Recommendations
of the
EU-Japan Business Round Table
to the Leaders of the European Union and Japan

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Working Party 3
Digital Innovation and Mobility

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List of Abbreviations

Abbreviation	Meaning
AI	Artificial Intelligence
BASA	Bilateral Aviation Safety AgreementEU-Japan
BRT	Business Round Table
DPA	Data Processing Agreement
DX	Digital transformation
DFFT	Data Free Flow with Trust
EASA	European Aviation Safety Agency
ECCG	The European Cybersecurity Certification Group
EPA	Economic Partnership Agreement
EU	European Union
EUCS	European Cybersecurity Certification Scheme for Cloud Services
GDPR	General Data Protection Regulations
GX	Green transformation
IAA	Industrial Accelerator Act
IAP	Institutional Arrangement for Partnership
ICT	Information & Communications Technology
IFR	Instrument Flight Rules
IoT	Internet of Things
ITA	Information Technology Agreement
JISC	Japanese Industrial Standards Committee
JSI	Joint Statement Initiative
MC	Ministerial Conference
MRO	Maintenance, Repair and Overhaul
NIS	Network Information Security
RE	Renewable Energy
SME	Small and Medium-sized Enterprise
R&D	Research and Development
WP	Working Party
WTO	World Trade Organization

Introduction

Digital Innovation

As geopolitical tensions continue to escalate the EU and Japan have consistently established a strong cooperative relationship as like-minded countries sharing values and principles, which has become increasingly important in recent years.
In light of the rise in protectionist policies, including reciprocal tariffs centred around the US, and heightened geopolitical tensions in 2025, there is a strong demand for principles such as liberal trade and the promotion of data flows, championed by institutions like the WTO. Consequently, there is a need to promote public-private partnerships between the EU and Japan based on common principles such as sustainability and reliability.

An international framework conducive to liberal trade principles is also important in the field of digital innovation, and the EU-Japan Digital Partnership launched in 2022 is regarded as the framework for identifying areas of common interest between the EU and Japan and promoting cooperation. It is hoped that EU and Japan will strengthen its cooperation with international frameworks such as the G7 and the Global South, which are affected by the digital divide, while focusing on EU-Japan cooperation which has similar values.

The BRT recognised that the Joint Statement of the Third EU-Japan Digital Partnership Ministerial Meeting, held in May 2025, affirmed an agreement to strengthen competitiveness, innovation, and resilience in new areas such as semiconductors and quantum technologies. It also acknowledged the intention to lead digital governance and innovation, including AI, through a human-centric approach.

Furthermore, we welcome the confirmation of EU-Japan cooperation for strengthening supply chains, and the expression of shared concerns regarding non-market policies and practices, as well as overcapacity, at the 6th EU-Japan High-Level Economic Dialogue held in May 2025.

Continuously, we hope that this proposal will contribute to a solution to strengthen the bilateral innovation ecosystem, promote economic growth between the EU and Japan, and strengthen the EU-Japan relationship, with a view to promote cooperation in the areas of reliable and free data flow, bilateral cooperation in data governance, quantum-HPC computers, cybersecurity, and artificial intelligence, based on the realization of sustainable societies in both countries.

WP-3 / # 01* / EJ to EJ Cooperation in Rulemaking on Digital Trade to realize DFFT

The BRT calls on the EU and Japanese Authorities to:

- Amid international calls, notably from the US administration, for the removal of reciprocal tariffs and non-tariff barriers, the EU and Japan, as countries sharing common values, should collaboratively counter protectionist moves to maintain and strengthen a free and fair trading system based on multilateralism as stipulated by the WTO and other frameworks.
- The EU and Japan should explicitly respect WTO rules and contribute to the stabilisation of the global trading order, including digital trade.
- Keep negotiating at the WTO Joint Statement Initiative on the electronic commerce to develop rules of a higher standard to reach an agreement among Party/Member as early as possible, such as free cross-border data flows, prohibition of data localisation and of requiring access to source codes and algorithms, and non-discriminatory treatment of digital products for promoting digital trade.
- Keep their strong support for the conclusion of the WTO Joint Statement Initiative on the electronic commerce. BRT welcomes the “stabilized” text on the Agreement on Electronic Commerce that was published on the 26th of July 2024. Of particular importance for the BRT is the text which includes the prohibition of the imposition of customs duties on electronic transmissions.
- Encourage the United States to re-engage in the WTO Joint Statement Initiative on the electronic commerce. BRT takes note that the United States had decided to make a pause in supporting longstanding demands with respect to free cross-border data flow and regrets that the United States did not endorse the joint statement issued on 26th of July 2024. BRT believes that EU and Japan which had achieved a meaningful progress on free cross-border data flow of the EU-Japan EPA and amended related articles can advocate members of WTO to step up toward higher level of commitment.
- Pursue their utmost efforts to ensure that the stabilized text of July 2024 be deposited to the WTO General Council table and to request that it is incorporated in the WTO core set of rules as an Annex 4 of the WTO Treaty. BRT acknowledges that it will be an important step towards stepping the Agreement on Electronic Commerce as a legally binding instrument, setting up global rules on digital trade, stating what businesses can do and cannot do in the fast-evolving digital environment. The agreement is an important tool to promote the development of strong and interoperable regulatory frameworks in areas such as privacy and data protection, e-authentication, e-signature, e-contracts, e-invoicing, paperless trading, etc.
- Cooperate in the development of government access rules for personal data held by the private sector.
- Work with like-minded governments and industry to develop a balanced approach to multi-sector data flows within trade agreements and international frameworks to enable DFFT. Rather than developing its own standards, it would ensure consistency with international standards on cross-border data exchange.

