

NOTES FOR PERSON PUBLISHING SURVEY

- The survey questions follow each indicator group (table)
- We have put formatting notes for responses in this color font.
- None of the questions are mandatory.
- Please make it possible for unlimited text in each response. Thank you!

REVISED FSC® CONTROLLED WOOD RISK ASSESSMENT FOR JAPAN

Question on geopolitical scale:

FSC's Risk Assessment Framework requires that the assessment should be conducted following an appropriate geopolitical scale. In the international ISO system, Japan is divided into 47 prefectures, each of which has its own ISO code.

Japan's forestry sector operates under national-level legal requirements that extend to the basic local government level. However, due to the decentralization, regional forest management plans are developed locally, and approvals for forest land development permits and the designation/revocation of protection forests are granted by prefectural governors. Consequently, practices are not uniformly applied nationwide. Therefore, the national six-block system adopted by the Forestry Agency was used as a reference. Furthermore, indicators related to Indigenous Peoples and their rights (43, 48) are significantly tied to the regional circumstances of Hokkaido (JP-01) and Okinawa (JP-47). Therefore, these regions are treated independently, resulting in eight regions for this risk assessment.

Do you agree with the geopolitical scales applied in the risk assessment? [Yes](#) / [No](#) Please comment [\[COMMENT BOX\]](#)

Question on source types:

FSC's Risk Assessment Framework requires assessments to be conducted for each timber source. This risk assessment categorizes sources into four types based on national forest ownership classifications: state forests, public forests, private forests with forest management plans, and private forests without forest management plans.

Do you agree with the source types applied in the risk assessment? [Yes](#) / [No](#) Please comment [\[COMMENT BOX\]](#)

Questions on the assessment of risk for 64 indicators

Land use and management

Indicator	Description of Risk	Negligible
1. Land tenure rights are secured and registered according to legal requirements.	Land ownership in Japan has long been legally secure due to land-use regulations and tax obligations, even when registration was voluntary. Although unregistered inherited land became a social issue, data show that delayed cadastral surveys do not correlate with increased cases of boundary or illegal-logging disputes. With the introduction of mandatory inheritance registration in 2024, remaining risks are minimal, therefore this indicator concluded as a negligible risk.	Yes

2. Land management rights are in place and registered according to legal requirements.	Land registration secures ownership and forest management rights under established laws. The 2019 Forest Management Act allows municipalities to manage forests from inactive owners, covering about 15,700 ha by 2023. Overall, legal risks are negligible.	Yes
3. Forest concession licenses are in place and are issued and registered according to legal requirements.	Japan introduced Tree Harvesting Rights in 2018, allowing limited logging in state forests under strict government plans. As these rights differ from overseas concessions, this indicator remains not applicable.	Not applicable
4. Harvesting permits are in place and are issued and registered according to legal requirements.	<p><i>For State forests and Public forests</i></p> <p>Since 2018, all confirmed illegal logging cases have occurred in non-state forests. State and public forests require formal contracts and post-harvest checks, making illegal activities highly unlikely. Japan's high CPI score also indicates low corruption risks. Thus, the risk for timber from state and public forests is considered negligible.</p> <p><i>For Non state forests with FMP, Non state forests without FMP</i></p> <p>In recent years, illegal logging, including unauthorized or mistaken logging, has become a serious issue of concern in Japan.</p> <p>In August 2016, a case of forest theft was uncovered in Miyazaki Prefecture, where an intermediary forged a notification of logging using the name of a deceased person and illegally clear-cut approximately 5 hectares of forest with 22 landowners. In March 2018, the perpetrator was convicted of forgery and use of a private document with an official seal, as well as violation of the Forest Act. As of July 2023, four cases of illegal logging in Miyazaki Prefecture have resulted in guilty verdicts. In addition, there have been many cases that were not prosecuted or not accepted by the police, with over 170 affected households reported across seven prefectures—Miyazaki, Kagoshima, Kumamoto, Oita, Kyoto, Hyogo, and Tochigi.</p> <p>In response, the Forestry Agency has strengthened the system for filing notifications of logging and post-logging reforestation under Article 10-8 of the Forest Act. Following the 2016 amendment (effective in 2017), those who submitted a notification of logging were required to report the condition of the forest after logging. The 2021 amendment (effective in 2022) further mandated reports on both post-logging forest conditions and re-planting status. Since 2023, submission of required supplemented documents with the notification of logging has also become mandatory.</p> <p>Since 2018, the Forestry Agency, in cooperation with local governments, has published annual data on “consultations related to unauthorized logging.” In 2023, 72 cases were reported (including 19 reported to the police), with 16 cases in Kyushu–Okinawa, 15 in Hokkaido–Tohoku, 14 in Kanto, and 11 in Chubu. Since 2020, the number of cases has remained high, fluctuating between 70 and 100 per year.</p> <p>The Forestry Agency has also requested cooperation from prefectural governors and provided tools for monitoring logging areas efficiently using satellite imagery. At the local level, the four southern Kyushu prefectures, Kumamoto, Oita, Miyazaki, and Kagoshima have established a cooperative framework to share information on unauthorized logging, unreported logging, and forest theft.</p> <p>However, in April 2024, an arrest was made in Kumamoto Prefecture on charges of forgery of a private document with an official seal and violation of the Forest Act, indicating that the effectiveness of current measures remains limited,</p>	<p>Yes</p> <p>No</p>

	<p>particularly against malicious operators. Strengthening enforcement through closer coordination with judicial authorities and other fundamental reforms are considered necessary.</p> <p>In this indicator, the situation is assessed as a non-negligible risk.</p> <p>Risk mitigation measures: <i>Verify that a logging notification is in place and contain the relevant information linking it to the owner and the plot of land</i> <i>(Document Verification)</i> 1. Confirm that the logging notification and compliance notification have been formally accepted by the municipality. 2. Confirm that the applicant's (notifier's) land parcel number is correctly stated on the logging notification, compliance notification, and logging plan. 3. Confirm whether the applicant (notifier) and the landowner are the same person, or whether the applicant has obtained the landowner's consent. <i>(Field Verification or interview to suppliers)</i> 4. Confirm whether the designated plots/parcels specified in the logging notification, compliance notice and logging plan have been logged appropriately and NOT been logged neighboring plots/parcels.</p>	
5. Legal requirements for land-use and management planning are complied with.	<p>Forest management planning in Japan is institutionally mandated for state forests and required for public forests under national and regional forest plans. Although private forest owners are only encouraged to prepare plans, submission is effectively compulsory to access subsidies, resulting in most operations being conducted under approved plans. Small-scale owners, who dominate ownership, commonly rely on forest cooperatives to meet minimum area requirements through collective planning. While coverage remains limited, legal obligations and financial incentives ensure compliance in practice, providing a clear basis to assess the risk related to forest use and management planning as negligible.</p>	Yes

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Taxes and fees

Indicator	Description of Risk	Negligible
6. Legal requirements for payment of royalties, land/area taxes and fees are complied with.	<p>Japan's Tree Harvesting Right System requires operators to pay a government fee equivalent to royalties. Although public data on actual payments are limited, the system has only a few cases to date and operates under clear legal deadlines. Combined with Japan's low corruption level, the risk of improper fee collection is considered negligible.</p>	Yes
7. Legal requirements for payment of value-added taxes and/or other sales taxes are complied with	<p>In Japan, consumption tax applies to timber sales and commissioned forestry work. Since October 2023, the invoice system has strengthened compliance by requiring registered businesses to issue invoices and properly remit tax. Although many forestry operators are small, unincorporated businesses and some remain tax-exempt, transitional input tax credit</p>	Yes

	measures are in place until 2029. As the system is functioning effectively, with no reported problems or stakeholder concerns, the current risk of improper consumption tax payment in the forestry sector is assessed as negligible.	
8. Legal requirements for payment of corporate taxes are complied with, including profit taxes.	<p><i>For State and public forests and non-state forests with FMP</i> Logging in state and public forests requires formal contracts and monitoring, and non-state forests with management plans undergo subsidy-related third-party checks. Evasion or falsification risks are therefore very low. Thus, timber from these forests poses a negligible risk.</p> <p><i>For non-state forests without FMP</i> The tax is imposed on all the income coming from the forestry operations[L21,L108]. In addition, according to Article 4, 21 and 22 of the Corporate Tax Act, "If the resident is a corporation, the tax is imposed on operating income of each business year in accordance with the rules." Similar to the Consumption Tax, it is difficult to evade the corporate tax, and such behavior is punished as anti-societal behavior by law.</p> <p>In recent years, exports of logs have also been increasing, but consumption tax on exports is exempted based on Articles 7 and 8 of the Consumption Tax Act. However, in the case of imports, the person taking the imported goods into their possession is obligated to pay the consumption tax. When taking goods out of a bonded area, the importer must, in principle, submit a declaration form listing the item name, quantity, amount, and consumption tax amount to the Director of the Customs Office having jurisdiction over the bonded area, and pay the consumption tax before taking the goods out[L27].</p> <p>Regarding risks associated with corporate tax payments, as illustrated in the cases of malicious operators referred to under Indicator 04, intermediaries are frequently exploited to obscure responsibility, and logging contracts are often concluded orally rather than in writing.</p> <p>From the perspective of the Corporation Tax Act, the calculation of taxable income is not determined by the form of the contract but by whether the rights and obligations have been substantively established. Thus, whether a contract is oral or written is not, in itself, decisive. Nevertheless, oral agreements present weak evidentiary value, and in practice, the tax authorities may require supplementary documentation to verify the substance of the contractual relationship and the determination of consideration[L22,L23].</p> <p>Further evidence of such practices is seen in a case of illegal logging involving approximately 5 hectares across more than 30 parcels, where notifications of logging had been submitted for only four parcels. At least six parcels had no record of notification, while the status of the remaining parcels could not be ascertained[R4,R7].</p> <p>In circumstances where malicious operators engage in unauthorized logging without written contracts or proper notification, it is highly improbable that the resulting income is reported accurately.</p> <p>However, in the case of state and public forests, it is considered that contracting procedures are properly implemented and unscrupulous operators are excluded. Similarly, in private forests where forest management plans are appropriately formulated, there is likely little room for unscrupulous practices.</p> <p>Therefore, this indicator assesses the source of non state forest without FMP as presenting a non-negligible risk.</p>	<p>Yes</p> <p>No</p>

	Risk mitigation measures: <i>Verify that the logging contract, receipts, and payment statements are retained in writing / documented, that they are in the owner's name, and that their contents are accurate;</i> 1. <i>Confirm whether a written standing tree sales contract has been concluded with the forest owner.</i> 2. <i>Verify records (such as receipts) regarding payment to the forest owner based on the sales contract.</i>	
9. Legal requirements for payment of trade and/or export taxes and fees are complied with.	The import and export of timber requires mandatory customs duty and consumption tax declarations, with quarantine and bonded procedures also strictly managed. False declarations are considered to be difficult, and the risk is negligible.	Yes

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Corruption and document or data falsification

Indicators	Description of Risk	Negligible
10. Legal requirements related to corruption, including bribery, fraud and conflict of interest, are complied with.	Bribery is regulated under the Penal Code, Companies Act, and other laws. Major cases include the Tokyo 2020 scandal and political fund misuse. While some forestry subsidy frauds occurred, enforcement has since strengthened. Japan's CPI score (71) and governance indicators show low corruption; thus, this indicator is negligible risk.	Yes
11. All forms of bribery and corruption are avoided.	Corruption and bribery are regulated by law, and relevant risks are addressed under Indicator 10. Although some forestry-related cases have been reported, they are isolated, and legal frameworks have been strengthened. Japan scores 1.40 (90th percentile) on the World Bank Governance Indicators and 71 on the CPI, indicating low perceived corruption. Therefore, the risk under this indicator is assessed as negligible.	Yes
12. Data and document falsification do not occur.	<p><i>For State forests, Public forests, Non state forests with FMP</i></p> <p>One of the illegal logging cases involved forged notifications using a deceased person's seal and another owner's parcel number, a rare act limited to non-state forests without plans. Logging in state, public, and planned non-state forests involves contracts or third-party checks, making fraud unlikely. Japan's CPI score (71, 20th/180) also indicates corruption risks are negligible; thus, the risk for such timber is considered as negligible.</p> <p><i>For non-state forests without FMP</i></p> <p>As mentioned in Indicator 4, individuals involved in illegal logging in Miyazaki Prefecture have been prosecuted for forgery of private documents bearing an official seal and for using such forged documents. Specifically, in logging notifications, they (1) used the name and seal of a deceased person as the notifier, and (2) listed the parcel number of another person's forest land as the location of the forest (logging site) [R7]. However, this is considered an extremely malicious and rare case, likely limited to logging in private forests without a forest management plan. For logging in state or public forests, which requires a contractual process with public agencies, or for logging in private forests based on a</p>	<p>Yes</p> <p>No</p>

