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Movement Toward Effective Measures to Restrict Access to Illegal Online Casinos in Japan: Study Group Releases Draft Interim Summary of Issues¹

(Ministry of Internal Affairs and Communications, July 10)

- The Ministry of Internal Affairs and Communications (“MIC”) conducted public consultations from July 11 to August 15, 2025 on the Draft Interim Summary of Issues compiled in July by the Study Group on Measures to Deter Access to Online Casinos, which discusses potential approaches to restricting access to illegal online casino content.
- The harms associated with illegal online casinos are becoming increasingly serious, and it is vital to adopt comprehensive and effective countermeasures. These must include restrictions on payment methods used for gambling and medical interventions for gambling addiction. Given the reality that online casino platforms operated abroad are easily accessible via the Internet, Japan also recognizes the need to consider access deterrence measures.
- One potential measure being considered is website blocking, which technically requires the comprehensive monitoring of destination information about communications (URLs) accessed by all Internet users. As such, it poses a potential conflict with the "secrecy of correspondence" obligation set forth in the Telecommunications Business Act. Therefore, any implementation of blocking by telecommunications carriers will require a legally sound framework and supporting environment.
- Currently, more than ten countries have introduced online casino blocking measures. Among them, France and the United Kingdom are notable for implementing nationwide blocking systems in a stable and consistent manner. These international examples will serve as important references as Japan considers its own policy options.

Takeaway: Moving forward, the Study Group on Measures to Deter Access to Online Casinos plans to expand its evaluation of the effectiveness of blocking measures, while also assessing the impact of alternative access deterrence strategies. Taking into account both domestic conditions and international practices, the group aims to present a policy direction based on the situation at that time. Stakeholders in the operation of online casinos should keep an eye on the developing regulatory situation.

¹ https://www.soumu.go.jp/menu_news/s-news/01kiban18_01000258.html (in Japanese)

Japan Publishes Survey Results on 5G Usage Needs in the 26 GHz and 40 GHz Bands²

(Ministry of Internal Affairs and Communications, July 15)

- In response to growing demand for fifth-generation mobile communication systems (5G), the MIC has been actively promoting 5G deployment, including through successive allocations of 5G frequency bands.
- The MIC conducted a public survey between May 19 and June 18, 2025 to assess current and future needs for 5G use in the 26 GHz and 40 GHz bands. The results of the survey were published on July 15.
- The survey collected input from nine companies about their motivations for adopting 5G, anticipated uses, and other related expectations. These findings will serve as an important reference for the future development of regulatory frameworks and spectrum allocation policies in Japan.

Public Consultation on the Draft Revision of Guidelines under Article 26 of the Information Distribution Platform Act (Illegal Online Casino Measures)³

(Ministry of Internal Affairs and Communications, July 17)

- The MIC has drafted a proposed revision to the Guidelines under Article 26 of the Information Distribution Platform Act to strengthen measures against illegal online casinos. A public consultation on the draft was conducted from July 18 to 31 (2025).
- On June 18, 2025, a revision to the law on countermeasures against gambling addiction was enacted in Japan. The amendment criminalizes the act of disseminating information via the internet that induces unspecified individuals in Japan to engage in illegal online gambling, including online casinos.
- In line with this revision to the law, the MIC has decided to revise the Guidelines under Article 26 of the Information Distribution Platform Act to include the act above in the list of situations in which there is a statutory obligation to implement preventive measures to prevent the prohibited transmission of information.

² https://www.soumu.go.jp/menu_news/s-news/01kiban14_02000716.html (in Japanese)

³ https://www.soumu.go.jp/menu_news/s-news/01ryutsu02_02000446.html (in Japanese)

Results of the Public Consultation on the Draft Partial Revision of the Guidelines Concerning "Seller or Equivalent Person" under the Act on the Protection of Consumers Who Use Digital Platforms for Shopping⁴

(Consumer Affairs Agency, July 18)