- In the Joint Statement of the Third Ministerial Meeting of the EU-Japan Digital Partnership, commitments towards initiatives for data sharing, enhanced interoperability, and the strengthening of trusted free data flows were welcomed.
- Given the escalating geopolitical risks, establishing interoperability between the industrial data spaces of the EU and Japan is indispensable for increasing data visibility across global supply chains and, in order to enhance and strengthen these entire supply chains through the use of AI, improving their efficiency and resilience. Therefore, we call for the acceleration of intergovernmental consultations to facilitate close dialogue and cooperation between EU and Japanese authorities on challenges such as verifying the authenticity and existence and defining service assurance levels.
- Furthermore, we anticipate strengthening policy coordination between the EU and Japan in promoting international cooperation. EU-Japan collaboration, grounded in shared values of trust and respect for data sovereignty, will be key to building a sustainable society alongside businesses worldwide. This includes initiatives such as the establishment of international standards and leading a global circular economy driven by AI and data that involves like-minded nations and regions.
- Cooperate in the OECD on the establishment of the IAP (Institutional Arrangement for Partnership).

The BRT believes that:

- The BRT is confident that for the EU and Japan to adhere to WTO rules on tariffs, trade, subsidies, etc., and to promote trade policies in line with WTO regulations, their concerted efforts to engage with countries, including the United States, will lead to the preservation of the global free trade system.
- The 14th WTO Ministerial Conference (MC14) will be a crucial meeting to renew the Moratorium on Customs Duties on electronic transmissions. The Moratorium has been extended up until MC14. Given that it is unlikely that the JSI on E-Commerce will be by that time legally binding for all its signatories due to usual national ratification processes, BRT urges the Japanese and European Authorities to keep the renewal of the Moratorium as a key priority for MC14. Failure to do so, it would mean that the WTO would allow the principle of accepting tariffs on services, which will be the major set back of the WTO since its inception.
- The 14th WTO Ministerial Conference (MC14) should also be an important meeting for resuming negotiation toward higher standard, such as free cross-border data flow, prohibition of data localisation requirement, prohibition of access requirement of source code and algorithm, and non-discriminatory treatment of digital products.
- Agreement of the EU-Japan EPA and adoption of mutual adequacy decisions for the protection of personal data provide unique building-blocks for the EU and Japan to advance a common agenda at global level. In addition to mutually promoting digital innovation and transition, efforts to promote digital trade rules at the WTO and in FTAs are necessary to support level playing fields and long-term growth perspectives.

WP-3 / # 02* / EJ to EJ Support for Social Implementation of Digital technologies

The BRT calls on the EU and Japanese Authorities to:

- Promote cross-regional projects by enabling interoperability that promote a data-driven economy through decentralised data sharing.
- Data formats should be standardised as far as possible using the same format to achieve the interoperability of data ecosystems between the EU and Japan, and to further ensure the smooth and effective utilisation of data through AI.
- . Furthermore, it is also important for the EU and Japan to work together to promote global interoperability.
- It is necessary to further accelerate technology deployment to enhance the competitiveness of Japanese and EU companies, and to address social issues such as global environmental issues. To achieve this, it is important to remove barriers to social implementation by deregulating, simplifying procedures, and developing environments such as special zones where technology can be demonstrated. Technology deployment should not be approached by the EU and Japan from "Made in Europe" approach but from a strategic cooperation/trusted partner perspective.
- It is necessary to foster digital technology literacy and social acceptance among citizens to correctly understand and utilize the benefits and considerations of digital technology. Furthermore, it is necessary to foster experts who promote the use of digital technologies in the industrial and social sectors, including the fields of culture and the arts, which are the sources of international competitiveness and soft power for both Japan and the EU.
- Promote joint EU–Japan pilot and demonstration projects for the real-world deployment of digital technologies such as AI, IoT, smart mobility, digital health, and smart energy systems. These initiatives should enable the testing of interoperable solutions under real operational conditions and across different regulatory environments, by making use of sandbox mechanisms in high-risk areas, such as the use of AI in public sector services and in the health sector.

The BRT believes that:

- The EU and Japanese Authorities are actively working to open data, but there are several countries and regions which are reluctant to open data. When DFFT will be expanded to all countries, the format must be as much as possible neutral in order to communicate effectively. From that time, it will be difficult to use different data formats in each country.
- As a practical example of an international data driven society based on DFFT, calculating the carbon footprint of a final product requires calculation across the entire supply chain.
- To meet this requirement, it is important to create an easily accessible environment for all actors, including small and medium-sized enterprises (SMEs).

WP-3 / # 03* / EJ to EJ Cybersecurity for Safe, Secure and Trusted Society

The BRT calls on the EU and Japanese Authorities to:

- Pursue international harmonisation in the field of cybersecurity, in particular the alignment between the EU cybersecurity certification schemes and Japan's regulatory cybersecurity framework and the integration of international standards including on the certification and labelling of IoT devices and services.
- In preparation for the arrival of the quantum computer age in the future, EU and Japan should cooperate without having barriers in the development of quantum-safe security (Quantum Key Distribution (QKD), Post Quantum Cryptography (PQC), and the hybrid) technologies, products and services.

The BRT believes that:

- Security is necessary as a precondition for creating value in cyberspace and the realisation of digital transformation. Without taking appropriate measures, however, the risks of increasing vulnerability might hold it back, or even seem to outweigh its benefits.
- Cybersecurity policy should be built on a shared responsibility in private and public sectors.
- A global coordinated approach is effective in coping with high-level attacks. An information-sharing scheme with regards to security incidents should be created between the national contact points in each EU Member State based on the NIS2 directives on the one hand and Japan on the other. The European Commission should work to ensure a harmonised implementation of NIS2 in the Member States.
- EU should make full use ofand, if needed, amend existing regulations to the minimum extent so that industrycan comply with new regulations without any unnecessary burdens. For low-risk products, regulations should allow for self-assessment and self-declaration. In addition, whether new cybersecurity schemes would be mandatory or not shall depend on the risk level which also makes us believe that it must be clearly defined what cybersecurity risks are in products/services or usage scenes.
- The advent of the quantum computer age is expected to make existing cryptography obsolete. New security technologies for the quantum computer age are now in the stage of practical application, and the introduction of these technologies will benefit both the public and private sectors. EU and Japan should further promote technological cooperation as trusted partners.
- EU and Japan governments should identify the framework to bring forward or tackling jointly cybersecurity issues with industry sectors. The BRT welcomes and expects efforts by EU and Japan governments, such as a workshop at EU-JP digital partnership, to enhance the framework to bring forward or tackling jointly cybersecurity issues with industry sectors.