	<p>forest management plan, mostly involving subsidy applications and disbursements, third-party involvement occurs in any way. Therefore, it is unlikely that such malicious acts are widespread.</p> <p>To address such practices, the national government revised the Forest Law Enforcement Regulations, strengthening the notification system for logging and post-logging replanting. This procedure now incorporates checks by municipalities, the designated notification points, at three stages: before logging, after logging, and after replanting. However, concerns remain that the vulnerability of this check system may not be resolved, particularly in municipalities with high timber production volumes, as not all municipalities have adequate specialized personnel or sufficient staff. There is also concern about whether the strengthened notification system will be effective against particularly unscrupulous operators.</p> <p>A survey of consultation cases regarding illegal logging and unauthorized felling conducted by the Forestry Agency since 2018 indicates that while there are regional variations in the number of cases, such activities have been confirmed nationwide[R200].</p> <p>This indicator classifies logging in private forests without a forest management plan, where third-party involvement is not guaranteed in the logging contract and verification is solely entrusted to municipalities, as a non-negligible risk. This classification considers the potential risks and aims to encourage operators to conduct careful due diligence.</p> <p>Risk mitigation measures: <i>Verify that a logging notification is in place and contain the relevant information linking it to the owner and the plot of land</i> <i>(Document Verification)</i> 1. Confirm that the logging notification and compliance notification have been formally accepted by the municipality. 2. Confirm that the applicant's (notifier's) land parcel number is correctly stated on the logging notification, compliance notification, and logging plan. 3. Confirm whether the applicant (notifier) and the landowner are the same person, or whether the applicant has obtained the landowner's consent. <i>(Field Verification or interview to suppliers)</i> 4. Confirm whether the designated plots/parcels specified in the logging notification, compliance notice and logging plan have been logged appropriately and NOT been logged neighboring plots/parcels.</p>	
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For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Management activities and environmental protection

Indicator	Description of Risk	Negligible
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<p>13. Legal requirements for management activities and related operational requirements are complied with.</p>	<p><i>For State forests and public forests</i></p> <p>In state and public forests, replanting after logging is effectively mandatory under legal and administrative frameworks. State forests are managed under national plans requiring regeneration after clear-cutting, and public forests must submit logging notifications specifying post-harvest replanting. Subsidy programs further impose strict conditions and repayment obligations if replanting is not completed. Although comprehensive statistics for public forests are unavailable, these institutional controls make abandonment after harvesting highly unlikely. Therefore, the risk for this indicator is assessed as negligible.</p> <p><i>For non-state forests with FMP and without FMP</i></p> <p>Regarding the operational requirements illustrated in FSC-PRO-60-006b, legal requirements are comprehensively covered and established. However, management activities at the field level are not uniformly prescribed by law nationwide; they are specified through planning categories, security forest designations, subsidiary project requirements, and prefectural implementation. Therefore, confirming the conditions at each logging site is crucial.</p> <p>Regarding compliance status, this indicator addresses reforestation / replanting after logging.</p> <p>As mentioned in Indicator 4, the logging and post-harvest afforestation notification system under the Forest Act has been strengthened. The 2016 revision of the Forest Act mandated reporting on post-harvest conditions. The 2021 revision of the Forest Act Enforcement Regulations required reporting on both the post-harvest forest and afforestation status. Furthermore, starting in 2023, attaching necessary documents to the logging notification has become mandatory.</p> <p>However, according to Forestry Agency data, reforestation area has remained around 30,000 ha, indicating limited progress. Factors cited include declining timber prices, high reforestation costs dampening forest owners' motivation, and a decrease in the number of forestry workers[R218].</p> <p>For example, in 2021, the figures were 10,771 ha for state-owned forests and 23,015 ha for privately-owned forests (of which 17,272 ha, or 75%, were subsidized afforestation). On the other hand, the area of standing trees harvested was 9,949 ha for state-owned forests and 82,122 ha for privately-owned forests. While this figure includes both clear-cutting and selective cutting and is therefore a reference value, comparing it to the afforestation area shows a reforestation rate of 108% for state-owned forests and 28% for privately-owned forests [R106].</p> <p>Meanwhile, the Forestry and Forest Products Research Institute used satellite imagery to map logging sites across Japan over the past 35 years, clarifying the locations and timing of logging as well as subsequent planting conditions. Utilizing satellite imagery with long-term observation, they estimated annual logging sites from 1985 to 2019 and investigated whether conifers were planted after logging, as well as how logging and planting activities changed over time. The results indicate that while the annual deforestation area has shown an increasing trend over the last decade, the proportion is estimated to be around 50–60% [R6].</p> <p>The abandonment of un-reforested areas after logging raises concerns about the risk of secondary disasters such as landslides triggered by torrential rains associated with the frequent occurrence of linear precipitation zones in recent years. Therefore, this indicator is judged to be non-negligible for private forests, excluding state and public forests.</p> <p><i>Risk mitigation measures:</i></p> <p><i>Verify that a logging notification and replanting plan are in place and whether replanting is actually being implemented or is scheduled to be implemented as outlined.</i></p>	<p>Yes</p> <p>No</p>
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	<p><i>(Document Verification)</i></p> <ol style="list-style-type: none"> 1. Confirm whether the logging notification, compliance notification and replanting plan have been formally accepted by the municipality. 2. Confirm the contents specified in the replanting plan (replanting method and species, number of trees). <p><i>(Field Verification or interview to suppliers)</i></p> <ol style="list-style-type: none"> 3. Confirm that replanting has been carried out on the designated plots/parcels specified in the replanting plan. 4. If replanting has not yet begun, confirm when it is scheduled to start. 	
14. Development and maintenance of infrastructure associated with management activities comply with applicable codes and legal requirements for the protection of environmental values.	<p>For State forests and public forests</p> <p>Forests owned by national and local governments are managed by public agencies in accordance with national guidelines. Research by the Forestry Agency shows that forest access roads built in line with these guidelines suffered little damage even after repeated torrential rains, although challenges remain in training, communication, and technical execution. Prefectures have also established their own standards based on national guidance. While comprehensive nationwide evaluations are limited, governance structures, direct public management, and Japan's low corruption risk support the assessment that forest access roads in state and public forests are generally well managed. Therefore, this indicator is considered to pose a negligible risk.</p> <p>For non-state forests with FMP and without FMP</p> <p>Forest work roads are an important infrastructure for management activities. The Forestry Agency has developed guidelines for the construction of forest roads to promote the design and construction of low-cost, durable, and maintainable roads and networks.</p> <p>In the guidelines, working roads are classified into the following categories[R14]</p> <ol style="list-style-type: none"> a) Forest roads: maintained and managed by the government (national, prefectural, and municipal governments) and used for purposes other than forestry (regional transportation, disaster prevention, tourism, and daily life of residents). The total width is about 5 to 6 meters, and they are often paved. b) Forestry roads: Medium-scale roads dedicated to forestry that are mainly used by forestry businesses and forestry cooperatives, with a total width of around 3.5 m. They are designed to be robust, taking into account slope, slope surface, and soil quality. c) Forest work roads: The simplest and lowest-cost forestry roads, which can be laid out and removed in a short period of time in the area to be worked. The width is 2.0 to 2.5 meters. Applications include efficient timber collection and thinning operations. <p>a) Forest roads and b) Forestry roads have specifications regarding width, maximum slope, etc., and are subject to inspections as they qualify for subsidies. While these specifications are not necessarily based on environmental considerations, if shoulders collapse or slopes are insufficiently compacted, they fail to meet the standards. Therefore, they are generally considered acceptable from an environmental perspective. Consequently, non-compliance with these specifications is fundamentally unlikely [E14].</p> <p>On the other hand, forest work roads, often called haul roads or skid trails, are not permanent facilities. While they also receive subsidies and undergo administrative inspections, these primarily focus on width and length, with little environmental consideration. Furthermore, unlike forest roads, these simple access roads are not excluded from the forest area. Consequently, after logging operations conclude, they are treated as reverting to their original state (part of the forest area). As a result, some access roads are constructed using ad hoc, somewhat haphazard methods that do not follow the Forestry Agency's guidelines. This creates conditions where topsoil erosion or deep channeling during heavy rains is likely to occur [E14].</p>	<p>Yes</p> <p>No</p>

	<p>Furthermore, the construction conditions of haul roads vary significantly depending on the responsible personnel and the specific work site, making it difficult to establish uniform “guidelines” [E14].</p> <p>In recent years, concerns have been raised that the poor quality of forest work roads construction has triggered landslides as secondary disasters when torrential rains and typhoons occur.</p> <p>According to a survey by the Forestry Agency, conditions prone to sediment runoff include steep slopes or rugged terrain forming concave cross-sections, with frequent occurrences in forested areas undergoing change where a road network has been constructed. In many cases, runoff originated from the shoulders of the road network, with ruts on the road surface expanding into water channels that accelerated runoff by converging with flows from valley terrain and surface runoff along the road network. Furthermore, significant shoulder erosion was observed on road networks constructed with simple embankments. In areas with high road network density, instances were noted where one runoff event triggered another. These findings suggest room for improvement in road network construction methods, such as slope, density, and length [R247].</p> <p>Comprehensive environmental legal requirements for the construction of forest work roads have not been established, making it difficult to deem non-compliance an issue where none is required. However, problems with non-permanent forest work roads and access roads should not be overlooked. This indicator applies the precautionary principles to non-state forests, classifying such risks as non-negligible.</p> <p>Risk mitigation measures: <i>Verify that a forest management plan and accompanying maps of the work road network are in place.</i> <i>(Document verification)</i></p> <ol style="list-style-type: none"> <i>1. Confirm with the person responsible for preparing the drawings how compliance with, and responses to, the Forestry Agency’s guidelines are ensured when developing the road network improvement plan.</i> <i>2. Confirm the availability of the company’s policies, guidelines, manuals, and other relevant documents on road network improvement and the construction of work roads.</i> <i>3. Confirm the status of training conducted based on these policies, guidelines, and manuals.</i> <i>4. Confirm how monitoring and maintenance are carried out for road network improvement and work road construction.</i> 	
<p>15. Development and maintenance of infrastructure associated with management activities is done in a way that minimizes adverse impacts on environmental values.</p>	<p>For State forests and public forests Forests owned by national and local governments are managed by public agencies in accordance with national guidelines. Research by the Forestry Agency shows that forest access roads built in line with these guidelines suffered little damage even after repeated torrential rains, although challenges remain in training, communication, and technical execution. Prefectures have also established their own standards based on national guidance. While comprehensive nationwide evaluations are limited, governance structures, direct public management, and Japan’s low corruption risk support the assessment that forest access roads in state and public forests are generally well managed. Therefore, this indicator is considered to pose a negligible risk.</p> <p>For non-state forests with FMP and without FMP Regarding forest road construction, concerns have been raised that compliance with national guidelines and related standards is insufficient.</p> <p>In the 208th session of the House of Representatives Committee on Agriculture, Forestry and Fisheries (2022), Representative Takaaki Tamura pointed out that logging and the construction of forestry work roads have contributed to large-scale sediment disasters, and he called for greater support for disaster-mitigation-oriented road construction[R219].</p>	<p>Yes</p> <p>No</p>

	<p>Furthermore, Watanabe et al. (2023) [R220] conducted a statistical analysis of 526 cases of forest road collapse caused by heavy rainfall in Nagano Prefecture between 2006 and 2010. Forest roads were classified into four categories: “along streams,” “crossing streams,” “zero-order basins,” and “others.” The study compared damage length, occurrence probability, repair costs, and triggering rainfall intensity. Results showed that although streamside segments accounted for only 15% of the total road length, they represented 42% of total damages. Their relative risk was about six times higher than that of other categories, making them the most vulnerable. The authors concluded that preventing damage in streamside segments is the most urgent issue in the region.</p> <p>Based on these concerns, and in light of the frequent sediment-related disasters caused by recent localized heavy rainfall events, it is essential to verify whether measures to reduce environmental impacts are properly implemented during forest road construction at log production sites.</p> <p>Therefore, in this indicator, such cases are considered a non-negligible risk in order to encourage appropriate due diligence by wood procurers.</p> <p><i>Risk mitigation measures:</i> <i>Verify that a forest management plan and accompanying maps of the work road network are in place.</i> 1. <i>Confirm with the person responsible for preparing the drawings how compliance with, and responses to, the Forestry Agency’s guidelines are ensured when developing the road network improvement plan.</i> 2. <i>Confirm the availability of the company’s policies, guidelines, manuals, and other relevant documents on road network improvement and the construction of work roads.</i> 3. <i>Confirm the status of training conducted based on these policies, guidelines, and manuals.</i> 4. <i>Confirm how monitoring and maintenance are carried out for road network improvement and work road construction.</i></p>	
16. Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with.	Overall, Japan’s legal and institutional frameworks concerning biodiversity conservation, habitat protection, and species management are functioning effectively. Protected area networks are extensive, restrictions on forestry operations in conservation-designated forests are clearly defined, and monitoring and enforcement mechanisms are in place. While the potential future expansion of non-native plantation species warrants ongoing attention, current risk levels related to biodiversity loss or ecosystem degradation from forestry operations are low. Therefore, this indicator can be assessed as presenting negligible risk.	Yes
17. Legal requirements relating to the harvesting, collection, and trade of CITES species are complied with.	Tree species harvested in Japanese forestry are not subject to CITES regulations, and imported timber is also managed under legal regulations, posing a negligible risk.	Yes
18. The volume and impacts of waste from management activities comply with	Japan generated 6.88–17.22 million m3 of forest residues In 2023, managed via laws and biomass use. Despite ongoing industrial waste dumping, forestry areas pose negligible risk.	Yes

