

Masako Konishi

WWF Japan, Expert Director (Conservation & Energy)

Member of the Board, TOHO Bank

Graduate school of Showa Women's University, Specially Appointed Professor

Ph.D.in Social Governance (Hosei University,2018)

MPA focusing on Environmental Policies (Harvard University,2005)

Certified Meteorologist

Resume

- Worked as TV presenter and reporter for CBC, NHK, CNN for fifteen years
- Attending UN climate COPs since 2005, engaging climate and energy research and advocacy work at WWF, and universities.
- Member of the Central Environment Council of the Ministry of Environment

Books and Papers

- 『気候変動政策をメディア議題に』著 (ミネルヴァ書房2022)
- 『地球温暖化を解決したい エネルギーをどう選ぶ?』著 (岩波書店2021)
- Routledge Handbook of Environmental Journalism, Part IV: Environmental Coverage in Asia and Australia; 25. The status and Future of Environmental Journalism in Japan, 2020
- The impact of Global NGOs on Japanese Press Coverage of Climate Negotiations: An analysis of the new “Background Media Strategy” *Environmental Communication*, DOI:<https://doi.org/10.1080/17524032.2017.1308403>, 2017



1. GX ETS (Japanese ETS) starts in April 2026 as real compulsory scheme for the first time in Japan!

- Finally, Japan implements compulsory Emission Trading Scheme from April 2026 and Auction system for power sector from 2033.
- Fuel surcharge (carbon surcharge) is planned to be implemented from 2028.
- Upfront investment support totaling 20 trillion yen, utilizing financial instruments such as GX Economic Transition Bonds.

Good news, but questions remain if this is comparable to other compulsory ETS in other areas, and if the level playing field is ensured among countries.

Can GX ETS achieve the necessary level of total emissions reduction?



2026年度より開始する排出量取引制度の全体像

①制度対象者

- CO2の直接排出量が前年度までの3カ年平均で10万トン以上の法人（単体）が対象。
- 義務対象者である親会社等が、密接な関係にある子会社（義務対象者のみ）も含めて一体での手続履行を可能とするための認定制度を創設。

②移行計画（仮称）の策定

- 対象企業は2050年カーボンニュートラルの実現に向けた排出削減目標や、その他関連事項を含む計画を策定・提出。
→ 例えば、2030年度の直接・間接排出削減目標等の中長期的な排出量の見通しを国が集計・公表。

③排出枠の償却義務

- ①排出枠の割当の申請
 - 政府指針に基づいて算出した排出枠の量を企業が割当申請（全量無償割当）。
- ②排出量の算定・報告
 - 企業は、自らの排出量について、第三者機関による検証を受けたいと、毎年度国に報告。
- ③排出枠の償却
 - 検証を受けた毎年度の排出実績と同量の排出枠の償却を義務づけ。
- ④不履行時の扱い
 - 償却義務の未履行分×上限価格の1.X倍の支払いを求める。

④価格安定化措置

- 政府は、排出枠の上下限価格を設定。
- （排出枠価格の高騰等で）排出枠が不足する事業者については、上限価格×不足分の支払いによって、義務を履行したものと見なす。
- 一定期間以上、市場価格が下限を下回って低迷する場合には、GX推進機構を通じてリバースオークションを行い、排出枠の流通量を調整するとともに、割当基準の強化を検討。

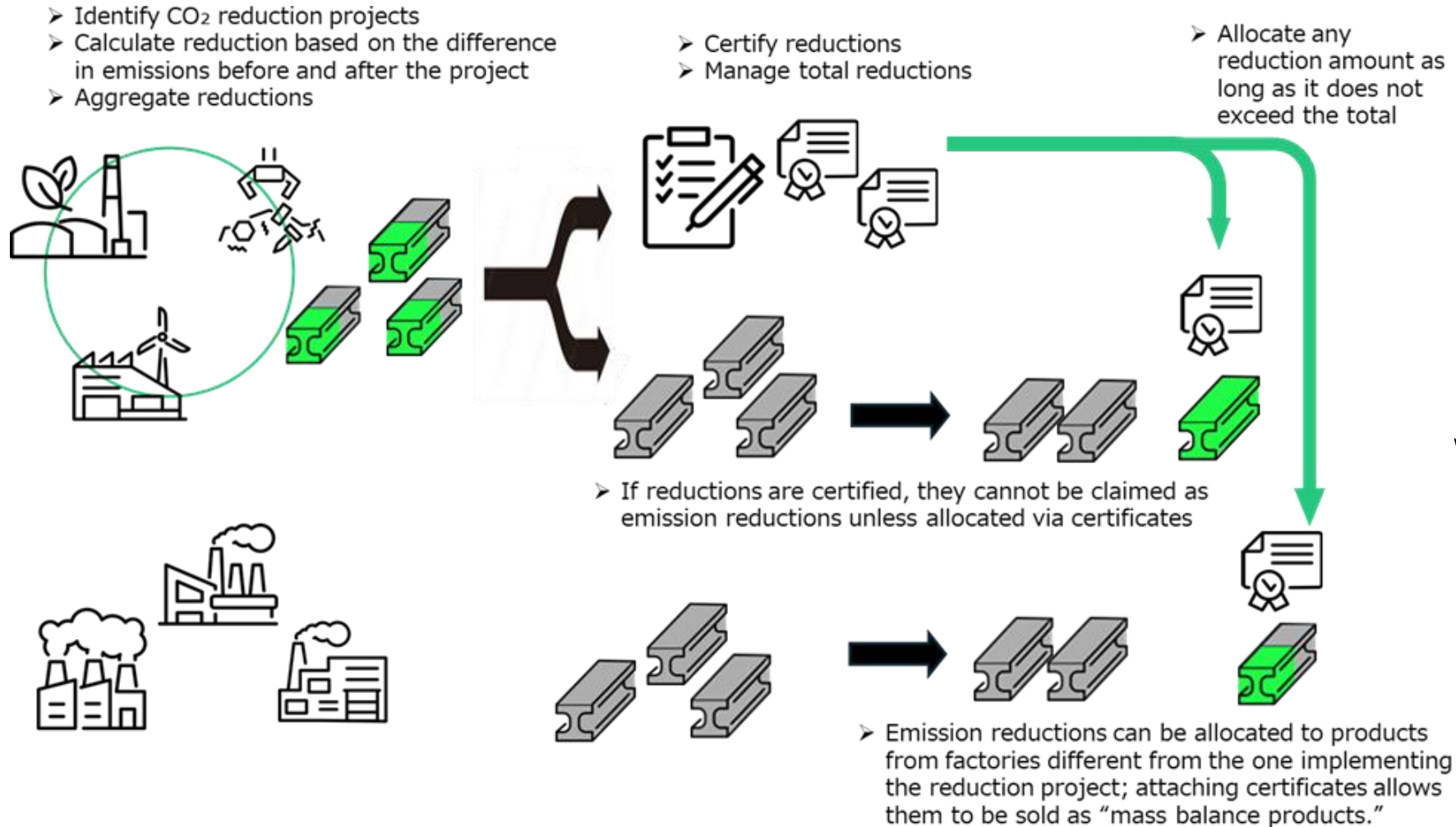
⑤排出枠取引市場

- 排出枠取引市場の公正かつ安定的な運営を担保するため、GX推進機構が市場を開設することとする。
- 制度対象者に加え、①カーボンプレジットについて一定の取引経験を有する取引業者や、②制度対象者からの依頼に基づいて取引を行う取引業者の市場参加を認める。

1. No mention of alignment with the NDC/1.5° C target. Full grandfathering allocation, based on benchmark-based approach.
2. Price Stabilization Measures. Upper (4300 yen) and lower price (1700 yen) limits for emission allowances are set. The possible carbon price in 2030 will be estimated around 5500 yen. (source: WWF Japan)
3. It is possible to achieve the targets through carbon credits up to 10 %.

2. GX Steel (green steel produced under the mass balance approach) by Japan Iron and Steel Federation

<https://www.jisf.or.jp/business/ondanka/kouken/greensteel/>



The Green Steel Guidelines define the framework: the CO₂ reduction achieved through a steelmaker's internal measures is pooled, certified, and allocated to selected steel. This scheme allows for the carbon footprint of any product to be arbitrarily reduced, designating it as low-CO₂ steel

Points to note about GX Steel from EU CBAM perspective

- EU's CBAM, products are assessed based on verified embedded emissions for each product.
- Although CBAM also uses the term “mass balance,” the term refers to balancing the carbon content of inputs and outputs in processes that involve chemical reactions, whereas Japan's GX Steel method is allocating emission reduction effects within an organization to particular products.
- In essence, the **GX-ETS is a political system that evaluates “investment in GX and efforts to reduce emissions”, whereas CBAM is a system that evaluates “the actual emissions per ton of product.”**

How to decarbonize hard to abate sector such as steel is tough for every nation, and the question is how to realize smooth transition towards real decarbonization. The transition pathway should lead towards real reduction and be transparent.



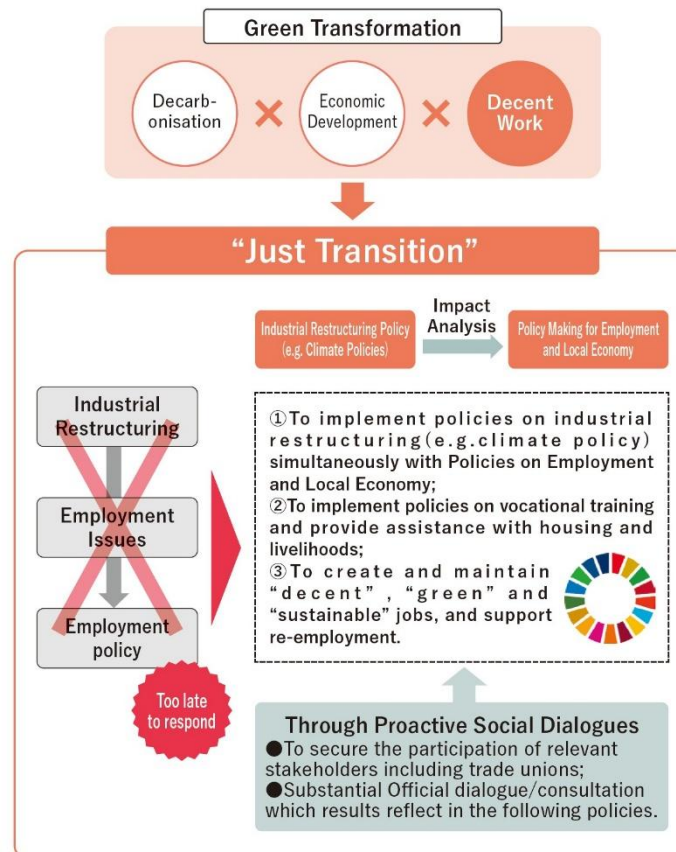
RENGO Policy

Carbon Neutral 2050

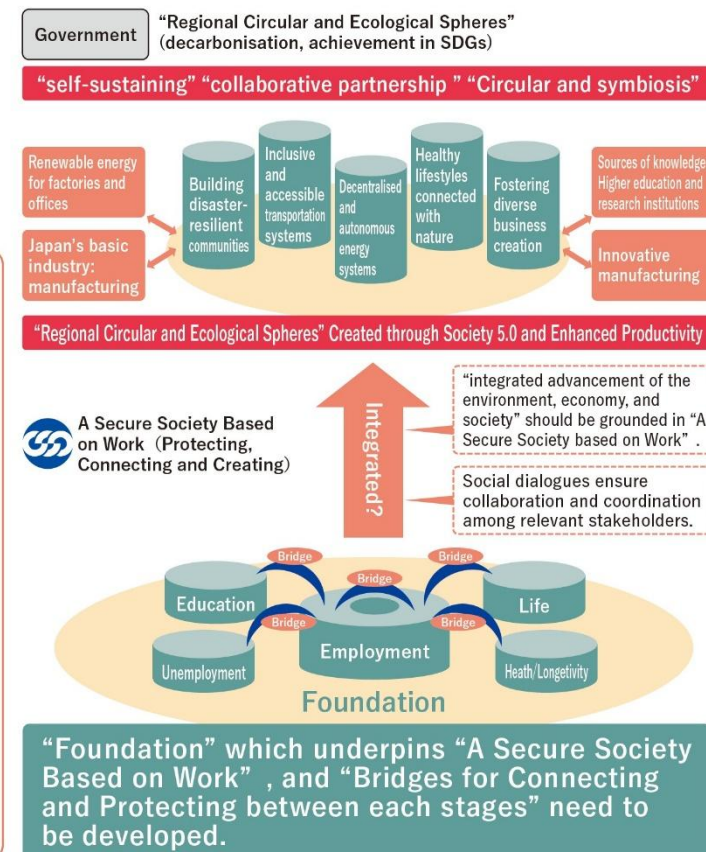
Takahito Katayama
Director, Social Policy Division
Japanese Trade Union Confederation (RENGO)

RENGO Policy : Carbon Neutral 2050

- Based on the principles of the SDGs, policy development will proceed by accounting for innovation and uncertainties of socio-economic landscape, enhancing predictability while maintaining multiple scenarios and options, and working toward consensus through inclusive and deliberative social dialogues.
- In considering and implementing related policies, proactive social dialogues with relevant stakeholders including trade unions, should be conducted in order to minimise the negative impacts of industrial restructuring such as energy transitions on the economy, society, and employment, thereby realising “Just Transition”.



