

EXHIBIT No. 3006

(33)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

Sworn Deposition

Deponent: Nobutake KONDO

Having first duly sworn an oath as shown on attached sheet and in accordance with the procedure followed in my country I hereby depose as follows:

1. My name is Nobutake KONDO. For approximately 40 years, from November 1907 (Meiji 40) when I graduated from the Naval Academy, until I was relegated into the reserves as a full admiral in September 1945 (Showa 20) I served in the Japanese Navy. During my term of service I held the following posts at the Naval General Staff at three different times.

From June 1930 (Showa 5) until December 1932 (Showa 7) -
Naval General Staff First Section Chief (Captain)

From December 1935 (Showa 10) until December 1938 (Showa 13)
Naval General Staff First Division Chief (Rear Admiral -
Vice Admiral)

From October 1939 (Showa 14) until September 1941 (Showa 16)
Vice Chief of Naval General Staff (Vice Admiral)

2. As a rule, the following procedure was followed by the Japanese Navy in its planning and effectuation of its armament program:

(1) The annual national defense plan was formulated by the First Section of the First Division of the Naval General Staff. This was a decision on policy on how to complete national defense: envisioning the eventuality of war, and formed the basis for armament plans and the training programs of all units, etc.

(2) The Third Division of the Naval General Staff collected and pieced together information on the international situation, the war preparedness conditions, and war potential of the major powers and distributed it to the divisions of the Naval General

Staff to serve as criterions for the various planning it did for the Navy in general.

(3) The Third Section of the Second Division of the Naval General Staff, on the basis of the above-mentioned National Defense plan, formed the draft of a plan for minimum possible armament required by the Navy for fulfilling its national defense responsibilities, after consideration of the national strength and of the armament situation of the major powers. The draft, after being approved by the superiors, was deliberated at a preliminary conference with competent officers of the Navy Ministry. At this preliminary conference, national strength, the difficulties of execution of the plan etc. were most minutely examined by the representatives of the Navy Ministry and of the Naval General Staff and it was customary for considerable alterations to be made in the draft.

(4) After an understanding had been reached at the above-mentioned preliminary conference, an official report of the conference was sent by the Chief of the Naval General Staff to the Navy Minister, to which the latter set forth his opinions on the prospects of the execution of the plan in his reply.

(5) The Navy Ministry, besides, contacted the various government organs in connection with distribution of budget and material.

(6) After the budget had been decided, the execution order was issued by the Navy Minister and the various organs began their allotted work in the execution of the order.

The organization being as above delineated, I - holding the positions before mentioned - had considerably detailed information on armaments.

It was immediately after the conclusion of the 1930 London Disarmament Conference that I was appointed First Section Chief of the First Department of the Naval General Staff. It was consequently at a time when the National Defense plan had to be revised to a yet more defensive order to conform to the new situation.

By the Washington Treaty, the number of capital ships and aircraft carriers permitted Japan for retention was limited to 60%

of those of the United States and Great Britain. However, information collected after the Treaty revealed that the United States Navy was steadily preparing for trans-ocean operations and it was thought that if the necessity arose the United States Fleet could at any time reach Japanese home waters. To oppose this threat, efforts were made to complete our national defenses by equipping the Navy with fleet-footed cruisers and other craft of lesser type which would depend principally upon their torpedoes to carry out interceptive operations in home waters.

Moreover, with the limitation placed on the strength in auxiliary vessels permitted for retention by the London Disarmament Treaty of 1930, the characteristic armament of our Navy was made subject to restriction. Further, we were forced to look on with folded arms whilst the United States Navy constructed new types of warships.

For this reason the ratification of the Treaty became a serious problem in the Privy Council, while Stimson's "Hats Off" speech in the Senate contributed not a little to aggravating the feelings of the Japanese people. The Naval General Staff arrived at the conclusion that there was no way of coping with this situation except through intensive training for the raising of technical strength and through construction of such small warships as were not limited by the restrictions of the Treaty and airplanes to cover up the resulting defects in armaments.

It was around this time that many precious lives were sacrificed in fierce training; and deplorable accidents involving warcraft which were not covered by treaty limitations occurred, such as the capsizing in heavy weather of torpedo boats under 600 tons which were too heavily armed.

4. I was appointed Chief of Division One of the Naval General Staff at the time when the 1935-1936 London Disarmament Conference was in session. A month after my appointment Japan seceded from that conference.