legal requirements, and are managed and minimised.		
19. Pollution resulting from management activities comply with legal requirements, and is controlled and minimized.	Waste in forestry, including oil and plastics, is managed under Japan's Waste Management Act; current risks are negligible.	Yes
20. Water resources are protected and used responsibly in compliance with legal requirements, and with the aim of ensuring long-term viability.	Japan designates 13.06 million ha of protection forests—over half of its forest area—including extensive water-source and erosion-control forests. Most are state, public, or large corporate forests, where logging requires gubernatorial permission, making illegal logging risks negligible. Although clear-cutting can affect low-flow discharge and water quality, Japan's climate and reliable regeneration reduce long-term impacts, and replanting failures are rare in public forests. While improper work-road construction can cause sediment issues, no threshold-level risks specific to water-source functions were identified. Accordingly, this indicator is assessed as negligible risk.	Yes
21. Negative impacts on soils from management activities are minimised, and comply with legal requirements.	<p>For State forests and public forests</p> <p>When clear-cutting operations, un-replanted areas, and poorly constructed forest work roads overlap, the impact on soil is significant and cannot be ignored. Therefore, for state and public forests, which are less likely to become un-replanted areas, the impact on soil is considered limited, and the associated risk is deemed negligible.</p> <p>For non-state forests with FMP and without FMP</p> <p>At the time of logging: Impacts from forest work roads (including forest land development)</p> <p>In forestry operations, the Forest and Forestry Road Construction Guidelines require environmental considerations when developing road networks. These include measures to prevent surface soil erosion, secure drainage, and reduce the risk of slope failure.</p> <p>One of the impacts of poorly constructed forest work roads, as mentioned in Indicators 14 and 15 regarding the risk factors for landslides during torrential rains, is soil disturbance. However, when considering soil impacts, it is necessary to examine the effects of logging operations as a whole, not just the construction of forest work roads. Many Japanese forests are located in steep mountainous areas, and logging operations inevitably have some impact on the soil. However, comparing selective cutting and clear-cutting operations, the impact from selective cutting is considered limited, while the impact from clear-cutting is greater.</p> <p>Regarding this point, the concept of Reduced Impact Logging (RIL) for mitigating environmental impacts during natural forest operations is well-established in tropical countries. However, in Japan, where plantation forestry operations are predominant, it is not stipulated in forestry-related laws and regulations. Instead, the Ministry of Health, Labour and Welfare provides the Guidelines for Safe Chainsaw Felling and Related Operations from the perspective of worker safety and health[L167]. This is based on the concept that safe felling also results in lower environmental impact.</p> <p>After logging: Impacts from lack of reforestation</p>	<p>Yes</p> <p>No</p>

	<p>As noted in Indicator 13, areas left unplanted after logging are increasingly exposed to heavy rainfall events, including the frequent occurrence of linear precipitation zones in recent years. These conditions heighten concerns about secondary disasters such as landslides, and the resulting impacts on soil are considered significant.</p> <p>In contrast, where replanting has been completed after clear-cutting, soil impacts are mitigated because the process involves treating logging residues and preparing the site prior to planting. Moreover, replanting after logging is legally required under the current Forest Act.</p> <p>The legal framework to reduce adverse soil impacts does exist but is not fully sufficient. Nevertheless, the effects of more frequent torrential rains are becoming evident. When clear-cutting overlaps with two factors which are poorly constructed skid trails / forest work roads (Indicators 14 and 15) and areas where replanting has not been completed (Indicator 13), the risk of secondary disasters, particularly in non-state forests, cannot be ignored. Therefore, applying the precautionary principle, the overall risk associated with clear-cutting in non-state forests is considered non-negligible.</p> <p>Risk mitigation measures: <i>Verify that a forest management plan and accompanying maps of the work road network are in place.</i> <i>(Document verification)</i></p> <ol style="list-style-type: none"> <i>1. Confirm with the person responsible for preparing the drawings how compliance with, and responses to, the Forestry Agency's guidelines are ensured when developing the road network improvement plan.</i> <i>2. Confirm the availability of the company's policies, guidelines, manuals, and other relevant documents on road network improvement and the construction of work roads.</i> <i>3. Confirm the status of training conducted based on these policies, guidelines, and manuals.</i> <i>4. Confirm how monitoring and maintenance are carried out for road network improvement and work road construction.</i> 	
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For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Specific questions:

For indicator 13,

This indicator assessed the risk associated with uncompleted replanting issues as significant. However, regarding replanting after logging, the option of natural regeneration is available, and given the legally required five-year grace period, there is room for further consideration of more realistic risk mitigation measures (RMMs). It would be highly appreciated for your input and insights. [\[COMMENT BOX\]](#)

For indicator 14 and 15,

These indicators assessed that for the construction of forest work roads in private forests (regardless of whether a forest management plan exists), the risk to ensuring their 'quality' cannot be ignored. On the other hand, for state and public forests, it is assessed that the inspection systems by the national and prefectural governments regarding

subsidies are functioning, and the quality is assured. However, more persuasive evidence for the evaluation concerning national and public forests, including scientific and concrete numerical data are still needed. It would be highly appreciated for your input and opinions on reference materials, data, or perspectives. [\[COMMENT BOX\]](#)

For indicator 20 and 21,

Indicators 20 and 21 pertain to water resource conservation, maintenance of water source recharge functions, and conservation. This has assessed that the risk is non-negligible when all three factors, clear-cutting operations, improper construction of forest work roads, and incomplete replanting are present. On the other hand, for state and public forests, the inspection systems by the national and prefectural governments regarding subsidies are functioning effectively. It was determined that the construction of access roads and reforestation are being appropriately managed and guided. However, more persuasive evidence, including scientific and concrete numerical data, is required. It would be highly appreciated for your opinions / inputs on reference materials, data, or perspectives that could be useful. [\[COMMENT BOX\]](#)

Health and safety

Indicator	Description of Risk	Negligible
22. Legal requirements related to occupational health and safety are complied with.	<p><i>For State forests and public forests</i> In state and public forests, logging and related projects are carried out through bidding processes before moving to operational contracts. As a result, it is reasonable to expect that these projects are undertaken by appropriately qualified contractors who have undergone a certain level of screening and evaluation. Such contractors are also generally considered reliable in terms of compliance with requirements such as occupational safety and health. Therefore, this indicator is assessed as presenting negligible risk.</p> <p><i>For non-state forests with FMP and without FMP</i> Safety standards for forestry work are regulated by the Labor Safety and Health Act, which requires employers to establish safety management systems and provide training. The Labor Standards Act obligates employers to provide medical care for injured workers, and the Workers' Accident Compensation Insurance Act offers insurance benefits.</p> <p>However, the decline in forestry-related fatalities and injuries has stalled. In 2023, the accident rate was 22.8 per thousand workers—about ten times the national industry average (2.4). U.S. data similarly shows that the "agriculture, fisheries, and forestry" sector has the highest fatality rate, indicating that the sector itself involves inherently high risks rather than problems specific to legal frameworks[R225].</p> <p>The 2023 Forest and Forestry White Paper notes that: (1) around 70% of fatal accidents occur during logging, especially involving hanging trees; (2) workers with less experience face higher risks; (3) accidents are frequent among older workers and small-scale operators; and (4) many accidents occur without witnesses, delaying emergency response[R203]. Recent fatal logging accidents in Miyagi, Shizuoka, Okayama, and Fukushima led to criminal referrals due to inadequate safety management by forestry cooperatives and contractors[R226,R227,R228], suggesting insufficient recognition of the dangers on both managerial and operational levels.</p> <p>Structural issues exacerbate these risks. Most forestry enterprises are micro-enterprises or sole proprietorships (82% in 2020). Occupational safety obligations generally apply only to employers with 10 or more workers, meaning many forestry businesses fall outside regulatory coverage. Forestry cooperatives often subcontract work to sole proprietors, but clients are not held responsible</p>	<p>Yes</p> <p>No</p>

	<p>for their safety. Moreover, if daily work supervision is minimal, contracts are often treated as service contracts rather than employment relationships, reducing legal protection (Kawasaki et al., 2010).</p> <p>Policy reforms are emerging. Workers' compensation coverage for freelancers has expanded, and a May 2025 amendment to the Occupational Safety and Health Act introduced obligations for both clients and individual contractors, though its application to forestry remains unclear. The Ministry of Health, Labour and Welfare Council (October 9, 2025) also supported making workers' accident compensation insurance mandatory for self-employed workers in agriculture, forestry, and fisheries, with a bill expected in the next Diet session.</p> <p>Overall, while legal safety requirements exist, they primarily protect employed workers. Since many forestry operations are carried out by sole proprietors or individual forest owners, safety often depends on personal responsibility alone. This represents a structural gap in Japanese labor law.</p> <p>Therefore, this indicator considers strengthening safety awareness and ensuring protection for self-employed workers essential, and assesses the situation as a non-negligible risk.</p> <p>(The Aftermath of Radioactive Contamination)</p> <p>Radioactive contamination from the 2011 Fukushima Daiichi accident was noted in the FSC NRA 2018. Although the ICRP recommends a public exposure limit of 1 mSv/year, Japanese law does not set a fixed limit. In 2014, national and prefectural guidelines advised avoiding forestry work above 2.5 $\mu\text{Sv/h}$, with 0.5 $\mu\text{Sv/h}$ as the basic limit, and permitted logging above that level only if bark contamination was $\leq 6,400$ Bq/kg. These thresholds, however, were widely questioned.</p> <p>By 2025, conditions have markedly improved. A 2024 survey found an average dose rate of 0.16 $\mu\text{Sv/h}$ at 1,316 sites (excluding restricted areas), with most regions—including Southern Fukushima, Aizu, and Minamiaizu—below 0.23 $\mu\text{Sv/h}$[R25]. Cesium decay has reduced dose rates, and in some areas natural background radiation now predominates. Cs levels in wood correlate with dose rates, and monitoring of wood products has shown no confirmed impacts[R26].</p> <p>However, issues remain:</p> <p>(1) Safety and health measures for individual forestry workers (e.g., health checks, radiation monitoring, protective equipment) are still insufficient.</p> <p>(2) Differences in technical knowledge among forest owners and managers lead to inconsistent application of radiation-based work planning.</p> <p>In this indicator, improvement of occupational safety and exposure management is considered essential. Therefore, the situation is judged to present a non-negligible risk, requiring heightened awareness and caution among employers and workers.</p> <p>Risk mitigation measures:</p> <p><i>Verify the employment status, workers' compensation insurance coverage, and use/wearing of PPE for all workers performing on-site operations.</i></p> <ol style="list-style-type: none"> <i>1. Confirm that all workers at the logging site including sole proprietors (one-person contractors) have received appropriate safety training.</i> <i>2. Confirm that all workers, including sole proprietors (one-person contractors), are enrolled in workers' compensation insurance.</i> <i>3. Confirm that appropriate PPE is available and being used.</i> <i>4. Confirm that training materials or supervision protocols are in place.</i> 	
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<p>23. Facilities and activities are safe and support worker's health, and workers have access to and use appropriate Personal Protective Equipment commensurate with the activities undertaken.</p>	<p><i>For State forests and public forests</i></p> <p>In state and public forests, logging and related projects are carried out through bidding processes before moving to operational contracts. As a result, it is reasonable to expect that these projects are undertaken by appropriately qualified contractors who have undergone a certain level of screening and evaluation. Such contractors are also generally considered reliable in terms of compliance with requirements such as occupational safety and health. Therefore, this indicator is assessed as presenting negligible risk.</p> <p><i>For non-state forests with FMP and without FMP</i></p> <p>The use of personal protective equipment (PPE) is part of workplace safety management under the Occupational Safety and Health Act and its related regulations, which include risk assessment, safety training, and verification of PPE suitability. It falls within the employer's duty of care regarding occupational safety. In addition, the Ministry of Health, Labour and Welfare and the Forestry Agency have established safety guidelines specific to the forestry sector, requiring the use of PPE and the implementation of safety education.</p> <p>According to the expert, the usage rate of personal protective equipment among employed workers is estimated to be nearly 100%. However, this does not apply to small and micro enterprises or sole proprietorships, as they fall outside the scope of the mandatory provisions of the Occupational Safety and Health Act.</p> <p>Currently, the following challenges are recognized in forestry work sites:</p> <ul style="list-style-type: none"> • Inadequate use of PPE during chainsaw operations <p>While protective pants and similar gear are legally required, compliance varies significantly by region and operator. Particularly among sole proprietors, non-compliance is frequently reported.</p> <ul style="list-style-type: none"> • Cost burdens and slow adoption <p>High-performance PPE is expensive, and the financial burden on small-scale businesses and individuals hinders widespread adoption. While subsidy programs exist, penetration among existing workers remains limited.</p> <ul style="list-style-type: none"> • Inadequate education and supervision systems <p>Legal obligations are limited to employers, making it difficult to provide adequate education and guidance to individual forest owners and sole proprietors. Consequently, safety awareness and proper usage practices have not become firmly established.</p> <ul style="list-style-type: none"> • Disparities in safety culture <p>While safety management is thoroughly implemented in larger-scale operations, safety culture has not sufficiently taken root in small-scale operations. This results in disparities in PPE usage rates and accident prevention measures.</p> <p>In the forestry industry, occupational safety and health regulations and guidelines are revised almost every year, and the Ministry of Health, Labour and Welfare is also getting serious about disaster mitigation. Every year, safety measures lectures and training sessions, including practical skills, open to anyone are offered nationwide, and promotional materials are also well-developed. However, the expert notes, "Since participation in all of these is voluntary, the administrative side is also struggling to improve the penetration of information".</p> <p>The usage and adoption rate of PPE is sufficient among employed workers. However, challenges remain for small businesses and individuals (sole proprietors). It is crucial to promote awareness reform among both employers and employees, including measures to address introduction costs and the dissemination and thorough implementation of safety education. This indicator is therefore judged to pose a non-negligible risk.</p>	<p>Yes</p> <p>No</p>
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	<p>Risk mitigation measures:</p> <p><i>'Verify the employment status, workers' compensation insurance coverage, and use/wearing of PPE for all workers performing on-site operations.</i></p> <p><i>1. Confirm that all workers at the logging site including sole proprietors (one-person contractors) have received appropriate safety training.</i></p> <p><i>2. Confirm that all workers, including sole proprietors (one-person contractors), are enrolled in workers' compensation insurance.</i></p> <p><i>3. Confirm that appropriate PPE is available and being used.</i></p> <p><i>4. Confirm that training materials or supervision protocols are in place.</i></p>	
24. The use, application, storage, and disposal of chemicals in management activities addresses the protection of the environment and human health and safety and complies with legal requirements.	In Japan, the use of chemicals in forestry is strictly regulated, limited in scope, and poses a negligible risk.	Yes