Source: RENG0



Source: RENG0

Government of Japan : GX2040 Vision

The GX2040 Vision aims to enhance investment predictability toward the realization of Green Transformation (GX) by setting strategic directions for GX-related industrial location and industrial structure. It also addresses "just transition," stating that necessary measures—such as facilitating labour mobility into newly emerging industries. (Cabinet decision in Feb 2025)

1. Overall picture of the GX2040 Vision

2. GX Industrial structure

3. GX Industrial Location

4. Importance of Realistic Transition and to Global Decarbonisation

5. Initiatives in Specific Areas to Accelerate GX

6. Pro-Growth Carbon Pricing Concept

7. Just Transition

In promoting GX, take needed actions such as promoting labour mobility to new industries for a just transition.

8. Progress and Review of GX Policy Implementation

A bill, which is an amendment of GX promotion Act and defines the institutional framework of the concept was passed by the ordinary session of the Diet in 2025.

- Full operation of Emission Trading System(starting from FY2026)
 - Companies with direct emission of 100,000 tons or more CO2 must participate, regardless of industry.
 - Allocate free emission allowance to companies based on industry characteristics.
 - Establish price floors/ceiling for emissions allowances to ensure predictability.
- Introduction of GX surcharge (fossil fuel levy) (starting from FY2028)
 - Establish measures for smooth and effective implementation.

RENGO Policy : Basic Concept for Emission Trading System

- In designing a concrete framework for “Pro-Growth Carbon Pricing Concept”, the process should be grounded in principle of “S+3E” (Safety, Energy Security, Economic Efficiency, and Environmental Protection). In order not only to ensure industrial competitiveness, but also to minimise negative impacts on employment and wages by fully incorporating the concept of Just Transition. To this end, the burden associated with the decarbonisation transition should be broadly shared by the general public, who will also benefit from the outcomes, rather than being borne solely by specific industries. Careful and inclusive dialogues are essential to this process.
- As concrete investment and support measures are identified, and medium and long term policy framework is shaped, the government must take responsibility and take the lead in providing sufficient explanations to citizens, businesses and local governments, and then work for building public consensus.



EBC

EUROPEAN
BUSINESS
COUNCIL
IN JAPAN

GREENWASHING: RISKS & SOLUTIONS

EU-Japan Joint Civil Society Dialogue

STÉFAN LE DÛ

EBC Sustainability & Social Responsibility Committee Chair

4th March 2026, Tokyo

WHY GREENWASHING IS A PROBLEM FOR ALL BUSINESSES

ERODED CONSUMER TRUST

Greenwashing makes it difficult for all businesses to be believed when they make eco-friendly claims:

- Genuine companies struggle to stand out
- Consumer engagement with sustainability initiatives declines



UNEVEN PLAYING FIELD

Greenwashing creates unfair competition for companies truly committed to sustainability:

- Lack of recognition for real efforts
- Harder to attract eco-conscious consumers and investors



LEGAL & REPUTATION RISKS

Regardless of current practices, greenwashing exposes companies to problems:

- Growing regulatory scrutiny and lawsuits
- Public backlash and negative media coverage



⚠️ WHAT CHANGED

Green Claims Directive: suspended June 2025

The most ambitious EU framework for green claims substantiation was pulled before finalisation (political pushback on burden for small businesses). The direction of travel has not reversed, but the tool is weaker than planned.

✓ WHAT STAYS IN FORCE

Empowering Consumers for the Green Transition Directive (ECGT) — applies September 2026

Bans vague terms: "eco-friendly", "carbon neutral" (via offsets), "biodegradable" - unless fully substantiated

CSRD: Mandatory audited ESG reporting for large companies

EU Taxonomy: Common framework defining truly sustainable activities

EU Forced Labour Regulation: Supply chain due diligence now legally required



Shein fined €1m in Italy (2025)

Sustainability claims ruled "vague", "feel-good" or "simply misleading": recycling overstated, climate targets inconsistent with rising emissions.

Stricter rules protect consumers, and create space for EU and Japanese firms to compete on credibility, with quality products.

JAPAN

Small steps forward, but no binding rules:

Feb 2025: Ministry of Environment released a Carbon Footprint Indication Guide. soft guidance, not regulation.

Oct 2024: Unjustifiable Premiums Act strengthened with tougher penalties and new commitment procedure.

SSBJ: Issued IFRS S1/S2 equivalents, progress on disclosure, but investor-facing only.

The enforcement gap: a concrete example

Kiko Network filed a greenwashing complaint against energy company JERA. The self-regulatory body declined to review it, stating the matter was beyond their remit. No further action was taken. This is Japan's enforcement gap in practice.

REST OF ASIA

AUSTRALIA

AU\$40m+ in greenwashing penalties in 2025.
Leads Asia-Pacific in enforcement

SOUTH KOREA

Watchdog issued multiple enforcement actions in 2024-25.

SINGAPORE

Released substantive guidelines on misleading sustainability advertising (late 2025)

OUR RECOMMENDATIONS: GREENWASHING & EU-JAPAN TRADE

FOR JAPAN

1. **Define legal criteria** for sustainability claims in advertising and product labeling
2. **Establish enforcement mechanisms**, independent review bodies with real authority and meaningful penalties
3. **Require evidence-based substantiation** aligned with recognised international standards
4. **Strengthen corporate disclosure** by moving toward double materiality and credible transition plans

FOR EU-JAPAN COOPERATION

A growing gap in green claims standards creates trade friction and an uneven playing field for companies on both sides.

- EU companies face strict rules at home; their competitors in Japan do not
- Japanese exporters to the EU will face ECGT compliance from Sept 2026
- Common language on what is "green" benefits both markets

We encourage both Parties to initiate a structured dialogue on green claims convergence, for example under the EU-Japan Green Alliance.

**ALIGNING GREEN CLAIMS STANDARDS IS NOT JUST AN ENVIRONMENTAL GOAL.
IT IS A TRADE FACILITATION GOAL**

Tanja Buzek

**7th Joint Dialogue with
Civil Society
under the EU-Japan EPA
Tokyo, 4 March 2026**

European Transport Workers' Federation (ETF)

Member of the EU DAG





EU-Japan Green Alliance and new focus areas



This presentation follows

EU-Japan **Green Alliance**
and existing areas of cooperation

New areas and elements to further
advance the strategic initiative

Recommendations to the Parties



EU-JAPAN GREEN ALLIANCE

The EU and Japan were among the first to commit to climate neutrality by 2050. Japan is a crucial partner in **implementing the Paris Agreement** and in raising international **climate ambition**, as well as implementing the **Kunming-Montreal Global Biodiversity Framework**.

The EU and Japan launched the first **Green Alliance** in May 2021 for accelerated and ambitious action to:



The EU and Japan are committed to reinforcing the strategic partnership within the Green Alliance. The cooperation ranges from climate, environment and energy to other sectors such as transport, trade, research and innovation, and financial regulation. During the first four years, the Green Alliance has delivered on several dimensions, strengthening bilateral cooperation on the following areas.

- » Implementation of the Paris Agreement and cooperation towards COP30 and NDCs
- » Biodiversity conservation and Implementation of the Kunming-Montreal Global Biodiversity Framework
- » Carbon pricing and Carbon Capture Utilisation and Storage
- » Energy security, LNG in particular, and reduction of methane emissions
- » Hydrogen based on the Memorandum of Cooperation on Hydrogen signed in 2022
- » Renewable energy deployment and safe and sustainable low-carbon energy manufacturing and supply chains
- » Industrial policy for the energy transition, for instance on batteries
- » Circular economy and resource efficiency across the value chain
- » Promoting conservation and sustainable management of wildlife
- » Cooperating closely towards an agreement on a global and legally binding plastics treaty
- » Enhancing ocean governance to support the conservation and sustainable use of oceans and resources
- » Sustainable food system
- » Regional and urban climate policy
- » Supporting Just Energy Transition Partnerships in third countries, notably with Indonesia and Vietnam

Sixth Meeting of the Committee on Trade and Sustainable Development (CTSD)

2 October 2025 via videoconference

Both sides reflected on recent developments in environment matters, noting in particular the discussions in the JDCS on green shipping corridors, circular economy and the Green Alliance.

Source: Joint Minutes of CTSD, October 2025

On Green shipping corridors:

- The EU and Japan confirmed green shipping corridors as an important area of cooperation to make trade more sustainable. This includes cooperation in the bilateral and plurilateral (G7) context as well as in the International Maritime Organization, with an up-coming vote on the Net-Zero Framework, which both sides support. Green transition and just transition are interlinked in this area as maritime professions need to adapt.

On Green Alliance:

- The EU noted the EU-Japan Green Alliance as a useful framework of cooperation, high level engagements over the last 18 months and the increasing focus on the competitiveness-climate nexus.

Emission Trading System (ETS)

Carbon Capture, Utilization and Storage (CCUS)

CBAM





MARITIME TRANSPORT AND **JUST TRANSITION**

As **focus area for the Green Alliance** and the operational work plan

SHIPPING NEEDS STRUCTURAL CHANGE

Global shipping is responsible for the movement of 90% of world trade and currently accounts for nearly 3% of global GHG emissions

IMO Net-Zero Framework is aimed at reducing GHG emissions from ships, in line with its 2023 GHG Strategy (including a global fuel standard, a pricing mechanism and a Net-Zero Fund)

Adoption of IMO legally binding measures adjourned for one year to 2026

*“The maritime industry’s transition to a zero emissions future won’t be powered by policies alone –
it will be powered by people.”*



A Just Transition will not happen if workers have no seat at the table when planning the transformation of the sector...

The effective participation of trade unions and guaranteeing fundamental labour rights are key.

The ILO Just Transition Guidelines must remain a reference document as they lay out the principles of a Just Transition ...

through safeguarding and creation of decent jobs, social dialogue, collective bargaining, active labour market policies and social protection.

Just Transition Recap

requires the participation of workers and their Trade Unions in the negotiations of transition strategies at various levels:

- at national level when industrial and sectoral strategies are developed
- at company level workers must be effectively and actively involved in the anticipation and management of change of their companies.

requires resources for training, technology transfer, and capacity building – ensuring that seafarers are equipped to navigate the complex and fast-evolving future of maritime work.



- **New advisory committee* launched in January 2023 to address major maritime issues impacting Filipino seafarers**
- **Based on a memorandum of understanding**
- **Between global leaders from organisations representing seafarers, shipowners and other maritime employers and the Philippines's Department of Migrant Workers**

“Put Filipino seafarers in the box seat to be at the forefront of addressing the industry's challenges and promoting a sustainable future for maritime professionals.”

