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Digital-Related Matters

Japan Begins Formulation of the “AI Basic Plan” under the AI Act¹

(Cabinet Office, September 12)

- On September 12, 2025, the first meeting of the AI Strategic Headquarters was held to discuss the outline of the upcoming AI Basic Plan. The plan is being formulated pursuant to Article 18(1) of the Act on Promotion of Research and Development, and Utilization of AI-related Technology (Japan’s AI Act), which came fully into force on September 1, 2025. The plan will set forth the basic policy on measures that the government should take for the promotion of research, development, and utilization of AI-related technologies.
- In line with the fundamental principles of Japan’s AI Act, the draft outline of the plan presents the following three guiding principles:
 - Balancing innovation and risk management to realize a human-centered AI society where people and AI work together and human creativity can flourish.
 - Implementing the PDCA (Plan–Do–Check–Act) cycle embodied in Japan’s AI Act to respond flexibly and swiftly to societal and technological changes.
 - Integrating domestic and international policies and proactively engaging in global collaboration to position Japan as a hub for diverse AI innovation.
- The draft outline also identifies the following four basic policy for promoting research, development, and utilization of AI-related technologies:
 - (1) Using AI: Foster innovation by promoting active use of cutting-edge AI technologies across Japanese society, while facilitating data accumulation, utilization, and sharing across organizations to enable full-scale AI deployment.
 - (2) Creating AI: Develop “trustworthy AI” as a national strength by encouraging development and integration across each layer of the AI ecosystem, from infrastructure to applications.
 - (3) Enhancing AI reliability: Establish and lead proper AI governance both domestically and internationally to ensure trustworthy collaboration between humans and AI. This includes conducting research under Article 16 of Japan’s AI Act to identify emerging risks in a timely and appropriate manner, and ensuring compliance through the guidelines under Article 13.
 - (4) Collaborating with AI: Promote continuous transformation of industries, employment systems, and social institutions to realize collaboration between humans and AI.
- Furthermore, prior to the establishment of the AI Strategic Headquarters, research studies were conducted on (1) AI that generates sexual deepfakes and (2) the use of AI in employment processes such as recruitment and personnel evaluation. The fact that such studies were conducted suggests that the government is likely to prioritize and

¹ https://www8.cao.go.jp/cstp/ai/ai_hq/1kai/1kai.html (in Japanese)

respond to these issues.

Takeaway: The government will continue discussions toward finalizing the plan and developing related guidelines, including consultations with experts through the Expert Panel on Artificial Intelligence Strategy. We recommend monitoring these developments, particularly given the different approaches from the EU AI Act.

Convening of the AI Security Committee²

(Ministry of Internal Affairs and Communications, September 18)

- On September 18, 2025, the Ministry of Internal Affairs and Communications (MIC) held the first meeting of the AI Security Committee under the Cybersecurity Task Force, with the aim of discussing technical measures and related issues to address threats to AI.
- As the social implementation of generative AI continues to advance, the AI Guidelines for Business have been formulated to promote the safe and secure use of AI, with “ensuring security” as one of the common guiding principles. In addition, reflecting the growing international attention to AI safety, the AI Safety Institute (AISI), which is comprised of relevant ministries and agencies, has been established to identify and analyze potential threats to AI. The meeting of the committee has been convened in light of these developments.
- The main topics discussed at the meeting included:
 - Approaches to technical measures for addressing threats to AI by developers and providers.
 - Approaches to promoting awareness and dissemination of such measures.
- Going forward, the Committee plans to meet approximately once a month. A summary of its findings is expected to be compiled around December this year, and the MIC intends to publish related guidelines within the current fiscal year.

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https://www.soumu.go.jp/main_sosiki/kenkyu/cybersecurity_taskforce/02cyber01_04000001_00321.html (in Japanese)

Industry

Japan's Ministerial Conference on Promoting the Globalization of Digital Industries³

(Cabinet Secretariat, September 8, 19)

- To promote the globalization of Japan's digital industries, the Japanese government has launched the Ministerial Conference on Promoting the Globalization of Digital Industries. The purpose of this initiative is to develop and implement policies in a strategic and integrated manner across ministries. The inaugural meeting highlighted the growing deficit in Japan's digital trade balance, and the second session focused on encouraging the globalization of the entertainment and content industry.
- **Third Meeting (September 8, 2025):**
The discussion centered on the current state and challenges of Japan's cybersecurity and content industries. With the digitalization of society progressing rapidly, cyberattacks have become increasingly diverse and complex, underscoring the importance of strengthening Japan's cybersecurity products to meet global demand. However, most cybersecurity products used domestically are foreign-made. Participants discussed (1) strengthening the foundation of Japan's cybersecurity industry through public procurement of promising technologies, (2) developing and implementing cybersecurity measures in anticipation of advances in technologies such as quantum computing, and (3) supporting the content industry's global competitiveness through multi-year and year-round funding, as well as investment in digital production and studio infrastructure.
- **Fourth Meeting (September 19, 2025):**
Building on the discussions of the previous sessions, the fourth meeting formulated key policy measures to promote the globalization of Japan's digital industries. Two main policy pillars were identified.
 - The first focuses on fostering high-quality digital solutions with global competitiveness by promoting AI and data utilization, enhancing cybersecurity, and building international networks.
 - The second centers on enhancing the profitability of Japan's digital content in overseas markets through large-scale, long-term public-private investment. This includes supporting IP and talent development, content creation, and international distribution and fan community building.

