

(Reference Materials)

Guidelines for Business Operators
on the Amendments to the Four Product Safety Acts
(February 2026)

February 2026

Introduction

On June 19, 2024, the Diet passed in its 213th ordinary session the Act Partially Amending the Consumer Product Safety Act and Other Acts, which was promulgated on June 26, 2024, and came into force on December 25, 2025.

Amendments were made to the Four Product Safety Acts, namely the Consumer Product Safety Act, the Electrical Appliance Safety Act, the Gas Business Act, and the Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas.

To ensure the effectiveness of the amended acts, it is necessary to communicate the details of the amendments to specified importer, domestic administrators, and digital platform (DPF) providers, which are now subject to regulations under the revised laws. However, these acts only set out the minimum requirements for these business operators, so the assurance of product safety requires voluntary efforts by each operator. These are the two reasons behind the development of the Guidelines for Business Operators on the Amendments to the Four Product Safety Acts.

For business operators that are now subject to the laws, these guidelines outline in a Q&A format the key points of the amendments to the Four Product Safety Acts and things to note when conducting business. It provides clear answers based on the needs of overseas business operators and others, however, the guidelines only contain information of particular importance, and they are not exhaustive. For more details, please refer to the URLs and other materials indicated in the comment section of each question, and make use of them when conducting practical business.

*About the “Guidelines for Business Operators on the Amendments to the Four Product Safety Acts”

The translations here are not official texts, and are not necessarily finalized version. Only the original Japanese texts of the laws / regulations have legal effect, and the translations are to be used solely as reference materials to aid in the understanding of Japanese laws / regulations.

*Some of the reference materials provided are available only in Japanese.

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Q1

Please provide an overall picture of Japanese laws and regulations on product safety.

To ensure product safety, we have the Consumer Product Safety Act, the Gas Business Act, the Electrical Appliance Safety Act, and the Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas (the Four Product Safety Acts). These acts are designed to prevent accidents resulting in injuries, burns, deaths, etc. that could be caused by consumer products that are used by general consumers and to protect the safety and benefits of consumers.

Specifically, products with the potential to cause harm are designated as products subject to PS mark, and manufacturers and importers of such products are required to submit notifications to the government and ensure conformity with the technical requirements specified by the government. Manufacturers and importers that fulfill certain obligations, including ensuring conformity with the technical requirements, are allowed to put a PS mark label on their specified products. Manufacturers, importers, and distributors may only sell products bearing a PS mark label.

Products that are manufactured or imported by manufacturers or importers “for business use” may be classified as consumer products if they are considered to be fit for extensive use among general households in terms of their specifications, sales channels, and other factors. The Four Product Safety Acts are applicable to not only retail products for end users but also wholesale products for business-to-business (B to B) transactions.

Furthermore, individual products are subject to the provisions of other laws, such as the Food Sanitation Act for food products and the Road Transport Vehicle Act for automobiles. Please also look at the provisions of the applicable laws in each case.

Aside from these acts, the Product Liability Act sets forth civil liability for damages.

Reference: Legal Operation Guide for Consumer Product Safety Act (pages 8)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

: Attention to Business Operators: Procedures Required by the Four Product Safety Acts

https://www.meti.go.jp/english/policy/economy/consumer/product_safety/index.html

Q2

Tell us about the PS mark system.

To prevent accidents resulting in injuries, burns, death, etc. that could be caused by products and to protect the safety and benefits of consumers, we have the Consumer Product Safety Act, the Gas Business Act, the Electrical Appliance Safety Act, and the Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas (the Four Product Safety Acts).

The Four Product Safety Acts designate products with the potential to cause harm as products subject to PS mark, and they require manufacturers and importers to submit a notification to the government and ensure conformity with the technical requirements specified by the government. Manufacturers and importers (including specified importer) that fulfill certain obligations, including ensuring conformity with the technical requirements, are allowed to put a PS mark label on their specified products. Manufacturers, importers (including specified importer), and distributors may only sell specified products bearing the PS mark. (For notifications to the government, please refer to Q6. For obligations regarding compliance with technical standards, please refer to Q8 and Q9 together.)

Products subject to PS mark are products that are recognized, in terms of their structure, materials, and usage, as having particularly high risk of causing harm to the lives or bodies of general consumers. Products subject to PS mark are designated as products subject to Diamond PS mark if some of their manufacturers or importers are found to have failed to provide a necessary level of quality that is sufficient to prevent harm to the lives or bodies of consumers.

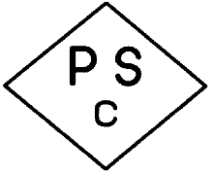
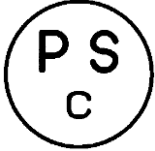


A Circle PS mark label can be put on products subject to PS mark that are found from self-inspections to conform to the technical requirements. A Diamond PS mark label can be put on special specified products if they are found to conform to the technical requirements through tests by a state-registered inspection body, in addition to self-inspections.

A Children PSC Mark label can be put on products that demonstrate conformity with the technical requirements and user age requirements on the condition that precautions for use, including the target age group, are indicated on the product. None of these products may be sold or displayed for sales purposes unless the correct PS mark label is put on them.



The locations for displaying the PS mark are specified in each relevant law or regulation. The PSC mark, in particular, is stipulated for each specified product in "Annex Table 5 of the Technical Standards Ministerial Ordinance." The PSE mark must be displayed on the surface of electrical products in a manner that is not easily erased, and the name of the notified business operator or the registered inspection body must be indicated nearby (Article 17 of the Enforcement Regulations and Annex Table 5 of the same). However, for parts and materials such as electric wires, fuses, and wiring devices where it is structurally difficult to secure display space,

a simplified symbol "<PS>E" or "(PS)E" may be used instead of the standard mark.



Products regulated by the Consumer Product Safety Act (PSC marks)

Special specified products	Specified Products excluding Special Specified Products
	
Specific Products for Children that are Special Specified Products	Specific Products for Children that are Specified Products excluding Special Specified Products
	



Products regulated by the Electrical Appliance Safety Act (PSE marks)

Specified electrical appliances and materials	Electrical appliances and materials other than those specified
	

Products regulated by the Gas Business Act (PSTG marks)

Specified gas appliances and materials	Gas appliances and materials other than those specified
	

Products regulated by the Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas (PSLPG marks)

Specified liquefied petroleum gas appliances, etc.	Liquefied petroleum gas appliances, etc. other than those specified
	

*To see the list of regulated products, please click the URL indicated below.

