

# **Fourth Year Review on the Implementation of Japan’s NAP on Business and Human Rights**

## **(April 2024 to the end of March 2025)**

May 2025

Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan’s National Action Plan on Business and Human Rights

Chapter 4 in the National Action Plan on Business and Human Rights (hereinafter “the NAP”) states that the Inter-Ministerial Committee<sup>1</sup> will follow the progress of implementation of the NAP on an annual basis. The main initiatives of the Government in the fourth year of the NAP (from April 2024 to the end of March 2025)<sup>2</sup> comprise discussions on promoting the NAP and measures taken by the Government to implement the NAP as described below.

### **1. Discussions Within the Framework for Promoting the NAP**

The following discussions were held at meetings of the Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan’s NAP (hereinafter “the Inter-Ministerial Committee”) as well as at the Roundtable for Promoting the NAP (hereinafter “the Roundtable”) and meetings of the Working Group for Promoting the NAP (hereinafter “the Working Group”), both of which are convened by the Ministry of Foreign Affairs (MOFA), under the decision of the Inter-Ministerial Committee.

- (1) In May 2024, the seventh Roundtable was held (documents for approval were circulated without holding an actual meeting), and ministries and agencies reported on their respective efforts regarding the “Third Year Review on the Implementation of Japan’s NAP on Business and Human Rights.”
- (2) In the same month, the 10th meeting of the Inter-Ministerial Committee was held and the “Third Year Review on the Implementation of Japan’s NAP on Business and Human Rights” was approved. In addition, the Cabinet Secretariat reported on the third-year exchange of opinions regarding the NAP, which was conducted following a stakeholder consultation based on the “Stakeholder report on the review of the third year of the NAP for the Exchange of Views on ‘Business and

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<sup>1</sup> In March 2021, the “Inter-Ministerial Committee on the Implementation of Japan’s National Action Plan on Business and Human Rights” was established in line with the agreement of the relevant ministries and agencies. This was reorganized into the “Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan’s National Action Plan on Business and Human Rights” in December 2021.

<sup>2</sup> The first year of the NAP is from October 2020 to the end of March 2022.

Human Rights’ (8 March 2024)<sup>3</sup> (hereinafter “the Stakeholder Report”), at the meeting of the Inter-Ministerial Committee held on 8 April, and the summary of the results of that exchange of opinions was approved. Moreover, the Inter-Ministerial Committee granted approval to start work on the revision of the NAP in line with chapter 4.6 of the NAP.

- (3) In August, at the fifth meeting of the Working Group, government ministries and agencies reported on the current status and future prospects of the measures taken in response to the Stakeholder Report, followed by an exchange of opinions.
- (4) In November, a joint meeting of the eighth Roundtable and sixth Working Group was held to exchange views on the draft outline of the revised version of the NAP.
- (5) In December, at the 11th meeting of the Inter-Ministerial Committee, MOFA explained the draft outline for the revision of the NAP and it was approved. In addition, the Ministry of Health, Labour and Welfare (MHLW) introduced the “Business and Human Rights at Work Checklist” (hereinafter “the Checklist”) released in October 2024.

## 2. Measures by the Government

The NAP refers to measures consisting of 85 items that the Government will undertake concerning business and human rights.<sup>4</sup> A list of all the initiatives implemented by each ministry and agency in the fourth year of the NAP, with regard to these items, is provided in the annex. The following initiatives have made significant progress.

### (1) Measures Regarding the State’s Obligation to Protect Human Rights

Recognizing that the Government itself is an economic actor and should lead by example in promoting respect for human rights, the relevant ministries and agencies decided a policy on human rights considerations in public procurement in April 2023. This policy aims to advance human rights initiatives in public procurement and to create mechanisms for promoting human rights initiatives within business enterprises. Based on this decision, all relevant ministries and agencies are working to include the statement “Bidders and contractors will make efforts to respect human rights in light of the Guidelines on Respecting Human Rights in Responsible Supply Chains” in tender documents, contracts, and other documents related to public procurement.