Takeaway: Japan aims to accelerate the global expansion of its digital industries through two key strategies: promoting internationally competitive digital solutions and enhancing the global reach of Japanese content. To this end, the government will strengthen AI and data utilization, advance cybersecurity, and foster international talent networks, while supporting the overseas deployment of

³ https://www.cas.go.jp/jp/seisaku/digital_global_kakuryokaigi/index.html (in Japanese)

innovative solutions from both large and small enterprises. At the same time, Japan seeks to expand the global market for Japanese content to ¥20 trillion by 2033 through bold investment in intellectual property, talent, and digital technologies, along with efforts to build international distribution channels and fan communities. Businesses in the EU such as content distributors can have opportunities to address this Japan's efforts.

Data Protection

Advancing EU–Japan Cooperation on Data Protection and Consumer Policy⁴⁵

(Personal Information Protection Commission, Consumer Affairs Agency, September 18)

- On September 18, 2025, Tezuka Satoru, the Chairperson of the Personal Information Protection Commission of Japan, and European Commissioner Michael McGrath, met in Tokyo to further advance the strategic collaboration between the EU and Japan in the areas of data protection and data transfers.
- They discussed the significant progress in the ongoing talks to extend the scope of the EU adequacy decision for Japan to academia and research, as well as to the public sector. They welcomed the successful conclusion of discussions on academia and research, recognizing the substantial mutual benefits this will bring. They also agreed to intensify discussions on extending the adequacy decision to the public sector and to review progress by the end of the year.
- The meeting further reaffirmed their shared commitment to the promotion of Data Free Flow with Trust (DFFT). This includes efforts such as expanding mutual adequacy to third countries, fostering interoperability of model contractual clauses used in different jurisdictions, and promoting alignment with international instruments such as the OECD Declaration on Government Access to Personal Data Held by Private Sector Entities.
- Commissioner McGrath also met with Yoshitaka Itō, Minister for Consumer Affairs and Food Safety, to discuss consumer policy cooperation under the EU-Japan Strategic Partnership Agreement. Both sides reaffirmed their commitment to strengthening collaboration on consumer product safety, enforcement, and education, and to continuing the EU-Japan Informal Dialogue on Consumer Policy, focusing on emerging issues such as digitalization, green transition, and consumer vulnerabilities.

Launch of a Common Reporting Format for Cyberattack Incidents⁶

(Personal Information Protection Commission, September 30)

- Effective October 1, 2025, a common reporting format was adopted for data breach incident reports regarding DDoS attacks and ransomware cases.
- In the past, when organizations in certain sectors experienced data breach incidents as a result of cyberattacks, they were required to submit reports to each relevant government agency using different reporting formats. This created an excessive reporting burden on the affected organizations. In response, with the introduction of

⁴ https://www.ppc.go.jp/enforcement/cooperation/250918_EU_McGrath/ (in Japanese)

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https://www.caa.go.jp/policies/policy/consumer_research/international_affairs/assets/consu mer_research_cms209_250918_01.pdf

⁶ <https://www.ppc.go.jp/personalinfo/legal/leakAction/#cloud> (in Japanese)

the common reporting format, organizations can now submit incident reports on DDoS and ransomware cases to all relevant authorities using a single, standardized form.

- Looking ahead, in line with the reporting obligations to be introduced under the Act on Prevention of Damage Caused by Unlawful Acts Against Important Electronic Computers, which is scheduled to come into effect in the near future, the Japanese government will make the necessary arrangements to centralize the point of contact when reports are submitted via the common format.
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Economic Security

METI Jointly Signs International Guidance on a Shared Vision of Software Bill of Materials (SBOM) for Cybersecurity with National Cybersecurity Office (NCO)⁷

(Ministry of Economy, Trade and Industry, the National Cybersecurity Office, September 4)