- Products regulated by the Consumer Product Safety Act (PSC marks)
<https://www.meti.go.jp/policy/consumer/seian/shouan/item.html>
- Products regulated by the Electrical Appliance Safety Act (PSE marks)
<Specified electrical appliances and materials>
https://www.meti.go.jp/policy/consumer/seian/denan/specified_electrical.html
<Electrical appliances and materials other than those specified>
https://www.meti.go.jp/policy/consumer/seian/denan/non_specified_electrical.html
- Products regulated by the Gas Business Act (PSTG marks)
<https://www.meti.go.jp/policy/consumer/seian/gasji/item.html>
- Products regulated by the Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas (PSLPG marks)
<https://www.meti.go.jp/policy/consumer/seian/ekiseki/item.html>

Please note that there are transitional periods for some regulated items.

- For products subject to the Children PSC Mark, this regulation does not apply to products that have been imported before the enforcement date (December 25, 2025).
- For infant beds imported before the enforcement date, the PSC mark must be replaced with the Children PSC Mark during the transitional period, which lasts until March 24, 2027. All infant beds sold on or after March 25, 2027, must display the Children PSC Mark. There is no need to submit new notifications or undergo additional procedures for this replacement.

Please also note that items newly added to the list of regulated products in the future may also be granted a transitional period, so be sure to check for updates.

Below are examples of products that have been designated as regulated products in recent years.

(1) Mobile batteries

<https://www.meti.go.jp/policy/consumer/seian/denan/topics/mlb/mlb-outline.pdf>

(2) Toys for babies and infants

https://www.meti.go.jp/product_safety/kodomo/gangu_kisei.html

(3) Gas torches

https://www.meti.go.jp/product_safety/consumer/gastorch.html

Reference: Legal Operation Guide for Consumer Product Safety Act (page 8)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q3

What are specified products for children?

Specified products are products that are primarily provided for use in children's everyday life and that are required by Cabinet Order to include instructions for use and other warnings to prevent harm to the lives or bodies of children (Article 2.4 of the Consumer Product Safety Act and Article 3 of the Order for Enforcement of the same act). Specified products for children that do not bear any Children PSC Mark may not be put on sale (Article 4.2 of the Consumer Product Safety Act).

The Children PSC Mark can be put on specified products for children that fulfil obligations, such as ensuring conformity with the technical requirements and user age requirements. The Diamond Children PSC Mark is put on special specified products for children, and the Circle Children PSC Mark is put on specified products for children that are not special specified products.

For an outline of the regulations on specified products for children, please click the URL below.
https://www.meti.go.jp/product_safety/kodomo/gangu_kisei.html

As of December 2025, beds for babies and infants (Diamond Children PSC Mark) and toys for babies and infants (Circle Children PSC Mark) are designated as specified products for children.

Toys for babies and infants are subject to certain technical and user age requirements and the legal provisions specifying the details of warnings to be included with them (Attached Lists 1, 1-2, and 2-2 of the Ministerial Order on Technical Requirements). For toys for babies and infants, please click the URL below to see 2. Toys for babies and infants.

https://www.meti.go.jp/policy/consumer/seian/shouan/contents/gangu_faq_2.pdf

For beds for babies and infants, please click the URL below to see the reference materials.

https://www.meti.go.jp/policy/consumer/seian/shouan/contents/babybed_faq_1.pdf

https://www.meti.go.jp/product_safety/kodomo/babybed_kodomopsc.html

Reference: Legal Operation Guide for Consumer Product Safety Act (pages 5 and 6)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q4

Overseas business operators are now subject to the regulations under the Four Product Safety Acts. Can you explain this more specifically?

The following types of overseas business operators are subject to the Four Product Safety Acts:

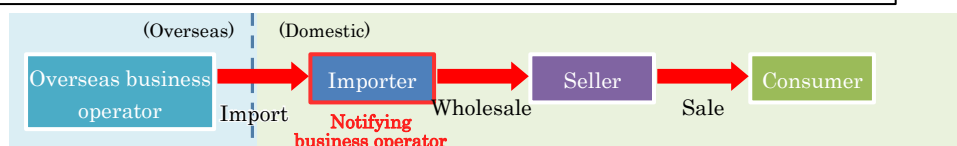
- (1) They sell and deliver products to consumers via importers.
- (2) They sell products directly to consumers.

Previously, in cases falling under (1) above, domestic importers handling products subject to PS mark (specified products) were subject to the Four Product Safety Acts. Now, overseas business operators in cases falling under (2) above are also regulated by the acts. The overseas business operators selling products subject to PS mark that fall under (2) are defined as specified importer.

More specifically, the overseas business operators in (2) are divided into two types: (a) those that sell and deliver products through digital transaction platforms in Japan and (b) those that receive orders and deliver products through their own websites, which they operate overseas for Japanese customers. In both cases, specified importer are required to appoint their own domestic administrator.

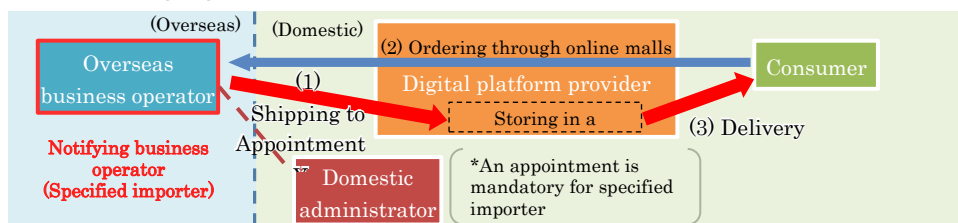
<Overview of Notifying business operator>

(1) Overseas business operators sell and deliver products to consumers **through**

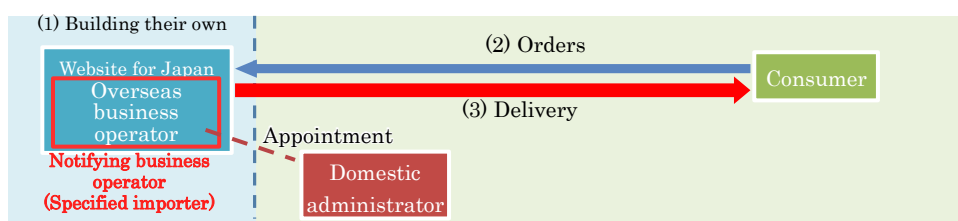


(2) Overseas business operators **directly** sell and deliver products to consumers

<a)Cases involving digital platform providers>



<b)Cases of companies with their own websites>



*Businesses not labeled as "Notifying business operator" in the above diagram are not subject to regulations as Notifying business operator.

