



EU-Japan Centre for Industrial Cooperation

一般財団法人
日欧産業協力センター

Japanese policy and regulatory developments

June 2025

Prepared by
Nishimura & Asahi Europe Rechtsanwalts-gesellschaft mbH



Noriya Ishikawa
Yumiko Kato
Kei Hattori

For further inquiries: <https://www.eu-japan.eu/be-informed>

Table of Contents

8th Japan-EU Digital Policy Dialogue Held	3
The 10th Meeting on Digital Administrative and Fiscal Reform	3
Designation of large-scale specified telecommunications service providers pursuant to Article 20(1) of the Information Distribution Platform Act	4
Public Consultation on the Data Governance Guidelines (draft)	5
Meeting with European Commission Commissioner Michael McGrath / Meeting with the European Data Protection Supervisor	7
Preparatory Meeting for Roundtable Conference on Personal Information Protection Policy	8
Publication of the revised Basic Guidelines for Management of Health and other personal data by PHR Service Providers	9
First follow-up meeting of GX Study Group on Green Steel for Green Transformation (GX) Promotion	10
DISCLAIMER	11

Digital-Related Matters

8th Japan-EU Digital Policy Dialogue Held¹

(Ministry of Economy, Trade and Industry, April 2)

- The 8th Japan-EU Digital Policy Dialogue was held on April 1, 2025.
- The dialogue was jointly organized by Japan’s Ministry of Economy, Trade and Industry (METI) and the European Commission's Directorate-General for Communications Networks, Content and Technology (DG Connect).
- The dialogue covered key digital policy issues in rapidly advancing technology areas, including Artificial Intelligence (AI), Semiconductors, Quantum Technology, Online Platforms, Data and Cyber Resilience.
- Both sides agreed that the areas of cooperation will eventually be incorporated into the framework of the Japan-EU Digital Partnership. Japan and the EU reaffirmed their commitment to maintaining close cooperation as leaders in shaping a future digital society. This dialogue highlights the strengthening partnership between Japan and the EU in addressing shared digital challenges and advancing global standards.

The 10th Meeting on Digital Administrative and Fiscal Reform²

(Cabinet Secretariat, April 22)

- On April 22, 2025, Prime Minister Ishiba held the tenth Meeting on Digital Administrative and Fiscal Reform at the Prime Minister’s Office. At the meeting, participants engaged in discussions on the combination of digital technologies and Regional Revitalization 2.0 and other matters as well as further deepening and acceleration of digital administrative and fiscal reform. Key focus areas were as follows:
 1. Realization of Regional Revitalization 2.0 (Utilizing Digital and Emerging Technologies)
 - Advanced case studies were introduced, such as the use of Digital Resident Certificates to foster community engagement and population exchange.
 - The Regional Economy and Society Analyzing System (RESAS) is being increasingly utilized by local governments.
 - Efforts should be expanded nationwide using the new Regional Revitalization Grant, with evidence-based policymaking.
 2. Advancing the “Reconstruction of Japan in the Reiwa Era” (Reforms in Infrastructure, Mobility, and Education)

¹ https://www.meti.go.jp/english/press/2025/0402_001.html

² <https://japan.kantei.go.jp/103/actions/202504/22digitalgyouzaisei.html>

- Wide-area management and the introduction of digital transformation (DX) are being considered to ensure the future sustainability of water and sewage infrastructure.
 - In mobility, efforts are underway to promote the adoption of autonomous driving and to establish systems for investigating the causes of related accidents.
 - Regarding ridesharing, in response to mobility shortages in rural and tourist areas, the government will improve driver availability, monitor private vehicle-based services, and advance legal discussions on non-taxi rideshare models.
 - In education, challenges with the current single-application system for public high school admissions were raised. The government will promote pilot initiatives in willing municipalities, considering both benefits and on-the-ground challenges.
3. Development of a Framework for Data Utilization
- Effective use of AI requires a system that enables data sharing and utilization across companies and industries.
 - Promote the use of currently underutilized data in sectors such as healthcare, education, and finance.
 - The government agency is instructed to promptly compile concrete measures, including legal and regulatory frameworks.

Takeaway: A comprehensive framework for data utilization remains a challenge. In the EU and elsewhere, legal systems are being developed in alignment with data protection laws such as the GDPR. Japan is also advancing discussions to balance privacy and data utilization, improve quality of life, and strengthen industrial competitiveness. A basic policy, potentially including new legislation, is expected approximately by June 2025.