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Specific questions:

For indicator 22 and 23,

Indicators 22 and 23 assessed the risks associated with “sole proprietors” in forestry work as non-negligible, particularly regarding lack of workers' compensation coverage in Indicator 22 and inadequate PPE use in Indicator 23. However, information on actual conditions at forestry sites is insufficient. It would be greatly appreciated for your insights, opinions, and input, from both an expert perspective and a practical business standpoint, regarding the data that should be referenced and the risks that should be considered in relation to the issue of “sole proprietors”. [\[COMMENT BOX\]](#)

Human and labor rights

Indicator	Description of Risk	Negligible
25. Human rights protected under international law, as enshrined in national law, are complied with.	Under the International Covenant on Human Rights, rights such as life, expression, prohibition of discrimination, labor, and education are also guaranteed under Japanese domestic law, and the risk is deemed negligible.	Yes
26. Harvest or trade in products do not contribute to a violation of international human rights or is not associated with armed conflicts.	Japan's wood exports are minor compared to its domestic production and strong reliance on imports, indicating negligible risk of human rights issues abroad. Domestic concerns such as labor safety and foreign workers are covered under other indicators. No conflicts are reported in Japan; therefore, the risk is assessed as negligible.	Yes
27. Legal requirements related to child labour and employment of young workers are complied with.	Japan has ratified the Convention on the Prohibition of Child Labor and has established legal regulations. However, as no cases of child labor have been reported in the forestry sector, the risk is considered negligible.	Yes
28. Child labour is not present, and the employment of young workers is responsibly managed, including related rights as specified in the ILO Fundamental Principles and Rights at Work.	Japan strictly prohibits hazardous work for minors under 18 and child labor under 15. Education coverage is nearly universal (99.9%), and no child labor cases are reported. Although small-scale forestry operations pose monitoring challenges, legal controls and safety programs support compliance; thus, the risk is negligible.	Yes
29. Legal requirements related to modern slavery, including forced and compulsory labour, are complied with.	Japan's former Technical Intern Training Program faced serious human rights criticisms, prompting a 2024 legal reform that strengthened oversight and penalties. In forestry, nearly all tasks require licenses, and firms employing foreign workers must provide safety training, translation support, and proper living arrangements, with many costs subsidized by local governments. Because compliance is strictly monitored and subsidies would be withdrawn in cases of misconduct, exploitative practices are unlikely. Combined with the sector's high labor costs and limited capacity to expand foreign employment, the overall risk of human rights violations is assessed as negligible.	Yes
30. Modern slavery, including forced and compulsory labour are not used, promoted, or supported in any way, including as specified in the ILO Fundamental Principles and Rights at Work.	Japan has not ratified ILO Conventions 111 and 155, and concerns about poor conditions under the former TITP remain. However, in forestry, most tasks require licenses and strict safety training, and firms accepting foreign workers must meet testing, oversight, and council-membership requirements. Because these obligations and subsidies impose strong compliance pressure and exploiting workers would risk subsidy loss or business failure, the likelihood of forced labor or other abuses is considered very low. Thus, this indicator is assessed as negligible risk.	Yes
31. Legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.	Civil servants and state enterprise employees are denied union and strike rights, but private forestry workers, protected under the Labor Standards Act, often join agricultural or construction unions. As forestry operations are outsourced to private firms, the risk related to labor rights restrictions is considered negligible.	Yes

Indicator	Description of Risk	Negligible
32. Labour rights related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are respected, including as specified in the ILO Fundamental Principles and Rights at Work.	In 2020, Japan had 34,001 forestry entities, mostly small private businesses, though major operations are outsourced. Foreign trainee programs were extended from one to up to five years. Japan's SDG 8.8.2 score is 1.1/10, ranking 80th of 267 countries, indicating that labor rights risks are negligible.	Yes
33. Legal requirements related to the recruitment and employment of workers are complied with.	In Japan, the aging forestry workforce is being offset by the "Green Employment" program, launched in 2003. This national initiative promotes recruitment, training, and financial support for new workers. Combined with strict compliance with labor laws, the risk to workers' rights is currently negligible, enhancing employment conditions in forestry.	Yes
34. Legal requirements related to the contracts and working permits, and requirements for competence certifications and other training requirements are complied with.	The Forestry Agency enhances forestry workers' skills and careers via training, career models, and role-specific programs. Prefectures now operate 24 forestry colleges, supported financially through the Green Youth Employment Preparation Grant. Safety for foreign trainees is prioritized with translated materials and interpreters, making associated risks negligible.	Yes
35. Legal requirements related to workers' wages and other payments, such as social insurance contributions and the payment of social and income taxes withheld by the employer on behalf of the worker, are complied with.	The proportion of year-round forestry workers has risen to 67% in 2022, boosting social insurance coverage. By 2025, 77% of cooperative employees are targeted to work 210+ days yearly. Health and pension insurance coverage is high, with 83% enrolled in mutual aid schemes, making associated risk negligible.	Yes
36. Legal requirements related to working hours, overtime, rest time and time off are complied with.	<p>According to the OECD, Japan's average annual working hours are 1,607 hours per year (2023). According to the ILO, Japan's average weekly working hours are 36.6 hours per week (2020).</p> <p>However, according to the Nippon Institute for Research Advancement (2025), while the trend in Japan's average annual total actual working hours per person has been declining, the primary cause of this decrease is the increase in the number of part-time workers and other short-term workers. The total actual working hours for regular full-time workers have remained above 2,000 hours per year (about 38.5 hours per week) for the past 30 years, with little change.</p> <p>According to the results of inspections and guidance conducted by the Ministry of Health, Labour and Welfare in fiscal year 2024 targeting workplaces suspected of excessive working hours, violations related to working hours and overtime pay (overtime wages) constitute the most common category of legal violations. Of the 26,512 workplaces surveyed, 11,230 (42.4%) were found to have illegal overtime work. There were 5,464 workplaces where overtime and holiday work exceeding 80 hours per month was found. There were 2,118 workplaces (8.0%) where unpaid overtime work was found. This is a statistic for all industries, but the high number of violations suggests that excessive overtime work exceeding the statutory working hours and unpaid overtime wages are widespread.</p>	No

Indicator	Description of Risk	Negligible
	<p>According to the Ministry of Health, Labour and Welfare's supervision and enforcement activities report (Jan to Dec 2024), in the forestry sector, out of the 817 cases inspected, 465 (57%) were found to have violated labor laws. The violations included 47 cases of failure to disclose working conditions, 20 cases of unpaid wages, 44 cases of violations related to working hours, 58 cases of unpaid overtime wages, 53 cases of violations related to wage ledgers, 288 cases of violations of labor safety and health regulations, and 63 cases of violations related to working hour tracking.</p> <p>In Yamanashi Prefecture, the Kyonan Forest Cooperative is alleged to have forced employees to work 144 hours of illegal overtime in one month (2019).</p> <p>Japanese Federation of Forrest and Workers Union (全日本森林林業木材関連産業労働組合連合会、abbreviation 森林労連) has outlined its 2025 spring labor struggle policy, which includes “strictly enforcing strict working hour management to eliminate unpaid overtime” and “implementing effective measures to reduce overtime,” and is demanding improvements to excessive working hours.</p> <p>Therefore, it is considered that there is a widespread risk of illegal overtime work and unpaid overtime wages in Japan, and this risk is non-negligible.</p> <p>Issues related to foreign workers are addressed in indicators 29 and 30.</p> <p>Risk mitigation measures:</p> <ol style="list-style-type: none"> 1. Tracking and managing working hours <ol style="list-style-type: none"> 1a. Confirm that the start and end times, break times, and overtime hours for each employee are accurately recorded. 1b. Confirm that a 36 Agreement (agreement regarding overtime and holiday work) has been concluded between the employer and employees and submitted to the relevant labour standards office. 1c. Confirm that no overtime or holiday work exceeding 80 hours per month has occurred. 2. Payment of overtime wages (overtime pay) <ol style="list-style-type: none"> 2a. Verify that overtime hours are clearly stated on pay slips and paid appropriately based on the statutory overtime rate. 2b. Verify that wage ledgers are properly maintained and stored for audit purposes. 3. Employee Consultation Channels and Training <ol style="list-style-type: none"> 3a. Confirm whether an anonymous complaint handling mechanism is in place that employees can use without fear of retaliation (as desired). 3b. Confirm whether the procedures are documented and whether the system is communicated to employees. 3c. Confirm whether the procedures from complaint receipt to resolution are recorded and whether the results of improvements are shared with employees. 3d. Confirm whether annual training on working hour management and compliance with laws and regulations is provided to managers and on-site leaders. 4. Interviews <p>Conduct interviews with employees to confirm whether working hours are appropriately managed and there are no instances of illegal overtime work or unpaid wages or overtime pay.</p> 5. Disclosure and Transparency 	

Indicator	Description of Risk	Negligible
	<i>Confirm whether a system is in place to fulfill the duty to explain to external parties in response to inquiries.</i>	
37. Labour rights related to recruitment and employment...are upheld, including as specified in the ILO Fundamental Principles and Rights at Work are upheld.	Japan has adopted ILO core conventions into law, but non-negligible risks remain. These compliance issues are highlighted under Indicators 33 to 36.	Yes
38. Legal requirements related to discrimination against workers are complied with.	Japan prohibits employment discrimination based on gender, nationality, or social status. Companies must meet disability employment quotas, with forestry businesses largely exempt due to small size. The sector's disability employment rate is comparable to national levels. Discrimination against former outcast communities is rare in forestry, making overall risk negligible.	Yes
39. There is no discrimination against workers in processes related to hiring, remuneration and access to training, promotion, termination, or retirement, including related rights as specified in the ILO Fundamental Principles and Rights at Work.	Japan has not ratified ILO Convention C111, but its laws prohibit discrimination based on gender, nationality, creed, or social status. Equal treatment is mandated across employment practices. Overall, the legal risk of discrimination is considered negligible.	Yes
40. Legal requirements related to gender equality in the workplace are complied with.	<p>According to the Labour Standards Act, discrimination based on gender, nationality, creed, or social status is prohibited. In particular, regarding gender equality, laws have been established to strengthen gender equality by ensuring equal opportunities and treatment for men and women in the field of employment. However, in Japan, the gender pay gap is extremely large, as indicated by multiple international sources.</p> <p>According to the OECD, the gender wage gap is 22% (2023), ranking third worst in the world. According to the World Economic Forum, the Global Gender Gap Index stands at 0.663, ranking 118th (2024). According to the ILO, the average monthly earnings of employees by sex are 337,200 yen for men and 253,600 yen for women, meaning women earn only 75% of what men earn (2021). According to wtw, the gender pay ratio in the Fisheries, Agriculture, and Forestry sector is 56.81%, ranking third worst among 33 industries.</p> <p>The International Trade Union Confederation (ITUC, 2011) also points out that 'although discrimination is prohibited by law in Japan, discrimination in employment and remuneration exists in reality,' and reports that women are at a disadvantage.</p> <p>As shown below, in Japan, there is also substantial evidence of widespread discriminatory practices in the workplace.</p> <ul style="list-style-type: none"> - Discrimination regarding job opportunities <p>According to a survey by the Japanese Trade Union Confederation (2023), 32.8% of job seekers felt they had been discriminated against based on gender. 19.5% of respondents reported receiving inappropriate questions or comments during job interviews. For example, female candidates were told, 'You'll probably end up quitting anyway,' or asked whether they would continue working after marriage or pregnancy.</p> <ul style="list-style-type: none"> - Disadvantage ous treatment due to pregnancy and childbirth (maternity harassment) 	No

