaluit and Yap.
- (4) Radio Range Stations - In addition to these wireless stations there were a few of these direction finding stations for the purpose of assuring safety of aerial navigation. Even after these facilities had been turned over to the Bureau the Navy continued to supply them from time to time with materials which the Bureau could not obtain from other sources.
- (5) Miscellaneous - Meteorological stations, marine stations, route indicators, light houses, roads, fisheries, etc.

On all of these, the Bureau had expended considerable effort but had not made much headway.

As to oil tanks, private oil companies had small tanks ranging from between 1,000 and 2,000 ton capacity on Saipan, Palau, Ponape and Truk but these tanks were wholly inadequate for supplying our fleet when in that region on maneuvers and periodic cruises. For that reason it became advisable for the Navy to give thought to the construction of its own oil tanks.

(6) Coming down to November of 1941, in my capacity as an expert in charge of such matters, I emphatically state that there was almost nothing on these islands which could be designated as the Navy's own facilities, much less qualifying under the terminology of naval bases or fortifications. To present to the Tribunal a perfectly honest and clear picture of the actual situation, I wish to state the following facts:

- (1) Although the Navy had commenced the construction of its own oil tanks on Palau, Saipan and Jaluit around middle of 1939, few, if any, were completed at the time of commencement of war.
- (2) It had originally been intended to make temporary use of facilities belonging to private companies and to the Bureau as resting quarters for war ship personnel. But in view of the climatic and other conditions prevailing in the Tropics, it was considered advisable to erect temporary barracks for their use to the extent that we could do so without conflicting with treaty restrictions. We therefore decided to erect a few temporary

barracks on Saipan and Palau in the fall of 1940. It was not done with the idea of providing a base but simply for the convenience of our ships during maneuvers.

(3) The Navy carried out maneuvers in the region of the South Seas time after time but the only time that land maneuvers which necessitated carrying guns on to the islands took place was in 1940 & 41. At the 1940 maneuvers, we used two 8-centimeter guns which were landed on the islands of Truk and Palau for the purpose of giving training in the landing and securing of gun emplacements. Both however were removed on completion of the training maneuvers. In the following year, 1941, the maneuvers were continued from spring until autumn. On this occasion, the Navy Department placed at the disposal of each of the several forces attached to the Fleet several guns of 12-centimeter and lesser caliber for the purpose of carrying out the training maneuvers and making tests as to the capacity of these guns to withstand heat and humidity. In these maneuvers gun bases were erected because of the need of carrying out test firings. Most of these guns had been obtained from naval schools and naval corps where they had been used for instruction purposes. They were old models and proved of little practical use and, according to reports received, these guns were so short in range - between 5,000 and 6,000 meters - that they did not even reach the outside

of the coral reefs. Prior to the execution of these maneuvers there had been an explanation given to the maneuvering forces by the Naval General Staff and Fleet Headquarters that upon completion of the maneuvers at one place the guns were to be removed and taken to the next place where the maneuvers were to be held. It is true that a few of these guns were not removed. The reason for the failure to remove them in most cases lay in the fact that the guns were old and obsolete and not considered of great value. In addition thereto, we desired to make a more thorough check on the condition of the guns after exposure to tropical climatic conditions over a lengthy period of time and hence they were left exposed to daily rain and other special aspects of the tropic climate.

- (4) Conditions after November 5, 1941: It was on November 5, 1941 that the Navy decided, for the first time, to carry out the construction of defense works on the Mandated Islands and the order to that effect was issued thereafter. It was not until the middle of November that the organization of the construction, procurement of necessary materials, allotment of ships, loading of ships, etc. took place and it was not until after the middle of the month that the construction corporations left Japan for the Islands.

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5. I have read the testimony of Admiral J. O. Richardson given before this Tribunal relative to the Mandated Islands. Admiral Richardson's statement that the Japanese Navy built naval bases throughout the Islands appears to be based on the fact that the English translation of General Order Number 1 uses the word "Base" to indicate the supply station which we constructed on Saipan and eight other places for the purpose of supplying our fleet. It is true that the Japanese Navy planned and actually made use of the various islands for the purpose of supplying our fleet in the Pacific operations after war commenced. The method of supplying the ships which was actually contemplated by the Order consisted mainly of having supply ships enter the coral reefs and to have the vessels supplied from the supply ships rather than from storage on the Island. Consequently, it must be pointed out that we did not have supply facilities completed on these islands prior to the war or at the beginning of the war. At no time prior to November 5, 1941 did we have what could be considered as a supply dump on any of the eight islands.