In the international arena, in their July 2024 statement, the G7 Trade Ministers concurred on the importance of compliance with human rights and international labor standards in global supply chains, including working to further increase predictability and

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<sup>3</sup> <https://www.mofa.go.jp/mofaj/files/100660230.pdf>

<sup>4</sup> Following the formulation of the NAP, three new items have been added, bringing the total number of items listed to 88.

certainty for companies. In June of the same year, the report of the Working Group on Business and Human Rights was submitted to the Human Rights Council.<sup>5</sup>

In addition, in March 2024, the Stakeholder Report, including 23 proposals consisting of seven items, was compiled by the Roundtable and the Working Group. At the Inter-Ministerial Committee in April, based on the Stakeholder Report, the relevant ministries and agencies held discussions on relevant international trends and the current status of efforts by Japanese companies (third-year exchange of opinions), in line with chapter 4.5 of the NAP. In this way, they confirmed progress made to date and shared their experiences of the challenges Japan faces in advancing its efforts moving forward. At the meeting of the Inter-Ministerial Committee in May, the Committee gave approval to initiate the revision process of the NAP in line with chapter 4.6 of the NAP. Taking into account the subsequent discussions at the Roundtable and Working Group, a draft outline was approved at the meeting of the Inter-Ministerial Committee in December.

## (2) Measures of the Government Promoting Corporate Responsibility to Respect Human Rights

In the fourth year of the NAP, the Government continued to make progress in its efforts to promote respect for human rights in domestic and international supply chains and human rights due diligence based on the United Nations Guiding Principles on Business and Human Rights (hereinafter “the UNGPs”). In order to encourage companies to address business and human rights, the Government has so far published the “Guidelines on Respecting Human Rights in Responsible Supply Chains” (hereinafter “the Guidelines”), the “Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains,” as well as the “Guidebook for Respecting Human Rights in Food Enterprises” (hereinafter “the Guidebook”). Following that, in 2024, MHLW, in cooperation with the International Labour Organization (ILO), developed the Checklist as a tool to help companies assess their current status of initiatives related to business and human rights, deepen their understanding of labor-related laws and international labor standards, and further advance their efforts. In addition to disseminating these guidelines and raising awareness of them, various measures were undertaken to raise awareness of human rights due diligence in companies. The main measures taken in this regard are described below.

Through contributions to the United Nations Development Programme (UNDP), MOFA has supported UNDP’s provision of human rights due diligence training and individual guidance sessions for companies and their employees, giving companies the opportunity to learn how to address human rights risks in their own operations and those

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<sup>5</sup> Report of the Working Group on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises, A/HRC/56/55/Add.1 (1 May 2024)

Note: The Japanese government’s comments are published as an annex to the visit report. (Comments by the State, A./HRC/56/55/Add.2 (28 May 2024))

of their partner companies and suppliers. The project also provided support to governments in 12 countries in the formulation and implementation of action plans. In Japan, MOFA co-hosted an event with UNDP in February 2025 aimed at promoting human rights due diligence in business enterprises, where panel discussions were held on themes such as the role of the NAP and Small and Medium Enterprises (SMEs). At the event, MOFA introduced the Guidelines, the Guidebook, the Checklist, and best practice examples as useful tools for companies to implement concrete measures to fulfil their responsibility to respect human rights. Moreover, MOFA held online seminars in Thailand and Singapore to provide information on the implementation of human rights due diligence for Japanese companies and their business partners in countries where Japanese companies operate. Additionally, MOFA conducted in-person seminars in Hamamatsu and Fukuoka to introduce business and human rights for Japanese companies. The seminars focused on considering the issue of business and human rights from the perspective of foreign workers and in the context of the Sustainable Development Goals (SDGs) and were followed by discussions among participants.

