



CLOSE UP: Artificial Intelligence (AI)

Japan's Evolving AI Governance: Balancing Innovation and Rights Protection in the Generative AI Era

Key Takeaways

- Japan is promoting AI innovation through a light touch regulatory approach, while facing rising pressure to strengthen rights protections.
- Creators and rights holders are demanding greater transparency, consent, compensation, and safeguards against AI misuse and deepfakes.
- The government is expected to form a new system where both the AI and the contents industries benefit and continue to act as drivers of the Japanese economy

Japan positions itself as a global leader in innovation friendly AI governance amid the rapid expansion of generative AI technologies.



Overview

Japan stands at a pivotal juncture in AI governance. Having enacted its inaugural AI statute in May 2025—an innovation-forward framework that deliberately avoids the prescriptive regulatory burdens of the EU AI Act—the country faces mounting pressure from creators, performers, and rights holders demanding concrete protection against AI-driven misuse of their intellectual property, voice, and likeness. This report examines the trajectory of Japan's AI policy landscape, tracing rights holders' advocacy efforts, the government's institutional responses, as well as emerging regulatory and quasi-regulatory instruments being developed to bridge the gap between innovation promotion and rights protection. The report concludes that the central policy challenge facing Japan is not a binary choice between innovation and rights protection, but the construction of a governance architecture that serves both imperatives simultaneously. Close monitoring of the government's evolving measures will be essential for any stakeholder seeking to anticipate the direction of Japan's AI policy and its implications for the content creation industry, platform operators, and end consumers alike.

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Introduction

Artificial intelligence (“AI”), particularly generative AI, has rapidly transformed the production and dissemination of creative works, voice synthesis, image generation, and digital content. While these technologies promise economic growth and innovation, they have also generated significant legal and policy concerns relating to copyright infringement, unauthorized use of personal likeness and voice, deepfakes, and unfair exploitation of creators’ works. Japan has recently accelerated its institutional response to these challenges.

In 2025, Japan enacted the “Act on the Promotion of Research, Development and Utilization of Artificial Intelligence-Related Technologies” (commonly referred to as the “AI Promotion Act” or “AI Act”). Unlike the European Union’s AI Act, which adopts a binding, risk-based regulatory framework that imposes extensive compliance obligations and penalties on AI providers, Japan’s approach remains comparatively light-touch and innovation-oriented. The Japanese framework emphasizes voluntary compliance, cooperation between government and industry, and flexible governance mechanisms rather than hard regulation. Whereas the EU AI Act classifies AI systems by risk level and imposes mandatory transparency, safety, and accountability obligations, Japan’s AI governance model has largely relied on guidelines, principles, and administrative coordination. Critics argue that this softer approach may leave gaps in enforcement, particularly concerning intellectual property (“IP”) protection and rights infringements by foreign AI providers.

Moreover, mounting concerns from creators, performers, publishers, and civil society organizations have intensified pressure on the Japanese government to strengthen safeguards against AI-related rights violations. Policy discussions increasingly focus on balancing innovation promotion with protection of copyright, portrait rights, voice rights, and personal dignity.

Rights Holders’ Advocacy and Policy Proposals

The proliferation of generative AI has created acute tensions with creators, performers, publishers, and other rights holders who have watched AI systems trained on their works, reproduce their voices, and generate their likenesses—often without consent, compensation, or attribution. Japanese rights holders have mounted an increasingly organized and politically assertive campaign for legislative and regulatory remedies, including through direct engagement with political parties and government agencies. Since 2023, manga artists, musicians, voice actors, publishers, and entertainment organizations have repeatedly submitted policy proposals to the Liberal Democratic Party (LDP), the Cabinet Office, the Agency for Cultural Affairs, and other governmental bodies requesting stronger protections.

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One prominent concern relates to Article 30-4 of the Japanese Copyright Act, which broadly permits the use of copyrighted works for “information analysis” purposes—including AI training—without the authorization of the rights holder, provided such use does not “unreasonably prejudice the interests” of the copyright holder. The legislative intent behind the provision, introduced in the 2018 amendment to the Copyright Act, was premised on the assumption that the input stage of information analysis does not involve the *enjoyment* of the expressive content of a copyrighted work, and that the rights holder would accordingly suffer no material disadvantage. In other words, the legislature drew a conceptual distinction between the consumption of creative expression—which requires authorization—and the computational processing of works as data, which it treated as harmless to rights holders and therefore freely permissible. Organizations representing creators have therefore sought legislative reform and clearer guidelines. Japan Actors Union (*Nippairen*) has publicly endorsed EU’s AI Act as a model for Japanese reform.

