

Mori & Partners

Roppongi Hills North Tower 16F, 6-2-31 Roppongi, Minato-ku, Tokyo 106-0032 Japan
TEL: 03-6831-9281 FAX: 03-6800-5542
<https://mps-legal.com/>

Japan's Product Safety 4 Laws Reformed: Extra-Territorial Compliance Duties for Foreign E-commerce Operators

December 5, 2025

I. Introduction¹

Driven by the rapid expansion of cross-border e-commerce and recurring safety incidents involving overseas-manufactured electrical appliances, lithium-ion batteries, and household devices, the Japanese government has substantially revised its product-safety framework. These amendments extend the statutory obligations traditionally imposed on domestic importers to a new category of foreign operators that sell regulated products directly to consumers in Japan.

Under this revised regime, overseas manufacturers, marketplace sellers, and D2C brands may be legally treated as "Specified Importers" even without any physical presence, employee, or entity in Japan. This designation triggers regulatory duties, including technical-standards compliance, documentation retention, accident reporting, and the requirement to appoint a Japan-based Domestic Manager who will act as the regulatory representative before METI and other authorities.

These changes represent a deliberate shift by the Japanese government to eliminate enforcement blind spots that emerged as digital platforms increasingly enabled direct-to-consumer sales from abroad. As a result, a wide range of overseas operators (particularly those handling electrical appliances, lithium-ion-battery products, gas devices, and other regulated consumer goods) must reassess their Japan-facing business models and prepare for a structured compliance cycle.

¹ This communication is provided as a service to our clients and friends and is for informational purposes only. It is not intended to create an attorney-client relationship or constitute an advertisement, a solicitation, or professional advice as to any particular situation. Further, the legal framework related to e-commerce and consumer protection laws in Japan is subject to frequent amendments and evolving regulatory interpretations. Readers are strongly encouraged to verify the most up-to-date information and seek advice from counsel before taking any action.

The sections below outline the key elements of this new framework, focusing on:

- the statutory structure under the Product Safety 4 Laws;
- the definition and scope of a Specified Importer;
- mandatory obligations imposed on overseas operators; and
- a practical roadmap for achieving compliance.

II. Legal Framework – Product Safety 4 Laws

Japan's product-safety framework for consumer goods is built around four statutes collectively referred to as the "Product Safety 4 Laws." These laws establish technical standards, conformity-assessment requirements, labeling obligations, and post-market duties for a broad range of consumer and industrial products. As of 25 December 2025, the revised regime extends these obligations to overseas businesses that sell regulated products directly to Japanese consumers, including through digital platforms.

The Product Safety 4 Laws consist of the following regulatory pillars:

(1) Consumer Product Safety Act:

Governs designated consumer products that present higher safety risks (e.g., laser pointers, pressure cookers, helmets, magnetic toys). It also establishes a mandatory accident-reporting system for serious incidents.²

(2) Electrical Appliances and Materials Safety Act:

Regulates electrical appliances (both AC-powered and lithium-ion-battery-powered) and prescribes detailed technical standards, conformity assessments, and labeling requirements. This category includes lithium-ion battery products, mobile batteries, AC adapters, home appliances, AV equipment, lighting products, and beauty-care devices.³

(3) Gas Business Act:

Covers gas-fueled appliances such as gas water heaters and gas stoves, including specific conformity inspections by registered testing bodies.⁴

(4) Act on the Securing of Safety and the Optimization of Transactions of Liquefied Petroleum Gas:

² See, Explanation on the Consumer Product Safety Act by the Ministry of Economy, Trade and Industry, available at <https://www.meti.go.jp/policy/consumer/seian/shouan/item.html>

³ See, the Electrical Appliances and Materials Safety Act by the Ministry of Economy, Trade and Industry, available at <https://www.meti.go.jp/policy/consumer/seian/shouan/item.html>

⁴ See, "Samples of Subject Products" by the Ministry of Economy, Trade and Industry, available at <https://www.meti.go.jp/policy/consumer/seian/gasji/item.html>

Regulates LPG-powered devices such as portable gas stoves, gas torches, LPG leak detectors, and related fittings.⁵

Under the statutes, regulated goods must comply with technical standards established by the Ministry of Economy, Trade and Industry (“METI”), and the corresponding conformity documentation must be retained by the responsible business operator in Japan.