What we advocated at this conference was a step forward from

our earlier demand for armaments that were non-aggressive and non-menacing - namely, armament which would remove all danger of war ever breaking out. Unfortunately our thesis was not accepted by the other powers. The Japanese Navy directed its attention to various experiments with the aim of fulfilling its responsibilities in national defense within the scope of the minimum possible budget, in consideration of the meagre resources of the nation. The result was the discovery that there was no other way than to give our armament program the characteristics hereafter to be shown. As a result, the Third Supplementary Program was drafted.

The Third Supplementary Program called for the construction of two battleships, two aircraft carriers, eighteen destroyers and fourteen submarines - a total of thirty six ships with a total tonnage of 233,000 tons, plus thirty four auxiliary vessels displacing 44,500 tons by the end of 1941.

Considering that, even were the Washington and London Treaties to continue in effect, the time had arrived for replacement and construction of capital ships with the tendency present in all major powers to launch into large scale warship construction, the plan was indeed on a very minor scale.

The principal characteristic of this plan was the construction of two capital ships each carrying nine 18 inch guns and displacing 64,000 tons. As before mentioned, as there was finally no quantitative limitation adopted at the London Disarmament Conference because of the trend for replacement and construction of capital ships, the major powers simultaneously launched into construction of capital ships. In this situation our country, unable to realize armament in any way comparable to that of the other nations by any ordinary methods, adopted the construction of super-battleships as a last resort and attempted to fulfill its national defense obligations within the scope of a small budget.

In May 1938 (Showa 13) the second "Vinson" Plan passed the United States Congress and information steadily filtered in to t

Defense Document 1978

effect that construction of capital ships and other craft was being promoted. Various measures to counter this situation were studied but expenditure running high owing to the China Incident, no concrete plan had been formulated up to the time of my leaving the post of Chief of the First Department of the Naval General Staff in December of the same year (1938).

5. It was immediately after the outbreak of World War II in Europe that I was appointed Vice Chief of the Naval General Staff. In our country it was the time when we were worrying over means of preventing the war from spreading outside Europe. We had already received notification of the abrogation of the Japan-United States Trade Treaty at the time. Our intelligence section knew that American reconnaissance troops had already moved into Hawaii and that the Hawaiian Army Air Force had been greatly strengthened. This United States pressure on Japan was felt acutely by us who were charged with the plans for national defense, and our uneasiness over the question as to how we should meet our responsibilities of national defense in the face of the rapidly mounting American naval preparations was hourly increasing.

At that time the Japanese Navy was in the midst of the above-mentioned Third Supplementary Program, but with the exception of the completion of a portion of the smaller craft, this Program was still unfinished. Meanwhile, from the beginning of the same year namely of the year 1939 (Showa 14), it had started on the Fourth Supplementary Program. According to the judgment of the Naval General Staff at that time, the United States, in accordance with the Second Vinson Plan, had started or was about to start construction in the near future on three 45,000 ton capital ships, aircraft carriers to the tonnage of 40,000 tons, cruisers to the approximate tonnage of 70,000 tons, plus destroyers and submarines totaling an approximate 40,000 tons, and other auxiliary craft, in addition to the six capital ships, two aircraft carriers and numerous cruisers and smaller craft it had under construction. It was because of this enormous United States armament program and the aforementioned

political and military pressure that the Third Supplementary Program was considered insufficient to warrant confidence from the national defense viewpoint, and the Fourth Supplementary Program was begun.

The Fourth Supplementary Program was a program for the construction of a total of fifty nine vessels including two battleships, one aircraft carrier, six cruisers, twenty four destroyers, twenty six submarines, displacing an approximate 296,000 tons, besides twenty four auxiliary ships totaling approximately 29,000 tons, by the end of 1944 (Showa 19); but at the time of my appointment in October 1939 (Showa 14), with the exception of part of the small warship program, the plan was not yet under way. Further, the two battleships of this plan were similar to those of the Third Supplementary Program. Their construction was commenced in the beginning of 1944 (Showa 15); but as will be shown later, the building had to be discontinued within the same year. One of them had to be scrapped before the outbreak of the Pacific War, while the other was abandoned with its keel on the docks until the war began.

Immediately after my appointment to office, information was received that the Third Vinson Armament Expansion Plan had passed the United States Congress and we felt grave misgiving touching national defense. And in January 1940 (Showa 15) the incident in which the "Asama Maru" was boarded by a British warship in waters so close to Tokyo made the Japanese people in general very sensitive regarding our security by sea. In July 1940 (Showa 15) the United States published its so-called "Stark Plan" for construction of a two-ocean fleet. Up to that time we had managed somehow to form national defense plans against the naval expansion of the United States; but we could discover no means of discharging our national defense duties within the scope of our limited national resources if this enormous plan were to materialize.