WP-3 / # 04* / EJ to EJ Deployment of human-centred AI Technology

The BRT calls on the EU and Japanese Authorities to:

- Support, develop, and implement human-centred, trusted AI technologies to protectcitizens' fundamental rights.
- In order to achieve a balance between the reduction of social risks posed by AI technology (Specifically, strengthening measures against the spread of disinformation and misinformation and the misuse of deepfake technology, as well as the appropriate protection of copyright holders while promoting the utilization of AI technology**)** and the maximization of benefits from innovation and utilization of AI technology, it is essential to engage in ongoing international discourse to clarify the nature, scope, and basis of regulations, as well as to establish methods for measuring and evaluating risks based on use cases.
- In order to counter the threat of counterfeit information and synthetic content that can be easily generated by the social implementation of generative AI technology, security against misinformation will be ensured, and an international cooperation system must be established with Japan and the EU playing a central role.
- Ensure that AI technologies not only respect copyright during training but also that their generated outputs do not infringe on creators' rights, despite differing copyright laws across jurisdictions..
- Authorities should consult with all relevant stakeholders to consider under what circumstances works created through using AI technology should be protected by copyright.
- Avoid imposing responsibilities of risk management and legal liability only on AI system developers, recognising the facts that AI technology itself is neutral and can be both a problem and a solution depending on how it is used.
- Strengthen cooperation on AI standardisation between the EU and Japan (JISC), promote the development and deployment of human-centred and reliable AI technology in both regions, and cooperate with international standards organisations (ISO/IEC JSC).A key area for cooperation should be the development of standards that organisations may follow to develop and deploy AI technologies in an ethical manner.
- It is necessary for the EU and Japanese authorities to strengthen collaboration with the international community, including the United States and the Global South, and to promote discussions on research, development, and utilization with a focus on solving social issues.

The BRT believes that:

- Discussions about the potential risks of AI technologies have only just begun in various industries, and it is premature to expect convergence. The concept of "risk" varies across industries and should be consistent with existing legal concepts. However, we must be very careful in implementing suitable measures, as the potential risks associated with Artificial Intelligence vary considerably across different industries, contingent upon the specific manner in which it is utilized and deployed.

- In the mobility field, artificial Intelligence has the potential to bring innovation to our roads, increasing road safety and making our transport system more accessible. Additionally, in the entertainment and culture field, it serves as a tool to improve workflow efficiency in content production and enhance the creativity of creators.

WP-3 / # 05 * / EJ to EJ Updating Connectivity for Digital Transformation for All

The BRT calls on the EU and Japanese Authorities to:

- Further strengthen cooperation in joint research and development and global standardisation for 6G, based on the outcomes of the third EU-Japan Digital Partnership Ministerial Meeting.Continue to promote 5G/6G networks, taking into consideration the progress of innovation such as Open RAN, cloudification, and virtualisation. This should stimulate fair competition in the 5G equipment and software market and achieve the strengthening of secure and diverse supply chains, a common goal for both the EU and Japan.
- Facilitate the sharing of practical and effective use cases for 5G network applications and deployments. In the development of 6G, it is necessary to promote the development of technologies and applications that will be realised on6G in parallel.
- While the demand for telecommunications continues to increase, radio spectrum resources are finite, and their scarcity is a common challenge shared by both the EU and Japan. Therefore, it is necessary to promote the development and social implementation of technologies that enable more efficient use of the radio spectrum, such as dynamic spectrum access.

The BRT believes that:

- Ensuring availability of high speed and reliable connectivity for all is a necessary condition so that all citizens are able to enjoy the benefits of the digital transformation.
- Together with AI and sensing technologies, 5G and expected 6G are key technologies for accomplishing “Society 5.0” such as“A human-centred society that balances economic advancement with the resolution of social problems by a system that highly integrates cyberspace and physical space”[2]. Governments and the EU institutions should establish without delay policy frameworks to encourage the necessary investment from businesses and to ensure that trustworthy, open and secure 5G/6G infrastructure as well as optical networks that support these 5G/6G infrastructure will be available to all ona sustainable and market-oriented basis.
- 5G and 6G have important consequences in all fields of industry not only for innovative services, but also because of the need for a vast amount of relevant and trustworthy data as well as their analysis are required across borders to tacklevarious global challenges such as climate change, natural disasters and infectiousdiseases.

WP-3 / # 06 * / EJ to EJ Cooperation on Supply Chain Resilience

The BRT calls on the EU and Japanese Authorities to:

(Semiconductors)

- Become an “active player” as a provider of semiconductor within the trusted partners in the semiconductor value chain and build the whole ecosystem of capacities (front-end, back-end, equipment, materials, labour and energy) / competences around semiconductors.
- Share learning and build capacities for EU-Japan cooperation in the manufacturing of all types of chip technologies.

(Critical Minerals)

- Share learnings and build capacities for EU-Japan cooperation in the sourcing, refining, and trading of critical minerals in the context of “EU-Japan Competitiveness Alliance”.
- Promote a level playing field for EU and Japanese companies when it comes to supply chain resilience.