Indicator	Description of Risk	Negligible
	<p>Although the law prohibits dismissal and demotion due to pregnancy and childbirth, there are reports that ‘maternity harassment’ still occurs in practice. According to the Japan Institute for Labour Policy and Training (2016), the rate of disadvantageous treatment due to pregnancy, such as maternity harassment, is 21.4%. In 47.0% of cases, women were told things that made it difficult for them to assert their rights related to pregnancy, childbirth, and childcare, such as ‘It’s inconvenient that you take time off’ and ‘Why don’t you quit?’ In 21.1% of cases, women were told things that suggested they would be treated unfavourably due to pregnancy, etc., and in 18.4% of cases, women were given unfavourable bonuses.</p> <p>- Actual use of childcare leave (especially the rate of use by men)</p> <p>Legally, both parents have the right to take childcare leave, but as of 2024, the rate of men taking childcare leave remains at around 40.5%, and the reality is that many men are unable to take it. Although there are institutional guarantees, it has been pointed out that workplace culture and cultural factors make it difficult for both men and women to actually take childcare leave.</p> <ul style="list-style-type: none"> • International comparison and ranking <p>Japan ranks 118th out of 146 countries in the World Economic Forum's Gender Gap Index (2024) and is the lowest among the G7 countries, lagging significantly in terms of economic participation, political empowerment, and education. According to the United Nations Committee on the Elimination of Discrimination against Women (CEDAW) (2024), there are concerns about gender wage gaps in Japanese workplaces and workplace discrimination related to pregnancy, childbirth, and childcare.</p> <p>Therefore, even though the system is in place, it is not accompanied by actual results, and the ILO principles and FSC best practices are not fully met, which we classified this as non-negligible risk.</p> <p>Although not related to forestry, cases of score manipulation that disadvantaged female applicants in medical school entrance examinations were uncovered in 2018.</p> <p>Therefore, it is determined that there is a risk that cannot be ignored.</p> <p>Risk mitigation measures:</p> <ol style="list-style-type: none"> <i>Equality in employment and promotion</i> <ol style="list-style-type: none"> <i>Confirm transparency in the recruitment and promotion process:</i> <i>Confirm that there is no discrimination in recruitment, evaluation, or promotion based on gender, and that this is documented and communicated throughout the company.</i> <i>Data disclosure: Confirm that annual reports document and disclose gender-specific wages, management ratios, and promotion numbers.</i> <i>Equal Pay for Work of Equal Value</i> <p><i>Wage Gap Analysis: Compare wages by position, job type, and gender. If gaps exist, confirm that corrective action plans are in place.</i></p> <i>Protection of Rights Related to Pregnancy, Childbirth, and Childcare</i> <ol style="list-style-type: none"> <i>Maternity Harassment Prevention Policy: Confirm that clear internal regulations prohibiting adverse treatment based on pregnancy or childbirth are in place and that training is conducted.</i> <i>Reporting and Remedial Mechanisms: Confirm that a complaint handling mechanism is in place and that opportunities for reporting and redress are ensured.</i> <i>Verify that workers' opinions are reflected in the complaint handling process and that measures to prevent retaliation and ensure anonymity are in place.</i> 	

Indicator	Description of Risk	Negligible
	<p><i>4. Promotion of Childcare Leave Utilisation</i></p> <p><i>4a. Confirm that men are encouraged to take childcare leave.</i></p> <p><i>4b. Return-to-work support: Confirm that career paths are guaranteed after returning to work. Confirm that flexible working arrangements such as reduced working hours or remote work are included in the system.</i></p> <p><i>5. Skill development and participation in decision-making</i></p> <p><i>5a. Equal provision of work and training opportunities: Confirm that equal work opportunities and vocational training are provided regardless of gender.</i></p> <p><i>5b. Confirm that targets for the proportion of female managers have been set and progress is being monitored.</i></p>	
<p>41. Gender equality is protected following best practice... as specified in the ILO Fundamental Principles and Rights at Work.</p>	<p>Although Japan has not ratified the ILO's 'Discrimination (Employment and Occupation) Convention' (C111), in Japan, rights related to gender equality are clearly protected by the Labour Standards Act, the Equal Employment Opportunity Act, and the Child Care and Family Care Leave Act. These laws stipulate 'equal pay for work of equal value' and 'prohibition of dismissal based on pregnancy, childbirth, or marriage,' which are consistent with the core principles of the ILO.</p> <p>Therefore, there are no contradictions in the legal system.</p> <p>However, the legal violation has been identified as shown in the indicator 40 and therefore this indicator is also classified as a non-negligible risk.</p> <p>Risk mitigation measures:</p> <p><i>1. Equality in employment and promotion</i></p> <p><i>1a. Confirm transparency in the recruitment and promotion process:</i></p> <p><i>1b. Confirm that there is no discrimination in recruitment, evaluation, or promotion based on gender, and that this is documented and communicated throughout the company.</i></p> <p><i>1c. Data disclosure: Confirm that annual reports document and disclose gender-specific wages, management ratios, and promotion numbers.</i></p> <p><i>2. Equal Pay for Work of Equal Value</i></p> <p><i>Wage Gap Analysis: Compare wages by position, job type, and gender. If gaps exist, confirm that corrective action plans are in place.</i></p> <p><i>3. Protection of Rights Related to Pregnancy, Childbirth, and Childcare</i></p> <p><i>3a. Maternity Harassment Prevention Policy: Confirm that clear internal regulations prohibiting adverse treatment based on pregnancy or childbirth are in place and that training is conducted.</i></p> <p><i>3b. Reporting and Remedial Mechanisms: Confirm that a complaint handling mechanism is in place and that opportunities for reporting and redress are ensured.</i></p> <p><i>3c. Verify that workers' opinions are reflected in the complaint handling process and that measures to prevent retaliation and ensure anonymity are in place.</i></p> <p><i>4. Promotion of Childcare Leave Utilisation</i></p> <p><i>4a. Confirm that men are encouraged to take childcare leave.</i></p> <p><i>4b. Return-to-work support: Confirm that career paths are guaranteed after returning to work. Confirm that flexible working arrangements such as reduced working hours or remote work are included in the system.</i></p> <p><i>5. Skill development and participation in decision-making</i></p> <p><i>5a. Equal provision of work and training opportunities: Confirm that equal work opportunities and vocational training are provided regardless of gender.</i></p> <p><i>5b. Confirm that targets for the proportion of female managers have been set and progress is being monitored.</i></p>	<p>No</p>

Indicator	Description of Risk	Negligible

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Specific questions:

For indicator 29-30,

Indicators 29 and 30 address the issues associated with the former Technical Intern Training Program, which has been decided to be abolished. The assessment considers the possibility that similar problems may reoccur under the Specified Skilled Worker Program, a new initiative for accepting foreign workers in the forestry sector. Although certain risks are recognized, the program is still in its early stages of implementation. Therefore, these risks are assessed as potential rather than actual at this stage. To strengthen this assessment, further collection of relevant scientific evidence, data, and reference materials is necessary. It would be greatly appreciated for your insights, opinions, and input, from both an expert perspective and a practical business standpoint, regarding the data that should be referenced and the risks that should be considered in relation to the Specified Skilled Worker Program. [\[COMMENT BOX\]](#)

For indicator 31-35,

Given the current situation in which securing a stable workforce has become difficult due to the decline in forestry management entities, this assessment has gathered information on potential risks to employment continuity and social security; however, that information may not be sufficient. It would be very much appreciated your thoughts / opinions from the perspectives of both subject-matter experts and industry practitioners. [\[COMMENT BOX\]](#)

For indicator 36,

(1) Do you agree with the assessment of indicators in the Indicator 38 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)

(2) If you disagree or have suggestions, please provide justification. [\[Long answer\]](#)

(3) Could you provide us with information on violations, data, and litigation concerning working hours (excessive working hours) and overtime pay (unpaid overtime) within the forestry and timber industry? [\[COMMENT BOX\]](#)

For indicator 40,

(1) Do you agree with the assessment of indicators in the Indicator 40 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)

(2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)

(3) Could you provide examples, available data, or documents such as the following?

- a) Data, examples, or litigation information concerning wage gaps, or disparities in promotion and personnel evaluations within the forestry and timber industry [\[COMMENT BOX\]](#)
- b) Data, examples, or litigation information concerning instances where job seekers felt discriminated against on the basis of gender, or experienced actual disadvantage in selection processes within the forestry and timber industry [\[COMMENT BOX\]](#)
- c) Data, examples, or litigation information concerning instances within the forestry and timber industry where men and women felt discriminated against when requesting childcare leave, encountered statements or situations making it difficult to assert their rights, or were actually refused [\[COMMENT BOX\]](#)
- d) Data, examples, or litigation information concerning instances within the forestry and timber industry where individuals experienced worsened treatment upon returning to work, were demoted in terms of responsibilities or job duties, or felt subjected to discriminatory treatment [\[COMMENT BOX\]](#)

For indicator 41,

- (1) Do you agree with the assessment of indicators in the Indicator 40 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Could you provide examples, available data, or documents such as the following?
- a) Data, examples, or litigation information concerning wage gaps, or disparities in promotion and personnel evaluations within the forestry and timber industry [\[COMMENT BOX\]](#)
- b) Data, examples, or litigation information concerning instances where job seekers felt discriminated against on the basis of gender, or experienced actual disadvantage in selection processes within the forestry and timber industry [\[COMMENT BOX\]](#)
- c) Data, examples, or litigation information concerning instances within the forestry and timber industry where men and women felt discriminated against when requesting childcare leave, encountered statements or situations making it difficult to assert their rights, or were actually refused [\[COMMENT BOX\]](#)
- d) Data, examples, or litigation information concerning instances within the forestry and timber industry where individuals experienced worsened treatment upon returning to work, were demoted in terms of responsibilities or job duties, or felt subjected to discriminatory treatment [\[COMMENT BOX\]](#)

Third parties' rights

Indicator	Description of Risk	Negligible
42. Legal requirements related to the rights of Indigenous Peoples are complied with.	Japan officially recognizes the Ainu as its indigenous people, supported by the Ainu Policy Promotion Act and related laws. These laws promote cultural preservation and living support. Legal compliance is strong, and no violations are reported, indicating negligible risk.	Yes
43. The rights of Indigenous Peoples, including land tenure and management, are respected and upheld	<i>For Tohoku Region, Kanto Region, Chubu Region, Kinki Region, Chugoku-Shikoku Region, Kyushu Region, Okinawa</i> The Ainu are the indigenous people of Hokkaido. Therefore, Ainu rights as an indigenous people are recognized in Hokkaido. There are no indigenous peoples in other areas. Consequently, this indicator is not applicable in other area in Japan.	Not applicable

Indicator	Description of Risk	Negligible
<p>according to the principles of FPIC.</p>	<p><i>For Hokkaido</i></p> <p>The Ainu are the indigenous people of Hokkaido and its surrounding areas (Hokkaido Ainu Association [R505]), and were officially recognised as an indigenous people by the Japanese government in 2008. It is estimated that approximately 13,000 Ainu live in Hokkaido (as of 2017). Since the 19th century, the Ainu have been deprived of their traditional lands and resources through Japanese assimilation policies and territorial annexation. Many Ainu still live in Hokkaido, and some are involved in forest resources (e.g., traditional hunting and gathering).</p> <p>According to Uemura (2024), forests were the foundation of all aspects of life and culture for the Ainu people, providing food (nuts and plants), building materials for dwellings, fibres for clothing, dyes, medicine, and ritual implements. In particular, tree species found near water (such as walnut, alder, hornbeam, and elm) were utilised. Forests were also used as hunting grounds. Historically, these forest resources were freely available, but since modern times, their free use has been greatly restricted.</p> <p>According to Kominami (2024), interviews with Ainu people have revealed that they continue to utilise certain tree resources even today. However, since the modern Tokachi Ainu themselves were uncertain about the locations of the tree resources they collect, cultural transmission activities using purchased tree resources were occasionally observed.</p> <p>Ainu Policies (Domestic Law) – Japan has a law regarding the Ainu people called the ‘Act on Promoting Measures to Achieve a Society in which the Pride of Ainu People is Respected (APPA)’ (enacted in 2019). This law clearly states for the first time that the Ainu are an ‘indigenous people’ of Japan, but its main focus is on cultural promotion and the elimination of discrimination, and it does not include provisions guaranteeing the rights of indigenous peoples to their land and resources and FPIC. For example, the APPA allows the use of traditional flora and fauna resources only for the purpose of cultural preservation, but this is strictly a permit system and does not freely recognise the rights of indigenous peoples. Furthermore, there are no provisions regarding the restoration of collective land ownership or the guarantee of forest management rights. In fact, since the Meiji era, land in Hokkaido has been designated as state-owned or private property, and the traditional territorial rights of the Ainu have not been officially recognised. Domestic law does not sufficiently guarantee the ‘respect for the rights of indigenous peoples in accordance with FPIC’ as required by Indicator 43, and there are deficiencies and restrictions. Japanese law does not establish a FPIC process for indigenous peoples, but rather provides the same procedures for indigenous peoples as for other citizens. For example, the traditional Ainu practice of salmon fishing is uniformly prohibited under the general permit system, and the unique rights of the Ainu are not taken into consideration. The Ainu argue that ‘current laws that prohibit them on an equal footing with non-indigenous people are nothing more than assimilation policies’ and are contesting their validity in accordance with international law (UNDRIP, etc.). However, Japanese law does not currently recognise this. In other words, domestic law does not guarantee the exercise of traditional rights of indigenous peoples or the formation of agreements through FPIC, and instead restricts rights through uniform application, which is inconsistent with the criteria.</p> <p>One notable court case concerning the rights of the Ainu people is the Nibutani Dam case, which arose over the development and destruction of Ainu sacred sites by the government (ruling in 1997). At that time, the Ainu people had not yet been recognised as an indigenous people by the government, but the Sapporo District Court recognised</p>	<p>No</p>