- On July 18, 2025, the Consumer Affairs Agency released the results of the Public Consultation on the draft partial revision of the guidelines concerning a "Seller or Equivalent Person" under the Act on the Protection of Consumers Who Use Digital Platforms for Shopping ("DPF Act").
- The DPF Act provides protections for users regarding transactions on digital shopping platforms. The DPF Act primarily establishes the following matters:
 - Obligation of digital platform providers to make efforts to implement and disclose an outline of measures implemented, such as measures that enable smooth communications between consumers and sellers or equivalent persons, measures to secure the appropriateness of representations of sales conditions, etc., in response to complaints filed by consumers, and measures to request that sellers or equivalent persons provide information helpful for identifying the relevant sellers or equivalent persons;
 - The Prime Minister may request that digital platform providers suspend a seller or equivalent person's use of the relevant digital platform if a representation substantially differs from the truth or is otherwise inappropriate with respect to important particulars (specifically, those helpful for judging the safety of a product) and the seller or equivalent person cannot be expected to correct the representation;
 - Right to request disclosure of a seller or equivalent person's information as necessary when consumers make a claim for damages, etc.
- Although the DPF Act does not apply to consumer-to-consumer transactions, individuals acting as sellers or equivalent persons while posing as consumers, also known as "Hidden Businesses," have emerged. In response, the guidelines concerning sellers or equivalent persons were established in 2022 to clarify the scope of the DPF Act by outlining key concepts and factors used to determine who qualifies as a seller or equivalent person.
- This public consultation concerned a partial revision of these guidelines. Based on the results of the consultation, the revised guidelines were published on July 18. The main points of the revision are as follows:
 - Addition of examples of factors that may indicate a person is presumed to fall within the category of seller or equivalent person (e.g., continuous sale of alcoholic beverages);
 - Clarification of the expected role of digital platform providers in situations in which consumer-to-consumer transactions are conducted on the platform.

⁴ <https://www.caa.go.jp/notice/entry/043049/> (in Japanese)

Takeaway: This revision of the guidelines is an important step toward clarifying responsibilities and enhancing transparency in transactions conducted on digital platforms. Businesses are encouraged to take this opportunity to review their roles and obligations and prepare appropriate responses.

Subordinate Legislation and Guidelines for the Act on the Promotion of Competition for Specified Smartphone Software⁵

(Japan Fair Trade Commission, Ministry of Economy, Trade and Industry, July 29)

- The Japan Fair Trade Commission (“JFTC”) invited public consultation on draft subordinate legislation (a Cabinet Order and JFTC Rules) and Guidelines relating to the Act on Promotion of Competition for Specified Smartphone Software (Mobile Software Competition Act (“MSCA”)) from May 15 to June 13, 2025. After reviewing the feedback, the JFTC revised and published the following subordinate legislation and guidelines on July 29, 2025.
 - **Cabinet Order**

Prior to the revision, the Cabinet Order established only the average number of users of specified software required for designation of specified software service providers. However, as a result of the revision, it now also establishes other matters, the specification of which was delegated by the MSCA to the Cabinet Order (e.g., provisions specifying justifiable purposes such as ensuring cybersecurity).
 - **JFTC Rules**

The Rules establish various matters delegated to the JFTC Rules under the MSCA (or the related Cabinet Order). As a result of this revision, provisions have been added, including data subject to prohibitions on use, data requiring disclosure of acquisition conditions, specific implementation methods for information disclosures related to changes in specifications, and details for compliance reports and investigations into conduct violating the Act.
 - **Guidelines**

The newly established Guidelines aim to clarify conduct that violates the prohibitions established in the designated provider provisions, and the actions that designated providers should take to comply with the provisions regarding measures to be taken by designated providers. The clarification of the JFTC's policy for enforcement of the Act is intended to contribute to the smooth and appropriate application of this Act.
- The MSCA will come into full effect on December 18, 2025. The related subordinate legislation mentioned above will come into effect on the same date.

⁵

<https://www.jftc.go.jp/en/pressreleases/yearly-2025/July/250729.html>

Takeaway: While the MSCA sometimes is referred to as a "Mini-DMA" (Digital Markets Act), the criteria for identifying "designated providers" under the MSCA differ from the those used to identify "gatekeepers" under the DMA. Moreover, some obligations of designated providers exist only in the MSCA, such as mandatory measures related to changes in the specifications of specified software (MSCA, Art. 13), and other provisions are found only in the DMA, such as the obligation to provide advertisers with information on a daily basis, free of charge, concerning each advertisement placed by the advertiser (DMA, Art. 5(9)). As such, companies that may fall within the scope of the MSCA should be aware that it imposes distinct regulatory requirements and obligations from the DMA, and must ensure compliance by closely following the relevant subordinate legislation and guidelines.

