



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

August 2025

Prepared by
Nishimura & Asahi Europe Rechtsanwaltsgesellschaft mbH



Noriya Ishikawa
Yumiko Kato
Kei Hattori

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

Table of Contents

Publication of the “Digital Infrastructure Development Plan 2030” and the “Comprehensive Strategy for Global Digital Expansion 2030”	3
Japan’s Basic Policy on Ideal Data Utilization Systems: Toward Trust, Interoperability, and Cross-Sectoral Reform	4
Cabinet Approval of the Priority Plan for Realizing a Digital Society	6
Japan Publishes Draft OT Security Guidelines for Semiconductor Factories – Open for Public Consultation	7
Publication and Public Consultation on the Draft Interim Summary on Addressing Various Issues in Information Distribution in Digital Space	8
Publication of the Intellectual Property Strategic Program 2025	9
Operation of the Global CBPR System	10
Ministry of Economy, Trade and Industry Publishes Fourth Interim Report on New Direction of Economic and Industrial Policies – Industrial Structure in 2040 Led by Growth Investment”	11
DISCLAIMER	13

Digital-Related Matters

Publication of the “Digital Infrastructure Development Plan 2030” and the “Comprehensive Strategy for Global Digital Expansion 2030”¹²

(Ministry of Internal Affairs and Communications, June 11)

- On June 11, 2025, the Ministry of Internal Affairs and Communications (MIC) released (i) the “Digital Infrastructure Development Plan 2030”, which outlines Japan’s policy direction and specific measures for developing its digital infrastructure nationwide up to 2030, and (ii) the “Comprehensive Strategy for Global Digital Expansion 2030”, which outlines the fundamental policy for enhancing Japan’s international competitiveness in the digital field and ensuring economic security up to 2030.
- To address various complex challenges, (i) the “Digital Infrastructure Development Plan 2030” outlines nine priority areas, associated with the following three main strategic pillars.
 - Promoting the development of new digital infrastructure for the AI era
Data centers and submarine cables, All-Photonics Network (APN), and next-generation communications infrastructure (Beyond 5G) and quantum cryptography communication
 - Building network environments to support the utilization of emerging digital infrastructure and technologies
Optical fiber, mobile networks, and Non-terrestrial networks (NTN)
 - Items across various areas of digital infrastructure
Strengthening the resilience of communications infrastructure, integrated promotion of infrastructure development alongside the creation and dissemination of digital solutions, and clarification of roles and responsibilities between the public and private sectors
- (ii) The “Comprehensive Strategy for Global Digital Expansion 2030” sets forth key principles for strengthening international competitiveness and economic security, such as a “global-first” market-oriented perspective, and strengthened collaboration with like-minded countries, and the pursuit of strategic autonomy and indispensability along with concrete focus areas such as submarine cables, mobile networks, NTN, cybersecurity, large language model, APN, data centers, and quantum cryptography communication.

¹ https://www.soumu.go.jp/menu_news/s-news/01kiban07_02000077.html (in Japanese)

² https://www.soumu.go.jp/menu_news/s-news/01tsushin06_02000319.html (in Japanese)

Japan's Basic Policy on Ideal Data Utilization Systems: Toward Trust, Interoperability, and Cross-Sectoral Reform³⁴

(Cabinet Secretariat, June 13)

- On June 13, 2025, Prime Minister Ishiba convened the 11th Meeting on Digital Administrative and Fiscal Reform, in which the Japanese government adopted the Basic Policy on Ideal Data Utilization Systems (“Basic Policy”). The Japanese government aims to submit a bill to the ordinary Diet session in 2026, following studies on amending the Basic Act on the Advancement of Public and Private Sector Data Utilization (Act No. 103 of 2016) or enacting a new law. The Basic Policy outlines the following three strategic perspectives.
 - **Development of data linkage infrastructure and promotion of data standardization:** The Basic Policy outlines the development of a “trust infrastructure” by summer 2026 to support secure data linkage that is aligned with international standards to enable cross-border data utilization. It also considers the development of a “digital public infrastructure” for public-interest sectors, with a focus on usability across various fields based on actual needs, which is similar to the EU’s European Common Data Space in 14 sectors. Furthermore, efforts to accelerate data standardization will target practical use cases in FY 2025, especially in mobility, agriculture, and public works. The policy addresses vendor lock-in and de facto standards, with the goal of achieving international acceptance through proposals to the relevant international standardization bodies and the establishment of mutual recognition frameworks.
 - **Ensuring data collection and incentives for the provision of data by data holders:** The Basic Policy outlines a multi-option approach to incentivizing data holders to share data. Depending on the circumstances, this may include mandatory data provision, support for compliance with overseas regulations, requiring that data be provided in accordance with certain standards as a condition for the granting of subsidies, the development of digital public goods to avoid duplicate investments, or an approach that provides compensation as necessary. The Japanese government also will lead efforts to standardize and develop high-quality open data as digital public goods, particularly in socioeconomically important fields such as electricity, water, gas, public works, and mobility. To address potential market distortions from data monopolies or vendor dominance,