Moreover, as the United States - Japanese trade restrictions were steadily being stiffened and negotiations for increase of trade with the Netherland East Indies and French Indo China were

not progressing at all, it seemed as though the very foundation of our nation was being threatened. Further it was our belief that the fact of the United States Fleet moving into Hawaii, together with the strengthening of concerted United States - British support to the Chungking Government, made the latter confident of victory and thereby rendered more difficult the settlement of the China Incident, which was Japan's greatest concern at that time.

Such being the situation, and there being ever present the danger of war clouds spreading to the Far East by some untoward error at any time, the execution of the Third and Fourth Supplementary Programs had to be hurried.

As construction of the two battleships of the Fourth Supplementary Program was not progressing, and in order to concentrate all effort on speeding up construction of small-type craft especially required for defense purposes, construction on the former was discontinued in November 1940 (Showa 15). Again, around autumn of the same year, plans were submitted also for the emergency conversion of merchantmen into auxiliary aircraft carriers.

Toward the end of 1940 (Showa 15) the international situation took a sudden turn for the worse. Information was received of the mobilization of the Philippines Reserve Army, of the United States Secretary of War's instructions to declare martial law in Pearl Harbor, of the withdrawal of United States troops stationed in North China, of announcement of mines being laid in the eastern entrance to the Singapore Straits, of reinforcement of Australian troops in Malay, of military conferences and operations agreements between the United States, Great Britain and Australia and the arrival of United States troops to reinforce the Philippine Army in Manila, etc.

As for the Naval General Staff, it considered various plans realizing that it had to do something about naval armaments in view of the great naval expansion of the United States. While it was being hampered in forming any workable plan because of lack of national resources, the international situation took a turn for

the worse, as already mentioned, and in view of the steadily progressing United States naval armament expansion the Emergency Supplementary Program was put into effect in May 1941 (Showa 16) which called for the construction of nine medium and nine small submarines respectively, besides war-ships for defense purposes. Further, in August of the same year, an Emergency Armament Program, of which one aircraft carrier, two cruisers, twenty six destroyers thirty three submarines and other defensive forces comprised the main points, was put into execution. However, with even this, we could not possibly keep pace with the enormous expansion plan of the United States Navy, and we always suffered from misgiving and apprehension. Our armament plans were stimulated by this overwhelming expansion plan of the United States Navy and what we considered the military encirclement of Japan. Thus our plans were formulated on the spur of the moment, as is indicated by the use of the names Extraordinary Supplementary Program and Emergency Supplementary Program. In substance, they were mainly based on small defensive warships.

6. The armament situation of the Japanese Navy during my various terms of office at the Naval General Staff was as given above. Those responsible applied themselves perseveringly to the task of fulfilling their duties of national defense and consolidating armaments within the scope of the meagre national resources to oppose the increasing naval armaments of the major powers.

In other words, our Navy's single thought was how to defend against the potential threat of a foreign fleet invading our home waters, and our plans were formed and armament policy decided on the basis of this consideration. Not even once was a plan drafted for an aggressive attack on another nation at this time.

I swear to the Tribunal that in my capacity as a high ranking officer in the Japanese Navy that during my tenure of office at the Naval General Staff there were absolutely no plans made by the Japanese Navy which were intended or planned for offensive war. Prior to my assumption of office there existed no such plans be-

cause I closely surveyed all of the information and papers that existed in the files of my predecessors. From personal observation of the plans for naval training which I received and those that I drafted myself while serving with the Fleet, as well as of the education given at the various naval educational institutions, I emphatically testify that the naval plans for the protection of Japan were wholly defensive in nature.

7. During the time I held office at the Naval General Staff and was participating in the decisions on national defense plans and armament policy, the poverty of national resources constituted a large source of worry. Difficulties were encountered especially on the following points:

1. In the event of war, it was considered quite possible that Japan's shipbuilding speed might slow down but that it would be most difficult, if not impossible, for it to be increased, while the United States and Great Britain, on the contrary, were expected to accelerate their construction rate at a rapid pace as had been done at the time of World War I.
2. While Japan possessed very few first rate merchant ships which could be converted into auxiliary warships in case of emergency, Great Britain and the United States had many such vessels capable of speedy conversion.
3. Japan did not possess civilian aircraft which could be converted into a reserve air force as could the numerous civilian aircraft possessed by the United States and Great Britain.
4. Japan possessed only a small number of civilian factories capable of being converted into munition factories during war time while, on the other hand, the United States and Great Britain were capable of large scale conversion of civilian industrial plants into military use during war time.
5. Japan faced a shortage of materials vital for war time needs whereas, by comparison, both the United States and Great Britain had an abundance of such materials.