Reference: Overview of the Act Partially Amending the Consumer Product Safety Act and Other Acts (Extending Regulations to Overseas Business Operators) (page 8)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q5

Why are specified importer now subject to regulations under the Four Product Safety Acts?

The recent expansion of online transactions has increased opportunities for business operators in and outside of Japan to sell products through online shopping malls and other means to consumers in Japan. In cases where overseas business operators use online shopping malls and other digital platforms (DPFs) to sell products directly to domestic consumers, there is no manufacturer or importer based in Japan that is (legally) responsible for the safety of such products. To deal with this problem, overseas business operators selling products subject to PS mark directly to Japanese consumers are clearly defined as “specified importers” and are required to submit a notification.

Reference: Overview of the Act Partially Amending the Consumer Product Safety Act and Other Acts (Extending Regulations to Overseas Business Operators) (page 1)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q6

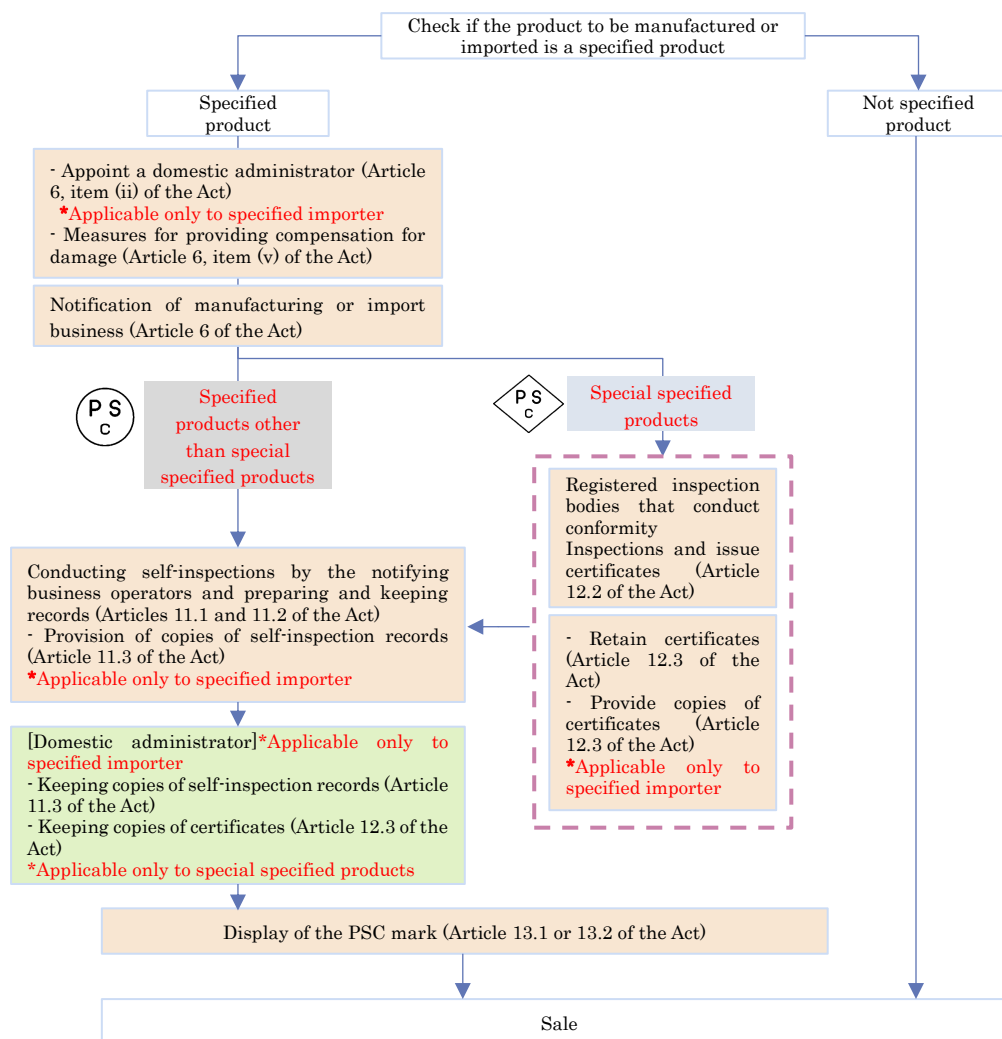
Tell us about the procedures necessary for specified importer to sell products subject to PS mark in the Japanese market (and procedures to discontinue the business).

To sell products subject to PS mark directly to Japanese consumers, specified importers must notify the Ministry of Economy, Trade and Industry (METI) of the starting date of their business and the classification of the products subject to PS mark to be manufactured (or imported) by them (Article 6 of the Consumer Product Safety Act, Form 3 of the Ministerial Order on Technical Requirements, etc.)

Prior to this, each specified importer had to appoint a domestic administrator and submit a notification to that effect together with the administrator's certificate of residence and documents related to the contracts between the specified import business operator and the administrator (Article 6, item (ii) of the Consumer Product Safety Act, Article 6.2 of the Ministerial Order on Technical Requirements, etc.) If a specified product, as set out in the Consumer Product Safety Act, has a defect that causes damage to the life or body of a consumer, the specified importer must have measures in place to provide compensation to the affected consumer for the damage caused (measures for damage compensation) (Article 6, item (v) of the Consumer Product Safety Act, Article 11.5 of the Act, etc.). The specified importer must take out a casualty and liability insurance policy with a minimum compensation of at least 10 million yen per person and at least 30 million yen per year (Article 16 of the Ministerial Order on Technical Requirements, etc.).

The flow of the procedures is detailed below.

< Procedures for Selling Products subject to the PS Mark >



If you have a complete set of necessary notification documents at hand, submit them to METI. Once they are accepted, the notification process will be completed. However, the required period may vary depending on the circumstances of each case, as described below. You are advised to start making preparations well in advance.

Appointing and signing a contract with your domestic administrator: it takes several weeks to several months prior to the notification

Taking measures to provide compensation for damage (taking out a casualty and liability insurance policy): it takes several weeks prior to the notification

Verifying conformity with the technical requirements (self-inspection or conformity inspections): it takes several weeks to several months prior to the notification, depending on the product

If the products to be imported are specified products for children, the notifying business operator must indicate the recommended user age groups and include warnings (Article 12.2 of

the Consumer Product Safety Act).

Please note that notifications must be submitted for each product category as specified by the relevant laws and regulations.