III. Who Is a “Specified Importer”? – Extra-Territorial Reach to Overseas E-Commerce Sellers

Japan’s revised Product Safety 4 Laws introduce a new regulatory category known as the “Specified Importer” (*Tokutei Yunyu Jigyo-sha*).

1. Specified Importer

A Specified Importer means a business operator located outside Japan that imports regulated products directly to general consumers in Japan without using a domestic importer.⁶

This definition applies regardless of the company’s corporate form or size.

A manufacturer, a trading company, or an online seller operating through a digital platform may fall within the scope, so long as (i) the business operator is based outside Japan, (ii) the products are supplied directly to consumers in Japan; and (iii) the products fall within the categories regulated by the Product Safety 4 Laws.

Historically, Japan’s product safety regime assumed that a **domestic importer** existed and would take responsibility for compliance.

The revised laws change this model. If an overseas seller uses a digital marketplace to ship goods from abroad directly to Japanese consumers, the overseas seller itself is deemed the importer, even though it is not physically present in Japan. This statutory approach reflects the government’s objective to eliminate regulatory blind spots created by the rapid expansion of cross-border e-commerce.

2. Typical Scenarios Capturing Overseas E-Commerce Sellers

⁵ See, “Samples of Subject Products” by the Ministry of Economy, Trade and Industry, available at <https://www.meti.go.jp/policy/consumer/seian/ekiseki/item.html>

⁶ See, Explanation on the Notification under the Product Safety 4 Laws by the Ministry of Economy, Trade and Industry, available at https://www.meti.go.jp/product_safety/tokuteiyunyu/tokuteiyunyu.html

The following business models are now within scope:

(1) **Direct overseas fulfillment**

The seller located outside Japan ships directly to consumers without a domestic intermediary.

(2) **Platform-based storefronts operated by overseas entities**

Even if the seller is not the manufacturer, operating a branded storefront or seller account on digital platforms can qualify the operator as a Specified Importer.

(3) **Third-party brands using overseas logistics hubs**

If the product is not imported by a Japanese entity before sale, responsibility shifts to the overseas operator.

3. Manufacturers vs. Marketplace Sellers — Both Can Be Specified Importers

Importantly, the law does **not** distinguish:

- manufacturers vs. resellers
- OEM/ODM brands vs. marketplace merchants
- large enterprises vs. small-scale online stores

Even a non-manufacturer seller operating an Amazon storefront may be treated as the “importer” for regulatory purposes. As a result, the revised regime affects not only global appliance manufacturers but also thousands of smaller cross-border e-commerce sellers who may not previously have considered themselves subject to Japanese product-safety laws.

IV. Key Obligations for Overseas Brands and Sellers

Once an overseas operator is classified as a Specified Importer, the following obligations arise:

- (1) Appointment of a Japan-based Domestic Manager (“*Kokunai Kanrinin*”)
- (2) Submission of Business Notifications to METI (one per product category)
- (3) Retention of technical documentation, test records, and certificates of conformity
- (4) Accident reporting, recall coordination, and cooperation with investigations
- (5) Display of the PS Mark bearing the name of the Specified Importer

Failure to comply may prevent the seller from legally applying the PS Mark, resulting in inability to sell regulated products on digital platforms.

In this Section, we focus on two core obligations for overseas operators:

- (1) the appointment of a Japan-based Domestic Manager, and**
- (2) the submission of Business Notifications to METI.**

1. Appointment of a Domestic Manager (“*Kokunai Kanrinin*”)

A significant new obligation for overseas businesses is the mandatory appointment of a Japan-based Domestic Manager, who acts as the Specified Importer’s primary representative for product safety matters.