The Ministry of Economy, Trade and Industry (METI) organized workshops in Tokyo, Nagoya, and Osaka to promote and support corporate efforts to respect human rights based on the Guidelines. These workshops utilized a model self-assessment questionnaire that large companies require SMEs to complete, along with other topics, with the aim of sharing and improving knowledge among companies. Moreover, through contributions to the ILO, METI supported the development of a pool of specialists with expertise in business and human rights. From February to March 2025, as a commissioned project of the Overseas Industrial Human Resources Development Association, METI conducted a training program in Japan aimed at promoting responsible business conduct in Asia. The program targeted executives and managers from Vietnamese companies, including Japanese companies' overseas business partners, as well as representatives from industry associations. Furthermore, aiming to enhance the competitiveness of Japan's textile industry by strengthening its responses in the social and human rights areas, the Japanese Audit Standard for Textile Industry (JASTI), which sets out audit requirements and evaluation criteria based on the actual situation of Japan's textile industry, was established in March 2025. For its part, the Japan External Trade Organization (JETRO) continues to make information available on a dedicated website on "Supply Chains and Human Rights." This information includes cases of how various countries have applied relevant laws and regulations to companies as well as examples of how companies have responded. Additionally, JETRO received consultations from companies regarding their efforts to respect human rights through its Consultation Desk for Business and Human Rights.

Furthermore, METI will continue to promote the dissemination of the Guidance for Collaborative Value Creation 2.0, a framework designed to strengthen corporate management, to effectively disclose information, and to engage in constructive dialogue with investors for the realization of Sustainability Transformation (SX). This

Sustainability Transformation will entail synchronizing the sustainability of society (ESG/SDGs) with corporate sustainability (earning power), and enhancing companies' ability to generate sustainable sources of growth and increase corporate value by incorporating the perspectives of ESG/SDGs and other social issues into management and investor dialogue. Based on this guidance, METI has selected, as "SX Brands 2024," a group of leading companies that are enhancing their ability to generate sustainable sources of growth and increase corporate value through SX. To promote the dissemination of advanced SX initiatives among a wide range of Japanese companies and to further facilitate dialogue and engagement with domestic and international investors, METI also prepared and published the SX Brands 2024 Report, which introduces the initiatives of the selected companies.

The Ministry of Agriculture, Forestry and Fisheries organized a seminar to further promote respect for human rights in food companies, introducing the "Guidebook for Respecting Human Rights in Food Enterprises," and inviting speakers who are at the forefront of human rights initiatives in food enterprises to give presentations.

The Ministry of the Environment updated its "Practice Examples of Environmental Due Diligence." It also held a roundtable meeting of experts to promote environmental due diligence measures by Japanese companies and organized a seminar to introduce international trends and key points of environmental due diligence, based on the results of the roundtable discussion.

### (3) Measures Regarding Access to Remedy

In accordance with Article 5 of the Supplementary Provisions of the amended Whistleblower Protection Act, an expert review committee was established and convened at the Consumer Affairs Agency in May 2024. The committee conducted discussions on issues related to the recent changes in domestic and international circumstances surrounding the whistleblower protection system and the implementation status following the amendments, and compiled and published a report in December of the same year. Based on the report, the "Bill to Partially Amend the Whistleblower Protection Act" was approved by the Cabinet in March 2025 and submitted to the 217th session of the National Diet.

Additionally, the "Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises" (hereinafter "the OECD Guidelines") was revised to make it the "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct" (hereinafter "the revised OECD Guidelines"). In response to this revision, in June 2023, the Government published a Japanese translation of the revised OECD Guidelines and a revised version of the Case-handling procedures of the Japanese National Contact Point (NCP). The Government is also conducting domestic awareness-raising activities and international outreach through Japanese diplomatic missions overseas. Moreover, in February 2025, the format of the specific instance submission form was revised, among other measures, to enhance the

convenience of submitters and facilitate the smooth handling of specific instances. Through such awareness-raising activities and revisions of the Case-handling procedures, the Japanese NCP has been striving to meet the core effectiveness criteria outlined in the revised OECD Guidelines, including visibility, accessibility, and transparency, while working closely with relevant ministries and agencies to strengthen the functions of the NCP, which was a key objective of the revision.

