



## **Joint Minutes of the Sixth Meeting of the Committee on Technical Barriers to Trade under the Agreement between the European Union and Japan for an Economic Partnership**

**Brussels and Tokyo (by video-conference), 5 February 2026**

The sixth meeting of the Committee on Technical Barriers to Trade (“TBT”) under the Agreement between the European Union (“EU”) and Japan (“JP”) for an Economic Partnership (“EPA”) took place on 05 February 2026, by video-conference.

On the Japanese side, participants included representatives of the Ministry of Foreign Affairs (MOFA), Ministry of Economy, Trade and Industry (METI), the Ministry of Health, Labour and Welfare (MHLW), Ministry of Agriculture, Forestry and Fisheries (MAFF), National Tax Agency (NTA) and the Mission of Japan to the EU. Participants on the EU side included representatives of Directorate-General for Trade, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Directorate-General for Environment and the EU Delegation in Japan.

### *Cosmetics and quasi-drugs*

The EU conveyed EU industry concerns about Japanese specific ingredient usage regulations for cosmetics and suggested the harmonisation of existing “Japan-only” regulations on efficacy, quasi-drugs and ingredient usage with EU/global standards. Japan acknowledged similar complaints from industry associations, including EU companies, and expressed willingness to participate in a technical discussion with the EU.

The EU asked whether Japan would consider eliminating animal testing requirements, which are currently mandatory for introducing new ingredients in Japan (for quasi-drugs), and promote no-animal testing methods. The EU stressed that animal testing for general cosmetics is virtually outlawed in OECD nations and banned in the EU since 2013. As an example of trade obstacles, the EU emphasized the extreme difficulties faced by EU cosmetics companies with declared “non-animal testing” policy to enter new innovative ingredients in Japan, as well as reported difficulties of Japanese cosmetics companies to export animal-tested products. Aware of this issue, Japan explained that, for cosmetics, the submission of animal testing data is not required at the time of marketing notification, and that, with respect to quasi-drugs which include new active

ingredients and/or new additives, animal testing data are not required when test results obtained through alternative methods adopted as OECD Test Guidelines are available. Japan further explained that, given the current level of scientific and technological development, it remains difficult to ensure safety in humans solely through alternative methods. Accordingly, for endpoints for which no established alternative methods exist, a minimum level of animal testing continues to be necessary from the perspective of ensuring safety in humans. Japan also noted that Japan is actively advancing initiatives to promote alternatives to animal testing, including research on NAMs (New Approach Methodologies). Japan stated that it would welcome the further information from the EU, as well as technical discussion with the EU.

The EU inquired whether Japan could ease limitations on efficacy claims with respect to numerical representations and testimonials in cosmetics advertisement. Japan mentioned that the industry had raised similar concerns, and explained it is currently conducting a survey on the relevant situation in third countries, for which EU cooperation would be welcomed. The EU expressed its readiness to engage in a technical discussion and share relevant information.

### *Medical technologies*

The EU raised industry concerns about the very long and unpredictable/non-transparent regulatory approval process for in-vitro diagnostics (IVDs), leading to higher costs, longer waiting periods, and planning difficulties.

The EU also noted concerns about Japan's IVD regulatory requirements, which differ from international (EU/US) practices, notably regarding Japan's requirements for a product performance evaluation against several comparator products, stability testing even for already approved products, and the lack of clear regulatory guidance and limited public access to review procedures, approval reports and precedents. The EU noted that, taken together, these lead to longer time-lines, increased costs and reduced predictability and access to the Japanese market. Japan explained that, according to the published statistics on review periods, operations are being conducted within the set timeframe. Japan also stated that, although review reports for IVDs are not currently being prepared, the additional work implied could potentially lengthen the review period. Japan added that participation from industry is necessary for this discussion, as item-specific information will be required.

The EU confirmed that it would provide more detailed, written information on the concerns raised regarding IVDs regulatory approval in Japan. Japan proposed a dedicated discussion with EU companies located in Japan (through the European

Business Council in Japan (EBCJ)). The EU offered assistance in preparing for the meeting with the participation of the EU Delegation to Japan.

*EU Packaging and Packaging Waste Regulation (PPWR):*

Japan reiterated concerns on the implementation of the EU's PPWR (in particular, from food, automotive and electronics industry), noting that it may restrict multilayer films used in food packaging. Japan also pointed out that significant uncertainty persists due to the absence of published guidelines, FAQs, and EU implementing or delegated acts, making it difficult for Japanese manufacturers supplying the EU market to understand and prepare for specific obligations. In particular, Japan emphasized that unclear requirements—especially those related to Articles 5, 15, 18, and 35–39—pose practical challenges for industry.

Japan requested early clarification of the requirements and early publication of the necessary guidance and additional information, as well as a sufficient transitional period to prepare for compliance, as some requirements will become applicable from August 2026. Japan also requested that the EU continue discussions on the PPWR, including through a meeting of the Japan-EU Working Group on Circular Economy involving the European Committee for Standardization (CEN). Japan recalled that, at the previous Committee meeting, it had requested the EU to provide sufficient explanation to third countries and to give due consideration to their views, and therefore, expected those actions to be implemented through the Working Group. In addition, Japan referred to the possibility of exchanging views with the EU on new packaging materials compliant with the PPWR.

The EU provided timelines for dates of adoption and application for specific provisions, and stressed that more clarifications would be provided, both in the upcoming guidance document (to be adopted by the Commission and published in the Official Journal of the EU), and in the FAQ factsheet (soon to be published online on the web site of DG Environment). Furthermore, the EU proposed that these key documents, once adopted and published, be published, in addition, on the EU's one stop shop web-platform "Access2Markets", to ensure accessibility for Japanese companies, which Japan appreciated. Additionally, the EU explained that upcoming EU implementing and delegated acts would further contribute to add clarity on the Regulation. The EU stressed that, obligations such as to ensure recyclability of packaging or recycled content in plastic packaging, will apply only after the adoption of the EU implementing legislation. The EU noted Japan's concerns on multilayer films and stressed that, although the guidance document will not address them, clarifications on the recyclability assessment criteria would be dealt with by a future delegated act, for which technical specifications are under development by EU standardisation bodies (CEN). In addition, the EU

noted that European companies are also using multilayer films for their products and that these concerns are therefore addressed in the standardisation process, which is industry-led.

### *Lot codes*

The EU inquired about the progress made by Japan in addressing the issue of lot codes' removal from certain EU alcoholic beverage bottles imported into Japan, emphasizing that lot codes are mandatory in the EU, unlike in Japan. The EU was aware of the discussions being held between the Japanese importers' association (JWSIA) and Japan's National Tax Agency (NTA) and expressed its expectations for a solution on the lot codes issue.

Japan asked the EU additional questions on the EU lot codes system and both Parties exchanged information. The EU proposed to continue discussions at technical level on this issue.

The EU and Japan Co-Chairs expressed their appreciation for the productive meeting and concurred to continue exchanging information in the TBT area.

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## **Sixth Meeting of the Specialised Committee on Technical Barriers to Trade under the Agreement for an Economic Partnership between Japan and the EU**

**5<sup>th</sup> February 2026 08:30~ Brussels time/16:30~ Tokyo time**

**(Video Conference)**

### *Agenda*

- 1. Opening remarks**
- 2. Adoption of the Agenda**
- 3. Information requests on specific technical regulations or conformity assessment procedures**
- 4. Follow-up of the previous Committee meetings**
- 5. Closing session**