Designation of large-scale specified telecommunications service providers pursuant to Article 20(1) of the Information Distribution Platform Act³

(Ministry of Internal Affairs and Communications, April 30)

- The Information Distribution Platform Act, which came into effect on April 1, 2025 (a partial amendment of the Provider Liability Limitation Act), was established in response to the growing societal issue of illegal and harmful online content. The Act aims to create a legal framework that enables platform operators and other relevant entities to appropriately address online rights violations, while carefully balancing two important interests: the protection of victims from harm caused by illegal and harmful information and the freedom of speech of content providers.

³ https://www.soumu.go.jp/menu_news/s-news/01ryutsu02_02000435.html (in Japanese)

- Under the Act, in order to deal with illegal and harmful information on the Internet such as defamation, large-scale platform operators are obligated to take measures including (1) speeding up their response and (2) making the operational status transparent.
- On April 30, 2025, the Ministry of Internal Affairs and Communications announced its decision to designate the following entities as large-scale specified telecommunications service providers pursuant to Article 20(1) of the Act:.

Large-Scale Specified Telecommunications Service Providers	Service name (reference)
Google LLC	YouTube
LY Corporation	LINE Open Chat, LINE VOOM
Meta Platforms, Inc.	Facebook, Instagram, Threads
TikTok Pte. Ltd.	TikTok, TikTok Lite
X Corp.	X

Takeaway: Entities designated as large-scale specified telecommunications service providers are required to publish standards for the implementation of transmission preventive measures, and the preventive measures published by these businesses would be practically referable. In addition, further designation of large-scale specified telecommunications service providers is also under consideration. If such further designation is made, it will be publicly announced, so it is necessary to continue to keep an eye on the designation status.

Public Consultation on the Data Governance Guidelines (draft)⁴

(Digital Agency, May 1)

- The Digital Agency published the data governance guidelines draft and conducted a public consultation on the draft.
- The draft is primarily aimed at executive management and outlines the key points of data governance and its practical application, with a focus on maximizing the use of owned data to drive digital transformation (DX) and enhance corporate value towards Society 5.0.
- The draft also recognizes data as a critical business resource, alongside people, goods, and capital, and aims to enhance corporate value through effective data governance. It establishes four key pillars of data governance: (1) operation processes aligned with the realities of cross-border transfer of data, (2) data security, (3) data maturity, and (4) behavioral guidelines for the utilization of advanced technologies such as AI.
- The draft presents measures that executive management should take.

⁴ <https://www.digital.go.jp/en/news/b2fc6989-3256-4d80-8ef1-f422f78da216>

Takeaway: The draft primarily outlines the baseline needed to achieve DX through the utilization of data, with the ultimate goal of enhancing corporate value in line with the realization of Society 5.0. These guidelines will be helpful to understand the level of awareness of the importance of the data governance for Japanese companies for the current or potential business collaboration with them.

Data Protection

Meeting with European Commission Commissioner Michael McGrath / Meeting with the European Data Protection Supervisor⁵⁶

(Personal Information Protection Commission, April 9)

- Currently, the EU adequacy decision for Japan covers only the private sector, with academia, research, and the public sector excluded. However, following amendments to the Act on the Protection of Personal Information of Japan, which expanded the scope of application to include academia, research, and the public sector, the Personal Information Protection Commission (PPC) of Japan made a request to the European Commission for an extension of the scope of the EU adequacy decision to also cover academia, research, and the public sector.
- On April 9, 2025, a joint press statement by Michael McGrath, Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection and Ohshima Shuhei, Commissioner of the PPC was issued. A summary of the statement is as follows:
 - Regarding discussions on the extension of the scope of the EU adequacy decision for Japan to include the academic research sector and the public sector, significant progress has been made, particularly in the academic research sector. Both sides confirmed their commitment to progress within the next months with a view to concluding talks swiftly.
 - The two sides also agreed to enhance cooperation on developing trusted data flows with like-minded partners, including within the framework of the "adequacy network" launched by the European Commission in March 2024.
 - Specifically, they agreed to: (1) expand mutual adequacy arrangements to new countries, (2) build "bridges" between sets of model contractual clauses used in different jurisdictions, and (3) promote adherence to international instruments, such as the OECD's "Principles for government access to personal data held by private sector entities".
 - To advance this joint work, regular meetings at the commissioner level will be held. The next meeting is foreseen to take place in September.
- On the same day, Commissioner Ohshima also met with Wojciech Wiewiórowski, the European Data Protection Supervisor (EDPS), to exchange views on the state of data protection and privacy from an enforcement perspective.