When discontinuing the business, the business operator must notify METI of its intention to discontinue business (Article 9 of the Consumer Product Safety Act, etc.). The business operator must also maintain the ability to deal with product accidents that may occur in relation to any of the products it has sold.

Reference: Legal Operation Guide for the Consumer Product Safety Act (pages 8, 9, 17, 18, and 19)
<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q7

Tell us about the obligations specified importer must fulfill in order to sell products subject to PS mark in the Japanese market.

When specified importers sell products subject to PS mark directly to Japanese consumers through digital platforms and other means, they are required to put a PS mark label on their products and ensure conformity with the technical requirements, and they must also appoint a domestic administrator that satisfies certain criteria specified by law.

In the event of an accident involving a product they have sold, specified importers must promptly collect information and provide such information to consumers and, if necessary, recall the product and take measures to prevent similar accidents. They must report any Serious Product Accident to the Consumer Affairs Agency.

Reference: Overview of the Act Partially Amending the Consumer Product Safety Act and Other Acts (Extending Regulations to Overseas Business Operators) (page 18)

https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q8

What is the obligation to conform to the technical requirements set out in the Four Product Safety Acts?

When putting a PS mark label on applicable products, a notifying business operator must assess that they conform to the technical requirements and take responsibility for the safety of such products.

More specifically, the notifying business operator must ensure that products subject to PS mark to be imported conform to the technical requirements specified in the Ministerial Order on Technical Requirements.

If the technical requirements are revised, the notifying business operator must observe the new technical requirements (Article 11.1 of the Consumer Product Safety Act, etc.). For interpretations of the technical requirements, please refer to the notice on interpretations and FAQs. The technical requirements are specified in the Ministerial Order on Technical Requirements, and its interpretations are contained in a table attached to the notice on interpretations. The content of the notice on interpretations is updated as needed in view of technological progress, international marketability, and other factors. You are advised to constantly check the contents of the latest version.

Reference: Legal Operation Guide for the Consumer Product Safety Act (page 10)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q9

What kinds of inspections are needed to verify that products subject to PS mark conform to the technical requirements?

Circle PS marks can be put on products that are found from self-inspections to conform to the technical requirements. Diamond PS marks can be put on products that are found from self-inspections and tests by a state-registered inspection body to conform to the technical requirements.

(1) Products subject to Circle PS mark

A notifying business operator must conduct self-inspections to verify conformity with the technical requirements of a specified product that is manufactured or imported and is of the type notified by the notifying business operator, and it must make and keep records of such inspections (Article 11.2 of the Consumer Product Safety Act, etc.). The inspection records should contain the following six items, and they should be retained for a period of three years from the date of the inspections (Articles 14.1 to 14.3 of the Ministerial Order on Technical Requirements, etc.):

- (i) The classification of the specified product and a summary of its structure, materials, and performance
- (ii) The date and place of the inspections
- (iii) The name of the inspector
- (iv) The quantity of the specified product subject to the inspections
- (v) The inspection method
- (vi) The outcome of the inspections

For details about the content, form, and retention period of inspection records, please refer to Q4-3-2 (page 53) of FAQs on the Amendments to the Four Product Safety Acts.

Please also refer to Q4-3-4 of the FAQs (page 54), which explain whether inspections by a third-party inspection body are necessary for toys for babies and infants.

In addition to this, a notifying business operator that is a specified importer must provide a copy of the inspection records to its domestic administrator. Upon receipt of such a copy, the administrator must hold that copy in safekeeping (Article 11.3 of the Consumer Product Safety Act). The retention period is three years, starting from the date of the inspections (Article 14.3 of the Ministerial Order on Technical Requirements, etc.).

(2) Products subject to Diamond PS mark

A notifying business operator that is a specified importer must have them go through such

self-inspections as set out in (1) above and conformity inspections by a registered inspection body, and it must receive a certificate of conformity and hold it in safekeeping prior to the sale of the special specified products (Article 12.1 of the Consumer Product Safety Act).

In addition to this, a notifying business operator that is a specified import business operator must provide a copy of the certificate of conformity to its administrator. Upon receipt of such a copy, the administrator must hold that copy in safekeeping (Article 12.3 of the Consumer Product Safety Act).

For details about how to apply for conformity inspections, the number of days, and the cost of the inspections, please look at the list of registered inspection bodies set out in the Four Product Safety Acts, and then contact the inspection body of your choice.

●The Consumer Product Safety Act

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tourokukensakikan2.pdf>

●The Gas Business Act

<https://www.meti.go.jp/policy/consumer/seian/gasji/contents/gasujitourokubo.pdf>

●The Electrical Appliance Safety Act

https://www.meti.go.jp/policy/consumer/seian/denan/cab_list.html

●The Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas

<https://www.meti.go.jp/policy/consumer/seian/ekiseki/contents/ekisekitourokubo.pdf>

For electrical appliances and materials, please refer to examples of safety violations contained in the Examples of Commonly Found Violations Concerning the Electrical Appliances and Materials Safety Act.

https://www.meti.go.jp/policy/consumer/seian/denan/file/pse_ihann_jirei.pdf

Reference: Legal Operation Guide for the Consumer Product Safety Act (page 10)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

FAQs on the Amendments to the Four Product Safety Acts (pages 53 and 54)

https://www.meti.go.jp/policy/consumer/seian/shouan/contents/gangu_faq_2.pdf

Q10

Who or what is a domestic administrator, as mentioned in the Four Product Safety Acts?

A domestic administrator in Japan is defined as “a person or a corporation that is responsible for taking necessary measures to prevent the occurrence and spread of harm to the lives or bodies of general consumers that may arise in Japan due to specified products that the administrator is involved in importing.” Under the Four Product Safety Acts, administrators in Japan are agents for overseas business operators. They are obligated to keep copies of inspection records, respond to report collection orders, and assume certain responsibilities for assuring the safety of specified products in Japan.

Specified importers are required to submit a notification of a domestic administrator who meets the standards stipulated in Article 15.2 of the Ministerial Order on Technical Requirements when selling PS Mark-regulated products.

However, overseas business operators that are specified importer are supposed to ensure that their administrators can fulfill their obligations by maintaining regular contact with them and responding to any requests from METI or to emergency situations. To help their administrators to fulfill their obligations, overseas business operators are also required to provide copies of inspection records and any information necessary to respond to report collection orders to their administrators without delay.

Reference: The Outline of the Act Partially Amending the Consumer Product Safety Act and Other Acts
(making regulations applicable to overseas business operators) (page 9)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q11

What are the obligations imposed by the Four Product Safety Acts on domestic administrators?