In October 2025, the Content Overseas Distribution Association (CODA), representing a broad range of Japanese content rights holders, submitted a formal written request to OpenAI demanding that the company cease using member companies’ content without permission for AI training purposes, with specific reference to concerns surrounding the Sora 2 video generation model and its outputs resembling Japanese creative content. The request carried tangible consequences: OpenAI subsequently suspended its Sora 2 service on 26 April 2026.

In October 2024, a breakthrough moment in Japanese rights-holder advocacy occurred with the launch of the “NOMORE無断生成AI*” (No More Unauthorized Generative AI) campaign. Led by an informal coalition of prominent voice actors—including celebrated performers such as Koichi Yamadera, Ryusei Nakao, Yuki Kaji, and Jun Fukuyama—the campaign launched video content in which 26 leading voice actors publicly articulated their concerns about the unauthorised use of their voices. Nippairen and the Japan Audio Producers’ Association (日本音声製作者連盟) participated as founding supporting organizations.

The campaign defined “unauthorized generative AI” as AI-generated content created through additional training on, or generation from, a performer’s recordings without consent—regardless of whether the initial training data collection fell within the Article 30-4 exception. Its first video garnered tens of thousands of views within 24 hours, demonstrating both public interest and the political significance of the issue. By late 2024, the breadth of organizations supporting the campaign had grown substantially.

In a notable 2025 incident underscoring the informal “opt-out” nature of the current framework, Nippairen formally requested the DMM Group’s “NijiVoice” AI voice service to remove certain voice models that demonstrated greater than 90% similarity to identifiable real voice actors. While the operator complied with the takedown request, it maintained that no rights infringement had occurred, highlighting the legal uncertainty that persists around AI voice synthesis.

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* <https://nomore-mudan.com>



In political discussions, rights holders have consistently demanded:

1. Greater transparency regarding training data;
2. Opt-out or consent mechanisms;
3. Compensation systems for creators;
4. Legal clarification concerning AI-generated deepfakes; and
5. Stronger accountability for platform operators and AI developers.

These demands have significantly shaped recent government deliberations.

Government Initiatives and Current Policy Discussions

As generative AI advances, creators and rights holders are pushing for stronger protections against unauthorized use of copyrighted works, voices, and digital likenesses.



The Japanese government has launched several major initiatives to address AI-related rights infringement concerns while maintaining a pro-innovation policy stance.

Principle Code for Protection of Intellectual Property and Transparency toward Appropriate Use of Generative AI

One of the most significant recent initiatives is the “Principle Code for Protection of Intellectual Property and Transparency toward Appropriate Use of Generative AI” (AIプリンシプルコード). Developed under the Cabinet Office and IP Strategy Headquarters, the framework adopts a “comply or explain” model rather than legally binding obligations. The Principle Code encourages AI developers and providers to establish governance systems respecting intellectual property rights, improve transparency concerning training data and model specifications, respect technical restrictions including digital watermarking of AI-generated outputs, and provide users with warnings concerning potential infringement risks.

The Principle Code has attracted substantial criticism from both industry and rights holders. AI developers argue that the framework imposes burdensome disclosure expectations that may be technically infeasible, especially for large-scale foundation models trained on vast datasets. Japanese AI businesses have also expressed concern that voluntary domestic compliance may disadvantage them against foreign competitors not effectively subject to Japanese soft-law governance. Conversely, creators and rights holders criticize the framework for lacking binding force and enforceable remedies, arguing that voluntary compliance alone is insufficient to deter unauthorized AI training and deepfake misuse.

Key government committees

Another key initiative is the Intellectual Property Strategy Headquarters’ “Study Group on Intellectual Property Rights in the AI Era” (AI時代の知的財産権検討会).