Industry

Courtesy Call to Prime Minister Ishiba and Presentation of the Joint Recommendation by the Japan-EU Business Round Table (BRT) Co-Chairs⁶⁷

(Ministry of Foreign Affairs of Japan, July 23)

- On July 23, 2025, Prime Minister Ishiba received a courtesy call from Endo Nobuhiro, Co-Chair of the Japan-EU Business Round Table (“BRT”), and Jeremy Grossas, Acting Co-Chair. The delegation presented the Joint Recommendations adopted at the 26th BRT Annual Meeting, held in Tokyo in February 2025.
- At the beginning of the meeting, Mr. Endo handed over the Joint Recommendation to Prime Minister Ishiba and explained that it reflects the shared common values of Japanese and EU business leaders to enhance industrial competitiveness and ensure economic security, the main themes of this year’s BRT. He expressed his intent to reinforce economic ties between Japan and the EU through continuing dialogue and cooperation with member companies. Mr. Grossas emphasized the BRT’s role in addressing geopolitical and technological challenges to ensure sustainable economic growth for both Japan and the EU.
- Prime Minister Ishiba acknowledged the importance of strengthening collaboration between Japan and the EU based on shared common values. He expressed appreciation for the BRT’s work and noted that the government of Japan would consider the recommendations carefully. He also encouraged the BRT to continue playing a key role in strengthening bilateral cooperation, especially on issues such as economic security and strengthening industrial competitiveness.
- This year’s Joint Recommendation focuses on themes that include economic security, industrial competitiveness, trade, investment and regulatory cooperation, life sciences, digital policy, and the environment—highlighting shared policy priorities for Japanese and EU industries.

The 30th Japan-EU Summit: Strengthening Strategic Partnership and Global Cooperation⁸

(Ministry of Foreign Affairs of Japan, July 23)

- On July 23, 2025, Prime Minister Ishiba hosted the 30th Japan-EU Summit in Tokyo, together with President António Costa of the European Council and President Ursula von der Leyen of the European Commission. The leaders reaffirmed their shared values and strategic partnership amid rising global uncertainty.
- At the summit and subsequent working dinner, the leaders issued a Joint Statement,

⁶ https://www.mofa.go.jp/ecm/ie/pageite_000001_01136.html

⁷ https://www.meti.go.jp/english/press/2025/pdf/0715_001a.pdf

⁸ https://www.mofa.go.jp/erp/ep/pageite_000001_01137.html

along with Attachment I: Deliverables and Priorities and Attachment II: Japan-EU Competitiveness Alliance.

- Prime Minister Ishiba emphasized the importance of Japan-EU cooperation in global governance, multilateralism, and ensuring a free and open international order based on the rule of law. The EU leaders emphasized that Japan is the EU's closest strategic partner in the Indo-Pacific and that the Japan-EU EPA serves as a key foundation for cooperation based on shared values. Key outcomes included:
 - Agreement to implement steady cooperation in areas such as cyber security, the defence industry, maritime security, space, and information, based on the Japan-EU Security and Defence Partnership announced in November 2024.
 - Progress in cooperation toward the launch of formal negotiations for a Japan-EU Security of Information Agreement.
 - Announcement of the launch of the Japan-EU Competitiveness Alliance, which targets joint work on economic security, innovation, energy, and industrial policy.
 - Expansion of the Japan-EU High-Level Economic Dialogue to strengthen strategic cooperation.
- On global issues, both sides committed to joint efforts on climate change, and reaffirmed strong alignment on regional challenges, including Ukraine, for which the EU expressed appreciation for Japan's continuing support. Prime Minister Ishiba also raised the abduction issue, and gained EU backing.

Takeaway: The Summit underscored Japan and the EU's roles as likeminded partners, committed to stability, prosperity, and shared strategic priorities across the Indo-Pacific and Europe.