In Sub-Division II, Numbers 20 and 21 of his affidavit, Admiral Richardson makes the following statement:

Paragraph 20: "At pages 2/76 to 2/78 is an Appended Table 1, giving initial fuel allowances for supply bases. The boiler oil allowance to five of the eight Mandated Island bases totals 46,500 metric tons. Likewise allotted to the Mandate bases are great quantities of aviation fuel, bombs, machine gun ammunition, torpedoes and mines. Rations are allotted for 36,000 persons per month at the eight Mandate bases. Large monthly replenishment allowances are tabulated at pages 2/91 to 2/94. Aircraft material for the South Seas area is to be replenished at TRUK, and submarine material at KWAJALEIN."

Paragraph 21: "No doubt Order No. 1 is accurate in applying the term "bases" to these Mandate installations. The materials, the quantities and the areas involved indicate that these naval bases and their equipment for storage, transport, communications, and guns and ammunition had been established on a large scale and over a considerable period of time.

It is to be noticed that in Paragraph 20 such words as "allowances", "allotted" and "monthly replenishment allowances" appear but there are no such words as "storage" or "storage installations." However he arrives at the conclusion that there were bases on these islands and that at those bases the Japanese Navy had been for some considerable period constructing storage, transportation, communication and gunnery facilities on a large scale because the word "base" appears in Paragraph 21. This conclusion is based on the misunderstanding that what was indicated in the Appended Table 1 as Initial Allowances and Monthly Replenishment Allowances, represented supplies that had been ^{stored} ~~stored~~ on the Island. It must therefore be said that since the statement is based on such a serious misunderstanding, the statement that storage facilities had been constructed on a large scale and over a considerable period is contrary to the facts. Actually there is nothing in the Order intended to mean that the figures indicated in the attached table must be stored on hand. The figures merely indicate the program of the Fleet of the amounts that they wish to have at those points without indicating as to the method that was to be employed. Moreover, while those figures indicate quantities that the Fleet was very desirous of having ready, that is not to say that the desired quantities were there.

Since I had the responsibility for over-all control and direction concerning supply preparations of the various naval materials, I feel that I know better than anyone else the difficulties involved. These difficulties will become evident when we compare the Fleet needs at the time and the quantities which the Navy actually had on hand. To cite but one instance - according to a study made by an officer in charge of supplies at the Naval Aeronautical Department - the need of 800-kilogram bombs for use by air units stationed at the various points on all fronts was around 2,972. However, the number that the Navy actually had of these bombs was only 800 so that there could be only 27% supplied of the amount needed. Moreover, in order to supply those bombs over the widely distributed areas it would have been necessary to have an additional 2,600 bombs in reserve. So, when we consider the actual need plus the reserve need, the supply ratio was only 14%. In the case of aerial torpedoes, the need at commencement of war was 1,859 against which we had only 560. The supply ratio was therefore only 30%. In the case of 20-milimeter machine guns, the need was 9,339 of which we actually had only 515. Upon the commencement of hostilities we had to send from Taiwan supplies to the coast of French Indo China in connection with the Prince of Wales sinking, and then as soon as that operation was over, to transfer the supplies to the Mandated Islands. It can thus be seen that it was absolutely impossible to satisfy the fleet needs at all the points concerned.

What I have stated is concerned with the first six months after commencement of hostilities, but if the situation was like that after the war started it was obvious that prior thereto the Navy was even more illly prepared.

In Chapter 7 of General Order No. 1, under the topic "Supply", the following facts are clearly set forth. In the attached Table 1, notice under the table, Note 1:

"Ammunition and torpedoes are to be loaded on munition ships."

Under the same topic of "Supply" there is a Paragraph 2 - "Outline of Supply". Among sub-topics under that are as follows: Sub-Paragraph (e):

"The various forces will be supplied by supply ships attached to them."

Sub-Paragraph (f):

"If possible, supply bases will not be used to supply other than airplanes and small vessels. In particular, except in unavoidable cases, supply bases will not be used to replenish stocks of supply ships."

The significance of the term "if possible" should not be overlooked.