#### (4) Cross-Cutting Areas

In June 2024, “the Amendment Act of the Immigration Control and Refugee Recognition Act and the Act on Proper Technical Intern Training and Protection of Technical Intern Trainees” was enacted and promulgated. This amendment aims to dissolve the current technical intern training program in a progressive manner and establish a new training and employment program, the “Employment for Skill Development Program.” The new program is designed to develop human resources with the necessary knowledge or experience in specific industrial fields where it is deemed appropriate to acquire skills requisite in such fields through employment in Japan, and to secure such human resources in those fields.

Additionally, in December 2024, under the “Ministerial Council on Acceptance and Coexistence of Foreign Workers,” the “Advisory Panel of Experts on the basic policy and field-specific operation policies for Specified Skilled Worker System and Employment for Skill Development Program” was established. Further, in March 2025, “the Basic Policy on the operation of the System for Status of Residence of Specified Skilled Worker and Basic Policy on proper implementation of the Employment for Skill Development and protection of Skill Development Employees” was approved by the Cabinet.

The implementation of the Employment for Skill Development Program is scheduled to begin in April 2027, and necessary preparations, including the drafting of cabinet orders and ministerial ordinances, are currently underway.

The Japan Platform for Migrant Workers towards Responsible and Inclusive Society: JP-MIRAI, in collaboration with JICA, also has ongoing pilot projects aimed at addressing issues related to foreign workers in Japan in which companies can participate. As part of these projects, JP-MIRAI shares appropriate and transparent information with foreign nationals—located both in Japan and overseas—who are interested in working in Japan through its JP-MIRAI Portal application. In the same context, JP-MIRAI has also provided multilingual consultation and grievance services in over 4,000 cases since its launch.

Furthermore, with regard to the use of AI and human rights, MOFA has been working in collaboration with the United Nations Educational, Scientific and Cultural Organization (UNESCO) on a three-year project (2022–2025) titled “Supporting Africa and SIDS to Benefit from AI Technologies while Addressing Ethical Risks” to support

developing countries with their implementation of “UNESCO’s Recommendation on the Ethics of Artificial Intelligence” adopted at UNESCO’s General Conference in 2021.

The Ministry of Internal Affairs and Communications (MIC) and METI have been engaging in discussions with experts to address rapid technological changes, including the widespread adoption of generative AI, and have integrated and updated existing guidelines related to AI. In April 2024, MIC and METI compiled the “AI Guidelines for Business Ver1.0” to outline matters that AI developers, providers, and business users should address, and they have been promoting awareness of these guidelines among relevant stakeholders. In March 2025, the guidelines were updated and published as Version 1.1, incorporating the latest developments. In addition, a representative of the Personal Information Protection Commission attended the 4th G7 Data Protection and Privacy Authorities Roundtable held in Rome in October, where the “Statement on the Role of Data Protection and Privacy Authorities in Fostering Trustworthy AI” was adopted. This statement shared the idea in the international community that, just as the fundamental principles of data protection must be embedded in AI technologies by design, data protection and privacy authorities must also be included in the governance that is being built in relation to AI technologies by design.

### **3. Summary**

As mentioned above, in the fourth year of the NAP, various initiatives were implemented to encourage business enterprises to respect human rights in their domestic and global supply chains. Particular progress was made in terms of measures to practically promote human rights due diligence based on the UNGPs, and in efforts regarding acceptance and coexistence of foreign human resources.

In particular, reflecting the trend toward the establishment of legal frameworks for human rights due diligence in European countries and the growing interest of domestic and overseas business enterprises in this area, the Government will continue to implement various measures according to the NAP, while striving to understand relevant international trends and the status of efforts by Japanese business enterprises. The Government will also work on the revision of the NAP, while continuing dialogue with relevant stakeholders, to make it more effective in light of the current situation.