* IACGMA is composed of the European Community Shipowners' Associations (ECSA), the International Chamber of Shipping (ICS), the International Maritime Employers' Council (IMEC), and the International Transport Workers' Federation (ITF)

... put in practice

- **Key aims include contributing to the provision of appropriate training to the country's seafarers in compliance with the Standards of Training, Certification and Watchkeeping (STCW) Convention.**
- **Contributing to the global competitiveness of Filipino seafarers and prepare them for a maritime just transition.**



Recommendations for the Joint Dialogue



Making **maritime transport** a new focus area of the Green Alliance

Integrating a **Just transition** to all dimensions of the operational work plan

Promoting the creation of **interaction bodies** on climate change with a strong Maritime workers' voice

Including the **advisory role of the DAGs** to Green Alliance initiatives

Intensifying **cooperation on a Just Transition within the IMO Net-Zero Framework** and Fund to ensure that seafarers are equipped to navigate future of maritime work



ITF

Moving the
World
Forward

WE MOVE THE WORLD
Seafarers

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***Challenges in establishing
deforestation-and-conversion-
free supply chains***

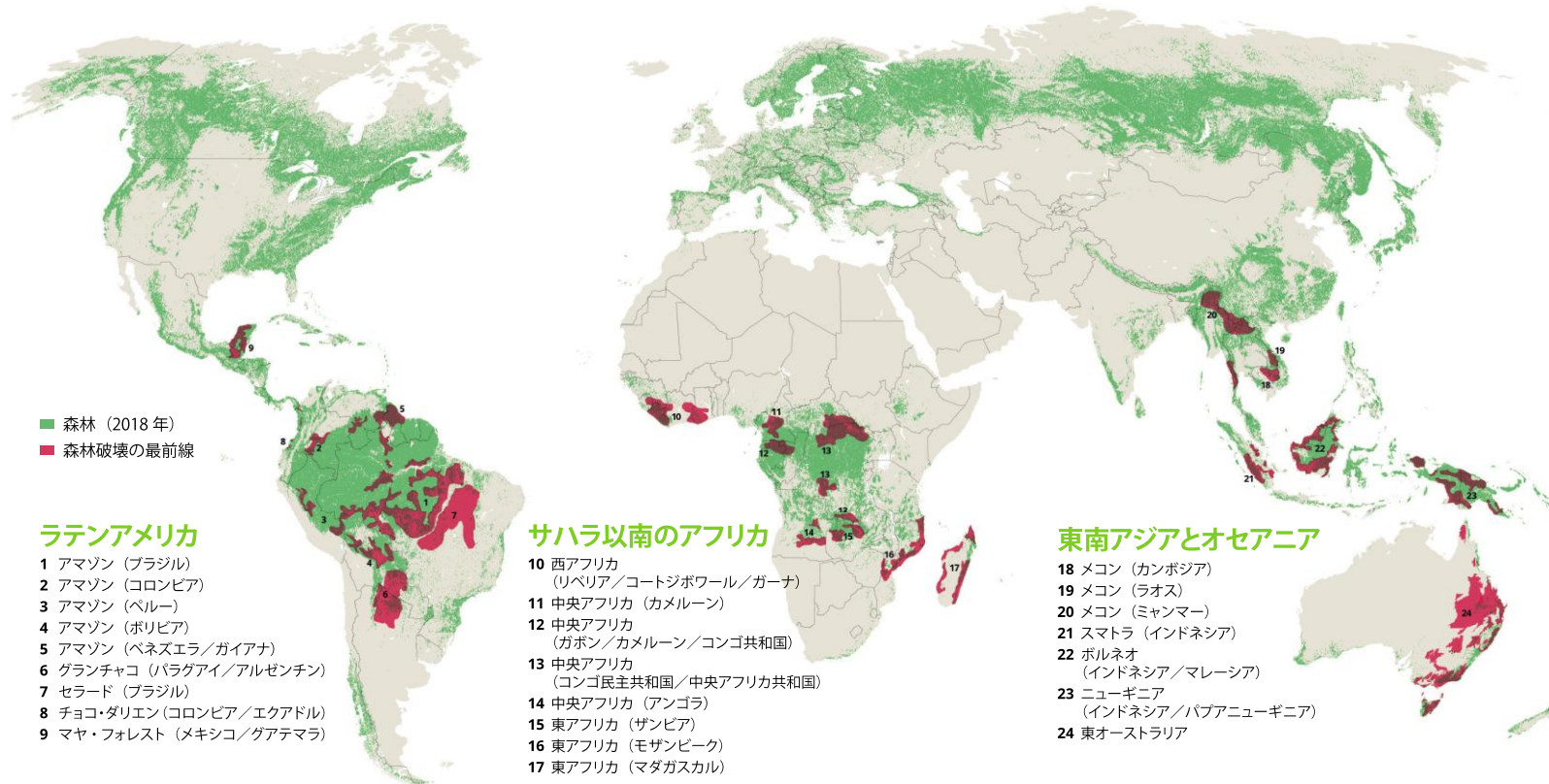
**March 4th, 2026
WWF Japan, Forest Practice
Toshitake Tanuma**

1. Scale of global deforestation
 2. Cattle-led deforestation and emission in Brazil
 3. Brazilian beef import by Japan and EU
 4. Japan-EU EPA's pledge to nature and carbon
 5. Comments and Recommendations
- (Appendix) Green Label program in Brazil

Scale of global deforestation



◆Location of Deforestation Fronts over 24 regions

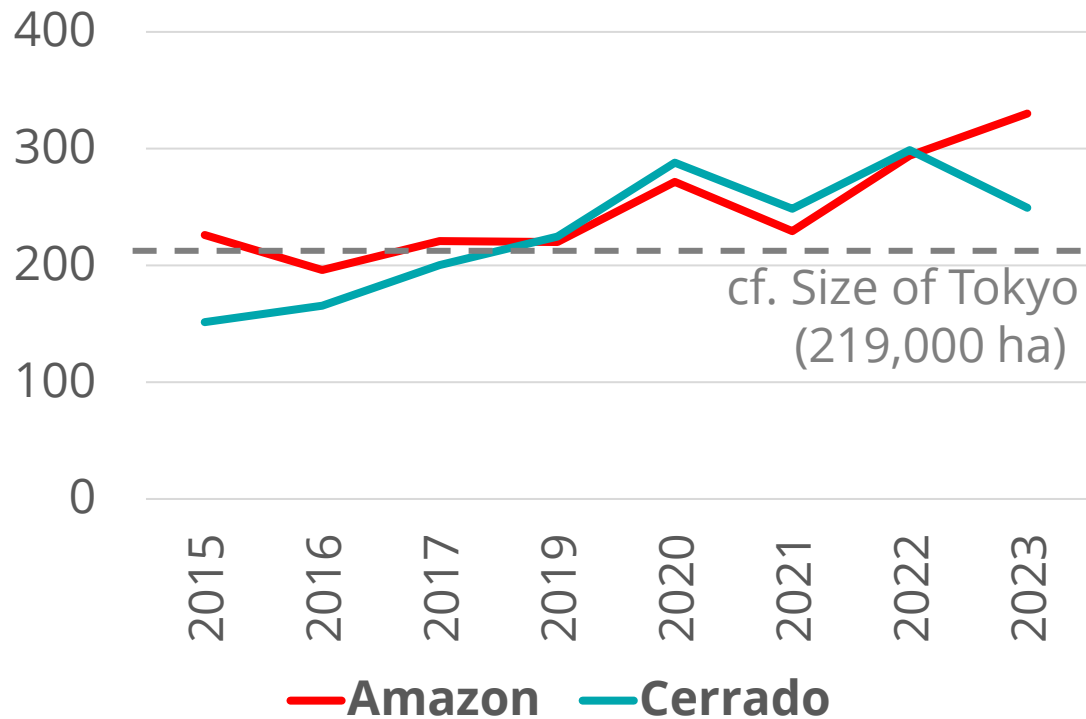


- Global deforestation rate* is at 10.9 million ha/ yr (i.e. approx. a quarter of Japan's land area)
- Deforestation is most pronounced in the southern hemisphere over 24 regions
- Brazilian biomes, notably Amazon and Cerrado, are among the deforestation fronts

Cattle-led deforestation and emission in Brazil

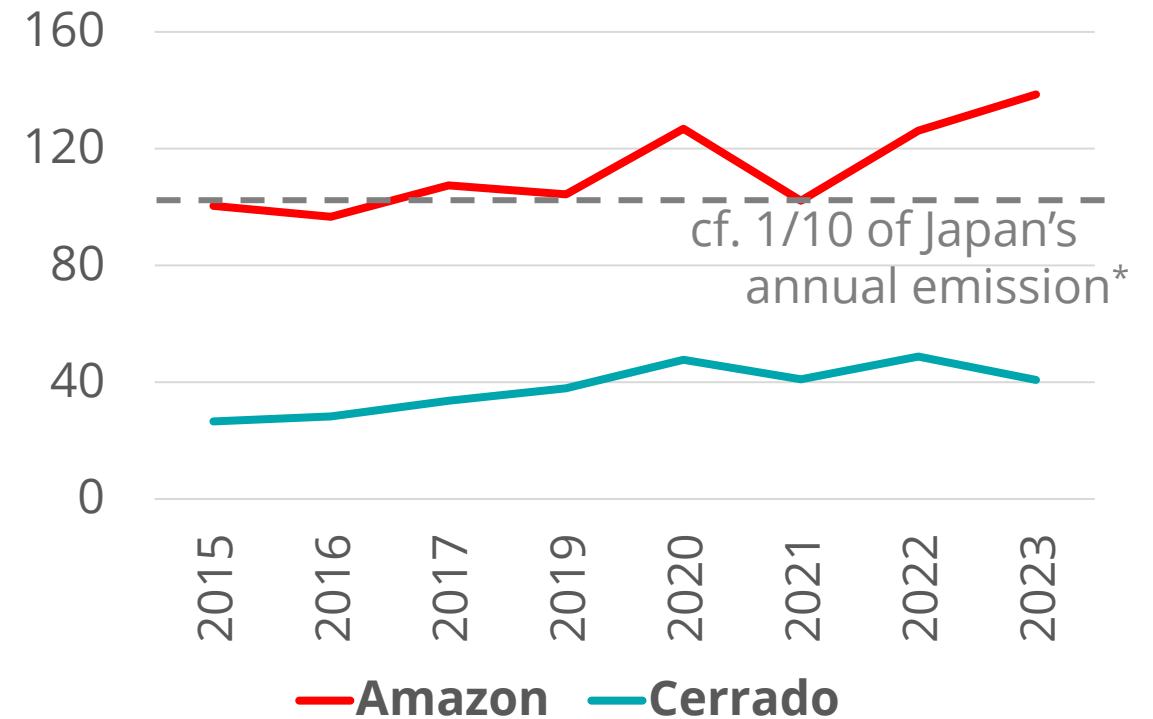


◆ Cattle-led deforestation & conversion ('000 ha)



Pastureland for cattle farming is one of the major drivers of deforestation and conversion, accelerating over time.

◆ Emissions from pasture conversion (M t CO₂ eq)



Deforestation and conversion for pasture create carbon emissions. In 2020, it accounted for 37% of Brazil's total GHG from land use change.

Brazilian beef import by Japan and EU



Japan prepares to open the market to import Brazilian beef

3.8. Regarding the opening of the Japanese market to Brazilian beef, as a next step, a technical inspection (on-site visit) in Brazil by the competent Japanese authorities should happen immediately to accelerate the work necessary for the risk assessment. The leaders will meet to evaluate the progress of this issue in the second half of this year. The issue will also be discussed in Biennial Summit meetings as confirmed in this Action Plan. Other frameworks, such as the Japan-Brazil Dialogue on Agriculture and Food, the Japan-Brazil Foreign Ministers' Strategic Dialogue and the Political Consultations Meeting will serve as mechanisms to monitor and report progress of scientific consultations between the relevant authorities to their respective leaders.

Japan commits to extending market access to other Brazilian states in the case of pork meat, in a timely manner, for mutually satisfactory results.

Both countries will finalize promptly the necessary procedures to modify the Animal Health Requirements to facilitate the continuation of the export of Brazilian poultry to the

(Article 3.8 of Strategic and Global Partnership Action Plan between Japan and Brazil- Excerpt)

EU is one of the 5 largest importers of Brazilian beef

Valor INTERNATIONAL | Agribusiness

The list of the five largest importers of Brazilian beef also includes the European Union (128,800 tonnes and \$1 billion), Chile (136,200 tonnes and \$754.5 million), and Mexico (118,000 tonnes and \$645.4 million). Russia, the Philippines, Egypt, Hong Kong and Saudi Arabia round out the top 10 destinations for exports of the protein. Among the top 10 importers, only Hong Kong posted weaker performance than in 2024, with a 15.3% drop in import volume (98,900 tonnes) and an 8.5% decline in revenue (\$355.3 million), according to the survey.