The BRT believes that:

- Global semiconductor demand is increasing significantly. Demand by the automotive sector will triple by 2030 due to autonomous driving, increasing vehicle connectivity, shared services and powertrain electrification. Besides state-of-the-art cutting-edge technologies, chips with bigger nodes (≥90 nm) are essential as they represent the largest share of demand from automotive sector. Furthermore, as seen in the evolution of Vision Language Model (VLM), the utilization of AI is expanding into the physical world, such as autonomous driving and robotics. In this context, the technological advancement and stable supply of image sensors — which serve as the "eyes" of these AI-powered systems — and power semiconductors—which determine the energy efficiency of various devices, including automobiles — are equally important.
- The transformation of the mobility and other industries requires a stable and sustainable supply of critical minerals (for e.g., batteries, advancement of key technologies). To reduce excessive dependencies on certain countries, diversification and strategic cooperation among like-minded countries are required.
- Promote closer alignment and modernisation of public procurement frameworks in both the EU and Japan to strengthen supply-chain resilience and facilitate fair access for companies from both sides. In particular, the BRT encourages dialogue on procurement reforms aimed at increasing transparency, reducing administrative burdens, and enabling trusted suppliers to participate in strategic projects related to critical infrastructure, digital technologies, and clean energy transitions. Enhanced cooperation could also support the development of common principles for resilient and sustainable procurement practices.

- Ensure coherence and harmonised implementation of the proposed Industrial Accelerator Act across EU Member States, in order to strengthen supply chain resilience and accelerate the deployment of strategic industrial capacities. A consistent and predictable implementation framework will help avoid fragmentation within the EU Single Market and provide clarity for trusted partners such as Japan. Close dialogue with industry and international partners should be maintained to ensure that the Act supports open, resilient, and diversified supply chains while reinforcing cooperation between the EU and Japan in key strategic sectors.

WP-3 | Recommendation

Annex

Recommendations from Both European and Japanese Industries

WP-3 / # 07* / EJ to EJ Cooperation through EPA and Digital Partnership between Japan and the EU to realize DFFT

The BRT calls on the EU and Japanese Authorities to:

- EU and Japanese Authorities should continue their regulatory cooperation in the framework of the EU-Japan Digital Partnership and continue to work on fast evolving issues like Semi-Conductors, Artificial Intelligence and Quantum Computing, and aim for coherent legal framework as much as possible so as to avoid diverging legislation and regulatory requirements that would slow the innovation in these domains.
- Keep negotiating on EU Japan EPA to include non-discriminatory treatment of digital products for promoting digital trade, and prohibition of requirements of the transfer or disclosure of, or access to an algorithm expressed in the source code.
- Pursue dialogue between the two regions in a digital partnership, create mutual understanding of current and future regulatory frameworks, including data governance and rules, IoT data, open data, and standards, and seek future collaboration and agreement in EPA's regulatory cooperation framework to eliminate legal uncertainties and complexities associated with decentralized data sharing across sectors and regions.
- Coordinate digital partnership governance.

WP-3 / # 08 / EJ to EJ WTO Information Technology Agreement: ITA / ITA2 Expansion

The BRT calls on the EU and Japanese Authorities to:

- Cooperate on expanding ITA / ITA2 by increasing the number of member countries and expanding the scope of products covered and coordinate in coping with violations of WTO binding commitments by third countries based on ITA / ITA2 expansion.
- Furthermore, the expansion of ITA/ITA2 should enable citizens of countries and regions including global south to benefit from the evolving IoT technology and DX, including AI.

WP-3 / # 09 / EJ to EJ Development of Next-Generation Computing Infrastructure

The BRT calls on the EU and Japanese Authorities to:

- Promote the development of next generation computing infrastructure that can be used for industrial purposes.
- Strengthen research collaboration between Japan and the EU on next generation computing technologies such as quantum computing.
- Strengthen investment towards development and social implementation of solutions that contribute to solving local problems by utilising the next generation computing infrastructure.
- Strengthen investment in the development and maintenance of a robust energy infrastructure, including renewable energy sources, taking into consideration the substantial power consumption associated with the advancement of next-generation computing infrastructure.
- Work on lowering the regulatory barriers in order to tap into the full technological potential in the context of quantum computing and quantum chip development and production.
- In the EU, the European High Performance Computing Joint Undertaking (Euro HPC JU) was established in 2018, and funds quantum computers and other resources. With regard to the quantum computer procurement project that has already been announced, the bidding target is limited to companies in the countries participating in the Digital Europe Programme. In order for Japanese companies to be eligible to bid for the project, Japan needs to participate as an "Associated countries" of the Digital Europe Programme. Therefore, BRT requests the Japanese authorities to negotiate participation.

The BRT believes that:

- As the global environment becomes increasingly uncertain and social issues become more complex, it is becoming more and more important to utilise a variety of data to solve problems and create new value.

- Establishing next generation computing platforms with advanced computing capabilities, such as HPC, AI, quantum inspired, and quantum computing; and creating an environment that can be used by many users will greatly contribute to solving complex social issues and realising innovation.

WP-3 / # 10 * / EJ to EJ Skill Development for Digital Economy

The BRT calls on the EU and Japanese Authorities to:

- Support the creation of the skills which are necessary to fulfil the requirements of the new job opportunities coming from new technologies. At the same time, the development of a structured curriculum based on skill levels is essential for learning the latest and most practical skills.
- Foster the digitalization of SMEs and their participation in the digital economy.

The BRT believes that:

- New technologies such as AI technology and Robotics as well as semiconductor technologies that supports them should be perceived as new opportunities to create jobs and economic growth, identifying the core for mutual competitiveness and sustained growth.