³ https://www.cas.go.jp/jp/seisaku/digital_gyozaikaikaku/kaigi11/gijishidai11.html (in Japanese)

⁴ <https://www.kantei.go.jp/jp/103/actions/202506/13digitalgyouzaisei.html> (in Japanese)

particularly those which affect SMEs, the Japanese government will study data systems in FY2025 while considering competition, consumer protection policies, and similar matters. The Basic Policy also refers to Chapter IV, Article 13 of the EU Data Act (“DA”) on unfair contract terms.

- **Establishing a highly reliable digital space:** The Basic Policy emphasizes enhancing data governance, data security, data linkage platforms, and proper personal data processing. In FY 2025, Japan will study institutional, technical, and operational approaches to foreign governmental access, similar to Article 48 of the GDPR, Article 31 of the Data Governance Act (“DGA”), and Article 32 of the DA. Legal frameworks for secure data platforms also will be studied, in a manner reminiscent of Chapter III of the DGA. An amendment to the Act on the Protection of Personal Information (“APPI”) is also planned.
- Additionally, Japan plans to establish legal channels for business-to-government (B2G) data sharing in disasters, in a manner reminiscent of Chapter V of the DA. Also, the Basic Policy identifies five priority areas (medical care, finance, education, mobility, and industry) for the development of data spaces. In healthcare, the Japanese government plans to consider a special law to balance personal data protection and the use of medical data. An interim report is due by the end of 2025, with final measures expected by summer 2026. The goal is to enable near-universal patient data sharing by 2030 and also to specify related measures. If legislative action is necessary, the goal is to submit a bill to the ordinary Diet session in 2027.
- The challenge is promoting the public development of highly versatile data as digital public goods in a manner that transforms public data into open data. Specific studies will be conducted in 2025 to determine ideal digital public goods, including methods of facilitating joint use of data.

Takeaway: The Japanese government seeks to either amend the Basic Act on the Advancement of Public and Private Sector Data Utilization or introduce new legislation, with a bill expected in 2026 in the latter case. EU-based companies should monitor the development of Japan’s data utilization policy and regulations, specifically with respect to the similarities and differences between the regulations of the EU and Japan, in order to potentially obtain new business opportunities. An amendment to the APPI, which also is likely to be submitted in 2026, should also be taken into account to ensure compliance.

Cabinet Approval of the Priority Plan for Realizing a Digital Society⁵

(Digital Agency, June 13)

- On June 13, 2025, the Cabinet approved the Priority Plan for Realizing a Digital Society. This plan outlines the key policies that the government should swiftly and intensively implement in order to realize a digital society.
- The plan focuses on promoting the digitalization of society through utilization of AI and other digital technologies. Specifically, the plan includes the following priority policies.
 - Utilization of technologies such as AI in national and municipal governments and administrative procedures
(e.g., developing environments for AI utilization and promoting its use)
 - Developing an AI-friendly environment, including systems, data, and infrastructure
(e.g., promoting open data and a safe and secure communication infrastructure)
 - Collaborative efforts being taken among stakeholders to enhance user convenience and contribute to economic growth
(e.g., promoting data linkage and utilization, as well as optimization of national information system)
 - Implementing initiatives to ensure safe and secure digitalization
(e.g., ensuring accessibility and cybersecurity, countermeasures against false and fake information, improving digital literacy)
 - Strengthening the driving forces for digital transformation across Japan
(e.g., securing and developing digital human resources, strengthening digitalization in the Japanese government)

Takeaway: This plan is formulated as “a priority plan in the Basic Act on the Formation of a Digital Society”, “an information system development plan in the Act on the Advancement of Government Administration Processes That Use Information and Communications Technology”, and “a basic plan for promoting the utilization of public and private data in the Basic Act on the Promotion of the Utilization of Public and Private Data”. In addition, this plan is statutorily required to be reported to the Diet. Businesses in Europe should monitor how these policies are put into practice in order to obtain new business opportunities in the subject areas.