Both Japan and EU have a risk of negatively contributing to cattle-led deforestation and conversion (and hence carbon emission) in Brazil without appropriate environmental measures.

Japan-EU EPA's pledge to nature and carbon



◆Japan-EU Economic Partnership Agreement (Article 16.6 and 16.5)

ARTICLE 16.6

Biological diversity

1. Each Party recognises the importance and the role of trade and investment in ensuring the conservation and sustainable use of biological diversity in accordance with relevant international agreements to which it is party, notably the Convention on Biological Diversity, done at Rio de Janeiro on 5 June 1992, and its protocols and the Convention on International Trade in Endangered Species of Wild Fauna and Flora, done at Washington D.C. on 3 March 1973 (hereinafter referred to as "CITES").
2. In that context, each Party shall:
 - (a) encourage the use of products which were obtained through sustainable use of natural resources and which contribute to the conservation and sustainable use of biodiversity, including through labelling schemes, taking into account the importance of trade in such products;

ARTICLE 16.5

Trade and investment favouring sustainable development

The Parties recognise the importance of enhancing the contribution of trade and investment to the goal of sustainable development in its economic, social and environmental dimensions. Accordingly, the Parties:

- (a) recognise the importance of the principles concerning fundamental rights at work, decent work for all, and fundamental values of freedom, human dignity, social justice, security and non-discrimination for sustainable economic and social development and efficiency, as well as the importance of seeking better integration of those principles into trade and investment policies;
- (b) shall strive to facilitate and promote trade and investment in environmental goods and services, in a manner consistent with this Agreement;
- (c) shall strive to facilitate trade and investment in goods and services of particular relevance to climate change mitigation, such as those related to sustainable renewable energy and energy efficient goods and services, in a manner consistent with this Agreement;

Comments and Recommendations



- Lack of appropriate environmental measures to assess the deforestation and conversion risk of Brazilian beef would go against the pledges made in the EPA agreement.
- As signatories of Kunming-Montreal Global Biodiversity Framework (KMGBF), which was adopted at COP15 in December 2022, both Japan and EU commit to halt and reverse biodiversity loss by 2030.
- EU adopted and prepares to implement EUDR at the end of 2026, encompassing beef commodity and classifying Brazil as “standard risk category”
- Recommendations to Japanese Government:
 1. Require both the Brazilian government and importing businesses to establish and verify a full traceability system that ensures beef imported from Brazil can be traced back to the breeding farm level and through the animal’s lifecycle.
 2. Assess and verify that the imported beef is free from deforestation and land-conversion risks.

Appendix: Green Label program in Brazil



Green Label (“SeloVerde”) provides a labelling solution that address both environmental and social concerns. Available in such states as Para, Minas Gerais, etc.

PORTUGUÊS

SeloVerde

Home

Regulations

Technologies >

SeloVerde supports the monitoring and evaluation of sustainable agricultural development policies and the fight against illegal deforestation in the Brazilian states.

The platform provides data on agricultural production and environmental compliance at the property level registered on the Rural Environmental Registry (CAR). SeloVerde integrates public data from state and federal agencies on a daily basis, aiming to combat illegal deforestation, promote environmental and land tenure regularization, and provide transparent traceability of agricultural production.

Access the SeloVerde PA, SeloVerde MG, SeloVerde ES, and SeloVerde AC platforms.

together possible™





SUSTAINABLE FOREST MANAGEMENT IN THE EU

Tokyo, March 2026



Sustainable forest management

- ▶ “Sustainable forest management means the stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.”
Resolution H1 of the Helsinki Ministerial Conference on the Protection of Forests in Europe, 1993.
- ▶ In 2026, **Sustainable Forest Management (SFM)** in the EU is transitioning from a voluntary framework based on pan-European principles toward a more regulated system integrated with climate and biodiversity laws
- ▶ It is a concept that balances ecological, social, and economic pillars. It uses six criteria to ensure forests maintain biodiversity, productivity, and regeneration capacity for future generations.

Core Pillars of the EU Understanding

- ▶ Multifunctionality: Forests are not viewed solely as wood factories but as providers of "ecosystem services," including clean water, carbon storage, habitat for species, and recreation.
- ▶ The Three Pillars: Management must be socially just, ecologically sound, and economically viable.
- ▶ Cascading Use of Wood: A key Commission principle where wood is used first for high-value, long-lived products (like buildings or furniture) before being reused, recycled, or finally burned for energy.
- ▶ Ecosystem-Based Adaptation: SFM is seen as a tool to help forests survive climate threats (pests, fires, storms) by moving away from monocultures toward mixed-species, uneven-aged stands

Current Policy Framework

- ▶ **EU Forest Strategy for 2030:** This remains the central "flagship" initiative, focusing on improving forest quantity and quality. It emphasizes a "closer-to-nature" approach, favoring continuous-cover forestry and mixed-species stands over traditional monocultures. Key 2026 focus areas include the 3 Billion Trees initiative and promoting "closer-to-nature" management.
- ▶ **Nature Restoration Law:** Effective as of August 2024, this law makes restoration targets legally binding. Member States are required to submit National Restoration Plans by September 1, 2026, which must include specific measures for forest ecosystems.
- ▶ **Deforestation Regulation (EUDR):** Following significant negotiations in late 2025, the application date has been postponed to December 30, 2026 for large and medium operators. It mandates that timber and other commodities placed on the EU market must be "deforestation-free" and legally produced.
- ▶ **The main source of EU funding,** with 90% of forest-related money coming from the [European Agricultural Fund for Rural Development \(EAFRD\)](#). It funds reforestation, climate resilience investments, and damage prevention.
- ▶ **Forest Monitoring Law:** In a major policy shift in **October 2025**, the European Parliament rejected the proposed **Forest Monitoring Law** due to concerns over administrative burden. The Commission has announced the formal **withdrawal** of this file in its 2026 Work Programme.
- ▶ **The next major State of Europe's Forests report** is scheduled for release in the **first quarter of 2026**

Recent Legislative Changes & Postponements

▶ 1. Nature Restoration Law (Active Implementation)

- ▶ The most significant active legislative driver is the Nature Restoration Law, which came into force in August 2024.
- ▶ National Restoration Plans: Member States are currently drafting these plans, with a mandatory submission deadline of September 1, 2026.
- ▶ Next Milestone: The Commission will present a "simplification review" by April 30, 2026, to assess the administrative burden on small operators.
- ▶ Binding Targets: Forests must show increasing trends in five key indicators: standing and lying deadwood, uneven-aged forests, forest connectivity, common forest birds, and organic carbon stocks.
- ▶ Overall Goal: Restore at least 20% of the EU's land and sea areas by 2030, and all ecosystems in need of restoration by 2050.

▶ 2. EU Deforestation Regulation (EUDR) - Postponed

- ▶ Following intense negotiations in late 2025, the application of the EUDR has been officially delayed to allow more time for technical preparation.
- ▶ New Deadlines: Large and medium operators must now comply by December 30, 2026. Micro and small enterprises have until June 30, 2027.
- ▶ Simplification Review: The Commission is scheduled to present a review by April 30, 2026, to evaluate the administrative burden on small-scale primary producers

Recent Legislative Changes & Postponements

- ▶ **3. Forest Monitoring Law** - Withdrawn: In a major reversal in October 2025, the European Parliament rejected the proposed law. The Commission formally scheduled its withdrawal in the 2026 Work Programme, effectively ending the push for a centralized EU-wide monitoring system for now.
- ▶ **4. "Closer-to-Nature" and Financial Incentives**
- ▶ Under the ongoing EU Forest Strategy for 2030, two key voluntary frameworks are being promoted:
- ▶ **Closer-to-Nature Guidelines:** Voluntary management practices that mimic natural processes, such as continuous-cover forestry and natural regeneration.
- ▶ **Payment Schemes:** New guidance for ecosystem services (2023) helps foresters monetize non-timber benefits like carbon sequestration and water purification.
- ▶ **3 Billion Trees:** The initiative to plant 3 billion additional trees by 2030 remains a core target for 2026

State of EU Forest Health

- ▶ **Total Forest Area:** Roughly 159-160 million hectares are classified specifically as forests, covering about 39% of the EU land area.
- ▶ **Total Wooded Land:** Including "other wooded land" (areas with lower tree canopy density), the total reaches over 182 million hectares.
- ▶ **Deteriorating Conditions:** Despite stable forest area, 35% of European forests are reported as damaged by storms, pests (like bark beetles), and fires.
- ▶ **Management Intensity:** Approximately 85% of EU forests are under active management, with a growing emphasis on balancing timber production with climate resilience.

Upcoming Key Dates in 2026

- ▶ Q1 2026: Expected release of the State of Europe's Forests 2025 report.
- ▶ April 30, 2026: Deadline for the EUDR simplification review.
- ▶ June 2-3, 2026: 10th Forest Europe Ministerial Conference in Stockholm.
- ▶ September 1, 2026: Deadline for National Restoration Plans

Euromontana Experience

- ▶ In January 2026, Euromontana (the European association for mountain areas) continues to be a vocal advocate for a "place-based" approach to sustainable forest management, ensuring that generic EU policies are adapted to the unique geographic and ecological constraints of mountain regions.

Euromontana`s Core Positions on Forest Management:

- ▶ Multifunctionality: Euromontana emphasizes that mountain forests must balance wood production with critical ecosystem services, such as protection against natural hazards (avalanches, rockfalls), water regulation, and biodiversity conservation.
- ▶ Opposition to Indiscriminate Afforestation: Euromontana argues that uncontrolled reforestation can damage specific habitats and increase forest fire risks.
- ▶ Ecosystem Service Compensation: Euromontana advocates for a European mechanism to compensate mountain foresters for all ecosystem services, not just carbon storage, recognizing that managing difficult terrain for public safety and biodiversity is costly.

Euromontana Experience

► Recent Activities & Involvement (2024-2026)

- Innovation & Knowledge Exchange: Euromontana is a core supporter of the Forest Innovation Workshop 2025 (Brussels, February 2025), which connects forest owners and researchers to discuss "Forests of the Future" and adaptive management.
- Research Projects: The association is active in Horizon 2020 projects like FIRE-RES, which focuses on building fire-resilient landscapes in mountain areas.
- Best Practice Sharing: In January 2024, Euromontana released a Booklet of Good Practices showcasing 10 initiatives for mountain development, including climate change adaptation of forests.
- Policy Advocacy: The association closely monitors the Nature Restoration Law, calling for restoration projects that respect local mountain socio-economic conditions and maintain pastoral systems to prevent "uncontrolled rewilding".

► Economic Priorities

- Sustainable Timber Industry: Euromontana supports the use of mountain wood in local circular bioeconomies, particularly for construction, and promote sustainable timber certification and Geographical Indications (GIs) to value local production.
- Training & Technology: Euromontana advocates for EU support (via Interreg or Social Funds) for specialized mountain harvesting techniques like cable skidding, which are more sustainable in steep terrain but require high levels of training.

THANK YOU





～The Seventh Joint Dialogue with Civil Society under Chapter 16 of the Agreement
between the European Union and Japan for an Economic Partnership, Tokyo, 4 March 2026～

Challenges Japan Faces in Ratifying and Implementing the ILO Core Conventions

Ryo SAITO

Executive Director, International Policy Department

JTUC-RENGO



日本労働組合総連合会 (連合)



The Japan-EU Economic Partnership Agreement (Excerpt)

Chapter 16 Trade and Sustainable Development

S1

Article 16.3 : International labour standards and conventions

1. The Parties recognise full and productive employment and decent work for all as key elements to respond to economic, labour and social challenges.
The Parties further recognise the importance of promoting the development of international trade in a way that is conducive to full and productive employment and decent work for all. In that context, the Parties shall exchange views and information on trade-related labour issues of mutual interest in the meetings of the Committee on Trade and Sustainable Development established pursuant to Article 22.3, and as appropriate in other fora.
2. **The Parties reaffirm their obligations deriving from the ILO membership.** The Parties further reaffirm their respective commitments with regard to the ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up.
Accordingly, the Parties shall respect, promote and realise in their laws, regulations and practices the internationally recognised principles concerning the fundamental rights at work, which are:
 - * For the European Union, "ILO membership" means the ILO membership of the Member States of the European Union.
 - (a) the freedom of association and the effective recognition of the right to collective bargaining;**
 - (b) the elimination of all forms of forced or compulsory labour;
 - (c) the effective abolition of child labour; and
 - (d) the elimination of discrimination in respect of employment and occupation.**
3. **Each Party shall make continued and sustained efforts on its own initiative to pursue ratification of the fundamental ILO Conventions and other ILO Conventions which each Party considers appropriate to ratify.**
4. **The Parties shall exchange information on their respective situations as regards the ratification of ILO Conventions and Protocols, including the fundamental ILO Conventions.**
5. **Each Party reaffirms its commitments to effectively implement in its laws, regulations and practices ILO Conventions ratified by Japan and the Member States of the European Union respectively.**
6. The Parties recognise that the violation of the internationally recognised principles concerning the fundamental rights at work referred to in paragraph 2 cannot be invoked or otherwise used as a legitimate comparative advantage, and that labour standards should not be used for protectionist trade purposes.



