

EXHIBIT No. 3023

(22)

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: NISHIURA, Susumu

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:

1. I was serving in the business concerning the military preparations in the Military Affairs Section, the Military Affairs Bureau, the War Ministry from October 1931 to August 1941, except the period from April 1934 to February 1937 during which I was residing abroad. From August 10, 1941 I was ill and in hospital over a month, and could not work in the office during the period of illness. Was transferred to the post of the Private Secretary to the War Minister in October of the same year, returned to the Military Service Bureau again in April 1942 as the Chief of the Military Affairs Section. Since then until December 1944, I was serving in the business of the same section.
2. First of all, I will speak about the fact that most of the armaments used in the Pacific war was spared or supplied from the military provisions either which had been originally prepared to be used in Manchuria for guarding Manchuria, against USSR or which had been prepared as an emergency in the process of the Sino-Japanese Incident and it had not been originally prepared to be used in a Pacific war. In the Mobilization Plan of 1941 which had been planned by March of 1941, the organization of the units in operations was as follows:
 - (a) Having a large Baggage Transport Section in the rear providing against the fighting in severely cold or barren regions.
 - (b) The whole organization of the brigade was equipped so as to be the Mobile Units in operations in Manchuria but under no consideration to be used in the Southern Islands.
 - (c) All the horses needed in the Supply and Baggage Departments were to be Manchurian horses except the horses for the Headquarters (which was one third of the whole horses).

These points are worth notice. Consequently, immediately before using these units in the Southern Regions, we had to change the organization completely to make it suitable for the purpose. And even though the organization had been changed, yet it could not be but a very unadjusted inadequate and incomplete one, when the unit was mobilized to the South. You can surmise the Operation Plan by the distribution of the Supplies for Operation. Noting, for example the distribution of ammunitions and aviation gasolines in the supplies for operations under the direct control of General Headquarters about the spring of 1941:

Ammunitions

In Manchuria	20%
In China Republic	30%
In Japan Proper	50%
In Formosa and French India	0%

Aviation Gasolines

In Manchuria	16%
In China Republic	4%
In Japan Proper	80%
In Formosa and French India	0%

Moreover, by the so-called "Seki Special Manoeuvres" which aimed at the strengthening of the guarding of the USSR Manchuria Boundaries, they began to send forth a considerable portion of the Supplies necessary for the operation which had been preserved within Japan to Manchuria from July or August 1941.

27% of the whole ammunitions and 14% of the whole amount of aviation gasolines were removed to Manchuria.

3. With the decision on National Policy early in September 1941, it was scheduled to make preparation for war by the end of October or thereabouts although we were working for a compromise with America through diplomatic negotiation and were decided not to resort to war with America and Britain except in unavoidable circumstances. But at least in the field of supplies Japan was already blocked entirely by America and England, and there was no room for an increase in output, and what was referred to as a completion of military preparation for the war against America and England was in reality a mere changing of the distribution of the supplies which were already possessed by Japan, or preparation of personnel and materials for developing resources in the Southern Region in case of an outbreak of operations in the South, and Japan was obliged to be content with this.
As for the supplies for operation mentioned above, for the first time, in the period from September 1941 to December, 10% of the ammunition and 12% of the aviation gasoline were transferred to Formosa and French India.
4. As a supplementary explanation, I will give the details of the completion of military preparation for about ten years preceding the Pacific War.

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In September 1931, the Manchurian Affair broke out. The Japanese Army at that time basically consisted of over 17 Divisions and 26 Air Squadrons. (EX. 380) However, although the numerical strength of the Front seems to have been arranged, material to equip them was badly wanting, and even the ammunition allotted to each Brigade on its mobilization was hardly sufficient. Though it had been decided to produce these munitions by mobilizing all the industrial power of Japan evidently it was only a paper plan and there were many parts that could not be taken seriously. But as we had no concrete remedy for them, we did nothing about that. As for the productive power of aeroplanes and the storage of aviation gasolines they were almost none, and the real substance of the Imperial Army, which was commonly acknowledged to be the strongest army power in the East Asia, was a mere superficial armament that had no content. The amount of consumption of steel in one year by the army at that time was only 20 thousand tons, and the total budget was only about ¥ 200,000,000. Thus being under the restriction of state economy, in spite of the anxiety of the authorities concerned with the military preparations, not only were the preparations of the Japanese Army inferior when compared with those of the other powers, which after participating in the First World War showed a marked advance in their armaments, but they were also substantially getting poorer and poorer. Munitions and other materials produced were merely sufficient to supply the peace time consumption. In such a condition of the military preparation, the Manchurian Affair broke out. However, Japan had promised a cooperative defense with Manchukuo, while on the other hand had to consider the defense of that part of Manchuria which bordered with the great military power of USSR. In addition, she had to face the continued advancement of industries of the USSR, and her increase of the numerical strength in the Eastern Part of "Siberia". All of these necessitated Japan to increase her military power in Manchuria in order to feel secure in the northern region of Manchuria. But in reality, the economical restriction was as strict as ever and the military power in Manchuria was increased only slightly year by year. For instance, aviation which needed the most urgent progress, the annual amount of production was only about 100 million yen in reality, and the entire Army air unit, which consisted of 26 companies in 1931, was barely increased to 50 some odd companies in 1936. Moreover the make up of these companies was so poor that no one thought it possible to carry out offensive operations. In the General Staff Office, they considered that if something should arise between Japan and the USSR, the defense of Japan and Manchuria would be impossible unless Japan had at least as many as two thirds of the military strength anticipated to be used in East Asia by the USSR. However, in actuality such strength could never be provided.