WP-3 / # 11 / EJ to EJ Fundamental Reform of the Private Copying Levy System (Compensation System for Private)

The BRT calls on the EU and Japanese Authorities to:

- Cooperate to thoroughly reform the levy system about private copying considering the evolution of technology and distribution channels for lawful consumption of digital contents. Expansion of the current levy system to an increasing number of devices and cloud services should be avoided. Instead, any new levy system mustbe based on independent studies that show the actual use of copyrighted works and demonstrate the harm to the right holders resulting from the use.

The BRT believes that:

- Any review for reform should consider, in a comprehensive manner, alternative methods available to secure adequate compensation of rights' holders and creators from private copying as well as the development of licensed cloud-based content streaming models. The goal should focus on reforming the system to be more transparent, predictable, and balanced, and to avoid distortions. Also, a new system shall be fair to consumers, rights holders, and service and equipment providers at the same time. To achieve these goals, we recommend:
  - Keeping a close look on copyright levy developments in the EU Member Stateswith a view to prevent internal market distortions.
  - Ensure that the Member States properly implement EU legislation and case law.
  - Coming forward with a recommendation for a clear and common approach to the calculation and application of copyright levies.

WP-3 / # 12 * / EJ to EJ R&D cooperation

The BRT calls on the EU and Japanese Authorities to:

- Lead the integration of various academic fields including humanities and social sciences, the creation of a forum for collaboration including human resource exchange, and international standardization to realise innovation development and social implementations under these programmes.
- Promote the creation and development of start-up ecosystems, including local communities, universities, and companies, and strengthen global partnerships in creating environments for start-up growth.

- Deepen R&D cooperation on semiconductors, AI, Quantum Technology,blockchain, 6G, cybersecurity, hydrogen, fuel cells and critical minerals. It is also important to have a perspective on strengthening industrial competitiveness.
- BRT welcomes that Japan and EU have made an agreement in principal that Japan becomes Associate countries in Horizon Europe in EU. BRT expects that Japanese subsidiaries in Europe are able to participate in cybersecurity and dual-use projects after this agreement. After Japan becomes an Associate countries of the Horizon Europe, it should simplify the negotiations for Associate countries in the next program of the Horizon Europe.
- Promote mechanisms to maximise the impact of joint research and innovation activities, including the creation of a dedicated incubator framework to support projects funded under Horizon Europe. Such an incubator could facilitate the exploitation and commercialisation of research results, foster collaboration between industry, academia, and start‑ups, and create synergies with existing EU–Japan initiatives in areas such as digital technologies, green innovation, and supply chain resilience. This framework would help ensure that promising research outcomes are effectively translated into market-ready solutions and scalable industrial cooperation between the EU and Japan.

The BRT believes that:

- Modern social systems are becoming more complex, and solving problems requires knowledge that is not confined to a single discipline or research area. In particular, collaboration between researchers in the natural sciences and engineering as well as those in the humanities and social sciences will lead to the resolution of social issues and the creation of new innovations.
- Start-ups are pioneers in transforming society through technological innovation and solving social issues. By strengthening cooperation between Japan and the EU to support the creation and development of globally viable start-ups, innovation in both regions should accelerate.

WP-3/ # 13 / EJ to EJ Cooperation in the Enforcement of Large Online Platform Regulations

The BRT calls on the EU and Japanese Authorities to:

- Welcome the Cooperation Arrangement on the enforcement of the Digital Markets Act (DMA) and the Act on Promotion of Competition for Specified Smartphone Software, signed between the Japan Fair Trade Commission (JFTC) and the European Commission (EC) in July 2025.
- Make maximum use of this cooperation framework to ensure the effective implementation and enforcement of both laws, and continue and deepen the close exchange of information.
- Actively share knowledge regarding best practices and challenges related to the application of the laws, methods for technical audits and for gathering and interpreting market information, and investigation tools, with the aim of enhancing the enforcement capabilities of both authorities.

What BRT believes

- Given that the entities regulated under the Act on Promotion of Competition for Specified Smartphone Software are designated as gatekeepers under the Digital Markets Act, sharing knowledge gained from the implementation and enforcement of regulations in each jurisdiction will make each regulation more effective.
- In particular, when it comes to app store and operating system (OS) interoperability, if a gatekeeper justifies its actions on the grounds of security or, privacy, the gatekeeper must demonstrate that these actions are the least restrictive means available. The effectiveness of enforcement can be enhanced by the two governments working together to evaluate the grounds of justification provided by the gatekeeper.

WP-3 / # 14 / EJ to EJ Cooperation Towards Harmonised Deployment of Advanced Driver Assistant Systems (ADAS) andAutomated Driving (In joint proposal with WP1 Regulatory Cooperation)

The BRT calls on the EU and Japanese Authorities to:

- Enhance cooperation to harmonise regulatory frameworks and roadmaps to deploy automated and connected driving in a consistent and synchronised manner.
- Continue to lead efforts to create international standards and interoperability frameworks in the domain of automated and connected driving.
- Align with the EU's General Safety Regulation and its delegated regulations on Intelligent Speed Assistance (ISA), Emergency Lane Keeping Assistance (ELKS) and Advanced Driver Distraction Warnings (ADDW)

The BRT believes that:

- European and Japanese Industry have the potential to be front-runners in automated and connected driving which can create jobs and growth and bring innovation to our roads, increasing road safety and making our transport system more accessible.

- For European and Japanese companies to invest in automated and connected driving and bring solutions to the market it is necessary to have stable legal certainty and predictable market conditions which are aligned and synchronised.