Article 16.17 : Government Consultations

- 1. In the event of disagreement between the Parties on any matter regarding the interpretation or application of this Chapter,** the Parties shall only have recourse to the procedures set out in this Article and Article 16.18.
The provisions of this Chapter shall not be subject to dispute settlement under Chapter 21.
2. A Party may request in writing consultations with the other Party on any matter concerning the interpretation and application of this Chapter. The Party requesting consultations shall set out the reasons for the request, including identification of the matter and an indication of its factual and legal basis, specifying the relevant provisions of this Chapter.
3. When a Party requests consultation pursuant to paragraph 2, the other Party shall reply promptly and enter into consultations with a view to reaching a mutually satisfactory resolution of the matter.
4. During consultations, each Party shall provide sufficient information to enable a full examination of the matter in question.
The Parties shall take into account the activities of the ILO and other relevant international organisations or bodies in which both Parties participate and, as may be required by the Parties on an ad hoc basis, may seek advice from those international organisations or bodies, or other experts.
The Parties shall discuss appropriate measures to be implemented, taking into account that advice.
5. If no solution is reached through the consultations held in accordance with paragraphs 2 to 4, the Committee shall be convened promptly on request of a Party to consider the matter in question.
6. The Parties shall ensure that the solutions reached through the consultations under this Article will be jointly made publicly available, unless the Parties agree otherwise.



ILO Convention 111-Prohibition of Discrimination, 1958

- The Convention 111 aims to eliminate discrimination based on seven factors—race, color, sex, religion, political opinion, national extraction, or social origin—as well as in matters related to employment and occupation.

Obligations of Countries That Have Ratified Convention 111:

Ratifying countries must establish clear national policies aimed at eliminating discrimination and promoting equal opportunities and fair treatment in employment and occupation.

They are required to:

(1) Enact appropriate laws to ensure the adoption and compliance with these policies.

(2) Abolish incompatible provisions in laws and regulations, and review all administrative orders and conventions that contradict these policies.



Challenges Japan Faces in Ratifying C111



Regarding the obligation outlined in previous slide **(1)**, **Japan's domestic legal restrictions are limited. Currently, the only prohibitions pertain to gender discrimination in job advertisements and hiring practices**

Regarding the obligation outlined in previous slide **(2)**, two key issues arise:

1. Provisions that differentiate (protect) based on gender—These regulations take into account physical and psychological differences in relation to hiring and labor conditions.*1
1. Provisions that differentiate (sanction) the expression of political views by public servants—These restrictions are intended to uphold the neutrality of administrative agencies.*2

*1 The Ministry of Health, Labour and Welfare aims to ensure that provisions designed to protect maternity do not pose issues in the application of C111.

*2 According to the Ministry of Health, Labour and Welfare, it has been confirmed that the United States, the United Kingdom, Germany, Canada, South Korea, and other countries also have certain restrictions. While the content and scope of these restrictions vary from country to country, many instances involve limitations on specific occupations (in the U.S. and U.K.) or particular actions and situations (in Germany and Canada).

National Diet of Japan (198th session)

Resolution concerning Japan's further contributions to the ILO on the commemoration of the centenary of its foundation

Acknowledging that the International Labour Organization (ILO) celebrates its 100th anniversary in 2019, we hereby

Reaffirm that since its foundation in 1919, in the aftermath of the First World War, the ILO, under the universal principles stipulated in the Preamble to its Constitution that “universal and lasting peace can be established only if it is based upon social justice”, has significantly contributed globally to the improvement of working conditions and the work environment, as well as to the establishment of fundamental rights at work through its efforts in discussing and adopting the International Labour Standards and delivering technical and development cooperation, all of which should be acknowledged to be historic milestones of the past 100 years,

Applaud the fact that the ILO, with 187 member states worldwide today, has established and institutionalised a unique tripartite structure which brings together representatives of governments, workers and employers for all decision-making and operation of the organization, and contributed to promoting tripartism in all its Member States, including Japan,

Recognize the fact that Japan, as one of the founding members of the ILO holding a titular seat in the ILO Governing Body as one of the states of chief industrial importance since 1954, has played a leading role in promoting ILO's activities, not only in Japan but also elsewhere in the world, and that our continued contribution is strongly expected by the international community,

Emphasize that “the ILO Declaration on Fundamental Principles and Rights at Work”, adopted in 1998, commits all Member States to respect and promote fundamental principles and rights at work in four categories, driving continuous international efforts toward ratifying and implementing the eight Fundamental Conventions corresponding to those principles, and that Japan, while having joined in this effort, **must make additional effort toward ratification of the remaining unratified Fundamental Conventions and to the sound and steady implementation of ratified Conventions**, And, welcome the fact that “Decent Work”, conceptualised in 1999 as a new strategic objective of the ILO, is now set as one of the SDGs (Sustainable Development Goals) adopted by the UN Sustainable Development Summit in 2015, we hereby reaffirm that Japan will make further contributions toward the efforts of the ILO in achieving Decent Work globally as well as domestically, setting the Decent Work agenda as one of the key targets of our on-going “Work Style Reform” programmes, in anticipation of the “Future of Work”, through tripartite efforts by government, workers and employers of Japan, leading the efforts of the international community.

In recognition that, as globalization and information-driven innovation will be accelerated, both in scale and speed, which inevitably change and diversify work styles and environments and increase the intra-/inter-national migration of workers in terms of size and complexity, the importance of the ILO and its basic principles, International Labour Standards, tripartism, and the Decent Work agenda will be increased, we, the Members of the House of Representatives, hereby reconfirm the leading roles of Japan to be played within the ILO, and express our commitment to make our utmost contributions to pursuing and achieving the principle and objectives of the ILO in cooperation with the member states throughout the world, leading to the development of the ILO in the next 100 years.

[Adopted at the Plenary Session of the House of Representatives of the National Diet of Japan on 26 June 2019]



Perspectives of ILO Parliamentarians on the Ratification of C111



- ★The current domestic legislation prohibits discrimination on seven grounds, but the only explicitly defined prohibition is sex discrimination. While sex discrimination is distinctly outlawed, existing laws and regulations effectively ensure compliance with the other requirements. Given this framework, ILO parliamentarians view the ratification of C111 as a viable step forward.
- ★Several observations have been made by the CEACR of the ILO.
It is possible to ratify a convention without necessarily having an explicit statute. Ratification itself can serve as a declaration of renewed commitment to this goal. Based on this understanding, the approval of the policy and compliance with the requirement to enact appropriate laws and regulations ensuring its acceptance and implementation are generally considered fulfilled.
- ★The key issue is the requirement to repeal all statutory provisions and amend administrative orders or practices that conflict with the policy. Under current domestic legislation, provisions that impose distinctions (sanctions) on restrictions related to the expression of political views by public officials remain in laws such as the National Public Service Act, the Local Public Service Act, and the Self-Defense Forces Act, among others. The Japanese government maintains that ratification will not be feasible unless these legal provisions are abolished and all relevant orders and practices are revised—without such changes, the ratification process cannot move forward.
- ★In other countries, public officials are recognized as individuals who hold human rights, including the fundamental right to express political opinions. This principle is universally accepted. However, Japan imposes restrictive measures that conflict with the purpose of the Convention. Furthermore, the Japanese government is unable to ratify the Convention in its current state, as it strictly evaluates existing provisions, including rules and regulations, making compliance difficult under current legal conditions.

ILO parliamentarians believe there may be a pathway to ratification within the framework of current Personnel Authority rules. However, such an approach could face challenges as a politically sensitive decision.

Challenges Japan Faces in Implementing C87

～Situation Regarding the Application of Fundamental Labor Rights to Public and Civil Service Personnel in the Republic of Korea and Japan～

Classification	 Republic of Korea			 Japan		
	Right to Organize	Collective Bargaining Right (Right to conclude a CBA)	Right to Engage in Industrial Action	Right to Organize	Collective Bargaining Right (Right to conclude a CBA)	Right to Engage in Industrial Action
General public service employees	○	○	×	○	△	×
Non-clerical public service employees	○	○	○	○	○	×
Educational public service employees	○	○	×	○	△	×
Firefighter Public service Employees	○	○	×	×	×	×
Prison officers	×	×	×	×	×	×

Note: The measure applying the right to organize and the collective bargaining right to the Republic of Korea's firefighter public service employees was enacted with related laws in December 2020. The △ mark in Japan's collective bargaining right indicates that the right to conclude a collective bargaining agreement is not included.



Challenges Japan Faces in Implementing C87

～Toward a Resolution of the Issue of Basic Labour Rights of Japanese Public Services Workers～



Conclusion of the 2024 CAS

The Committee took note of the oral and written information provided by the Government and the discussion that followed. The Committee noted the long-standing nature and the prior discussion of this case in the Committee, most recently in 2018. Taking into account the discussion, the Committee requested the Government, to consider, in line with the Convention and in consultation with employers' and workers' organizations:

- further improvements of the status and labour conditions of firefighters;
- what categories of prison officers are considered part of the police, thus exempted from the right to organize, and those categories that are not considered part of the police, and having the right to organize;
- with regard to public service employees:
 - **ensure that the National Personnel Authority (NPA) procedures guarantee effective, impartial and speedy conciliation and arbitration procedures;**
 - **continue to examine carefully the autonomous labour-employer relations system and seek solution to the various obstacles to it, in line with the Convention; and**
 - review the Local Public Service Act and any other related legislation to ensure that local public sector workers enjoy the rights and guarantees set out in the Convention.

The Committee requested the Government to submit a report to the Committee of Experts on progress achieved on all of the above matters by 1 September 2024.

**Summary of the 2024 Report of the Government of Japan:
"Convention concerning Freedom of Association and Protection of the Right to Organise (No. 87)"**

(i) Right to Organise of Firefighting Personnel

- In response to the conclusion of the 2018 ILO Conference Committee on the Application of Standards, the Ministry of Internal Affairs and Communications held the first regular consultation with the employees' side on January 18, 2019, and shared a recognition on a desired way of holding this consultation with the employees' side.
- It was confirmed that the consultation would continue after substantive discussions on the Fire Defense Personnel Committee system.

(ii) Right to Organise of Prison Officers

- In view of the purport of the ILO No. 87 Convention, Article 9, the prison officers are considered to be included in the "police" as mentioned in the same article.
- The personnel of penal institutions are not entitled to the right to organise. However, based on the observations on the report from the Committee of Experts on the Application of Conventions and Recommendations held in 2018, the GOJ newly created and expanded the opportunities for the personnel of penal institutions to express their own opinions on the working environment, etc. The GOJ is seeking to improve their workplace environment through various measures including those that are not stated above.

(iii) Basic Labour Rights of Japanese Public Service Employees

- The basic labour rights of the public service employees of Japan are restricted to some extent, due to the distinctive status as servants of all citizens and the public nature of the functions they should perform, in order to guarantee for all citizen's common interests. As a compensatory measure for these restrictions, neutral and third-party organizations such as the National Personnel Authority and Personnel Committees have been established to issue recommendations and implement other measures. The National Personnel Authority is effectively, impartially and speedily functioning as a compensatory measure for the restrictions on basic labour rights.
- With regards to measures for the autonomous labour-employer relations system, there are a wide range of issues that have yet to be understood by the public, making it necessary to continue careful considerations on these issues. This situation remains unchanged today. For this reason, the GOJ believes that the measures for an autonomous labour-employer relations system are issues that should be carefully examined while continuing to exchange opinions with employee organizations, etc. in Japan.