- On September 3, 2025, Japan's National Cybersecurity Office (NCO) and the Ministry of Economy, Trade and Industry (METI) jointly signed "A Shared Vision of Software Bill of Materials (SBOM) for Cybersecurity" (the "Document"). Developed under the leadership of METI and the U.S. Cybersecurity and Infrastructure Security Agency (CISA), the Document provides international guidance on the importance of SBOM for managing software vulnerabilities and enhancing supply chain transparency. Cybersecurity authorities from 15 countries, including Japan, the U.S., Germany, France, Italy, the Netherlands, Poland, Czechia, Slovakia, Australia, India, Singapore, and Korea, endorsed the initiative.
- **Background and Purpose** - Due to growing concerns regarding software vulnerabilities, SBOM (also called as "list of software components") has gained global recognition as a key tool for both developers and users. By improving transparency and accountability, SBOM aligns with the Secure-by-Design principle, ensuring cybersecurity is integrated at the earliest stages of product development. In Japan, METI has been actively promoting SBOM adoption through expert task forces and by publishing practical guides (ver. 1.0 in 2023, ver. 2.0 in 2024) outlining its benefits and key notes for implementation.
- **Advantages in introducing SBOM**
 - Efficient software vulnerability management
 - Supply chain risk management (selecting safe software/smooth communication between users and suppliers)
 - Improving the software development process
 - Efficient software license management
- **SBOM stakeholders and their benefits**

Software developers	They will be able to select the components that best suit their needs and respond appropriately to vulnerabilities.
Procurers	Transparency of software information enables procurement decisions based on risks.
Operators	It will be easier to determine which software should be addressed regarding new vulnerabilities.
Government agencies	It will be possible to improve the security risk management system across the country through the utilization of SBOM in the procurement processes.

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https://www.meti.go.jp/english/press/2025/0904_001.html

Takeaway: While the Document represents a shared international understanding of SBOM's importance, METI will continue work toward issuing more detailed technical guidance. This will further promote global interoperability in cybersecurity practices and strengthen international resilience against software supply chain risks.

The Ministry of the Environment published monitoring guidelines on the environmental impact of off-shore wind power plants⁸

(Ministry of the Environment, September 11)

- On September 11, the Ministry of the Environment published monitoring guidelines⁹ for the environmental impact of off-shore wind power plants.
- The guidelines set forth the basic approach for monitoring the environmental impact of off-shore wind power plants. The guidelines are not legally binding and are a reference material to which off-shore wind power plant operators may refer.
- There is a limited number of off-shore wind power projects in Japan. Thus, the guidelines introduce methods of monitoring noise, water quality, bird strikes, surrounding ecosystem, etc., and detail how to make effective use of that data.

Takeaway: Japan should continue to seek effective approaches for developing and monitoring off-shore wind power projects to contribute to a carbon neutral society.

The Japan-EU Energy Dialogue 2025 was held to discuss cooperation on the clean energy transition between Japan and EU¹⁰

(Ministry of Economy, Trade and Industry, September 16)

- On September 16, the Japan-EU Energy Dialogue 2025 was held between the Commissioner of the Japanese Agency for Natural Resources and Energy and the Director General for Energy of the European Commission.
- The key points of the Japan-EU Energy Dialogue 2025 are as follows.
 - **Building resilient and reliable supply chains**
Both parties confirmed the importance of building resilient and reliable supply chains in energy sectors (i.e., wind, solar, and hydrogen) and the necessity of cooperation in those sectors.
Also, they agreed that it is useful to take elements of transparency, diversification, security, sustainability, trustworthiness, and reliability into consideration when developing a country's policy measures for energy transitions.
 - **Launching the Japan – EU Intergovernmental Gas Dialogue**
The Japan-EU Intergovernmental Gas Dialogue was launched as a part of the Japan-EU Energy Dialogue. Both parties reaffirmed the importance of energy security, affordability, flexibility, and transparency of the LNG and hydrogen markets. A public/private roundtable was also held to discuss the role of private

⁸ https://www.env.go.jp/en/press/press_00418.html

⁹ <https://www.env.go.jp/content/000339264.pdf>

¹⁰ https://www.meti.go.jp/english/press/2025/0916_002.html

stakeholders in ensuring adequate energy capacity.

Takeaway: There is expected to be further cooperation between Japan and the EU, both in public and private sectors, on the clean energy transition, including the establishment of a resilient and reliable supply chain, as well as possible cooperation regarding natural gas/LNG, hydrogen, the reduction of methane emissions, and nuclear power.

Launch of the Working Group on Circular Economy by the Minister of the Environment of Japan and the European Commissioner for Environment, Water Resilience, and a Competitive Circular Economy¹¹

(Ministry of the Environment, September 19)

- On September 19, a bilateral meeting between the Minister of the Environment of Japan and the European Commissioner for Environment, Water Resilience, and a Competitive Circular Economy was held.
- They exchanged views on priority areas of bilateral cooperation, including circular economies, pollution, and biodiversity, and officially launched the Working Group on Circular Economy.¹²
- The Working Group will operate regularly with the participation of the relevant stakeholders, as appropriate.

Takeaway: There is expected to be long-term collaboration between Japan and the EU to address environmental challenges and to foster competitive, sustainable industries.

¹¹ https://www.env.go.jp/en/press/press_00418.html

¹² https://www.eeas.europa.eu/delegations/japan/bilateral-meeting-between-keiichiro-asao-minister-environment-japan-and-jessica-roswall-european_en

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