WP-3 / # 15 / EJ to EJ Early publication of guidelines for the EU AI Act

The BRT calls on the EU and Japanese Authorities to:

- The EU AI Act, published in the Official Journal of the EU on 12 July 2024, introduces various rules on AI technology and general purpose AI models (GPAI models), including the prohibition of certain types of AI systems and the regulation of high-risk AI systems.
- The EU AI Act has extraterritorial applicability and is broadly applicable to companies and organizations outside the EU. For example, the EU AI Act applies to providers that market AI technology, launch services or launch general-purpose AI models in the EU, as well as to providers and deployers of AI technology whose outputs are used in the EU, even if such provider or deployer is established in a third country or is located outside the EU.
- Under the EU AI Act, high risk AI systems or general purpose AI models that conform to harmonized standards can benefit from a presumption of conformity with the Regulation's requirements. This provides legal certainty, supports industry uptake, and overall helps ensure that AI technologies are safe and trustworthy. We hope that European Standardization Organization CEN-CENELEC is able to adopt standards on the EU AI Act's requirements for high-risk AI systems in a timely manner, and the European Commission will swiftly adopt these as European harmonized standards. Failing this, companies will face legal uncertainty over how to prove conformity with the requirements for high-risk AI systems.
- BRT support the European Commission's proposal in the AI Omnibus to delay the application dates for the rules on high-risk AI systems and the rules on labelling content generated by AI technology. However, BRT believe that these proposed timeline changes should be split from the rest of the AI Omnibus and should be adopted through a fast-track procedure. It is important in particular that the AI Omnibus proposals for delaying the application of the requirements for high-risk AI system are adopted well before 2 August 2026, which is the current application date for the EU AI Act's rules on high risk standalone AI technology; failing this, companies will need to grapple with a significant lack of legal certainty as to the application date of these requirements.
- In addition, Japanese companies and organizations that provide and deploy AI technology need guidelines on the extraterritorial application of the EU AI Act. BRT urges the European Commission to promptly develop and publish guidelines on the scope of the EU AI Act.

The BRT believes that:

- In order to comply with the EU AI Act, it is necessary to publish guidelines and harmonized standards on the EU AI Act that would help industry comply with the various rules in the Act at an early stage. Furthermore, it is necessary to enhance corporate predictability by clearly presenting, with concrete examples, cases where the regulations apply and where they do not, through such guidelines.

- High risk AI systems used in products covered by NLF laws (Machinery Directive, Radio Equipment Directive etc) should not be subject to the EU AI Act; instead, the EU AI Act's requirements should be integrated into NLF laws. The EU institutions should amend the AI Act accordingly during the legislative process that is currently being followed to adopt the AI Omnibus. Concretely, Section A in Annex I AI Act, which lists NLF laws, should be shifted to Section B in Annex I. We note that the Commission has already proposed amending the AI Act so that the Medical Devices Regulation is shifted from Section A to Section B; we are suggesting that the rest of NLF laws listed under Section A should also be shifted to Section B.
- The term of 'high-risk AI systems' should be clearly defined through providing use cases or specific examples of AI technology or services embedded in products. In that respect, we look forward to the publication of the European Commission's Guidelines on the classification of high-risk systems.

WP-3 / # 16 / EJ to EJ Early publication of guidelines for the EU Data Act

The BRT calls on the EU and Japanese Authorities to:

- The EU Data Act was issued on January 11,2024 and came into force on September 12, 2025. The EU Data Act was enacted as part of the European Data Strategy published by the European Commission. However, there are a number of uncertainties regarding its interpretation, making it difficult for companies to understand their compliance obligations.

The BRT believes that:

- In order to comply with the EU Data Act, it is necessary for the European Commission publish guidelines on the EU Data Act at an early stage. Furthermore, it is necessary to enhance corporate predictability by clearly presenting, with concrete examples, cases where the regulations apply and where they do not through such guidelines.
- The EU institutions should use the European Commission's proposal for the Digital Omnibus to amend articles 4(8) and 5(11) Data Act so that data holders are allowed to refuse to share data on the basis of trade secret or cybersecurity concerns, without obliging them to notify such refusals to the competent authorities. Data users and third parties authorized by data users would of course be allowed to challenge such refusals before national courts.

WP-3 / # 17 / EJ to EJ Digital Omnibus

The BRT calls on the EU Authorities to:

- Work with the co-legislators to ensure the swift adoption of the Digital Omnibus proposal, in particular the AI Omnibus proposal, with the legal framework and implementation timeline clarified before 2 August 2026. In order to ensure predictability for business investment and compliance preparation, the BRT supports

a postponement with a clear and fixed date, rather than a conditional or uncertain delay. Support the proposed GDPR amendment clarifying “legitimate interest” as a legal basis for data processing in the development and deployment of AI. Providing legal certainty where obtaining consent is not practicable is important for innovation investment in Europe, and the framework should remain workable, appropriately safeguarded, and harmonised across the EU without fragmentation at Member State level.

Establish a coherent, risk-based framework for cookies and other terminal equipment data that eliminates the current dual regime depending on whether the data is classified as personal or non-personal. In this context, low-risk processing carried out under a company’s own control for product and service improvement, maintenance, and fraud prevention should be appropriately covered by consent exemptions. In addition, the design of automated consent signals should ensure that the direct relationship between businesses and users is not unduly undermined and that excessive power is not concentrated in the hands of a limited number of browser or OS providers.

The BRT believes that:

- The Digital Omnibus proposal is a landmark initiative that embodies the spirit of the report on the future of European competitiveness (the Draghi Report), striking a balance between fostering innovation and protecting citizens. While the simplification proposed in the legislation is highly welcomed, further clarity regarding specific timelines and practical obligations is necessary to truly achieve its primary objective of enhancing competitiveness.It is an absolute prerequisite that the AI Omnibus proposal enters into force before August 2, 2026, when the obligations for high-risk AI systems under the current EU AI Act become applicable. Legal instability—where existing obligations come into effect while discussions on their postponement run in parallel—would cause significant disruption to the market and stakeholders, and must be avoided at all costs. Clear, predictable rules and timelines, without conditionalities, are essential to promote investment and ensure business certainty. Ensuring legal certainty for data use in AI development and eliminating dual regulation regarding cookies and other terminal equipment will accelerate the integration and growth of the EU-Japan digital economic sphere. The swift adoption of these proposals—without being watered down during the legislative process and without concentrating power in specific platforms—in a manner that safeguards diverse business models, will send a powerful message for promoting innovation in Europe.