Since specified importers are located overseas, domestic administrators in Japan are required to provide reports in order to regularly check how they keep in contact with their specified importers and to ensure the effectiveness and promptness of government orders. Specifically, administrators are required to perform the following obligations:

<Obligations>

- (1) Keep copies of inspection records (and copies of certificates concerning conformity inspections for special specified products) [Article 11.3 of the Consumer Product Safety Act (the latter half of the provision of Article 12.3 of the act)]
- (2) Accept orders concerning the collection of reports, on-site inspections, and the submission of products (Articles 40, 41, and 42 of the act)

*A domestic administrator that breaches these obligations will face sanctions, and its specified importer will be prohibited from putting labels on its products.

<Reporting requirements for domestic administrators in Japan>

- (1) A domestic administrator is required to report the following matters one year after the date of notification by its specified importer:

(Matters to be reported)

- The telephone number and e-mail address of the notifying business operator
- Its liaison system

- (2) If a domestic administrator wishes to terminate its contract with its specified importer, the administrator must give notice at least 30 days prior to the day preceding the intended termination date.

Reference: The Outline of the Act Partially Amending the Consumer Product Safety Act and Other Acts (making regulations applicable to overseas business operators) (page 9)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q12

As part of the notification process, a notifying business operator must appoint a domestic administrator. What requirements must the administrator satisfy?

A notifying business operator that is a specified importer must ensure that the domestic administrator it appoints conforms to the following requirements: Article 11.4 of the Consumer Product Safety Act, Article 15.2 of the Ministerial Order on Technical Requirements, and so on. And it must attach written evidence of the conformity with the notification documents. A person who fails to conform to the requirements is deemed inappropriate as a administrator, and products subject to PS mark are not allowed to be sold. The following are required from a administrator:

- (1) Must have an address in Japan
- (2) Must have been granted authority from the notifying business operator to receive notices on actions taken, etc. by the competent minister, as specified by law
- (3) Must abide by the provisions of laws and regulations concerning products subject to PS mark
- (4) Must have Japanese conversational skills
- (5) Must have executed a written service agreement that specifies the following:
 - (i) Matters relating to a liaison system for communicating with the Minister of Economy, Trade and Industry
 - (ii) Must recall specified products that are part of the notifying business operator's import business and take other measures to prevent harm from happening and increasing
 - (iii) Matters related to (2) (granting the authority to receive notices of actions taken by the competent minister, as specified by law)
 - (iv) Matters related to the safekeeping of copies of inspection records, etc.
 - (v) Matters related to the collection of reports
- (6) Must perform the duties of a domestic administrator in an appropriate manner

Reference: Legal Operation Guide for the Consumer Product Safety Act (page 9)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q13

Tell us what actions are required after finding a domestic administrator.

An domestic administrator may be an individual or a corporation who satisfies the requirements set out in Article 15.2 of the Ministerial Order on Technical Requirements (see Q10).

In addition to the notification form, specified importers are required to submit a certificate of registered matters or a copy of the resident certificate, a certificate of authority, a copy of the consignment contract (a contract regarding domestic administrator duties or other equivalent documents, or copies thereof), and a letter of commitment. When entering into the contract, it is important to prepare a consignment contract that clearly defines the scope of responsibilities of the domestic administrator. The consignment contract must include the following items stipulated in Article 15.2, Item 5 of the Ministerial Order on Technical Requirements.

- Matters relating to a liaison system for communicating with the Minister of Economy, Trade and Industry
- Must recall specified products and take other measures to prevent the occurrence and increase of harm
- Matters related to the granting of authority that allows the administrator to receive notices of action taken by the competent minister, as specified by law
- Matters related to the safekeeping of copies of inspection records, etc.
- Matters related to the collection of reports

There is no prescribed format for the contract, however, examples of items to be included in the consignment contract are provided in the “Legal Operation Guide for the Consumer Product Safety Act” and the “Electrical Appliances and Materials Safety Act Statutory Operations Implementation Guide” published on the Ministry of Economy, Trade and Industry website. Please refer to the examples shown in these guides when preparing your contract.

Expenses to be paid to the administrator differ according to the person and their services. Expenses will vary according to whether your contract is with an individual or a corporation, as well as the types and quantities of products you handle. One option is that you get estimates from several candidates and compare their proposed services and expenses.

Q14

If a notifying business operator commits a legal violation, what are the sanctions (including administrative orders) they will face under the Four Product Safety Acts?

The sanctions and other measures for violations of laws and regulations by notified business operators are as follows.

(1) Improvement order and prohibition of display

A notifying business operator may receive an improvement order or be prohibited from displaying anything related to PS marks (Article 14 and 15 of the Consumer Product Safety Act, etc.) if it fails to fulfill the following obligations:

- Implement measures for providing compensation for damage (applicable to specified products that are defined in the Consumer Product Safety Act)
- Conform to the requirements of a domestic administrator (applicable to specified importer)
- Conform to the technical requirements
- Conduct self-inspections and make and keep records of inspections
- Have conformity inspections conducted on Diamond PS mark products and hold certificates of conformity in safekeeping
- Conform to the user age requirements and include instructions for use and other warnings for specified products for children

(2) Hazard prevention order, etc.

If a manufacturer, importer, or distributor manufactures, imports, or sells products subject to PS mark that are not in conformity with the technical requirements (and such products are deemed to have the risk of causing harm to the lives or bodies of general consumers), the manufacturer, importer, or distributor may be ordered to recall the specified products and take other necessary measures if such measures are deemed particularly necessary to prevent the occurrence or increase of such safety hazards (Article 32 of the Consumer Product Safety Act).

*This also applies to specified products for children that fail to conform to the relevant user age requirements.

(3) Hazard prevention requests, etc.

If products subject to PS mark are in breach of the technical requirements in (2) and they are deemed to have the risk of causing harm to the lives or bodies of general consumers and no necessary measures are expected to be taken because the person breaching the technical requirements cannot be identified (or if any other reason applies) and it is deemed particularly

necessary to take measures to prevent the occurrence and increase of such harm, the DPF provider may be requested to suspend the person breaching the technical requirements from using its digital platform for transactions and to take other necessary measures (Article 32-3.1 of the Consumer Product Safety Act, etc.).

(4) Publication of the names of violators of laws

The Minister of Economy, Trade and Industry may publicize the names of people who break laws and regulations and the consumer products they handle, etc. if it is deemed necessary to do so to prevent the occurrence and increase of harm caused by such products to the lives or bodies of general consumers (Article 46-2 of the Consumer Product Safety Act, etc.).