Indicator	Description of Risk	Negligible
	<p>the Ainu as an indigenous people and ruled that the dam construction project, which would have had a serious impact on Ainu culture, was illegal.</p> <p>In addition, there are cases involving disputes over shared property and lawsuits seeking the return of Ainu remains collected for research purposes.</p> <p>And, under the Fisheries Resource Protection Law and the special fishing permit system, structural inequalities have been pointed out in the system between Ainu organizations and the Salmon Propagation Association.</p> <p>The permitted catch quota and actual catch figures for the Shizunai River are as follows: Ainu groups are limited to 100 fish, with an actual catch of 60 fish, while the Salmon Propagation Association has no upper limit on the permitted catch quota and reported an actual catch of 99,684 fish, effectively allowing unlimited fishing (2022). Additionally, in terms of procedures, Ainu groups are required to obtain consent from the Salmon Propagation Association, whereas the Salmon Propagation Association is not required to obtain consent from Ainu groups.</p> <p>Therefore, based on above circumstances of Ainu, it is determined that there is a risk is considered non-negligible.</p> <p><i>Risk mitigation measures:</i></p> <ol style="list-style-type: none"> 1. <i>FPIC Process preparation and implementation, oversight</i> <ol style="list-style-type: none"> 1a. <i>Obtain and review the FPIC procedure document and FPIC consent form referenced by the supplier to ensure that they adequately include Indigenous Peoples’ rights, information provision requirements, consultation steps, and the right to withdraw consent and that they follow FSC FPIC guidance.</i> 1b. <i>Provide training to suppliers on the correct implementation of FPIC procedures, including culturally appropriate engagement methods, and verify the suppliers’ understanding.</i> 1c. <i>Obtain and review annual FPIC process implementation records submitted by suppliers, such as briefing materials, meeting minutes, consent forms, and update logs, to ensure the process was conducted appropriately.</i> 1d. <i>Request and review the annual updates of existing consent to ensure that re-consultation is conducted when necessary.</i> 1e. <i>Implement contract management measures requiring suppliers to postpone activities until consent is obtained or disputes are resolved where any unresolved conflicts exist.</i> 2. <i>Respect for traditional resource use and land access</i> <ol style="list-style-type: none"> 2a. <i>Obtain and review survey reports and maps (Participatory mapping) submitted by suppliers to ensure that areas used by Indigenous Peoples for cultural activities, forest use, gathering, hunting, and fishing—such as lists of useful tree species and resource-use maps—are properly identified, before implementing forest management activities.</i> 2b. <i>Review forest management plans to ensure that culturally significant areas are excluded from operations or assigned buffers or conservation status (e.g., HCV areas).</i> 2c. <i>Verify that supplier forest management activities do not hinder traditional livelihoods such as hunting, gathering, or fishing, and review the status of any access agreements or co-management arrangements concluded based on consultations with Ainu, incorporating compliance obligations into supplier contracts.</i> 2d. <i>Obtain and review impact assessments prepared with input from Ainu knowledge to ensure that measures to avoid or minimize impacts on traditional resource use are incorporated.</i> 	

Indicator	Description of Risk	Negligible
	<p><i>3. Confirmation of the presence of indigenous peoples and identification of stakeholders</i></p> <p><i>3a. Obtain and review supplier assessments confirming the presence or absence of Ainu communities and Ainu-related land uses or activities—using interviews with multiple neighbouring municipalities, local Ainu associations, the Hokkaido Ainu Association, experts, residents, and literature reviews—to ensure comprehensiveness.</i></p> <p><i>3b. Review and validate the stakeholder list to ensure that identified Ainu groups and representatives are formally recognized as stakeholders for consultation, and require suppliers to adopt the same recognition.</i></p> <p><i>3c. Require suppliers to investigate any unresolved rights disputes or litigation, and ensure through contract conditions that activities are postponed or suspended until consent is obtained or the dispute is resolved.</i></p> <p><i>4. Continuous Dialogue, Monitoring, and Grievance mechanism</i></p> <p><i>4a. Obtain and review annual documentation from suppliers—regular meeting minutes, consultation records, cultural impact assessments, monitoring results—and require corrective actions where necessary.</i></p> <p><i>4b. Review monitoring arrangements to ensure that Indigenous Peoples have opportunities to participate in monitoring teams.</i></p> <p><i>4c. Obtain and review suppliers’ grievance mechanisms (contact points, procedures, timelines, escalation steps, received grievances and results) to ensure that Indigenous Peoples can access them fairly.</i></p> <p><i>4d. Provide training to suppliers on grievance procedures, FPIC requirements, and culturally appropriate engagement.</i></p> <p><i>5. Transparency: Record Keeping and Information Disclosure</i></p> <p><i>5a. Specify through contractual requirements that suppliers must retain original records related to FPIC, consultations, impact assessments, dispute resolution, and stakeholder engagement for at least 10 years, and review compliance annually.</i></p> <p><i>5b. Review whether information is shared with stakeholders—including Indigenous Peoples—through reasonable and accessible means such as websites, available for viewing, distribution to stakeholders, or briefing sessions.</i></p> <p><i>5c. Review annual reports and public disclosures to ensure that information on Indigenous engagement, including grievances and responses, is published in a form that enables third-party verification and ensures transparency.</i></p>	
44. Legal requirements related to the rights of Traditional Peoples are complied with.	Under Japanese domestic law, there are no laws defining traditional people, and therefore no traditional people have been recognized as traditional people.	Not applicable
45. The rights of Traditional Peoples, including land tenure and management, are respected and upheld according to the principles of FPIC.	The Okinawan/Ryukyuan people, residing in Okinawa Prefecture, are classified as Traditional Peoples under the current RA framework due to inconsistent self-identification within the community. Although U.S. military bases pose the greatest threat to their land rights, timber harvesting from these areas is minimal, making the risk of rights violations through wood sourcing negligible.	Not applicable
46. Legally recognised customary and community rights are identified and respected.	Japan’s traditional communal land-use system, iriai, once covered vast forest areas. However, it declined due to the introduction of modern land ownership systems after the Meiji era and changes in lifestyles. Today, disputes are rare, and the economic value of common lands has declined. No recent violations are reported, so the risk of improper logging due to customary rights is negligible.	Yes
47. The rights of local communities are respected and upheld.	Japan’s traditional communal land-use systems, Iriaichi and Iriai forests, declined after land reforms and the 1966 modernization law. Their role in daily life has diminished, and disputes now mainly concern external developments. With no recent violations reported, the risk of improper logging due to customary rights is negligible.	Yes

Indicator	Description of Risk	Negligible
48. Interaction with Indigenous Peoples, Traditional Peoples and local communities is conducted in a respectful and culturally appropriate manner.	<p>For Tohoku Region, Kanto Region, Chubu Region, Kinki Region, Chugoku-Shikoku Region, Kyushu Region</p> <p>There is no indigenous and traditional people in Tohoku Region, Kanto Region, Chubu Region, Kinki Region, Chugoku-Shikoku Region, Kyushu Region. Therefore, this indicator is not applicable in these region</p>	Yes
	<p>For Okinawa</p> <p>The primary threat to Okinawan/Ryukyuan rights is the presence of U.S. military bases, which have led to land rights infringements. While environmental issues like pollution and noise are documented, forestry-related concerns are absent. Timber harvesting does not occur on base lands, and no evidence links market timber to rights violations. A keyword search found no lawsuits related to forestry or land ownership. Thus, the risk of sourcing wood that infringes these rights is considered negligible.</p>	Yes
	<p>For Hokkaido</p> <p>The Ainu are the indigenous people of Hokkaido and its surrounding areas, and were officially recognised as an indigenous people by the Japanese government in 2008. It is estimated that approximately 13,000 Ainu live in Hokkaido (as of 2017). Since the 19th century, the Ainu have been deprived of their traditional lands and resources through Japanese assimilation policies and territorial annexation. Many Ainu still live in Hokkaido, and some are involved in forest resources (e.g., traditional hunting and gathering).</p> <p>According to Uemura (2024), forests were the foundation of all aspects of life and culture for the Ainu people, providing food (nuts and plants), building materials for dwellings, fibres for clothing, dyes, medicine, and ritual implements. In particular, tree species found near water (such as walnut, alder, hornbeam, and elm) were utilised. Forests were also used as hunting grounds.</p> <p>Historically, these forest resources were freely available, but since modern times, their free use has been greatly restricted.</p> <p>According to Konan (2024), interviews with Ainu people have revealed that they continue to utilise certain tree resources even today. However, since the modern Tokachi Ainu themselves were uncertain about the locations of the tree resources they collect, cultural transmission activities using purchased tree resources were occasionally observed.</p> <p>Ainu Policies (Domestic Law) – Japan has a law regarding the Ainu people called the ‘Act on Promoting Measures to Achieve a Society in which the Pride of Ainu People is Respected (APPA)’ (enacted in 2019). This law clearly states for the first time that the Ainu are an ‘indigenous people’ of Japan, but its main focus is on cultural promotion and the elimination of discrimination, and it does not include provisions guaranteeing the rights of indigenous peoples to their land and resources and FPIC. For example, the APPA allows the use of traditional flora and fauna resources only for the purpose of cultural preservation, but this is strictly a permit system and does not freely recognise the rights of indigenous peoples. Furthermore, there are no provisions regarding the restoration of collective land ownership or the guarantee of forest management rights. In fact, since the Meiji era, land in Hokkaido has been designated as state-owned or private property, and the traditional territorial rights of the Ainu have not been officially recognised. Domestic law does not sufficiently guarantee the ‘respect for the rights of indigenous peoples in accordance with FPIC’ as required by Indicator 43, and there are deficiencies and restrictions.</p> <p>Japanese law does not establish a FPIC process for indigenous peoples, but rather provides the same procedures for indigenous peoples as for other citizens. For example, the traditional Ainu practice of salmon fishing is uniformly</p>	No

Indicator	Description of Risk	Negligible
	<p>prohibited under the general permit system, and the unique rights of the Ainu are not taken into consideration. The Ainu argue that ‘current laws that prohibit them on an equal footing with non-indigenous people are nothing more than assimilation policies’ and are contesting their validity in accordance with international law (UNDRIP, etc.). However, Japanese law does not currently recognise this. In other words, domestic law does not guarantee the exercise of traditional rights of indigenous peoples or the formation of agreements through FPIC, and instead restricts rights through uniform application, which is inconsistent with the criteria.</p> <p>One notable court case concerning the rights of the Ainu people is the Nibutani Dam case, which arose over the development and destruction of Ainu sacred sites by the government (ruling in 1997). At that time, the Ainu people had not yet been recognised as an indigenous people by the government, but the Sapporo District Court recognised the Ainu as an indigenous people and ruled that the dam construction project, which would have had a serious impact on Ainu culture, was illegal.</p> <p>In addition, there are cases involving disputes over shared property and lawsuits seeking the return of Ainu remains collected for research purposes.</p> <p>And, under the Fisheries Resource Protection Law and the special fishing permit system, structural inequalities have been pointed out in the system between Ainu organizations and the Salmon Propagation Association. The permitted catch quota and actual catch figures for the Shizunai River are as follows: Ainu groups are limited to 100 fish, with an actual catch of 60 fish, while the Salmon Propagation Association has no upper limit on the permitted catch quota and reported an actual catch of 99,684 fish, effectively allowing unlimited fishing (2022). Additionally, in terms of procedures, Ainu groups are required to obtain consent from the Salmon Propagation Association, whereas the Salmon Propagation Association is not required to obtain consent from Ainu groups.</p> <p>Therefore, based on above circumstances of Ainu, it is determined that there is a risk is considered non-negligible.</p> <p>Risk mitigation measures:</p> <ol style="list-style-type: none"> 1. <i>FPIC Process preparation and implementation, oversight</i> <ol style="list-style-type: none"> 1a. <i>Obtain and review the FPIC procedure document and FPIC consent form referenced by the supplier to ensure that they adequately include Indigenous Peoples’ rights, information provision requirements, consultation steps, and the right to withdraw consent.</i> 1b. <i>Provide training to suppliers on the correct implementation of FPIC procedures, including culturally appropriate engagement methods, and verify the suppliers’ understanding.</i> 1c. <i>Obtain and review annual FPIC process implementation records submitted by suppliers, such as briefing materials, meeting minutes, consent forms, and update logs, to ensure the process was conducted appropriately.</i> 1d. <i>Request and review the annual updates of existing consent to ensure that re-consultation is conducted when necessary.</i> 1e. <i>Implement contract management measures requiring suppliers to postpone activities until consent is obtained or disputes are resolved where any unresolved conflicts exist.</i> 2. <i>Respect for traditional resource use and land access</i> <ol style="list-style-type: none"> 2a. <i>Obtain and review survey reports and maps (Participatory mapping) submitted by suppliers to ensure that areas used by Indigenous Peoples for cultural activities, forest use, gathering, hunting, and fishing—such as lists of</i> 	