Aviation

WP-3/ # 18 / EJ to EJ Government-Led Industrial Cooperation in Aeronautics

The BRT calls on the EU and Japanese Authorities to:

- Establish a permanent dialogue aiming to significantly upgrade the scale of EU-Japan industrial cooperation in aviation based upon mutual trust, equality and mutual benefits, and stimulated by government funding- focusing primarily on the following items.
  - Decarbonization & Regulation:
    Adhering to stringent environmental frameworks, such as ReFuelEU and ETS, while accelerating the production and adoption of Sustainable Aviation Fuels (SAF) through broad cross-border cooperation.
  - Operational Efficiency:
    Overcoming the fragmentation of European airspace by realizing the Single European Sky (SES) initiative and ensuring the digital interoperability of air traffic control systems.
  - Industrial Resilience:
    Mitigating ongoing supply chain disruptions and aircraft delivery delays by restructuring and supporting the industrial base to ensure long-term stability.

WP-3/ # 19 / EJ to EJ Industrial Cooperation in Unmanned Aerial Vehicle and systems (UAV)

The BRT calls on the EU and Japanese Authorities to:

- Establish a permanent dialogue aiming to initiate EU-Japan industrial cooperation in R&D and production in the strategic sector of UAVs and autonomous unmanned systems.
- Establish an expanded operational framework for the Japan–EU Aviation Safety Agreement (BASA) with a view to achieving a harmonized definition of the ‘publicness of airspace’ within the emerging low-altitude economy—including drones and advanced air mobility—and to streamlining aircraft certification procedures.”

WP-3 / #20 / EJ to EJ Cooperation in Aircraft Certification

The BRT calls on the EU and Japanese Authorities to:

- Accelerate the discussion of the annexes linked to MRO and training.

WP-3 / #21 / EJ to EJ Cooperation on Navigation Regulations for Helicopters

The BRT calls on the EU and Japanese Authorities to:

- Establish an increased level and better cooperation between Europe and Japan regarding the development of low altitude IFR routes and satellite-based navigation regulations for helicopters.

Space

WP-3 / #22 / EJ to EJ Regulatory Cooperation in Space Operations

The BRT calls on the EU and Japanese Authorities to:

- Continue to cooperate closely on regulatory matters in the space sector, and not lose the momentum, in addition to maintain our collaboration on all aspects of businesses.
- Consider setting up an EU-Japan Space Industry Forum to meet systematically shortly after each EU-Japan Space Dialogue and to be supported and jointly held by governments and industries, with the goals of:
  - Better communicating key outcomes of the EU-Japan Space Dialogue;
  - Expansion of Japan-Europe joint projects. Furthering industrial cooperation; and
  - Supporting the growth of a private space ecosystem
- EU Space ACT is being discussed with a view to 2030, and we would like both governments to secure mutual recognition certification through discussions in order to encourage active participation by Japanese companies. Also, regarding EUSST's obligation to use SSA, we would like to ensure interoperability with SSA in Japan and the United States.

The BRT believes that:

- Mutually open markets and cooperation are a possible opportunity for the EU andJapan to achieve their goals in space and for their industries to realise their full potential in the global market. The EU-Japan Space Policy Dialogue significantly promotes cooperation in Spaceand should be held a regular basis. Whereas European space companies, including SMEs, have mutually intercommunicating organisations (Eurospace, SME4space, national space industry associations) with formal communication channels to the institutional space customers, there is no such general channel to link EU and ESA member state space companies with the Japanese counterparts.

WP-3 / # 23 / EJ to EJ Technological and industrial cooperation on Japanese and European next generation of launch vehicles

The BRT calls on the EU and Japanese Authorities to:

- Strengthen technological and industrial cooperation in the framework of the development of the products and services related to space sector including next generation launch vehicles.
- Strengthen collaboration in launch environments, legal frameworks, and regulatory reforms

The BRT believes that:

- There is a similarity regarding the environment surrounding Japanese and European national launchers: Both have the responsibility *vis-à-vis* each respective government to guarantee an independent access to space and due to insufficient institutional demands, both must be commercially competitive in orderto maintain a sufficient number of launches.
- Due to rapidly emerging new satellite applications, continuous improvements are required for both the Japan and the EU in order to be competitive in the commercial market. As a lot of hardware and software developments are required in such improvements, Japan-EU cooperation is indispensable in quick and cost-effective developments.

Mobility

WP-3 / # 24 / EJ to EJ Coordinated funding of battery production

The transformation of the mobility industry requires innovation and investment in battery technology. In order to reduce dependencies and remain internationally competitive, targeted funding is required.

The BRT calls on the EU and Japanese Authorities to:

- Coordinate funding of battery research, development, and production among like-minded countries which supports cell production and associated value creation in the EU and Japan.
- Provide cheap, green energy for battery production sites with recycling solutions.

WP-3 / # 25 / EJ to EJ Promote charging infrastructure for electric vehicles (EVs)

Electric mobility requires governmental support in setting up and sustaining the necessary environment, especially the development of charging infrastructure.

The BRT calls on the EU and Japanese Authorities to:

- Share learnings regarding the promotion of electric mobility and the mobilisation of investment and build-up of international interoperable public and private charging

infrastructure for EVs (passenger cars and heavy-duty vehicles).