⁵

<https://www.digital.go.jp/policies/priority-policy-program> (in Japanese)

Japan Publishes Draft OT Security Guidelines for Semiconductor Factories – Open for Public Consultation⁶

(Ministry of Economy, Trade and Industry, June 27)

- On June 27, 2025, Japan's Ministry of Economy, Trade and Industry (METI) published the Draft OT Security Guidelines for Semiconductor Device Factories in both Japanese and English. This draft represents Japan's latest effort to strengthen operational technology (OT) cybersecurity in semiconductor manufacturing, in alignment with overseas security standards such as SEMI E187/E188 and NIST CSF 2.0.
- Given the increasing diversity and sophistication of cyberattacks targeting factory systems (especially in the high-value semiconductor sector), these guidelines are intended to safeguard production continuity, protect confidential information, and ensure the quality of semiconductor products against the most sophisticated threats, such as advanced persistent threat (APT) groups supported by nations. Recognizing that traditional cyber/physical security frameworks for generic assembly-type factory systems (like those outlined in METI's 2022 guidelines) are insufficient for semiconductor factories, the new draft responds to the unique risk landscape of process automation (PA)-type operations, characterized by large-scale operations and the significant number of manufacturing devices utilizing OS-dependent equipment.
- The guidelines were developed by METI's Semiconductor Industry Sub-Working Group, which includes experts from Japanese and global semiconductor device manufacturers and equipment suppliers.
- The guidelines detail security measures classified under the Purdue model, including fab areas, fab system areas, external services, and IT/OT demilitarized zones, along with organizational and human factors. They also include security measures addressing risk sources (i.e., threats and vulnerabilities) specific to semiconductor device factories, identified by leveraging risk management frameworks (CPSF and NIST CSF 2.0) based on the reference architecture for semiconductor device factories.
- A 60-day public consultation period is now open, during which stakeholders worldwide are invited to provide input. The guidelines are expected to be finalized around this fall. METI is also exploring linking compliance with these guidelines to eligibility for investment-related initiatives in Japan's semiconductor sector.

Publication and Public Consultation on the Draft Interim Summary on Addressing Various Issues in Information Distribution in Digital Space⁷

(Ministry of Internal Affairs and Communications, June 30)

- The Working Group of the MIC published the Draft Interim Summary on Addressing Various Issues in Information Distribution in Digital Space after a public consultation period from July 1 to July 22, 2025.
- The Internet is vital for modern communication and economic activity, but the spread and dissemination of illegal and harmful content (like defamatory comments) is an ongoing concern.
- To address these issues, the Working Group considered measures from the following two perspectives.
- **An approach focusing on types of information**
 - **Issue:** Rights-infringing information (e.g., defamation based on false facts) is covered by the Information Distribution Platform Act. However, illegal information (e.g., false advertising, recruitment for criminal acts) and harmful information (e.g., information that is harmful to adolescents, medically inaccurate treatment information, and fake disaster or incident footage) are not subject to the measure for the prompt response of this Act unless businesses publicly disclose the criteria for the voluntary deletion of such information. Therefore, although providers may not always act promptly to address illegal information, legally requiring them to remove harmful content must be approached with great caution with respect to their freedom of expression.
 - **Proposed response:** To implement processes to respond quickly to notifications from administrative agencies, including systematically providing a point of contact for complaints, specifying the scope of information subject to complaints, ensuring due process for the sender, and clarifying the illegality of certain harmful information under specific laws.
- **An approach focusing on service design by providers**
 - **Issue:** How to mitigate the spread of harmful and illegal information, how to display appropriate information, and how to identify users.
 - **Proposed response:** To ensure the transparency of the recommender system, avoid showing content based on user profiling, suspend monetization, assess and reduce risk, prioritize the display of reliable information, label AI-generated content, and conduct identity verification procedures when a user opens an account.

⁷

https://www.soumu.go.jp/menu_news/s-news/01ryutsu02_02000445.html (in Japanese)

Industry

Publication of the Intellectual Property Strategic Program 2025⁸

(Cabinet Secretariat, June 3)

- On June 3, 2025, the Intellectual Property Strategy Headquarters at the Cabinet Secretariat released the Intellectual Property Program 2025. The 2025 edition emphasizes laying the groundwork for creating added value in by demonstrating how to respond to generative AI and establishing a roadmap to fully leverage Japan's intellectual capital such as anime, manga, and video games.
- The key points of the Intellectual Property Strategic Program 2025 are as follows.