(1) Legal Position and Required Qualifications

According to METI’s published standards, the Domestic Manager (i) must have a residential address or office in Japan; (ii) must be able to communicate in Japanese; and (iii) must be capable of performing safety-related obligations on behalf of the overseas operator.⁷

In practice, the Domestic Manager functions as a quasi-statutory representative responsible for coordinating compliance and receiving official communications from Japanese authorities.

(2) Core Responsibilities

Under the Product Safety 4 Laws, the Domestic Manager is responsible for:

- (i) **Receiving administrative notices**, inquiries, corrective orders, and other communications issued by METI or local economic bureaus;
- (ii) **Retaining technical documentation**, including conformity certificates, testing records, inspection reports, and manufacturing information;
- (iii) **Maintaining the product safety file**, ensuring that documentation can be provided upon request;
- (iv) **Coordinating accident reporting** and recall-related actions;
- (v) **Responding to on-site inspections**, document requests, and product submission orders;
- (vi) **Providing updated information** when the Specified Importer changes its address, product categories, or other statutory details.⁸

Without appointing a Domestic Manager, regulated products cannot be sold in Japan

⁷ See, “Requirements for Domestic Managers” by the Ministry of Economy, Trade and Industry, available at https://www.meti.go.jp/product_safety/tokuteiyunyu/tokuteiyunyu.html

⁸ See, “Obligations of Domestic Managers” by the Ministry of Economy, Trade and Industry, available at https://www.meti.go.jp/product_safety/tokuteiyunyu/tokuteiyunyu.html

because the PS Mark cannot legally be affixed.

2. Business Notification to METI as a Specified Importer

Before commencing the importation of regulated products, the Specified Importer must submit a Business Notification (*jigyō todokede*) to METI (or the relevant regional bureau).

A typical Business Notification package includes:

- (i) Business Notification Form
- (ii) Evidence of the Domestic Manager's identity (corporate registry extract or residence certificate)
- (iii) Authority Certificate granting the Domestic Manager authority to receive notices
- (iv) Service Agreement between the Specified Importer and the Domestic Manager
- (v) Statutory Declarations / Oaths affirming compliance.⁹

All forms must be prepared in Japanese, and foreign-language documents require Japanese translations unless METI specifically allows English.

Importantly, filings are required per product category. For example, a company selling robot vacuum cleaners (PSE appliances) and lithium-ion batteries may need two separate notifications. This category-based structure is often overlooked by overseas sellers, but failure to file for each applicable category constitutes a violation.

V. Conclusion

Japan's revised Product Safety 4 Laws represent a structural shift in the country's consumer-product regulatory framework, extending statutory obligations to overseas manufacturers and e-commerce sellers that previously operated outside Japan's traditional import model. Under the new regime, any foreign operator supplying regulated products directly to Japanese consumers may be deemed a Specified Importer, regardless of physical presence in Japan. This designation brings with it a series of legally binding responsibilities including the appointment of a Japan-based Domestic Manager, mandatory notifications to METI, retention of technical documentation, accident reporting, and proper PS Mark labeling.

Given the breadth of products regulated under the Product Safety 4 Laws (particularly

⁹ See, Explanation on the Notification under the Product Safety 4 Laws by the Ministry of Economy, Trade and Industry, available at https://www.meti.go.jp/product_safety/tokuteiyunyu/tokuteiyunyu.html

electrical appliances, lithium-ion-battery products, household devices, and gas-related equipment) overseas e-commerce operators should promptly evaluate whether their Japan-facing business models fall within the scope of the amended framework.

Further contact:



Shinichiro ("Shin") Mori
MANAGING PARTNER

T: +813-6831-9281

E: shinichiro.mori@mps-legal.com

About Mori & Partners

Mori & Partners is a Tokyo-based law firm with a strong focus on cross-border matters. The firm represents international clients across diverse sectors, including technology, e-commerce, gaming, energy and fintech. Combining deep knowledge of Japanese law with international practice standards, Mori & Partners provides strategic, bilingual support in corporate and regulatory matters. <https://mps-legal.com/en/>