- Develop customer-friendly and sufficient public and private charging infrastructures, including, e.g., a variety of choices for high-power charging along highways, subsidies for attractive home chargers, chargers in urban and rural areas incl. parking lots, subsidies regardless of charging standard, in EU member states and Japan.
- Promote exchanges between EU and Japanese companies on future charging standards and consider alignment of charging-related requirements and certifications.
- Promote exchanges on next-generation storage batteries and grid-flexibility, including potentials of bidirectional EVs.
- Provide green energy for EV charging.

WP-3 / # 26 / EJ to EJ EU-Japan industrial leadership in battery design &manufacturing

The BRT calls on the EU and Japanese Authorities to:

- Include innovating SMEs in battery industry development programs to foster European & Japanese industrial leaderships (RE technology in Japan, RE production capacity in Europe).

WP-3 / # 27 / EJ to EJ Accelerate the digital transformation

The BRT calls on the EU and Japanese Authorities to:

- See innovation as an opportunity and not as a cost.
- Build digital maturity centres to support the transition to be competitive again. For example, establish inside universities centres with repeatable process to validate actual status versus the latest technologies in R&D and manufacturing, building a road map to fill the gap.

The BRT believes that:

- EU and Japan need to work together to gain competitiveness and play an active role in accelerating digital transformation.

Recommendations from European Industries

WP-3 / # 28 / E to J Mutual Backup of Government Satellite Launches

The BRT calls on the Japanese Authorities to:

- Bring about a mutual backup cooperation scheme of government launches using Japanese and European launcher fleets.

The BRT believes that:

- The International Space Station future automated cargo spacecraft HTV-X could benefit from a back-up launch service aboard the future European Ariane 6 launch vehicle.

WP-3 / # 29 / E to J Retain motivated engineers in Japan

The BRT calls on the Japanese Authorities to:

- Increase the value of living in Japan in order to attract the best talents.

The BRT believes that:

- Low compensation will let talents to go outside, so need to be aligned with the global market.

WP-3 / # 30 / E to J Cooperation towards a protective but easy to implement regulatory frameworks around digital services and trade

The BRT calls on the Japanese Authorities to:

- Adopt similar environmental and consumer protection rules to the European Union, enabling Japanese small, medium-sized and large businesses to maximize the development of digital service and promote trade, particularly online, between Japan and the European Union.

The BRT believes that:

- In a very fast-expanding legal context, notably in the digital sector or in the sale of goods online and offline, the compliance and regulatory framework actually developed by the European Union around the notion of “risk” such as in the AI domain or in the environmental domain (see the fragmented and complex EPR framework in the EU) should not lead to greater complexity in the free movement of goods between the EU and Japan, nor should it render the compliance of players in different EU countries geometrically variable, which could lead to a reduction in the willingness to develop digital services within the EU or reduce the willingness of Japanese economic operators to trade in Europe.

Recommendations from Japanese Industries

WP-3 / #31 / J to E Early publication of guidelines and Harmonized Standards for the EU Cyber Resilience Act

The BRT calls on the EU Authorities to:

- The EU Cyber Resilience Act was entered into force on Dec 10 in 2024 by the European Commission and will apply from Dec in 2027. The Act was designed to impose certain security requirements on digital products distributed on the European market.
- The EU Cyber Resilience Act stipulates to apply to companies and digital products, but the scope of digital products is broad. So companies need clear guidelines to fulfill the some obligations in the Act such as continuous monitoring and updating. The BRT requests that the European Commission prepare and publish guidelines on the scope of the EU Cyber Resilience Act prior to its implementation in 2027.

The BRT believes that:

- In order to comply with the Cyber Resilience Act, it is practically necessary to publish guidelines at an early stage.
- The scope of digital products and obligations such as continuous monitoring and updating should be clearly written in the guideline.

WP-3 / #32 / J to E Ensuring Certification Focuses on Technical Requirements and Upholding Institutional Separation in CSA2

The BRT calls on the EU Authorities to:

- Prevent any backsliding during the upcoming legislative process and scheme design from the structural arrangement in the original Cybersecurity Act 2 (CSA2) proposal, which clearly mandates that the European cybersecurity certification framework (ECCF) and future schemes, including the EUCS, must focus exclusively on conformity assessments against technical requirements. Firmly reject any attempts to reintroduce non-technical or sovereign elements—such as nationality, headquarters location, or ownership and control structures—into the certification framework as requirements for certification or as conditions for accessing specific assurance levels. Doing so would reproduce the market stagnation and fragmentation experienced during the EUCS drafting process, significantly undermining the openness and predictability of the EU market. The EU must clearly and unwaveringly uphold the institutional separation established in CSA2—whereby certification is based on technical standards, while non-technical risks are handled within the ICT supply chain framework —and guarantee fair market access for companies that fulfill purely technical requirements.

The BRT believes that:

- The Japanese industry has consistently expressed strong concerns that "sovereignty requirements" in the EUCS and other schemes, which are entirely unrelated to technical evaluations, could lead to the unjust exclusion of companies from trusted partner countries. The BRT highly commends the proposed CSA2 for separating these non-technical and sovereign issues from the certification framework and directing them to be addressed within the dedicated ICT supply chain security framework. This represents a crucial course correction that rectifies the politicization of the certification system.
- In light of the shared goals of "open and secure networks" and "secure and diverse supply chains" set forth in the EU-Japan Digital Partnership, retrogressively injecting sovereign elements back into the certification system during the legislative process would dampen investment appetite in the European market and ultimately undermine the EU's own competitiveness and innovation.
- Only by securing responses to truly high-risk cases within the supply chain framework while strictly dedicating the certification system to pure technical security evaluations can the original objectives of CSA2—enhancing security and boosting European competitiveness—be successfully achieved.

(Appendix)

New Recommendation Contents in this Recommendation

No.		Contents	Authorities
WP-3/#17	Di	Digital Omnibus	EJ to EJ