Economic Security

Japan Launches Cybersecurity Strategy Headquarters to Strengthen National Cyber Capabilities⁹¹⁰

(Cabinet Secretariat, July 1)

- On July 1, 2025, Prime Minister Ishiba convened the First Meeting of the Cybersecurity Strategy Headquarters at the Prime Minister's Office. The meeting focused on the development of Japan's next national cybersecurity strategy and the formulation of the Basic Policy under the Cybersecurity Response Capability Enhancement Act, which was enacted recently by the Diet.
- The newly restructured Headquarters—now chaired by the Prime Minister and comprised of all Cabinet Ministers—marks a significant upgrade to Japan's cybersecurity governance. The National Cybersecurity Office was established within the Cabinet Secretariat to serve as the central command for Japan's comprehensive cyber defense efforts.
- Japan faces increasingly sophisticated cyber threats that pose serious risks to public safety, economic fairness, and national security. Strengthening Japan's cyber defence capabilities is a top priority. In response to this growing threat, the Japanese Diet recently passed the Cybersecurity Response Capability Enhancement Act and the Supplementary Act, which includes the introduction of Active Cyber Defense, aligning Japan's strategic posture with that of leading Western countries.
- According to a Cabinet report, the Basic Policy based on the Cybersecurity Response Capability Enhancement Act will be formulated within 2025, and detailed implementation rules—including Cabinet and ministerial ordinances—will be prepared around by April 2026, particularly for sections involving public-private collaboration, such as the notification obligations of material infrastructure operators in the course of cyber attack incidents, etc.

Takeaway: Japan is accelerating its cybersecurity reform through strong institutional leadership and a new legal framework. The Cybersecurity Response Capability Enhancement Act aims to position Japan's capability for response to cyber threats alongside major Western countries in proactively addressing national cyber threats, and opens new avenues for international cooperation.

⁹ <https://www.kantei.go.jp/jp/103/actions/202507/01hossokushiki.html> (in Japanese)

¹⁰ <https://www.kantei.go.jp/jp/103/actions/202507/01security.html> (in Japanese)

Ministry of the Environment Published Policy on Middle-to-Long Term Development of Green Finance Market¹¹

(Ministry of the Environment, Minister's Secretariat, July 25)

- On July 25, 2025, the Ministry of the Environment published a policy describing Japan's approach to middle-to-long term development of a green finance market in Japan.
- Approximately JPY 150 trillion in investments will be required over the next 10 years to achieve net zero carbon emissions in Japan by 2050; therefore, it is crucial to leverage private funding for projects promoting green transitions, such as renewable energy and energy efficiency.
- The Ministry of the Environment is aware that some believe investments in the green transition have peaked. However, the Ministry of the Environment made it clear that it will commit to continue encouraging and promoting green finance to increase the capital flow, considering ESG factors, and generating positive environmental impacts through those investments by taking the following initiatives.
 - Fostering a sustainable finance market
 - ◇ Developing guidelines for green financial products (e.g., green loans, green bonds, sustainability-linked loans, sustainability-linked bonds)
 - ◇ Engaging in the development of guidelines for sustainable products (e.g., transition finance, impact finance, social finance)
 - ◇ Providing grants for green financial products
 - Supporting ESG regional finance
 - ◇ Supporting regional financial institutions accelerating ESG financing by providing a practical guide to ESG regional finance, green funds, and subsidies
 - Promoting financial institutions' ESG commitments and engagement based on ESG disclosures
 - ◇ Supporting financial institutions' climate disclosures through capacity-building programs and pilot programs
 - ◇ Promoting information disclosures in other areas relating to the environment (e.g., Task force on Nature-related Financial Disclosures (TNFD))
- The Ministry of the Environment set up a portal website explaining its policy and green finance projects: <https://greenfinanceportal.env.go.jp/en/>

Takeaway: Although geopolitical tensions could impact the transition to a green economy, the Japanese government has announced its clear intent to continue to promote green finance. This indicates that there are business opportunities for companies that pursue the green transition.

¹¹ https://www.env.go.jp/press/press_00235.html (in Japanese)

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