(iv) Local Public Service Employees

- The GOJ will carry out careful examinations regarding the basic labour rights of local public service employees, based on the examination of national civil service reform, listening to opinions of related organizations.

(v) Consultations with Social Partners

- **Taking advantage of the conclusions of the Committee on the Application of Standards in 2024, the GOJ will conduct a new exchange of opinions with domestic employers' and workers' organisations on issues related to the public service employee system. The GOJ continues to strive for further mutual understanding with social partners.**

**Summaries of the Japanese Government 2024 Annual Report and JTUC-RENGO's Views
on the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
(Related to consultation with social partners)**

Japanese Government's Annual Report	RENGO's Views
The GOJ continues to carefully examine, in consultations with social partners, how to respond to the recommendations stated in the conclusions of the Committee on the Application of Standards. In addition, the GOJ has been consulting employers' and workers' organisations at the annual ILO Panel on various themes related to this report, including the autonomous labour-employer relations system. <u>Furthermore, taking advantage of the conclusions of the Committee on the Application of Standards in 2024, the GOJ will conduct a new exchange of opinions with domestic employers' and workers' organisations on issues related to the public service employee system.</u> The GOJ continues to strive for further mutual understanding with social partners. The GOJ will continue to provide information in good faith to the ILO on our country's efforts.	With regard to the indication in the Annual Report of the Government of Japan that "the GOJ will conduct a new exchange of opinions with domestic employers' and workers' organisations on issues related to the public service employee system." as a response to the conclusion in the 2024 Conference Committee on the Application of Standards, <u>we intend to maintain vigilance over future developments, including whether or not the Japanese government will respond in good faith.</u> In order to have the Japanese government realize the request in the 2024 Report of the Committee of Experts on the Application of Conventions and Recommendations ("the Committee is bound to urge the Government to take the necessary measures without further delay to define, <u>in consultation with the social partners concerned</u>, a time-bound plan of action to give effect to the recommendations of the Conference Committee."), <u>we strongly urge the Committee to clarify, at least, (1) the setting of a minimum of approximately a two-year limit for the formulation of the action plan, (2) the identity of the personnel in charge in the ministries of the Japanese government who are to be consulted with, and (3) that the "related social partner" is the Alliance of Public Services Workers Unions (KOMU-ROKYO), which consists of unions related to public service employees and is affiliated with JTUC-RENGO, is the party representing the labour side.</u>

<Views of Keidanren (Japan Business Federation)>

○ Based on the conclusions of the Committee on the Application of Standards in 2024, the Government of Japan has decided to continue to communicate with the social partners by conducting a new exchange of opinions with domestic employers' and workers' organisations on various issues related to the public service employee system, in addition to the annual ILO Panel which has been discussing these issues for some time. Keidanren commends these decisions and responses by the Government of Japan.

JTUC-RENGO

We regretfully clarify that in the first meeting, held on December 19, 2024, it was not possible to sense in the slightest degree that the Japanese government held a sincere attitude toward a resolution of the issues and that the meeting was nothing more than an opportunity for government, labor, and management to express their different perceptions.

To be more specific, firstly, the explanations and materials provided by relevant ministries merely reiterated the current situation of constraints and a unilateral justification on the part of the Japanese government, which had been found to have behaved improperly by the Committee on Freedom of Association and the Committee of Experts on the Application of Conventions and Recommendations.

Secondly, by bringing up topics such as securing human resources and measures against harassment, which were not matters of consideration in the CCAS conclusion, the government is attempting to avoid a discussion of the essential issue of basic labor rights.

Thirdly, although the CCAS conclusion requested “the government to consider, in consultation with employers’ and workers’ organizations, in accordance with the Convention,” the Japanese government regarded the meeting as a mere formality. This is also symbolized by the title of the meeting as “an exchange of opinions.”

JTUC-RENGO recognizes that the conclusion in the 2018 Conference Committee on the Application of Standards urging the Japanese government to “formulate, jointly with the social partners concerned, a time-bound plan of action to give effect to the recommendations of the Committee of Experts on the Application of Conventions and Recommendations” is the only and extremely important measure that will lead to the resolution of the issue.

Further, on this issue, the report of the 2025 Committee of Experts on the Application of Conventions and Recommendations, JTUC-RENGO urges the Committee on Freedom of Association to take especial steps to ensure that the Japanese government initiates prompt action, at least by including the formulation of a time-bound action plan as an agenda item at meetings with employers' and workers' organizations.

Toward a Resolution of the Issue of Basic Labour Rights of Japanese Public Services Workers

On 23 June 2025, the 6th Joint Dialogue with civil society under the Japan-EU EPA was held in Brussels.

There, JTUC-RENGO raised the issues of Japan's non-ratification of Convention 111 and the public service labour rights situation. With support from our colleagues at ITUC, ETUC, CGIL, and DGB, the EU DAG chair's statement clearly expressed deep concern about these issues and was formally adopted.



6. On labour, we encourage the EU and Japanese institutions to further cooperate in complying with article 16.3 of the EU-Japan EPA. We recommend that progress is made on the Japanese side on compliance with international labour standards, especially with Convention 87, following the guidance provided by the ILO supervisory mechanisms. We equally call on all EU member states to ratify outstanding fundamental Conventions on Occupational Safety and Health, where this has not yet been done.
7. We further call for the ratification by Japan of ILO Convention 111. This is a fundamental ILO Convention that eliminates discrimination in the workplace based on race, sex, religion and political opinion. The ratification would be extremely important for every worker, and especially for the employees in the public sector.
8. It is crucial that the EU and Japan remain in close contact at all levels, including through the valuable civil society exchange, on how recently adopted EU legislation, which could have trade impacts, affects our Japanese partners and continues evolving, as the Commission seeks a substantial reduction of administrative requirements for economic operators. This should lead to greater understanding and a more efficient implementation of this legislation at home and abroad.
9. In this sense, in what concerns the Corporate Sustainability Due Diligence Directive, its full implementation will come in three years, and the changes proposed by the Omnibus package, which aims at simplifying this legislation, are not yet finalised. However, it is important that businesses on both sides already prepare for what will be required for full compliance and cooperate to ensure that trade between the EU and Japan continues as smoothly as possible. Equally, regarding CBAM, legal certainty is critical for all sides





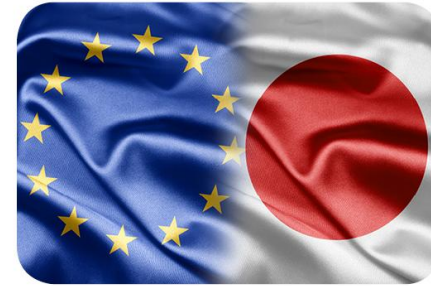
～The Seventh Joint Dialogue with Civil Society under Chapter 16 of the Agreement
between the European Union and Japan for an Economic Partnership, Tokyo, 4 March 2026～

Thank you for your kind attention



EU-Japan Economic Partnership Agreement (EPA)

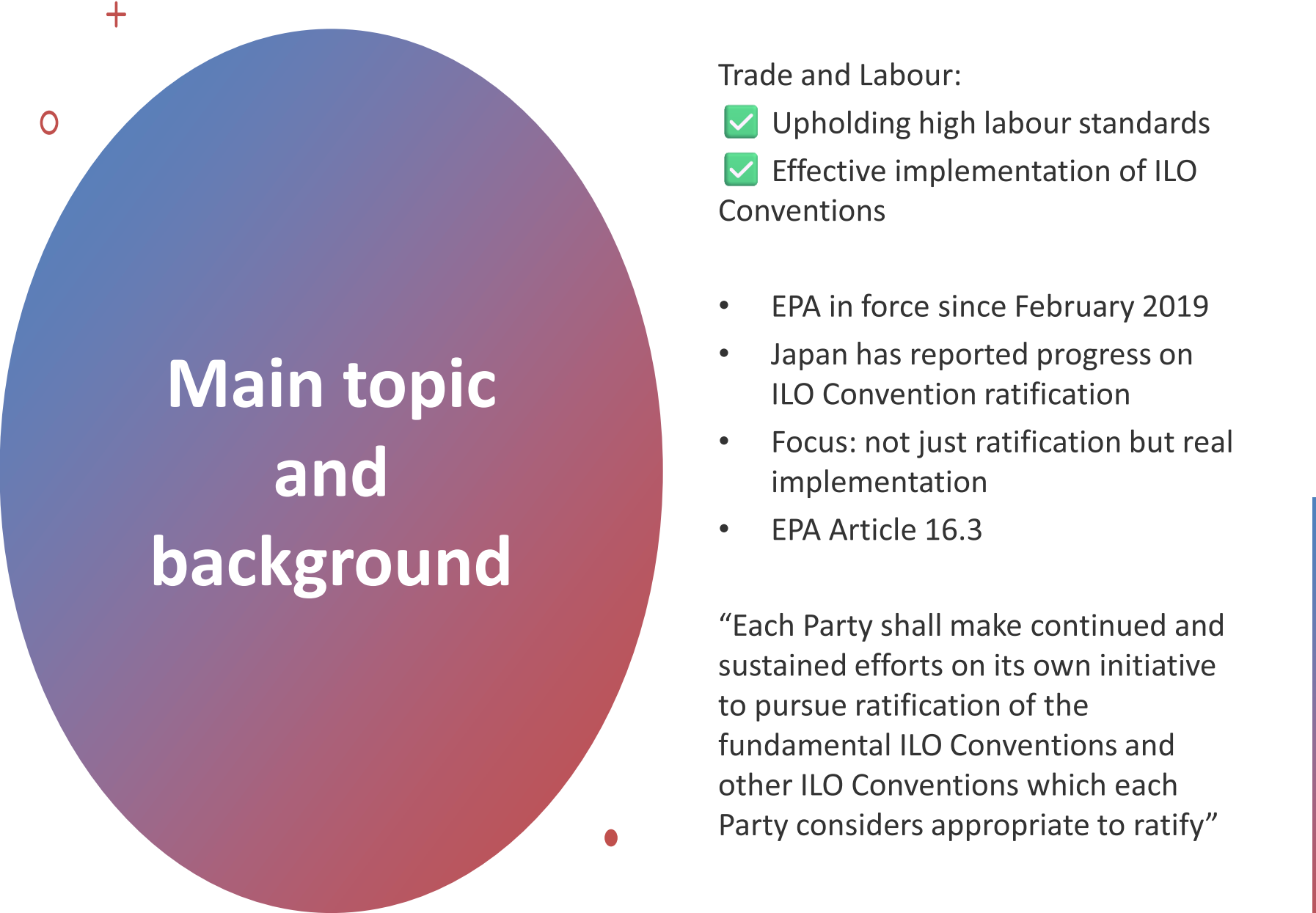
***Upholding high labour
standards and the effective
implementation of ILO
conventions***



**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**

7th Joint Dialogue with Civil Society
Trade and Sustainable Development

 Tokyo, 4 March 2026



Main topic and background

Trade and Labour:

- ✓ Upholding high labour standards
- ✓ Effective implementation of ILO Conventions

- EPA in force since February 2019
- Japan has reported progress on ILO Convention ratification
- Focus: not just ratification but real implementation
- EPA Article 16.3

“Each Party shall make continued and sustained efforts on its own initiative to pursue ratification of the fundamental ILO Conventions and other ILO Conventions which each Party considers appropriate to ratify”



Fundamental ILO Conventions: the ILO CAS cases C87 and C98

- Labour rights of Japan's public service employees
- Restrictions from 1948 still in place
- Violations of ILO Conventions 87 and 98
- No meaningful reforms

In Japan, the legislation still maintains restrictions on the basic trade union rights of public employees that are incompatible with principles of freedom of association and collective bargaining, including firefighters, prison staff, and civil servants

Reports by:

- ✚ Committee of Experts on the Application of Conventions and Recommendations
- ✚ Committee on Freedom of Association

ILO Convention 111 concerning Discrimination in Respect of Employment and Occupation



**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**

**The Discrimination Convention is
an anti-discrimination convention
which addresses discrimination
based on race, sex, political
opinion, or religion.**

**It is one of eight fundamental ILO
conventions on the protection of
labour standards.**



EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement

The primary obligation of States that have ratified Convention No.