Indicator	Description of Risk	Negligible
	<p><i>useful tree species and resource-use maps—are properly identified, before implementing forest management activities.</i></p> <p><i>2b. Review forest management plans to ensure that culturally significant areas are excluded from operations or assigned buffers or conservation status (e.g., HCV areas).</i></p> <p><i>2c. Verify that supplier forest management activities do not hinder traditional livelihoods such as hunting, gathering, or fishing, and review the status of any access agreements or co-management arrangements concluded based on consultations with Ainu, incorporating compliance obligations into supplier contracts.</i></p> <p><i>2d. Obtain and review impact assessments prepared with input from Ainu knowledge to ensure that measures to avoid or minimize impacts on traditional resource use are incorporated.</i></p> <p><i>3. Confirmation of the presence of indigenous peoples and identification of stakeholders</i></p> <p><i>3a. Obtain and review supplier assessments confirming the presence or absence of Ainu communities and Ainu-related land uses or activities—using interviews with multiple neighbouring municipalities, local Ainu associations, the Hokkaido Ainu Association, experts, residents, and literature reviews—to ensure comprehensiveness.</i></p> <p><i>3b. Review and validate the stakeholder list to ensure that identified Ainu groups and representatives are formally recognized as stakeholders for consultation, and require suppliers to adopt the same recognition.</i></p> <p><i>3c. Require suppliers to investigate any unresolved rights disputes or litigation, and ensure through contract conditions that activities are postponed or suspended until consent is obtained or the dispute is resolved.</i></p> <p><i>4. Continuous Dialogue, Monitoring, and Grievance mechanism</i></p> <p><i>4a. Obtain and review annual documentation from suppliers—regular meeting minutes, consultation records, cultural impact assessments, monitoring results—and require corrective actions where necessary.</i></p> <p><i>4b. Review monitoring arrangements to ensure that Indigenous Peoples have opportunities to participate in monitoring teams.</i></p> <p><i>4c. Obtain and review suppliers' grievance mechanisms (contact points, procedures, timelines, escalation steps, received grievances and results) to ensure that Indigenous Peoples can access them fairly.</i></p> <p><i>4d. Provide training to suppliers on grievance procedures, FPIC requirements, and culturally appropriate engagement.</i></p> <p><i>5. Transparency: Record Keeping and Information Disclosure</i></p> <p><i>5a. Specify through contractual requirements that suppliers must retain original records related to FPIC, consultations, impact assessments, dispute resolution, and stakeholder engagement for at least 10 years, and review compliance annually.</i></p> <p><i>5b. Review whether information is shared with stakeholders—including Indigenous Peoples—through reasonable and accessible means such as websites, available for viewing, distribution to stakeholders, or briefing sessions.</i></p> <p><i>5c. Review annual reports and public disclosures to ensure that information on Indigenous engagement, including grievances and responses, is published in a form that enables third-party verification and ensures transparency.</i></p>	

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

Specific questions:

For indicator 42,

- (1) Do you agree with the assessment of indicators in the Indicator 42 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Could you provide instances, data, or litigation information where the Ainu Policy Promotion Act (Act on Promoting Measures to Achieve a Society in which the Pride of Ainu People is Respected) has not been complied with or has been violated? [\[COMMENT BOX\]](#)
- (4) Could you inform us if there is a special monitoring system in place to ensure compliance with the Ainu Act? [\[COMMENT BOX\]](#)

For indicator 43,

- (1) Do you agree with the assessment of indicators in the Indicator 43 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Regarding the Ainu, could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the utilisation of forest resources and land use? [\[COMMENT BOX\]](#)
- (4) Regarding the Ainu, could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the utilisation of natural resources and land use other than forest resources ? [\[COMMENT BOX\]](#)
- (5) Could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the Ainu, including other matters in general? [\[COMMENT BOX\]](#)

For indicator 45,

- (1) Do you agree with the assessment of indicators in the Indicator 45 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Regarding Okinawa and the Ryukyu, could you provide instances, data, litigation, or concerns concerning infringements of rights related to forest resource utilisation and land use? [\[COMMENT BOX\]](#)
- (4) Regarding Okinawa and the Ryukyu, could you provide instances, data, litigation information, or concerns concerning infringements of rights related to the utilisation of natural resources and land use other than forest resources? [\[COMMENT BOX\]](#)
- (5) Could you also provide instances, data, litigation information, and concerns regarding rights violations in Okinawa and the Ryukyu, including other matters in general? [\[COMMENT BOX\]](#)
- (6) We concluded in first draft that ‘no timber harvesting occurs from land occupied by US military bases, and there is no evidence linking timber entering the market to rights violations against the people of Okinawa/Ryukyu.’ However, if instances, data, litigation information, or concerns regarding rights violations exist, could you provide them? [\[COMMENT BOX\]](#)

For indicator 46,

- (1) Do you agree with the assessment of indicators in the Indicator 46 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Regarding the communal forest (Iriaichi), could you provide any examples, data, litigation information, or concerns regarding infringements of rights related to forest resource utilisation (including timber production) or land use? [\[COMMENT BOX\]](#)
- (4) Could you provide any examples, data, litigation information, or concerns regarding infringements of rights related to the communal forest (Iriaichi), including other matters in general? [\[COMMENT BOX\]](#)
- (5) Could you provide examples, data, or information indicating whether forest resource utilisation (including timber production) is currently ongoing in the communal forest? [\[COMMENT BOX\]](#)
- (6) If examples exist, are such activities implemented in a manner recognising and respecting the common-use rights holders and customary rights? Furthermore, what are the specific legal requirements for forest resource utilisation (including logging) within the relevant common-use forest? [\[COMMENT BOX\]](#)
- (7) If there are special mechanisms for monitoring or prosecuting infringements of rights in the common-use area, could you provide information? [\[COMMENT BOX\]](#)

For indicator 47,

- (1) Do you agree with the assessment of indicators in the Indicator 47 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)
- (3) Regarding the communal forest (Iriaichi), could you provide any examples, data, litigation information, or concerns regarding infringements of rights related to forest resource utilisation (including timber production) or land use? [\[COMMENT BOX\]](#)
- (4) Could you provide any examples, data, litigation information, or concerns regarding infringements of rights related to the communal forest (Iriaichi), including other matters in general? [\[COMMENT BOX\]](#)
- (5) Could you provide examples, data, or information indicating whether forest resource utilisation (including timber production) is currently ongoing in the communal forest? [\[COMMENT BOX\]](#)
- (6) If examples exist, are such activities implemented in a manner recognising and respecting the common-use rights holders and customary rights? Furthermore, what are the specific legal requirements for forest resource utilisation (including logging) within the relevant common-use forest? [\[COMMENT BOX\]](#)
- (7) If there are special mechanisms for monitoring or prosecuting infringements of rights in the common-use area, could you provide information? [\[COMMENT BOX\]](#)

For indicator 48,

- (1) Do you agree with the assessment of indicators in the Indicator 48 ? [\[Multiple choice: Agree/ Agree with suggestions / Disagree\]](#)
- (2) If you disagree or have suggestions, please provide justification. [\[COMMENT BOX\]](#)

(3) Regarding the Ainu, could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the utilisation of forest resources and land use? [\[COMMENT BOX\]](#)

(4) Regarding the Ainu, could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the utilisation of natural resources and land use other than forest resources ? [\[COMMENT BOX\]](#)

(5) Could you provide instances, data, litigation information, or concerns concerning infringements of rights relating to the Ainu, including other matters in general? [\[COMMENT BOX\]](#)

Trade and transport

Indicators	Description of Risk	Negligible
49. Legal requirements related to the trade and transport of products are complied with.	Japan's Customs Act regulates the declaration and control of imports and exports, including timber. The Imported Timber Quarantine Guidelines require measures against pests and invasive species. The 2025 Clean Wood Act further mandates timber businesses to verify and retain records on species, origin, and legality for five years, strengthening monitoring. Comprehensive laws govern timber trade and transport to ensure legality, safety, and fair practices. Strengthened monitoring mitigates risks of illegal international trade, while stricter domestic regulations prevent overloading, collectively ensuring secure and compliant timber and timber product distribution. Despite remaining traceability issues, the 2025 enforcement of the Electronic Books Act is expected to advance digital management in timber trading, making document forgery and related risks negligible.	Yes
50. Legal requirements related to applicable trade restrictions and sanctions are complied with.	The Commercial Code regulates fraudulent transactions, including in timber trade. Forestry entities undergo inspections and audits by the NTA or tax offices, which review transaction documents to detect fraud. Large organizations are audited every 3–4 years, smaller ones about every 10 years.	Yes
51. Legal requirements related to the classification of products are complied with.	The Commercial Code regulates fraudulent transactions and applies to forestry product trade. Logging entities must report and undergo inspections. Internal, external, and tax audits detect fraud through transaction reviews, with large firms audited every 3–4 years and smaller ones about once per decade. Moreover, the JAS standard requires labeling of species, volume, and grade, and regular audits are conducted to prevent mislabeling, so the risk is negligible.	Yes
52. Legal requirements related to the export and/or import of products are complied with.	In Japan, numerous imports are handled, and many large sawmills operate their own wharves. Customs enforcement has become stricter due to rising cases involving narcotics and infectious diseases. False declarations are seldom accepted, and as a result, the risk is negligible.	Yes
53. Legal requirements relating to offshore trading and transfer pricing are complied with.	Japan manages transfer pricing in accordance with OECD international tax standards, through corporate tax filings and the exchange of offshore information. Consequently, the risks associated with cross-border transactions are considered negligible	Yes

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Specific questions:

For indicator 49,

This assessment has evaluated risks by considering not only legal frameworks directly related to timber transportation but also the implementation status of indirectly related regulations. However, there is limited reference to statistics and enforcement records that specifically address timber transportation. It would be greatly appreciated for your insights, from both an expert perspective and from a practical business standpoint, on the types of data that should be referenced and the risks that should be considered in relation to timber transportation. [\[COMMENT BOX\]](#)

For indicator 50,

The assessment has evaluated procedural risks in the commercial transactions of Japanese domestic timber based on commercial law. It would be very much appreciated for your opinions / thoughts regarding additional data and risks to consider, from both an expert perspective and a business practitioner's standpoint. [\[COMMENT BOX\]](#)

Due diligence and due care

Indicators	Short Description of Risk	Negligible
54. Legal requirements relating to due diligence or due care are complied with	<p><i>For State forests, Public forests, Non state forests with FMP</i></p> <p>Logging is conducted in state or public forests, which serve as sources of timber, contracts with the national or local government are required, and post-logging monitoring is also implemented. In the case of non-state forests with forest management plans, subsidies are often utilized, and third-party inspections are consistently carried out, therefore, the likelihood of illegal activity is extremely low.</p> <p><i>For Non state forests without FMP</i></p> <p>The revised Act on Promoting the Distribution and Use of Legally Harvested Timber, etc., came into effect in April 2025. This law requires all businesses, including middle and small businesses that introduce timber and timber products into the domestic market (defined as Type 1 timber-related businesses under the Clean Wood Act) [R287] to verify the legality of the timber. Additionally, businesses above a certain size threshold (The total volume of domestically procured timber amounts to 30,000 m³ or more, the total volume of imported timber converted into log equivalents amounts to 30,000 m³ or more, or the total volume of imported furniture, paper, and other non-timber goods amounts to 15,000 tons or more) [R286] must submit reports to the Minister of Agriculture, Forestry and Fisheries, the designated competent authority.</p> <p>Reporting is limited to timber and other materials acquired as a Type 1 timber-related business, and only when the volume exceeds one of the product-specific thresholds listed above, is a report required for all categories. The report must include (1) the total amount of timber and other materials acquired (reported by type), and (2) only the amount of timber and other materials in (1) whose legality has been confirmed.</p> <p>Since the first report will be submitted at the end of June 2026, this is a predictive assessment, but there is a lack of information on the implementation status of DD other than quantity, and the verification method by the authorities has not been made clear, so it is predicted that the DD system under the Act will not be usable as a system for eliminating illegal timber. [E19,E20]</p> <p>In response, some environmental NGOs have raised the following key points:</p>	<p>Yes</p> <p>No</p>