This study group has examined legal and policy issues arising from generative AI, including copyright limitations, transparency obligations, compensation mechanisms, and international regulatory developments. Its interim reports and discussion papers emphasize the need to reconcile innovation promotion with protection of Japan's creative industries, which are regarded as strategic national assets. The study group has also discussed practical guidance for copyright holders and possible licensing frameworks facilitating lawful AI training.

In parallel, the Ministry of Justice recently established the “Study Group on Civil Liability for Unauthorized Use of Portraits, Voices and Similar Attributes” (“肖像、声等の無断利用による民事責任の在り方に関する検討会”). This initiative directly addresses growing concerns regarding AI-generated deepfakes and synthetic reproductions of individuals' identities. The study group examines whether existing Japanese civil law sufficiently protects individuals against unauthorized AI-generated use of facial images, voice data, and other identifying attributes. Discussions include possible recognition of expanded personality rights, new tort-based remedies, injunction mechanisms, and compensation standards for AI-related misuse.

International collaboration

An important dimension to Japan's evolving platform governance framework emerged on 5 May 2026, when Japan and the European Union concluded the Fourth Japan-EU Digital Partnership Ministerial Meeting in Brussels. Among the outcomes of that meeting, Japan's Ministry of Internal Affairs and Communications (MIC) and the European Commission's Directorate-General for Communications Networks, Content and Technology (DG CONNECT) announced a Joint Statement referring to a Cooperation Arrangement for a framework “in areas related to the transparency of content moderation systems and the effectiveness and transparency of reporting systems for illegal content and rights-infringing information,” covering issues of common interest relating to the implementation of the EU's Digital Services Act (DSA) and Japan's Act on the Promotion of Transparency and Accountability in the Distribution of Information on Internet Platforms (情報流通プラットフォーム対処法, Information Distribution Platform Act).

The significance of this Cooperation Arrangement for AI-related rights protection should not be understated. Japan's Information Distribution Platform Act, enacted in 2024 as an amendment and retitling of the Provider Liability Limitation Act (プロバイダ責任制限法), imposes obligations on large-scale social media and platform operators to respond promptly to removal requests for illegal and harmful content, and to ensure transparency in their operational policies and content moderation systems. The Act is directly germane to the AI rights landscape: AI-generated deepfakes, unauthorized voice content, and rights-infringing generative outputs are increasingly distributed through the very platforms the Act regulates. The Cooperation Arrangement signals that Japan and the EU intend to align their approaches to platform enforcement — including their handling of “rights-infringing information” — in a manner that could ultimately inform stronger obligations on platform operators to address AI-generated rights violations. As Japan continues to develop its domestic AI governance framework, the prospect of harmonization with the DSA's more robust enforcement architecture may provide additional impetus for the government to move beyond soft-law instruments toward more binding platform-accountability measures in the AI context.

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The LDP's AI White Paper 2.0

While the measures directed at platform operators address important enforcement concerns, the LDP's AI White Paper 2.0, published by the AI and Web3 Subcommittee of the Digital Society Promotion Headquarters, takes a broader view of the regulatory architecture as a whole. It cautions that framing the issue as a binary contest between copyright holders and AI businesses risks accelerating the hollowing-out of both the AI and the content industries simultaneously. In its place, it advocates for a new ecosystem in which robust IP protection, licensing, and creator compensation operate in tandem with effective data connectivity and management infrastructure. The document further calls for a systematic analysis of the structural barriers that prevent rights holders from exercising their rights in practice and flags the need to examine dedicated legal frameworks for the protection of personal voice.

Conclusion

Japan's response to AI-related rights infringement is evolving rapidly. The range of government initiatives examined in this report reflects a growing governmental recognition that generative AI poses multifaceted challenges that no single legal instrument can adequately address.

At present, Japan remains committed to a comparatively flexible and innovation-friendly governance model distinct from the EU's more stringent regulatory framework. However, a sustained pressure from creators, performers, and rights holders, combined with the government's own identification of the content industry as a strategic driver of economic growth, suggests that stronger regulatory measures may eventually emerge, particularly regarding transparency, compensation, and protection against deepfake misuse.

The central policy challenge for Japan will be balancing industrial competitiveness with effective protection of intellectual property, personal dignity, and creative labor. As AI technologies continue to develop, Japan's policy trajectory may become an important global model for reconciling innovation policy with cultural and personality rights protection.

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