**111 is to declare and pursue a national equality policy, “by
methods appropriate to national conditions and practice” and to
seek the co-operation of employers’ and workers' organisations
and other appropriate bodies**

The present situation

- The European Commission states that, one of the reasons of Japan's hesitation to ratify C.111 relates to the restrictions it has, in its National Public Service Act (section 102), for civil servants to voice their political opinions.
- There have been discussions and consultations with social partners regarding ratification, but further study is needed to assess the alignment of C111 with Japanese laws.
- Trade unions call for ratification



**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**

Key aspects for Public Servants

Awareness and Education: Public servants should be aware of the provisions of ILO 111 and understand what constitutes discrimination in the workplace.

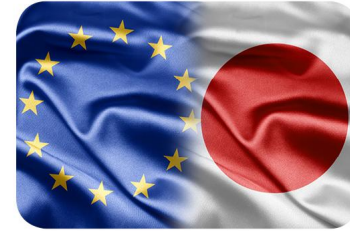


**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**

Policy Development: National policies should clearly outline the rights of public servants and establish procedures for addressing complaints of discrimination.

Training and Capacity Building: Public servants need training on identifying and preventing discrimination, as well as on handling complaints fairly and effectively.

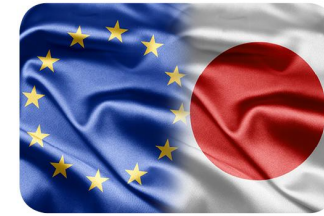
- **Complaint Mechanisms:** Clear and accessible mechanisms for reporting and resolving discrimination complaints should be in place, ensuring confidentiality and protection for those who come forward.
- **Monitoring and Evaluation:** Regular monitoring and evaluation of the implementation of ILO 111 in the public service is essential to identify areas for improvement and ensure continued progress.
- **Promoting Diversity and Inclusion:** Public service policies should actively promote diversity and inclusion in the workplace, creating an environment where all public servants feel valued and respected.



**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**

How to promote ILO Convention 111?

Focus on raising awareness, enacting relevant legislation, and fostering collaboration among stakeholders by partnering with employers' and workers' organizations, promoting educational programs, and ensuring that national policies and practices align with the Convention's principles.



**EU Domestic Advisory Group
under the EU-Japan Economic
Partnership Agreement**



Conclusion



Under EPA Articles 16.15 & 16.16



EU DAG calls for:

- **sound and steady implementation of ratified conventions**
- **fully respect ILO monitoring body reports and recommendations**



Full implementation of core labour rights is a cornerstone of the EPA's credibility



Ongoing dialogue and international supervision remain essential tools



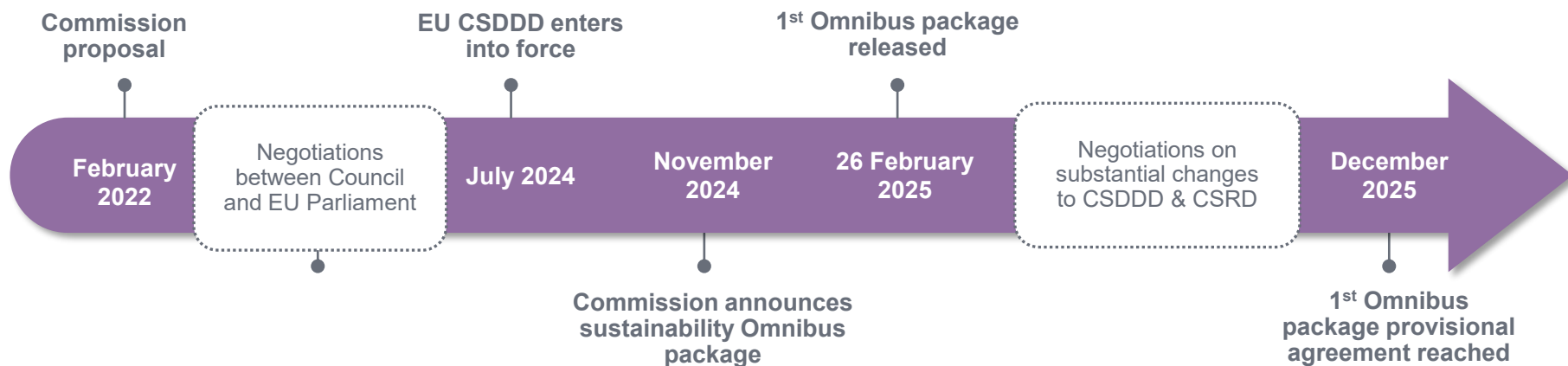
EU CSDDD implementation Omnibus package

*EU-Japan EPA - 7th Joint Dialogue with Civil Society
Tokyo, 4 March 2026*



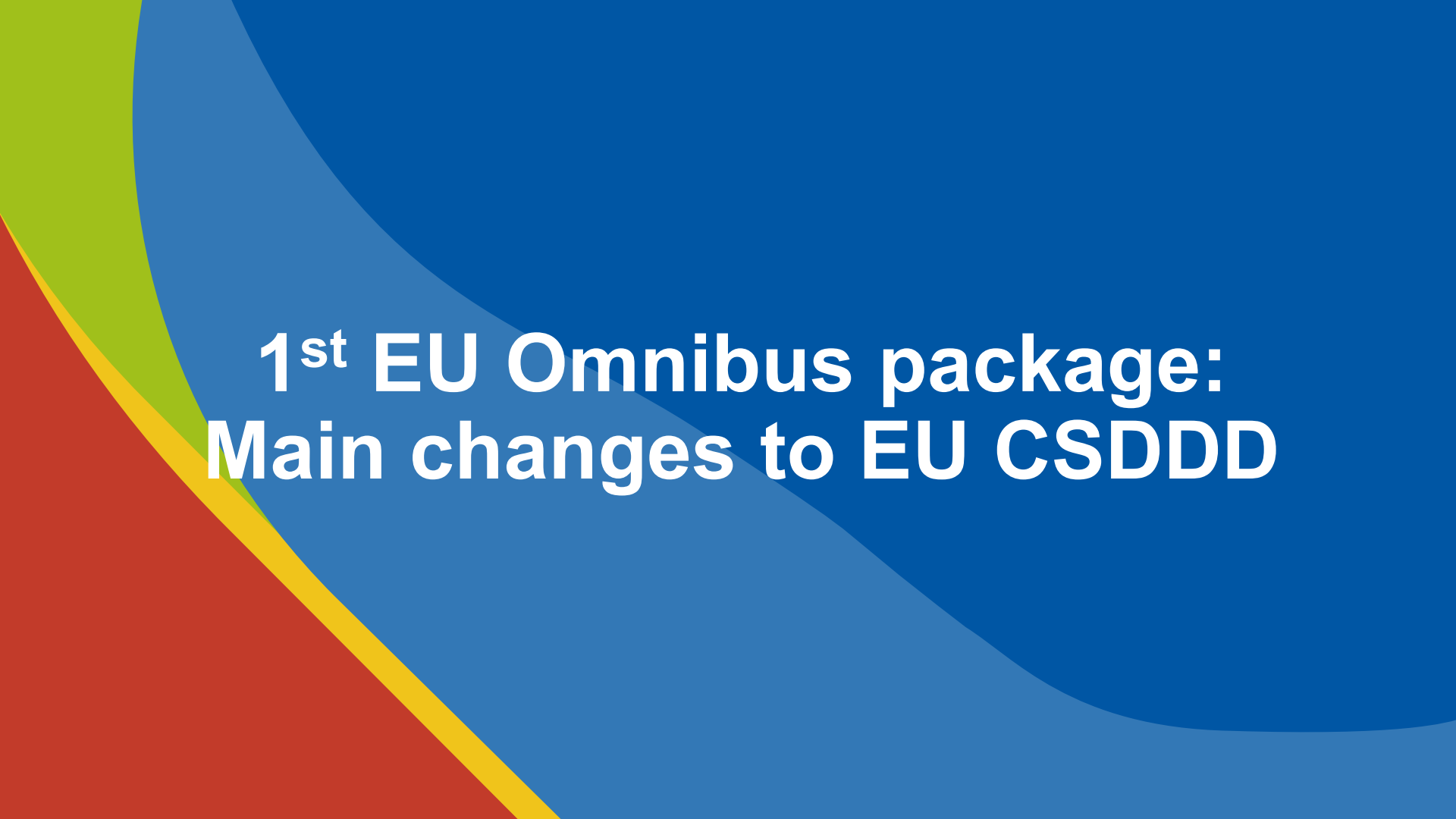
1st EU Omnibus package: A recap

How did we get here?



What's next?





1st EU Omnibus package: Main changes to EU CSDDD

CSDDD 2.0: What has been decided?

a. Adjusted timelines
(application,
transposition)

b. Adjusted
thresholds + review
clause

c. Risk-based due
diligence (scoping +
in-depth assessment)

d. Delayed
monitoring intervals
(from annual to
every 5 years)

e. Cap on information
from <5000 employee
suppliers

f. Maximum
harmonisation

g. No EU-wide civil
liability & max 3%
global turnover
penalties

h. Stakeholders
(who and when to
engage)

i. Climate transition
plan provision
deleted

j. Financial sector
revision out

k. Obligation to
terminate a
relationship deleted

CSDDD 1.0 vs 2.0: Scope & Timeline

CSDDD 1.0

July 2027 for EU companies with >1.5B€ worldwide turnover and 5000+ employees and for non-EU companies with >1.5B€ turnover in the EU.

July 2028 for EU companies with >900m€ worldwide turnover and 3000+ employees and for non-EU companies with >900m€ turnover in the EU.

July 2029 for EU companies with >450m€ worldwide turnover and 1000+ employees and for non-EU companies with >450m€ in the EU.

CSDDD 2.0

26 July 2029 for EU companies with worldwide net turnover **>1.5b€ and 5000+ employees**

26 July 2029 for non-EU companies with **>1.5B€ turnover in the EU**

Transposition into national legislation
by 26 July 2028

CSDDD 1.0 vs 2.0: Risk-based approach

CSDDD 1.0

Map operations, those of subs and those of BPs in chain of activities to identify general areas where adverse impacts are likely to occur & be most severe

Based on mapping, conduct in-depth assessment of areas where adverse impacts likely to occur & be most severe.

CSDDD 2.0

Scoping exercise based on **reasonably available information** to identify general areas where adverse impacts are most likely and most severe across own ops, those of subs and those of BPs in chain of activities

Based on scoping, in-depth assessment (info from BPs with <5000 employees only when it cannot be obtained by other means)



Risk based approach

Risk-based due diligence (based on international standards)

Integrate due diligence into policies & management systems

Identify & assess actual / potential adverse human rights & env impacts in own operations and supply chains.

Prioritise (severity and likelihood) identified adverse impacts

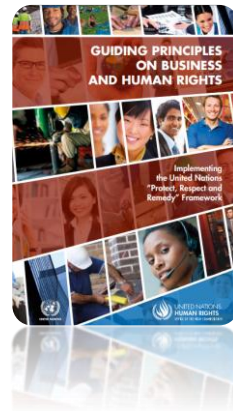
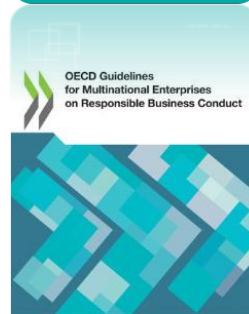
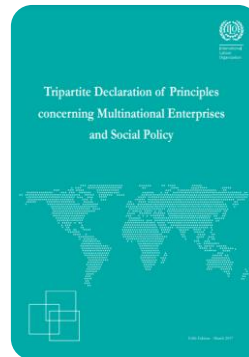
Prevent / mitigate them and **bring them to an end / minimize**

Provide remedies

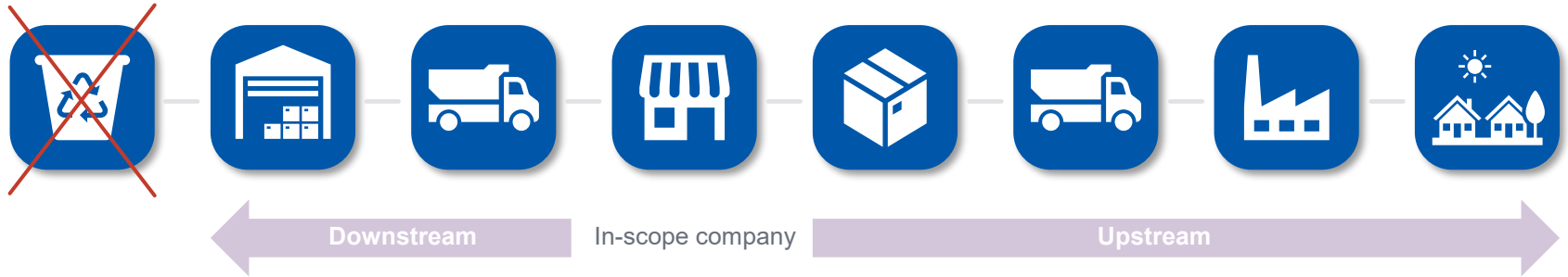
Monitor effectiveness of DD policies and measures

Establish a **notification mechanism & complaints procedure**

Publicly **communicate** on due diligence (if not covered by CSRD)



Where?