So, it was a matter of course that no one had ever thought of preparing for an all out war with China, if such did ensue. Up to the happening of the Lukouchiao Incident in 1937, there had never been any request from the General Staff Office concerning the filling up of the armaments with a view to such an incident. The idea behind the desire to complete the armaments in those days was mainly to be prepared to take counter-measure if and when attacked by the USSR. It was planned with the idea that benzine and other necessary war materials, which were lacking in Japan and Manchuria, could be obtained from the United States and Britain and even from China. Fighting against China, Britain and the United States was never Contemplated.

5. In the spring of 1937 when I came back to Japan from European duty to serve in the Military Affairs Office, they were just beginning to realize the above plan to complete the armaments - the plan which was being made intently since 1936 in the way of defense against the USSR. On the other hand they were having much discussion about the plan to expand the productive power of Japanese and Manchurian with the objective of developing industrial economy of the two nations. When we checked the military demand with this plan, the self-sufficiency of fuels in the event of war with USSR, for instance, would be impossible in Japan and Manchuria even if the plan was carried out accordingly. Furthermore we had never in peace time considered stocking the quantity necessary for war time. So the plan was being carried out with the idea of keeping friendly relations with America, England and China etc., even if a war should break out against the USSR.
6. In such a situation as explained above, suddenly the Lukouchiao Affair broke out in July 1937. The affair spread more and more in spite of the Japanese policy and effort to minimize it. The development of the hostile situation gradually made it necessary to mobilize and send to China a Group, which had not been expected necessary. Even the budget for the expedition was barely appropriated in 3 piecemeal amounts during the summer and fall of 1937. And a considerable quantity of the materials which had been accumulated with a great deal of trouble in preparation to defend against the USSR was consumed against China. Moreover, the divisions which were expected to be used in Manchuria had been used in China, and in many cases their organizations and equipment were not suitable for the local situation and we suffered greatly. For instance, though the use of field guns was inconvenient and mountain guns were more expedient in China, most of the Japanese divisions were Field Artillery divisions. Therefore we had to reorganize them with old-fashioned mountain guns. Moreover the consumption on the battlefield far exceeded the amount that could be produced. The mobilization of war industries was not as effective as desired since it had just then begun. The unexpected large-scale operation in China consumed a large amount of war materials on the one hand, and increased the danger in the northern region of Manchuria.

7. Especially the occurrences of the Changkufeng affair in the summer of 1938 and of the Nomonhan affair in 1939 gave us a lesson and a chance to reconsider our military preparations. The lack of our munitions in the Changkufeng affair made us realize the fact that we were capable of supplying only seven and a half divisions in the event the affair spreads. In the Nomonhan affair our capacity of supplying air and mechanized units was inferior when compared with the efficiency of supply of the mighty air and mechanized units of the USSR. These facts made us feel that unless we put our entire efforts in military preparation against the USSR, it was not possible even to carry out the China affair with confidence. On the other hand, as it became evident that the Sino-Japanese affair was going to be prolonged in spite of Japan's desire to settle the affair early, to supply the China theater of war and to increase the security against the North, the drafting of a plan was undertaken in 1939 and the idea conceived was to strengthen the Army war supply mobilization for 3 years beginning in 1941. The total budget for the plan was about 100 billion yen, and 40% of it was to be appropriated for supplies in China and the rest was for military preparation in Manchuria. Also the transfer of a munitions industry to Manchuria was tried as much as possible in consideration of war against the Soviet, and it was decided to establish the South Manchuria Plant etc., in Mukden and in other places. The immediate completion of military preparations being so urgently demanded at that time that the ordnance manufacturing was considerably advanced but the cultivation of the resources which was the basis of the Manufacturing industries was much neglected. Especially, liquid fuel, "rubber", bauxite, and alloys of special steel among the war materials of Japan had to be obtained more than ever from abroad, that is America and England due to the expansion of necessary wartime strength and the consequent need of these materials. That is, the material support by America and England, which had been considered to be absolutely necessary in case of war with the Soviet in future, became much more vital. The army of that time, bearing even this serious burden, went ahead to draft the Three Year Plan.
8. As the Sino-Japanese affair progressed, it gradually brought about the anti-Japanese economical oppression of America, England and other countries. The situation became critically worse after the summer of 1940. However, if the relations with America and England should be broken, the Japanese Army would be frustrated in carrying out the Sino-Japanese affair as explained above, and besides, it would also mean the upsetting of the foundation of completing military preparations for the defense of Manchuria in view of the frequent armed conflicts actually occurring along the Soviet-Manchuria borders. Also as we had never thought of waring against America and England, we believed we would somehow be able to come through this crisis. We were just unable to change our point of view and engage in military preparations for war against America and England. In fact, the public opinion was anti-America and anti-English and it

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would have been natural for the military authorities to prepare for an emergency because such is their duty. But they had a set traditional idea of defense against the USSR and anybody who knew anything about the material situation in the event of war with America and England were fully aware of the difficulties that would confront Japan in the course of such war. These facts prevented them from making whole hearted preparations. For the Japanese Army at that time the solution of the China Affair and the military preparation for the defense against the USSR were more than they could handle. Even if full military preparation for war with America and England was ordered by their superiors they would not have been able to do so concretely due to the lack of materials and the budget.

Since the middle of 1941, the situation grew worse day by day. In the Japanese Army, the consensus of opinion was to accelerate to reach an agreement through diplomatic negotiations and avoid the dangerous situation. And thus, the summer of 1941 came as mentioned above.

On this 28th day of May, 1947
At I.M.T.F.E.

Deponent /S/ NISHIURA, Susumu (seal)

I, KIYOSE, Ichiro, 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: /S/ KIYOSE, Ichiro (seal)

OATH

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

/S/ NISHIURA, Susumu (seal)