

No. 3355



Def. Doc. # 2569

Exh. No. 3355

Translated by  
Defense Language Branch

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

-vs-

ARAKI, Sadao, et al

SWORN DEPOSITION (Translation)

Deponent: SEMBA, Tsutomu

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

I, SEMBA, Tsutomu, was born in Tokyo on February 2, 1909, graduated from the college of engineering of the Tokyo Imperial University in March, 1933 and immediately entered the service of the Military Arsenal at Osaka. I was in the service of the Engineering Administration Section of the Maintenance Bureau of the War Ministry from March, 1939 to October, 1942,, and of the General Bureau of Aerial Ordinance of the Munitions Ministry from March, 1944 to the end of the war. Meanwhile I was commissioned as technical major-colonel in April, 1942.

The case of the employment of POW's, relating to Exhibit 1970 4, "Inquiry about the utilization of the Manchurian Machine Tool Company for the purpose of urgent aerial maintenance," occurred at the time when I was in the service of the Maintenance Bureau, and it was ~~in the~~ ~~directoy~~ in my charge.



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The note concerning the employment of POWs in the Manchurian Machine Tool Company was issued under the name of the Vice Minister, as entrusted according to the "Note Concerning the Disposal of POWs at the Present," (EX. 1965A) decided by the War Minister on May 2, 1942.

At that time, owing to the extreme shortage of our domestic manpower, especially of technicians and skilled workers, all our people were obliged to work according to their talent and speciality, without distinction of age and sex. So the Minister's policy was to engage the prisoners in the sort and extent of labor permissible by international laws and regulations.

As regards the conditions of the demand and supply of machine tools at that time, our domestic productivity was 40,000 pieces (about ¥400 million) per year, while the total amount ordered was more than 250,000 pieces (about ¥ 2.5 billion). In addition, owing to the scarcity of building materials, it was so difficult to build a new factory that there remained no alternative but to make the most of existing facilities. In consequence, we learned to utilize wholly and speedily the Manchurian Machine Tool Company which had a lot of excellent facilities idle. While man-power, especially brain and skilled labor, was then more scarce in Manchuria than in Japan Proper, we could not expect so much of the Manchurian workers, not skilled, irregular in attendance and frequently moving. It was also difficult for the



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difficult for the Japanese workers at home to move to Manchuria. Eventually, we planned to choose and employ those prisoners with mechanical skill and experience.

The Army had absolutely no intention of engaging the Manchurian Machine Tool Company in the production of arms, and it remained in the position of requisitioning and assisting the company as a requisitioner of machine tools. So the company was kept strictly distinct from the munitions industry which was under the direct guidance of the Army. This company was under the jurisdiction of the Engineering Agency of the Manchurian Economic Department. The prisoners participated in the production of <sup>bench</sup> lathes and automatic lathes of the German Index type.

The wording of "urgent aerial maintenance" in the "Note of Utilizing the Manchurian Machine Tool Company for the Purpose of Urgent Aerial Maintenance", (Exhibit 1970) which was drafted by me was used with the intention of engaging the company in the speedy production of machine tools, thereby contributing indirectly to the required ~~in~~ production of aircrafts.

We did not project and carry out the direct production of arms and ammunition.

On this 12th day of September, 1947.  
at Tokyo.

DEPONENT /S/ SEMBA, Tsutomu (seal)



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I, ABE, Akira, 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 : /s/ ABE, Akira (seal)

OATH

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

/s/ SEIJI, Tsutsumi (seal)