	<p>Mandatory Reporting for All Type 1 Businesses: Since risks of illegal logging exist not only among large enterprises but also small and medium-sized businesses, the government should require reporting from all Type 1 businesses while carefully considering the associated administrative burden.</p> <p>Introduction of Third-Party Evaluation for Legality Verification: To enhance the credibility of legality verification efforts by businesses, a system of independent third-party evaluation should be established, ensuring transparency and accountability.</p> <p>Harmonization of "Legal Timber" Definitions under the Clean Wood Act and the Green Purchasing Act: The current differing definitions and standards of "legal timber" between these two laws hinder effective sustainability and traceability. Therefore, unifying these definitions is essential.</p> <p>In conclusion, while the revised Act establishes a mandatory requirement for legality verification, the accompanying reporting obligations remain limited, thereby making it unlikely that an objective assessment can be conducted as to whether businesses have undertaken sufficient due diligence. Moreover, since the Act is a promotional law, not a regulatory law, no fines will be imposed unless a false report is made, because wood products that have not yet reached the stage at which legality verification is required fall outside the scope of regulation, compliance with the statutory requirements of the revised Clean Wood Act cannot, in itself, be regarded as ensuring the effective elimination of illegal timber from the market. The inability of the supervisory system to verify operators' reports against cases of illegal logging and timber distribution indicates that the risk cannot be considered negligible.</p> <p>Furthermore, when logging is conducted in national or public forests, which serve as sources of timber, contracts with the national or local government are required, and post-logging monitoring is also implemented. In the case of privately owned forests for which forest management plans have been established, subsidies are often utilized and third-party inspections are consistently carried out; therefore, the likelihood of illegal activity is considered to be extremely low.</p> <p>According to the Corruption Perceptions Index published by the international NGO Transparency International, Japan's CPI score for 2024 was 71, ranking 20th out of 180 countries. Accordingly, the overall risk is regarded as negligible</p> <p>Regarding threshold 2, because the Clean Wood Act is a promotional law, it does not have a mechanism for relevant parties to track businesses that handle illegal timber, and it is therefore expected that effective tracking will not be carried out, so there is a high possibility that threshold 2 will be violated.</p> <p><i>Risk mitigation measures:</i></p> <p><i>Verify that suppliers conduct legality verification, implement segregation management, and have established and are operating a robust Due Diligence System (DDS). For small and medium-sized enterprises (SMEs), item 3 may be omitted.</i></p> <ol style="list-style-type: none"><i>1. Legality verification: Confirm that domestic timber complies with legal requirements, including verification of the species, the place of harvest, and a certificate of legality.</i><i>2. Segregation management: Confirm that procedures are in place to separate timber whose legality has been confirmed from timber whose legality has not been confirmed.</i><i>3. Establishment and operation of a robust DDS: Confirm that a timber procurement policy has been formulated, dedicated personnel have been appointed, and director-level management is involved as responsible officers.</i>	
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For this indicator, do you agree with the assessment? [Yes](#) / [No](#) Please comment [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes](#) / [No](#) Please comment [\[COMMENT BOX\]](#)

Conversion and forest degradation

Indicator	Description of Risk	Negligible
55. There is no conversion from natural forest and no transformation of plantations to agricultural use since 31 December 2020	Japan strictly regulates forest conversion through the Forest Land Development Permit System, and natural forest loss is extremely low (0.00151% per year). FAO and GFW data show stable natural and primary forest areas, while forest-to-farmland conversion is not observed. Solar-related development is the only notable driver but remains well below the 0.02% threshold. Limited high-value hardwood demand and theft occurring mainly in accessible satoyama areas further reduce incentives for illegal conversion or logging. Overall, risks related to this indicator are negligible.	Yes
56. There is no conversion from natural forest to land uses other than agriculture since 31 December 2020.	<p>For State forests The government is reviewing laws and strengthening regulations regarding the conversion of forests for other uses, particularly for the installation of solar power facilities. Given this direction, it is considered extremely unlikely that such development activities would occur in state forests. Therefore, the risk associated with this indicator is judged to be negligible.</p> <p>For Public forests, Non state forests with FMP, Non state forests without FMP Legal systems related to forest conversion apply to all forests, including plantation forests. Conversion of private forests also requires obtaining permission from local governments based on the Forest Land Development Permit System.</p> <p>According to the Food and Agriculture Organization of the United Nations (FAO)'s "State of the World's Forests 2025 Country Report," Japan's natural forest area was 13,312,000 ha in 2007, 13,348,000 ha in 2012, 13,401,000 ha in 2017, and 13,464,000 ha in 2022. Forests with trees aged 81 years or older are classified as primary forests, showing no signs of human influence. The area of primary forest was 2.78 million ha in 2010, 2.90 million ha in 2015, 2.97 million ha in 2020, and 2.97 million ha in 2025. This indicates that natural forests have increased slightly, while primary forests have remained largely stable.[R210]</p> <p>According to Japan's data on the GFW dashboard, no values are published for Primary Forest loss. Looking at Tree cover loss, however, we see 48,000 ha (0.18% canopy cover) in 2021, 54,000 ha (0.2%) in 2022, 51,000 ha (0.19%) in 2023, and 54,000 ha (0.2%) in 2024, with an average of 51,750 ha from 2021 to 2024. Furthermore, examining forest loss in natural forest (excluding non-natural tree cover), the figures were 23,000 ha in 2021, 25,000 ha in 2022, 24,000 ha in 2023, and 25,000 ha in 2024, with a four-year average of 24,250 ha. The area of natural forests shown in the Land cover tab is 16,000,000 ha. Applying the average annual natural forest loss of 24,250 ha from 2021 to 2024 to this area yields an annual natural forest loss rate of 0.00151%, which is below 0.02%.[R244]</p> <p>The European Commission's official assessment under Article 29 of EU Regulation 2023/1115 does not classify Japan as "non-low risk."</p>	<p>Yes</p> <p>No</p>

Indicator	Description of Risk	Negligible
	<p>Since the introduction of the FIT system in July 2012, development activities on forest land for the purpose of installing solar power generation facilities have surged. From 2013 to 2022, the cumulative total reached approximately 13,000 cases in number and about 19,000 hectares in area[R2]. In 2023, the number of forest land development permits issued was 222, less than half the number from ten years ago, indicating a declining trend. However, there have been reports of development activities violating permit conditions in some cases, and concerns have been raised that adequate prevention of disasters and other incidents has not been achieved, as outlined below.</p> <p>In recent years, there has been concern that landslides and other disasters occurring during torrential rains, which have been frequent in various regions, are caused by forest land development related to solar power generation facilities. Specific examples include Ogawa Town, Arashiyama Town, Ogose Town, and Tokigawa Town in Saitama Prefecture (2019–2020), Mankan Town in Kumamoto Prefecture (2021), and Heguri Town in Nara Prefecture (2025) [R212, R213, R214]. A nationwide survey conducted by the Forestry Agency in 2020 also revealed that all confirmed sites of sediment runoff from small-scale forest land development were related to solar power projects [R215].</p> <p>As a countermeasure, the Forestry Agency amended the Forest Law Enforcement Order. Effective April 1, 2023, development activities for the purpose of installing solar power generation facilities in privately owned forests covered by regional forest plans require prefectural governor approval for projects exceeding 0.5 hectares.</p> <p>The Agency for Natural Resources and Energy also amended the Act on the Rational Use of Energy and the Shift to Non-Fossil Energy Sources (Energy Conservation Act) in 2023. Guidelines for Formulating Business Plans (Solar Power Generation) were revised, and local governments' guidance on installing and operating solar power facilities was reviewed.</p> <p>The Ministry of Land, Infrastructure, Transport and Tourism also fundamentally revised the Act on Regulation of Land Development, etc. and enacted it as the Act on Regulation of Land Development and Specific Embankments, etc. in 2023. This comprehensively regulates hazardous embankments, etc., regardless of land use.</p> <p>Furthermore, in February 2025, the Forestry Agency submitted to the Diet the “Bill to Partially Amend the Forest Management and Administration Act and the Forest Act,” which establishes new mechanisms for penalties against violations of permit conditions and the public disclosure of violators of orders. This bill was passed and enacted in May 2025, with implementation scheduled for April 2026.</p> <p>Logs and other timber sourced by forest land development are distributed as follows: good-quality logs enter the log market same as logs by standard Forestry activities, while the rest is primarily processed into chips. There are no specific regulations on timber sourced from forest conversion.</p> <p>Although countermeasures by the government are in place, their effectiveness in private forests, excluding state forests remains uncertain. Considering the marked increase in severe torrential rain disasters in recent years and the corresponding rise in related media coverage, this indicator designates private forests as posing a non-negligible risk. This is to encourage the implementation of DD (Disaster Mitigation) measures aimed at raising awareness regarding wood sourced from land converted to non-agricultural use.</p>	
57. There is no degradation of	FAO data show that both natural and primary forest areas in Japan have increased in recent decades. Solar power development has converted only a very small share of forest land (below 0.02% annually), and most domestic log supply comes from plantation	Yes

Indicator	Description of Risk	Negligible
natural forests since 31 December 2020.	species, with limited harvesting in natural forests. As large-scale or systematic natural forest degradation is not evident, the risk under this indicator is assessed as negligible.	

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Do you believe these risk mitigation measures are adequate and feasible to avoid or reduce risk? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

High Conservation Values (HCV 1-6)

Indicator	Description of Risk	Negligible
58. Concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional or national levels are identified and protected, maintained or enhanced (HCV1).	HCV forests and endangered species in Japan are protected through legislation, designated reserves, and conservation efforts by private organizations. HCV1 areas in Japan include reserved and protected forests under the Forest Act, where logging is strictly regulated to preserve public functions and ecosystems, resulting in a low risk of environmental damage. Consequently, the impact of commercial forestry, including plantation establishment and secondary forest conversion, is minimal, rendering the risk to HCV 1 areas and endangered species negligible	Yes
59. Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional, or national level.....are identified and protected, maintained or enhanced (HCV2).	Japan retains very few primary forests. Existing old-growth or high-scenic-value forests are regulated under national park and state forest protection systems. The NFSS Japan list designates HCV2 as linked to wildlife and forest protection zones requiring permits for construction, logging, and activities that may harm wildlife habitats or reproduction. Forestry primarily targets plantations, and pressure on protected areas is minimal. Consequently, the risk of HCV 2 being threatened by forestry activities is negligible.	Yes
60. Rare, threatened, or endangered ecosystems, habitats or refugia are identified and protected,	HCV 3 areas in Japan are safeguarded by domestic laws, international treaties, and protections such as national parks and IBAs, minimizing forestry-related risks. Impacts from invasive species are controlled under regulations, and the Amami–Okinawa region's national park status and World Natural Heritage designation ensure HCV 3 faces negligible threat.	Yes

Indicator	Description of Risk	Negligible
maintained, or enhanced (HCV3).		
61. Basic ecosystem services in critical situations, including the protection of water catchments and control of erosion of vulnerable soils and slopes, are identified and protected (HCV4).	Japan has a regulatory framework and longstanding management practices that protect disaster prevention and water resource values. Although some potential risks require continued attention, no significant negative impacts have been confirmed. Therefore, the risk to HCV 4 from forestry operations is assessed as negligible.	Yes
62. Sites and resources fundamental for satisfying the basic needs of local communities or Indigenous Peoples are identified and protected (HCV5).	In contemporary Japan, few depend on forests for their livelihoods, rendering HCV 5 inapplicable. Historically, Ainu communities in Hokkaido were significantly affected by forest and water resource development. However, current lifestyles no longer rely on forests. As for the Ryuku IPs, the Forestry Agency established a Comprehensive Management Plan and Regional Liaison Council to ensure the long-term conservation of the World Heritage Sites in Amami, Tokunoshima, Okinawa, and Iriomote. Regional Committees coordinate local governments, organizations, and NGOs to review action plans and promote cooperative management and conservation efforts. As local community involvement is also being promoted, and the risk to HCV 5 is negligible.	Yes
63. Sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance... of local communities or Indigenous Peoples are identified and protected (HCV6).	Japan's HCV 6 sites are safeguarded by the Cultural Properties Protection Act and local customs, rendering forestry-related risks negligible. Past issues of improper excavation have been mitigated through legislation and heightened awareness, making the likelihood of forestry threatening archaeological sites or indigenous burial grounds minimal. As for the Ryuku IPs, the Forestry Agency conducts five-year monitoring and established a Regional Scientific Committee to ensure science-based conservation of endemic species and Outstanding Universal Value. Efforts to prevent the spread of HCV are also being implemented, rendering the associated risk negligible.	Yes

For this indicator group, do you agree with the assessment of indicators? [Yes / No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for any of the indicators, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

Genetically Modified Organisms

Indicator	Description	Negligible
64. There is no commercial use of GMO	In Japan, the Cartagena Act strictly regulates the use of GMOs. Although their use is not prohibited, no commercial application of genetically modified timber species exists, and no violations have been reported, making the risk negligible.	Yes

For this indicator, do you agree with the assessment? [Yes](#) / [No](#) Please comment [\[COMMENT BOX\]](#)

If you think that there is a non-negligible risk for the indicator, please suggest risk mitigation measures for these risks [\[COMMENT BOX\]](#)

The End. Thank you!