The Japanese original is considerably stronger than this English translation in that it properly denotes "every effort should be made not to supply from supply bases except in the case of aircraft and small ships." These provisions make it absolutely clear that the Order did not contemplate a program of supply from land but rather from supply ships. As regards fuel, there is no mention of fueling from tankers in the Order but that is because that is a matter of common knowledge or common

sense in the Japanese Navy that supplying of fuel to ships was done from tankers. In other words, they didn't feel that there was any need of pointing out that it was to be done from tankers.

Regarding construction of fortifications, Admiral Richardson's statement on that subject appears in Paragraphs 24 to 32 of Sub-Division II under nine items. His evidence there is submitted with the blueprint of Wotje Island and two aerial photographs of the same island. I will leave the explanation on this point to a more suitable person, but I would like to make one comment - namely, that I recall having been told by Captain MIWA at the time of our transfer that there was no airfield on Wotje Island in the summer of 1940. Moreover, after the defense order was issued early in November of 1941 I, desiring to do everything possible for the construction of airfields on that island, called a conference of all persons concerned. On the basis of what I was told by Capt. Miwa and from the discussions at that conference, I am certain that the blueprint submitted by Admiral Richardson did not represent the actual situation on the Island at the time but what merely was a plan drawn up for the purpose of study. Further, it appears that Admiral Richardson's statement that the blueprint shows that before 10 August 1940 the Japanese Navy and Government had already created extensive fortifications is not only contrary to fact but is an unwarranted conclusion without actual background.

6. Under date of 17 December 1920, there is a provision in the Versailles Treaty under the heading "Mandate of Former German Islands North of the

Equator." In Paragraph 4 of that treaty it states:

"There must be no military education of the natives except for purposes of police within the Island and for local defense purposes. Moreover all military and naval construction of naval and military bases and fortification is prohibited."

Since it was the duty of my office to view constructions on the Mandated Islands in keeping with the terms of this treaty, it was decided that even under its provisions the obligation of the Japanese Navy of policing and locally defending the Mandated Islands could not be overlooked.

We therefore took the view that we were permitted to carry on military education of the natives for the sole purpose of affording them the opportunity of self defense and self protection. While we did not undertake this in pursuance of the above interpretation, the Japanese Navy did plan and carry out cruises for this purpose in the way of patrols and defensive training maneuvers.

The Japanese Navy has always drawn a clear cut distinction between "Kon Kyochi", translated "Naval Base" and the word "Kichi", translated "Available Spot." We use the word "Naval Base" to designate the naval station or a port having special facilities which make it possible for them to be used as fleet bases. And by "special facilities" was meant accommodations for certain fleet units, repair facilities and conditions which made it suitable for supplying of weapons, naval supplies, fuel, fresh water and if possible, also for replacement of personnel. Such was our conception of "Naval Bases" and it corresponds to the term "Naval Base" as used in England and America. By contrast, the word "Kichi"

translated "Available Spot" was used in a much lighter sense. This was used to designate places where the Fleet could anchor temporarily or receive certain kinds of supplies or serve as places for forced landings of planes. To such places we apply the term "Supply Spot", "Forced Landing Spot" and just "Available Spot." It corresponds to what the Americans and British would call "Available Spot", "Anchorage."

Since as I have stated the facilities on the eight islands mentioned in General Order Number 1 were either seriously or completely lacking in the requirements of a "Naval Base", it was a mistake to so designate them as "Naval Bases." In the Order in question, the word "Kichi" was used in the sense of "Available Spot."

The word "Fortifications" originated in the Army and came to be used by the Navy later and at least in the Naval Affairs Bureau we had the following conception of the word "Fortification." The naval conception of "Fortification" is that it must contain the following essentials:

- (1) It must have armament and fixed defensive facilities with which it can resist and defend itself from enemy attack from land, sea and air.
- (2) It must be defended by land forces.

Consequently, the facilities I have previously mentioned, namely, such cultural and industrial development as airfields, wireless stations, ports and harbors, as well as oil tanks, even constructed for the purpose of supplying fuel for our vessels on cruises, can not be characterized as fortifications.

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On this 6 day of June, 1947

At Tokyo

DEPONENT: YOSHIDA, Hideo (seal)

I, ONO, Seichiro, hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this Witness.

On the same date

At Tokyo

Witness: (signed) ONO, Seichiro (seal)

OATH

In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

(signed) YOSHIDA, Hideo (seal)