Intellectual Property Systems for the AI and Digital Era

- Strike a balance between “promoting the advancement of AI technologies” and “ensuring appropriate protection of intellectual property rights”, based on the principles of AI law (e.g., ensuring transparency in AI development to address concerns of rights holders and creators, and reviewing the definition of “inventors” of AI utilized invention to ensure AI developers’ incentives)
- Establish a world-leading IP system that attracts both domestic and international companies (e.g., by addressing cross-border patent infringement on the Internet and strengthening design protections in virtual space)

Formulating a New International Standards Strategy and Promoting Rule-Making

- Play a leading role in rule-making on the international stage across eight strategic fields, such as digital and AI, quantum technologies, information and communications, bioeconomy, and environment and energy.

Establishing the “Virtuous Cycle of Content and Regional Revitalization Plan”

- Develop a virtuous cycle between content industries, such as anime and manga, and regional revitalization, with the goal of using Japan's cultural assets to stimulate regional economies
- Set a target for the expansion of the global market value of Japan-originated entertainment and content industries to JPY 20 trillion by 2033

Takeaway: Based on the Intellectual Property Strategic Program 2025, the expert group has discussed various issues, including inventorship in the AI era. As legislative action related to AI-generated inventions remains a possibility, future developments should be monitored closely. In addition, it is worth considering cooperation with Japan in regard to its standardization activities, especially when the standardization activities for Europe's priority areas overlap with those in Japan.

⁸ <https://www.kantei.go.jp/jp/singi/titeki2/chitekizaisan2025/pdf/suishinkeikaku.pdf> (in Japanese)

Data Protection

Operation of the Global CBPR System⁹

(Personal Information Protection Commission, June 2)

- On June 2, 2025, the Global Cross Border Privacy Rules (CBPR) became effective. The Japan Institute for Promotion of Digital Economy and Community (JIPDEC) is now an approved certification body for the Global CBPR system and will begin assessing and certifying companies.
 - The Global CBPR system is an international framework which ensures that companies meet data protection standards for cross-border personal data transfers. The Global CBPR system was originally operated by APEC (Asia Pacific Economic Cooperation). However, in April 2022, the system expanded due to the creation of the Global CBPR Forum. Since then, Forum member countries (including Japan) have sought to establish company certification systems to promote smoother global data transfers to develop a new broader certification system.
 - On June 2, 2025, the Forum officially launched the Global CBPR system, and certification bodies have begun granting certifications.
-

Ministry of Economy, Trade and Industry Publishes Fourth Interim Report on New Direction of Economic and Industrial Policies – Industrial Structure in 2040 Led by Growth Investment”¹⁰

(Ministry of Economy, Trade and Industry, June 3)

- With the challenges posed by a declining population, it is important for the Japanese economy to shift from the cost-cutting mindset that has persisted for the past 30 years to a growth mindset, driven by investment and wage increases, in order to support societal welfare while achieving economic growth in Japan.
- On June 3, 2025, the Ministry of Economy, Trade and Industry (“METI”) published its Fourth Interim Report regarding industrial structure in 2040 led by growth employment, prepared by the Committee on the New Direction of Economic and Industrial Policies.
- The interim report covers the following two points:
 - forecasting the macroeconomic situation (including GDP, domestic investment, and wages) and the transformation of the industrial structure (Manufacturing - X industry¹¹, ICT & professional services industry, and advanced essential-service industry) in 2040 in a quantitative manner; and
 - proposing concrete main issues and measures to tackle in order to achieve the transformation of the above industries.
- The necessary transformations vary by industry:
 - Manufacturing – X Industry**
 - Expand employment and increase wages by adding value through service-oriented transformation using GX/frontier technologies.
 - ICT & Professional Services Industry**
 - Increase wages by developing new business opportunities through using frontier technology in the manufacturing industry and introducing labor-saving in the service industry.
 - Essential Services Industry**
 - Increase wages by providing advanced essential services through labor-saving investments, including the use of AI and robotics.
- Future policies will focus on three areas: (i) implementing structural reforms to encourage growth investments that will generate new value-added industries, (ii) encouraging local economies/industries to sustain growth despite labor shortages, and (iii) enhance economic infrastructure (e.g. energy, international trade) to encourage investment.

¹⁰ https://www.meti.go.jp/english/press/2025/0603_008.html

¹¹ Manufacturing – X Industry refers to manufacturing industry which sets trigger a social transformation.

Takeaway: Japanese government further encourage investment in manufacturing – X industry, ICT & professional services industry and essential services industry by using GX/frontier technology, which brings more business opportunities for companies dealing with the related fields.

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.