In addition to this, offenders of some laws and regulations, including the Electrical Appliance Safety Act, may face criminal sanctions, such as imprisonment and fines. Punishment provisions for offenders and joint punishment provisions for corporations are also applicable. Offenders may also have civil liability for compensation payments.

Reference: Legal Operation Guide for the Consumer Product Safety Act (pages 13, 14, and 15)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

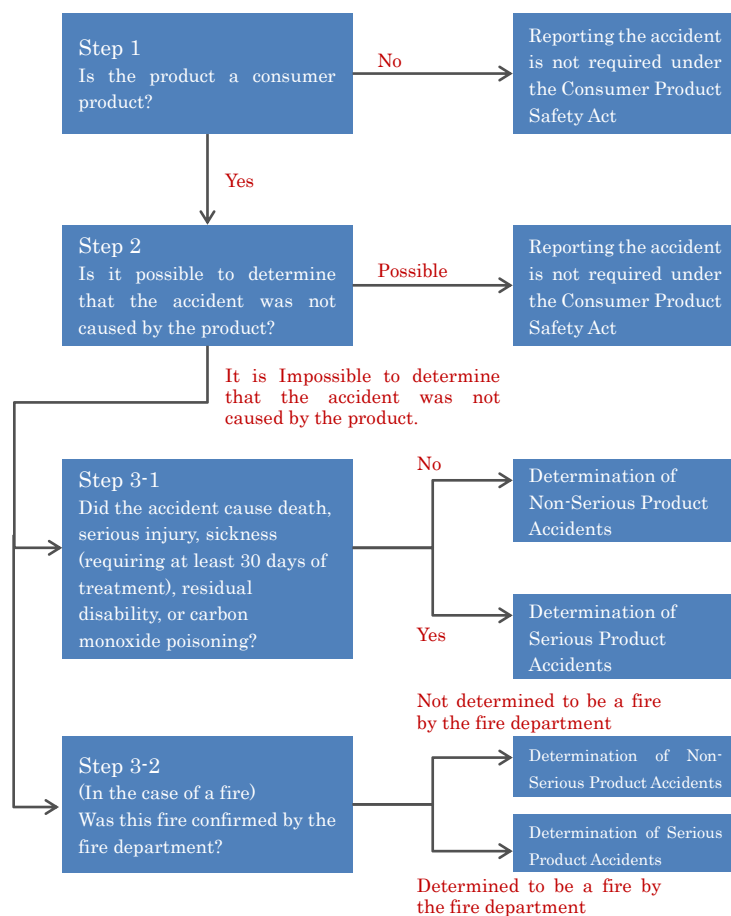
Q15

Tell us about the definition of a product accident under the Consumer Product Safety Act.

A product accident is defined as an accident arising from the use of a consumer product (a product used by general consumers that is not regulated by other laws) that involving harm to the lives or bodies of general consumers, except for any accidents that are clearly not caused by defects in the consumer product (Article 2.6 of the Consumer Product Safety Act). Please be aware that “Product Accident” includes “cases where it is unclear whether the accident was caused by a defect in the product.” “Product Accident” does not include “accidents that are clearly not caused by a defect in the consumer product,” meaning it is evident to everyone that the accident was not caused by a defect in the consumer product. Even when improper or unintended use of a consumer product by consumers is considered to be the cause of the accident, whether it is evident that the accident was not really caused by a defect in the product should be determined with extreme caution in each individual accident.

A serious product accident is a product accident that involving a fire, the death of those affected, carbon monoxide poisoning, an injury or a disease that requires at least 30 days of treatment, or a product accident that causes residual difficulty to the affected person due to the accident or fire (Article 2.7 of the Consumer Product Safety Act, Article 5 of the Ministerial Order on the Act, etc.).

<A flowchart to determine whether the accident is a Serious Product Accident>



Reference: Legal Operation Guide for the Consumer Product Safety Act (page 7)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

The 2023 Handbook for Enterprises on the Product Accident Information Reporting and Publication System Based on the Consumer Product Safety Act (page 19)

https://www.meti.go.jp/product_safety/producer/guideline/file/handbook_1.pdf

Q16

Tell us what reports and notifications are required if a product accident occurs.

The required reports and notifications if a product accident occurs are as follows.

(1) Providing information to consumers

Manufacturers, importers, or retailers of consumer products must make efforts to prevent harm from product accidents by collecting information on product accidents that have occurred in relation to the consumer products they manufacture, import, or retail, and they must properly provide such information to consumers (Article 34.1 of the Consumer Product Safety Act).

(2) Reporting accidents

If a manufacturer or an importer of consumer products becomes aware of any Serious Product Accident that has taken place in relation to a consumer product they manufacture or import, the manufacturer or importer must report the date, outline, and other details of the accident to the Consumer Affairs Agency within ten days of the accident (Article 35.1 of the Consumer Product Safety Act and Article 3 of the relevant Cabinet Office Ordinance). Even if the accident is not a Serious Product Accident (it is a Non-Serious Product Accident), it is recommended to provide information to the National Institute of Technology and Evaluation (NITE).

Please follow the procedures below. (You need to speak Japanese when reporting an accident.)

■ Serious Product Accidents

Report serious accidents using the report form that is specified in Article 3 of the Cabinet Office Ordinance (Form No. 1), and submit the report by e-mail, fax, post, or personally deliver it.

[Report form]

○ Report form

https://www.caa.go.jp/policies/policy/consumer_safety/centralization_of_accident_information/assets/consumer_safety_cms202_251224_02.docx

○ Examples

https://www.caa.go.jp/policies/policy/consumer_safety/centralization_of_accident_information/assets/consumer_safety_cms202_251224_03.pdf

■ Non-Serious Product Incidents

Check the page below and contact by email to report Non-Serious Product Accidents.

<https://www.nite.go.jp/jiko/jikojouhou/shushu/youshiki/index.html>

(3) Notifying the manufacturer or importer of the accident

When a retailer, repairer, or installation service provider of consumer products becomes aware of any Serious Product Accident involving their consumer products, it should notify the manufacturer or importer of the consumer products of the accident (Article 34.2 of the Consumer Product Safety Act).

(4) Contacting other parties involved

Businesses that have product liability (PL) insurance should consider contacting the non-life insurance company that provides their insurance policy.