Takeaway: As further progress is expected in discussions regarding the scope of the EU adequacy decision for Japan, close attention should be paid to future developments.

⁵ https://www.ppc.go.jp/enforcement/cooperation/250409_EU_McGrath/ (in Japanese)

⁶ https://www.ppc.go.jp/enforcement/cooperation/250409_EU_EDPS/ (in Japanese)

Preparatory Meeting for Roundtable Conference on Personal Information Protection Policy⁷

(Personal Information Protection Commission, April 28)

- On April 28, 2025, a preparatory meeting for the Roundtable Conference on Personal Information Protection Policy was held. The purpose of the Roundtable Conference is to examine broader and more comprehensive themes, as well as overall the personal information protection policy, through discussions with a wide range of experts and stakeholders, taking into account recent developments such as the rapid spread of AI technologies.
- The following is a summary of the policy direction of the Personal Information Protection Commission, as presented at the preparatory meeting:
 - **Act on the Protection of Personal Information**

Taking into account international trends in personal data protection, advances in information and communication technologies and businesses, and the like, the government will continue to formulate national policies concerning personal information, including a statutory review of the Act on the Protection of Personal Information conducted every three years. To ensure the proper handling of personal information, the Commission will implement appropriate, effective, and efficient supervision of both domestic and international businesses by confirming data breach notifications and voluntary information provision, as well as proactively conducting investigations and effectively monitoring administrative agencies and other entities.
 - **Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures**

To ensure the proper handling of Specific Personal Information, the Commission will conduct appropriate, effective, and efficient oversight and supervision, and revise relevant guidelines as necessary. Preparations will also be made for a review of the policies for the Assessment of the Protection of Specific Personal Information.
 - **International Cooperation**

To promote and realize Data Free Flow with Trust (DFFT) in the field of personal data protection and privacy, the Commission will continue to aim for the creation of an internationally interoperable environment. This will be achieved by respecting the diverse data protection systems and international frameworks of other countries and regions, while also taking into account the needs of businesses.

Takeaway: As continuous discussions with experts and stakeholders from various sectors are planned in the upcoming Roundtable Conference, keeping track of the topics and comments being discussed will be valuable for understanding the future direction of Japan's personal information protection policy.

⁷

https://www.ppc.go.jp/personalinfo/kentohkai/kondankai_jumbikaigou/ (in Japanese)

Publication of the revised Basic Guidelines for Management of Health and other personal data by PHR Service Providers⁸

(Ministry of Internal Affairs and Communications, Ministry of Health, Labour and Welfare, and Ministry of Economy, Trade and Industry, April 30)

- On April 30, 2025, the Ministry of Internal Affairs and Communications, the Ministry of Health, Labour and Welfare, and the Ministry of Economy, Trade and Industry jointly released a revised version of the Basic Guidelines for Management of Health and other personal data by PHR Service Providers. This revision reflects discussions held by the working group and the results of a public consultation that concluded on April 7. In addition, the Q&A on the Basic Guidelines for the Management of Health and other Personal Data by PHR Service Providers and the associated Checklist were also updated.
- These guidelines have been developed in light of the growing trend in recent years of private-sector entities providing a wide variety of services that utilize individuals' personal health information—referred to as Personal Health Records (PHRs)—including health checkup results, body weight, blood pressure, and blood glucose levels, to support personal health maintenance and lifestyle improvement. With the goal of promoting the safe and secure use of PHR services, these guidelines outline the necessary practices to be observed by those providing such services. Specifically, the guidelines apply to PHR service providers that use, either directly or indirectly, health and other personal data—such as infant health checkups, medical information including medication test results, and specific health examinations—when offering PHR-based services. The aim is to ensure appropriate, efficient, and effective utilization of PHRs by these providers.
- These guidelines present not only the requirements with which service providers handling health and other personal data are obligated to comply under the laws and regulations, but also the necessary practices that are considered essential for promoting the proper utilization of PHRs.