In the face of these facts, it was necessary for us to main-

tain a comparatively large peace time force even though this means a heavy strain on our meagre national resources. The ability of the United States and Great Britain to rapidly mobilize and draw upon their vast resources dictated this necessity. And to have failed to consider these factors would have left a serious defect in national defense.

8. In the affidavit of Admiral Richardson, presented to this Tribunal on November 25th of last year, it was stated that the Japanese Navy in its preparation for a war of aggression had been exerting itself toward the construction of aircraft carriers. The statement varies from the facts indicated by the very construction of the carriers themselves, which show that they were built for use in home waters.

It is a fact that aircraft carriers may very easily be utilized for offensive purposes, but it was also generally recognized that aircraft carriers were necessary for defense against attacks by fleets which included aircraft carriers.

The Japanese naval authorities believed that aircraft carriers were absolutely required for defense purposes as long as other powers possessed aircraft carriers.

For Japan there was great danger of attack by carrier-borne planes, in which event damage would be extremely great, for the following reasons:

1. Japan, being narrow and surrounded on all sides by sea, there was no area of the island which lay outside the attacking radius of carrier-borne planes.
2. Nearly all the major cities, large industrial areas, and the trunk lines of communications of Japan lie close to the coast.
3. Most Japanese houses, being constructed of inflammable material, damage through bombing would prove extremely great; and if incendiary bombs were used there was great danger of large fires resulting.

To defend itself against attack by carrier-borne planes, Japan required numerous airfields and aircraft. As means of defense against attack by aircraft there are airplanes, anti-aircraft

weapons and barrage balloons, but aircraft was the most effective of the three. When the objectives to be defended lie along the coast, as was mostly the case in Japan, anti-aircraft weapons and balloon barrages usually could not be expected to prove sufficiently effective in warding off attack.

Japanese territory, being small and surrounded by seas, necessitated the existence of numerous airfields and airplanes for the defense against attack from air. Further, weather conditions, being often very bad, would prove an obstacle to movement and concentration of aircraft, and hence an even greater necessity for large numbers of airfields and aircraft.

It was impossible to maintain large numbers of aircraft due to the meagreness of national resources. Further, construction of airfields was difficult because of the narrowness of the territory and especially because of scarcity of flat land.

On the one hand, for the Fleet not to include aircraft carriers while other nations possessed this type of ship would have meant a marked difference in capacity for reconnaissance, long distance attacking potential and strength in anti-aircraft defense. With the development of aircraft, a fleet without aircraft carriers lost its raison d'etre. It was therefore advantageous, especially in the case of Japan, to maintain this carrier strength of the Fleet at a point where it could fully hold its own against those of opponent nations, and thereby to serve the purpose of national defense.

Aircraft carriers could be utilized to advantage in the defense of the home land since it is surrounded on all sides by water. Especially is this true since there was the danger of attack by enemy carrier-borne planes. In such an event our carriers could be used to attack the enemy carriers before they entered the radius for bombing of the Japanese mainland, thus providing us with adequate defense against air attack. In view of the comparative facility of movement and concentration, even in the event of bad weather, there were many favorable arguments in favor

Defense Document 1978

of aircraft carriers in the naval defense of the narrow territory of Japan.

It was for this very reason that Vice Admiral Kanji KATO, the Senior Japanese Technical Committee member to the 1922 Washington Disarmament Conference, advocated the necessity of Japan having the same number of aircraft carriers as the United States and Britian, for defensive purposes.

Further, it may be clearly seen from the nature and capacity of the Japanese carriers that they were constructed for defensive purposes and not for offensive. Moreover, to utilize carriers for offensive warfare it is necessary to have various types of attending warships; but the Japanese Navy did not have them.

The number of Japanese aircraft carriers on December 7, 1941, including temporarily converted merchantmen, was ten with displacement of some 152,970 tons. Included in this number were the slow moving converted merchant ship "Kasuga Maru", the out-dated, over- aged small carrier the "Hosho", which was used only for training purposes, the small carriers, "Ryujo" and "Zuiho", which could carry only a limited number of small aircraft. Consequently, the number of aircraft carriers which could be utilized for fleet action was six. Moreover, the cruising radii of these first line carriers were far shorter than those of United States naval ships. Evidence of this fact may be seen in the extraordinary refueling problems that later confronted the Navy in its preparations for the Pearl Harbor Attack.

On this 11th day of August,
1947

At Tokyo.

DEFONENT: KONDO, Nobutake

I, KONDO, Nobutake 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 the same place.

Witness (signed) SUZUKI, Isamu (seal)

OATH

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

KONDO, Nobutake (seal)