- ✓ Own **operations** & **chain of activities** (up & down)
- ✓ No tier distinction
- ✓ However, companies can prioritise
- ✓ What's **appropriate** to “prevent” and “bring to an end” will depend on level of involvement + where in the supply chain + degree of leverage
- ✓ Obligation of **means**!

How

1

Administrative supervision

Investigation, penalties (e.g. max 3% of company's annual net worldwide turnover) & **injunctive measures**

2

Accompanying measures

Tools & guidance to be provided by EU Commission by mid 2027 (some by 2028). Specific support mechanisms for **SMEs**.

3

Collaboration

Companies may participate in **industry / multi-stakeholder initiatives** to support with the implementation of the rules. They can also collaborate with others to increase leverage.

Thank you

**Stuart Newman – Chair, EU-Japan DAG
Senior Advisor, amfori**

stuart.newman@amfori.org

Japan-EU EPA

Trade and Sustainable Development

7th Joint Dialogue with Civil Society

4 March 2026

Cross-cutting Aspects of Trade and
Sustainable Development

Building Capacity and Enabling Environments for Responsible Business Conducts in Global Supply Chains

Dr. Emi Sugawara

Professor, Osaka University of Economics and Law
(Member, Roundtable for implementation of NAP)

e-sugawara@keiho-u.ac.jp



THE UNIVERSAL DECLARATION OF Human Rights



Progress in Japan: focus on capacity building

December 2025: [Revision of National Action Plan on Business and Human Rights](#) (in Japanese) by the Inter-Ministerial Committee

- Goals : 1. Protecting and promoting human rights across society as a whole, including the international community
2. Ensuring policy coherence related to BHR
3. Ensuring and enhancing the international competitiveness and sustainability of Japanese companies
4. Contributing to the achievement of the SDGs

- **Eight Priority Policy Areas**

1. Human rights due diligence and supply chains, including JDCS
2. Promoting measures to ensure that no one is left behind
3. Thematic human rights issues: environmental concern and AI
4. Capacity-building for the implementation of the UNGPs
5. Corporate disclosure
6. Public contracts, including public procurement
7. Access to remedy: NCP, the design of HRts remedy mechanisms
8. Monitoring framework: indicators for impact assessment

Progress

1. Inclusion of priority policy areas from the SH report
2. Prioritization of **capacity building** (SMEs & GSC)
3. **A clearer policy direction toward coherence**
(Further specification through concrete actions remains necessary.)

Challenges

1. Smart mix: mandatory measures relating HRDD
2. Policy engagement between government and SH
3. A focus on systemic issues, including Japan's NHRI

March 2024: [Stakeholder review report on the NAP on Business and Human Rights](#) (in Japanese)

Contributors: Japan Business Federation, SMEs Business Association, Global Compact Network Japan, Japan Sustainable Investment Forum, Japanese Trade Union Confederation, Business and Human Rights Civil Society Platform, CSO network Japan, Japan Federation of Bar Association, Consumers Conference for Sustainability, ILO office for Japan, Academia

Human rights respect throughout the supply chain requires companies and other entities, **through dialogue and engagement with rights-holders**, to identify human rights risks and to take action to prevent, mitigate, and remedy adverse impacts. Human rights issues are closely intertwined with environmental concerns—not only climate change, but also natural capital and biodiversity—and should therefore be addressed in an integrated manner.

23 Proposals in the Seven priority policy areas (building capacities & creating an enabling environment)

EU Omnibus I package on sustainability:

focusing on the Corporate Sustainability Due Diligence Directive (CSDDD)

July 2024: CSDDD establishing mandatory HREDD along chains of activities, aligned with international standards

Feb 2025: Commission proposals, including the Omnibus I sustainability package, adopted

to reduce the administrative burden for businesses (especially SMEs) without undermining the policy objectives (HRts&EN)

Prevent unwanted trickle-down effects and the shifting of compliance burdens onto SME business partners

Dec 2025: A provisional agreement reached by the Parliament and the Council after negotiations

Amendments to the CSDDD

- Scope (thresholds), monitoring (every five years), penalties (maximum cap of 3%), postponement (until July 2029 for companies), etc.
- Definition of “stakeholders”: rights-holders (“affected stakeholders”) and their legitimate representatives
- Due diligence throughout the chain of activities based on relevant risk factors:
 - a scoping exercise based on reasonably available information
 - in-depth assessment focusing on the most severe adverse impacts identified last resort measures: the obligation to terminate removed
- Last-resort measures: removal of the obligation to terminate
- EU-harmonised liability regime removed: the obligation on Member States to ensure a right to full compensation; a review clause on the need for an EU-level regime
- A harmonization clause introduced

Effectiveness of due diligence: Expectations for capacity-building and enabling environments for RBC

Baseline for effectiveness

Human rights respect throughout the supply chain requires companies and other entities, through dialogue and engagement with rights-holders, to identify human rights risks and to take action to prevent, mitigate, and remedy adverse impacts. (SH review report (2024))

Reducing the administrative burden on SMEs is important, but strengthening supply-chain-wide efforts is also necessary; fair burden-sharing among companies (buyers and suppliers) and governments across the supply chain is key.

Encourage meaningful stakeholder engagement (Art.13, CSDDD)

Reasonably available information: grievance-based due diligence across the supply chain (UNGPs Principle 29)

Model contractual clauses (Art. 18) and guidelines (Art. 19, CSDDD) to support these efforts

Expectations under on Japan-EU EPA

To effectively implement responsible business conduct, including human rights and environmental due diligence, in practice, meaningful engagement with rights-holders throughout supply chains is indispensable.

While reducing the administrative burden for business (especially SMEs) is important, the effectiveness of due diligence ultimately depends on the fair sharing of responsibilities and burdens among governments, buyers, and suppliers, so that people and communities across supply chains can genuinely benefit.

1. Smart mix and policy coherence to build capacities and enabling environments

Combine mandatory human rights and environmental due diligence with diverse and coherent policy measures—such as sanctions, incentives, guidance, and public support—to effectively influence corporate behavior.

While reducing the administrative burden on SMEs is important, capacity-building efforts should benefit not only lead companies but also business partners and communities throughout the supply chain, including in host countries.

Ensuring access to remedy remains a central pillar for the effectiveness and credibility of due diligence.

2. Inclusive approach involving third countries to ensure responsible supply chains

Promote continuous dialogue and collaboration among governments, buyers, suppliers, and stakeholders in Japan, the EU, and third countries. Effective due diligence requires fair and balanced burden-sharing among governments and companies (buyers and suppliers), rather than the downward transfer of responsibilities and compliance costs to SMEs.

3. Addressing root causes, systemic issues, and governance gaps

Address human rights and environmental risks by focusing on root causes, systemic challenges, and governance gaps within and beyond supply chains. This requires recognizing the complementary roles and responsibilities of governments and companies, including through bilateral and multilateral intergovernmental dialogue and negotiation.



Expectation for Joint Dialogue with Civil Society under Japan-EU EPA

Ensure meaningful exchange of stakeholder views by prioritizing and selecting key issues, ensuring balanced stakeholder representation, and maintaining continuous follow-up on important issues raised.

Further opportunities—such as the JBCE/EBC/OECD joint event on 25 February—are expected to contribute to proposals that are taken forward into policy.

JBCE-EBC-OECD joint event

Bridging Stakeholders and Business to Advance a Meaningful Dialogue:
Japan–EU Cooperation for Responsible Business Conduct in Global Supply Chains
February 25, 2026 Tokyo (Europa House)
16:30-18:30(JST) / 08:30-10:30(CET)

Executive Summary

The JBCE–EBC–OECD Joint hybrid event brought together about 80 representatives from business, government and international organizations and experts to discuss approaches for strengthening constructive dialogue with stakeholders—particularly civil society actors in Southeast Asia— around responsible business conduct with a focus on human rights issues. The session focused on sharing practical experiences aligned with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines) and the UN Guiding Principles on Business and Human Rights (UNGPs). The discussion also aimed to contribute to continuing dialogue grounded in the common values shared by Japan and the EU, including feeding into the Japan-EU Joint Dialogue with Civil Society under the Economic Partnership Agreement 2026.

1. Approach to Meaningful Stakeholder Engagement

Companies recognised that meaningful stakeholder engagement, as defined in the OECD Guidelines and the UNGPs, is a **two-way, good-faith, responsive, and continuous process** through which business and stakeholders can openly exchange views and shape decisions affecting rightsholders and other stakeholders.

Effective engagement requires:

- **Mapping and prioritising affected rightsholders and other relevant stakeholders, including rightsholders’ representatives.**
- **Ensuring transparency and timely information-sharing.**
- **Building long-term trust during “normal times” and early in business engagement.**
- **Better understanding how the UNGPs’ involvement continuum “caused, contributed to, or is directly linked to harm” relates to stakeholder engagement.**
- **Integrating stakeholder input into human rights due diligence and remediation processes.**
- **Recognising the knowledge gap-** Differences in technical or policy backgrounds can sometimes make it difficult for all stakeholders to engage on equal footing.

Conducting stakeholder engagement increases legitimacy, strengthens human rights due diligence, and enables more credible and effective remedies.

2. Practical Challenges Identified by Companies

Companies highlighted several practical challenges in implementing meaningful stakeholder engagement, including:

- **Empowering workers to speak up**—particularly at risk, vulnerable or marginalised groups such as foreign migrant workers—to raise concerns, even when grievance channels exist.
- **Identifying legitimate rightsholder representatives** and managing situations where some parties

may not engage in good faith, in some cases jeopardising trusted dialogue and rights-based solutions.

- **Balancing transparency with risks** such as legal exposure or intensifying criticism with associated reputational harm, which can make disclosure decisions complex including because of wide-ranging internal views.
- **Navigating differing expectations** and communication approaches between companies and stakeholders including civil society organisations.
- **Addressing internal coordination** within firms.

Participants recognised that stakeholder engagement tends to be far easier in home countries, whereas entering new markets requires extensive efforts to understand the context and which stakeholders may need to be prioritised. Stakeholder mapping and relationship building during “**normal times**,” before any crisis emerges is necessary. Effective stakeholder engagement in some cases requires **neutral mediators** who are trusted by both companies and rightsholders and their representatives, particularly when challenges or tensions arise.

3. Next Steps

For Companies

- **Continuous stakeholder mapping and relationship building**, especially with rightsholders and civil society organisations, including local groups.
- **Strengthening internal awareness and governance** so that different departments, including senior leaders, understand the value of stakeholder engagement and take early action
- **Building capacity for constructive dialogue**, including cross-cultural communication, sharing information on corporate governance and how that might impact decision-making time-frames and the ability to work with independent mediators where necessary.

For Governments and International Organisations

- **Creating structured dialogue platforms in host countries**, by playing a critical role as conveners, to companies and civil society to identify shared goals and build trust.
- **Providing capacity building and practical tools**, including encouraging training for, and access to, more neutral facilitators, guidance on stakeholder engagement for different types of human rights challenges and information on vulnerable groups.
- **Strengthening enabling environments**, coordinated policy dialogue and collaboration among governments, companies, and civil society, with recognition of shared responsibility, are essential to fostering responsible business conduct and to achieving more sustainable and resilient value chains.

This meeting demonstrated that Japanese and European companies share common values and a strong commitment to responsible business conduct. The event concluded with participants reaffirming these shared principles and further emphasising that sustained and structured Japan–EU dialogue—grounded in open, practical, and institutionalized engagement among business, government, and civil society—remains essential for advancing these common objectives.