Takeaway: Businesses that provide services utilizing PHRs in Japan should carry out their operations in accordance with these guidelines, including the revised sections, while also utilizing the checklist. Furthermore, given the possibility of amendments to laws such as the Act on the Protection of Personal Information, updates to guidelines, changes in the operation of these guidelines, and developments in PHR services or security technologies, it is important for the target audience and stakeholders of these guidelines to remain attentive to future updates.

⁸ https://www.soumu.go.jp/menu_news/s-news/01ryutsu06_02000443.html (in Japanese)

First follow-up meeting of GX Study Group on Green Steel for Green Transformation (GX) Promotion⁹

(Ministry of the Environment, April 21)

- In October 2024, METI launched the Study Group on Green Steel (the “GX Study Group”) to promote GX and to draft an action plan for expanding the green steel market and reducing emissions in the steel industry. The GX Study Group published the action plan in January 2025 (the “Action Plan”).¹⁰
- The first follow-up meeting was held on April 21 to review and evaluate the status of implementation of the Action Plan.
- As a recap, the Action Plan suggests addressing the following points and emphasize the importance of monitoring and evaluation:
 1. Promoting and reflecting GX value in international standards;
 2. Enhancing the utilization of carbon footprints for steel products;
 3. Providing support for purchasers of steel products; and
 4. Providing support for suppliers of steel products.
- The following points were confirmed in the first follow-up meeting:
 1. Efforts to expand the green steel market have been ongoing since January 2025;
 2. Explanation sessions on emission reduction data and allocation methods have been provided for stakeholders in/outside of Japan; and
 3. Governments, the steel industry, and customers shall work together to promote green steel and GX (e.g., establishing and implementing transparent rules for reducing emissions, and provisions of emission data, introducing a policy to promote green steel products).

Takeaway: Japanese steel companies continue to research, develop, and expand green steel technology. Also, the Japanese government supports the promotion of green steel for GX on an ongoing basis. Stakeholders are aware of importance of international cooperation and there are investment opportunities in promoting green steel for GX.

⁹ https://www.meti.go.jp/shingikai/mono_info_service/green_steel/follow_up/001.html (in Japanese)

¹⁰ https://www.meti.go.jp/english/press/2025/pdf/0123_001a.pdf

DISCLAIMER: The information contained in this report has been compiled by one or several independent experts and reflects the views of the author(s) indicated on the front page and above, and not necessarily the views of the EU-Japan Centre for Industrial Cooperation nor the views of the European Authorities. It is made available for general information and non-commercial purposes only. It does not claim to be comprehensive or up to date and is not intended to provide legal or other advice. No person should rely on the contents of this report – or of internet web sites or other information sources indicated in this report – without first obtaining advice from a qualified professional person. This report is made available on the terms and understanding that the EU- Japan Centre for Industrial Cooperation and the European Authorities, which have not verified its content, are not responsible for the results of any actions taken - or omitted to be taken - on the basis of information in this report, nor for any error in or omission from this report, or for any plagiarism. The EU-Japan Centre for Industrial Cooperation and the European Authorities expressly disclaim all and any liability and responsibility to any person in respect of anything and the consequences of anything, done or omitted to be done by any such person in reliance, whether wholly or partially, upon the whole or any part of the contents of this report. Without limiting the generality of the above neither the EU-Japan Centre for Industrial Cooperation nor the European Authorities shall have any responsibility for any act or omission of the author(s) of this report.

Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Innovation Council and SMEs Executive Agency (EISMEA). Neither the European Union nor the granting authority can be held responsible for them.

COPYRIGHT: The contents of this report are protected by copyright under international conventions. Reproduction is authorized for non-commercial purposes, provided that (i) the name of the author(s) is indicated and the EU-Japan Centre for Industrial Cooperation is acknowledged as the source, (ii) the text is not altered in any way and (iii) the attention of recipients is drawn to this warning. All other use and copying of any of the contents of this report is prohibited unless the prior, written and express consent of the EU-Japan Centre for Industrial Cooperation is obtained. All logos and figures published in this report are copyrighted and may not be reproduced without the full consent of their respective author(s).

GOVERNING LAW AND JURISDICTION: Any dispute arising from or related to the use of this report and/or the information in this report shall be submitted to the exclusive jurisdiction of the competent courts in Brussels, Belgium, which will apply Belgian law, with the exclusion of private international law rules.

Published by the EU-Japan Centre for Industrial Cooperation.