Reference: The 2023 Handbook for Enterprises for Product Accident Information Reporting and Publication

Systems Based on the Consumer Product Safety Act (page 6)

https://www.meti.go.jp/product_safety/producer/guideline/file/handbook_1.pdf

The 2022 Recall Handbook (pages 32 and 33)

https://www.meti.go.jp/product_safety/recall/recall_handbook2022.pdf

Q17

If a product accident occurs that involves a product manufactured or imported by a manufacturer or an importer, what actions should they take?

In the case of a product accident involving a product manufactured or imported by a manufacturer or an importer, it should take the following actions:

- (1) Understand all the facts; organize the details; and report the accident to the government and other relevant agencies

When a product accident or a sign of such accident is detected, the first action to take is to understand all the facts and organize the details. These can be divided into the following four steps:

- (i) Organize the details of the product accident, etc., and report it to the government
- (ii) Understand and organize traceability information
- (iii) Organize information on signs of a product accident, etc.
- (iv) Understand and organize related information

- (2) Identify the cause

You need to understand all the facts, and take prompt action to identify the cause.

- (3) Provide support to people affected by the accident

If the product accident has caused damage, the main priority is to provide support to those affected. You are required to understand all the facts and provide appropriate support to those affected.

If it is a product accident of the kind that could occur frequently or spread in severity, you must take necessary measures to prevent a recurrence of such an accident in the future. If the manufacturer or importer fails to take such measures and that leads to greater damage, it may face civil liability for committing an illegal act or criminal liability for professional negligence resulting in injury or death if the accident involving injury or death.

It would be useful to make it a regular practice to ensure the centralized management of product accident information and to set up an internal system that enables quick responses to product accidents.

Reference: The 2022 Recall Handbook (pages 30 to 40)

https://www.meti.go.jp/product_safety/recall/recall_handbook2022.pdf

Q18

When is the recall of products (including the voluntary collection of products) required?

A manufacturer or importer of consumer products must investigate the cause of any product accident that might occur in relation to a consumer product manufactured or imported by it, and it should take measures, such as the recall of products, when it is deemed necessary to prevent the accident from causing or increasing harm (Article 38.1 of the Consumer Product Safety Act).

Therefore, if there is a need to prevent the occurrence or spread of harm, you are required to take measures, including the recall of products.

The term “measures, including the voluntary collection of products” (hereinafter referred to as a “recall”) shall mean the following:

- (1) Suspending the manufacture and distribution and sale/collection of products in the distribution and sales stages
- (2) Providing appropriate risk information to consumers
- (3) Warning consumers about the risks, including providing information, such as precautions for use, that is necessary to prevent the occurrence of similar product accidents
- (4) Replacing, repairing (checking, fixing, replacing parts, etc.), or collecting products owned by consumers

A recall is a measure to prevent the spread of damage to consumers when a problem with a product causes or could cause serious additional damage. In addition, even when the problem is not a defect (the product fails to have the normal level of safety it should have) or when the existence of a defect is not clear, the manufacturer or importer can decide to start a voluntary recall to prevent the occurrence of any additional damage.

Even when additional damage is not inflicted, if a product is found to have a problem, etc., it is often recalled.

To conduct a recall, the following are necessary: (1) Have a recall plan in place; (2) Conduct the recall promptly and appropriately; (3) Monitor the progress of the recall, with the focus being on the safety of consumers and a company-wide effort being applied in each of the phases.

Whether a recall should be conducted may be determined by considering the following factors: (i) the nature and severity of the damage, (ii) the characteristics of the accident (or damage) and whether it could occur frequently or cause additional damage or if it is a defect in one type of product, and (iii) causal relationships (whether the cause is a product defect, obvious misuse by the consumer, etc.).

Reference: The 2023 Handbook for Enterprises on the Product Accident Information Reporting and Publication System Based on the Consumer Product Safety Act (page 7)
https://www.meti.go.jp/product_safety/producer/guideline/file/handbook_1.pdf

The 2022 Recall Handbook (pages 4,13, and 41-47)
https://www.meti.go.jp/product_safety/recall/recall_handbook2022.pdf

Q19

What are the required procedures for notifying METI of a planned recall (voluntary collection of products, etc.)?

Please take the following steps in the instructions below:

(1) Decide to conduct a recall

*If your company has decided to recall a consumer product, please contact METI, as indicated below.

(2) Submit a Product Recall Initiation Report

[Documents that must be submitted before initiating a recall]

(a) A Product Recall Initiation Report

(b) Pictures showing the external appearance of the product to be recalled and the defective part

(c) A statement or an announcement (planned) to be put on the business operator's website concerning the planned recall

(d) A description of how to tell whether repairs or the replacement of parts has been performed by looking at the exterior of the product

(3) Check the information publicly disclosed on METI's website

*Upon receipt of the report mentioned in (2), METI will post the recall information on its website and X (formerly known as Twitter). The business operator is requested to check the information posted before initiating a planned recall. The recall information will be shared with NITE and made publicly available on NITE's recall information page.

(4) Conduct the recall (announce the recall information)

*If you have already initiated a recall, you need to submit a Product Recall Initiation Report.

(5) Submit a Product Recall Progress Report to provide regular reports on the progress of the recall.

*Please submit reporting forms by e-mail to: bzl-seihin-anzen@meti.go.jp

For consultations and inquiries about other recall issues, please contact the Product Accident Information and Analysis Office of METI at:

+81-(0)3-3501-1511

Reference: The Product Safety Guide

https://www.meti.go.jp/product_safety/recall/recall_flow1.pdf

Q20

If a product accident occurs and the business operator fails to take appropriate measures to prevent hazards, what are the sanctions (including administrative orders) that the government may impose on the business operator?

If a product accident occurs and the business operator does not take appropriate measures to prevent harm, the sanctions and other actions imposed by the government are as follows.

(1) Hazard prevention order

If a serious product accident occurs, the government may order the manufacturer or importer of the consumer product to recall it and take other necessary measures if it is deemed necessary to prevent the occurrence and spread of hazards (Article 39.1 of the Consumer Product Safety Act).

(2) Hazard prevention requests, etc.

If a Serious Product Accident occurs and no necessary measures are expected to be taken because the manufacturer or importer of the consumer product cannot be identified, or for any other reason, and it is deemed particularly necessary to take measures to prevent the occurrence and spread of such hazards, the government may request the DPF provider to suspend the breaching party from using its digital platform for transactions and to take other necessary measures (Article 39-2.1 of the Consumer Product Safety Act).

(3) Orders to develop a system for information collection

If a business operator fails to make a report, the government may issue an order to develop a system for collecting information on product accidents (Article 37 of the Consumer Product Safety Act).

Reference: Legal Operation Guide for the Consumer Product Safety Act (pages 14)

<https://www.meti.go.jp/policy/consumer/seian/shouan/contents/20250828guide.pdf>

Q21

What are the DPF providers that are mentioned in the Four Product Safety Acts?

Digital transaction platforms (DPFs) for transactions covered by the Four Product Safety Acts

are internet malls or internet auctions that are intended for Japanese consumers. A DPF for transactions is judged to be covered by the acts if it provides a space for transactions for Japanese consumers, regardless of whether the DPF or its provider is located in Japan or abroad.

Whether the DPF provides a space for transactions for Japanese consumers is determined by comprehensively considering factors, such as whether it falls under the following:

- It is a website containing information in Japanese
- It has a reliable means of delivering goods to Japan
- It has prices indicated in Japanese yen

Reference: Overview of the Act Partially Amending the Consumer Product Safety Act and Other Acts
(Extending Regulations to Overseas Business Operators) (page 14)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q22

What are the responsibilities of DPF providers that are set out in the Four Product Safety Acts?

The acts include provisions that allow the government to request a DPF provider to withdraw its products if any of its products could cause hazards to general consumers who use its DPF. The acts specify the following responsibilities for such providers:

<Responsibilities, etc. for DPF providers>

(Requests)

- Necessary measures for requests to prevent safety hazards (requests to withdraw products, etc.) (Articles 32-3, 39-2, etc. of the Consumer Product Safety Act)

(Responsibilities)

- Cooperate with the retailer, etc. concerned in collecting and providing information to consumers (Article 34.2 of the Consumer Product Safety Act)
- Give notice about a Serious Product Accident to the product's manufacturer, importer, and other enterprises concerned (Article 34.4 of the Consumer Product Safety Act)
- Cooperate in measures taken by the manufacturer, importer, and other enterprises concerned in response to government orders to prevent safety hazards (Articles 32-2 and 38.3 of the Consumer Product Safety Act)
- Cooperate in product recalls and other measures taken by the manufacturer and importer of the product (Article 38.2 of the Consumer Product Safety Act)

Reference: Overview of the Act Partially Amending the Consumer Product Safety Act and Other Acts (Extending Regulations to Overseas Business Operators) (page 14)
https://www.meti.go.jp/policy/consumer/seian/shouan/contents/tokuteiyunyu_kaisei_Japanese.pdf

Q23

What are the Product Safety Pledges?

Based on the “Communiqué on Product Safety Pledges,” which was published by the OECD, the Japanese “Product Safety Pledges” (hereinafter the “Pledges”) were formulated by the relevant ministries and agencies in collaboration with operators of major online marketplaces (hereinafter “OMs”).

The Pledges are designed to protect consumers from the risk of harm that may be inflicted on their lives or bodies by recalled products and unsafe products placed or sold on OMs, such as fires caused by such products. As a public-private voluntary initiative beyond the legal frameworks for product safety, the Pledges cover both B-to-C businesses, such as large internet malls, and C-to-C businesses, such as online flea markets and internet auctions.

Moreover, the Pledges are composed of three parts: [i] the main text of the Pledges, which consists of 12 pledge items in total, [ii] Guidance for OM Operators, reference materials for such operators to understand the details of the Pledges, and [iii] the Guide for Personnel in Charge, compiled by the relevant ministries and agencies, including the Consumer Affairs Agency, the Fire and Disaster Management Agency, METI, and the MLIT (“Relevant Ministries and Agencies”), which describes the concept, the concrete details of measures, procedures about unsafe products, etc. The Pledges are meant to be executed collaboratively by the public and private sectors.

[The webpage outlining the Product Safety Pledges]

<https://www.meti.go.jp/press/2023/06/20230629001/20230629001.html>

https://www.caa.go.jp/policies/policy/consumer_safety/product_safety_pledge/assets/consumer_safety_cms205_230629_02.pdf

Q24

What is the safety inspection/labeling system for products that are used for a long time?

The safety inspection/labeling system for products that are used for a long time is as follows.

(1) The safety inspection system for products that are used a long time

“Specified Products Requiring Maintenance” are products that consumers find difficult to maintain on their own and are highly likely to cause Serious Product Accidents due to age-related deterioration. The safety inspection system of products that are used for a long time is intended to allow those engaged in the manufacture or import of Specified Products Requiring Maintenance (specified manufacturers, etc.), those engaged in the sale of them, etc. (enterprises trading Specified Products Requiring Maintenance), and the relevant enterprises, consumers, etc. (the owners) to play their roles appropriately to prevent product accidents due to age-related deterioration.

■ Products (Specified Products Requiring Maintenance)

Oil-fired water heaters, oil-fired bathtub water heaters

■ Obligations

Manufacturers and importers (specified manufacturers, etc.) have the following obligations:

- Notify the Director-General of the Regional Bureau of Economy, Trade and Industry of their business
- Set a design standard use period and an inspection period
- Put labels on their products
- Attach specified documents and owner forms to their products
- Set up a system for maintenance support, including routine checks
- Give notice of and carry out routine checks

(2) The safety labeling system for products that are used a long time

The safety inspection/labeling system for products that are used a long time is applicable to products that do not have a high incidence of serious product accidents due to age-related deterioration but do cause accidents frequently. Through routine maintenance and observation, owners of these products can find signs of potential future accidents.

Products covered by the system have labels put on them that specify how long they can be used and warnings about age-related deterioration (applicable to products manufactured or imported on and after April 1, 2009).

■ Products

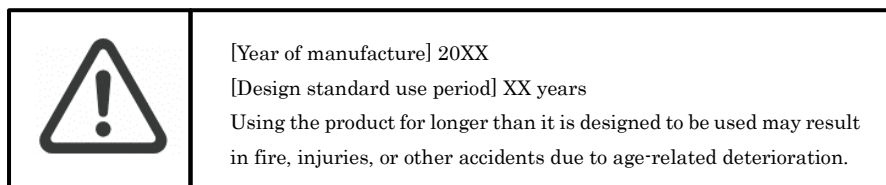
Electric fans, electric air conditioners, exhaust fans, washing machines (excluding

washing/drying machines), and televisions (limited to cathode-ray tube televisions)

■ Obligations

The above products must have a label (shown below) placed on them in a clearly visible place that indicates the details (shown below) of the technical requirements added to the Ministerial Order to Provide Technical Standards for Electrical Appliances and Materials.

Image of a label



Reference: A booklet on the safety inspection/labeling system for products that are used a long time
https://www.meti.go.jp/product_safety/producer/shouan/21_shouan_panfu.pdf