

Survey on Trades of School Uniforms at Public Junior High Schools
(Tentative translation)

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The Japan Fair Trade Commission

I. Objectives

Public junior high school students generally wear school uniforms and it is common that the parents of students entering junior high schools are asked to purchase school-specified uniforms. Those school uniforms are relatively expensive among the items parents need to buy for their children entering junior high schools. In recent years, the prices of school uniforms have been on the rise.

Under these circumstances, with the aim of confirming if there are any trade practices in trades of school uniforms at public junior high schools, which might cause problems from the viewpoints of the Antimonopoly Act (hereinafter, “AMA”) or competition policies, the Japan Fair Trade Commission (hereinafter, “JFTC”) has initiated a survey on conducts of schools specifying their uniforms against school uniform manufacturers, conducts of schools specifying their uniforms against distributors and conducts of school uniform manufacturers and distributors.

II. The targets of this survey, etc.

1 The targets of this survey

This survey was conducted to clarify trades of school uniforms at public junior high schools which accept students without entrance examinations (academic achievement tests, aptitude tests, etc.)

2 Survey methods

This survey was conducted from December 2016 through July 2017 using the following methods:

(1) Questionnaires

A questionnaire survey was addressed to 600 schools chosen from all public junior high schools in Japan (a total of approximately 10,000) on the designation and specifications of school uniforms, the relationship between schools and school uniform manufacturers (hereinafter, “manufacturers”), the relationship between schools and school uniform distributors (hereinafter, “distributors”), selling prices of school uniforms, and so forth (447 schools responded with a recovery rate of 74.5%).

(2) Interviews

The following 45 organizations were interviewed for this survey:

- a. 4 manufacturers
- b. 7 distributors
- c. 27 public junior high schools
- d. 7 others

III. Survey Results (key points of the summary)

- 1 Relationship between schools and manufacturers/distributors (pages 5 to 7 of the summary)
 - Many of the schools that designate a manufacturer of school uniforms do not review the designation of the manufacturers. There are some schools which continued to designate the same manufacturers without knowing the reason for it.
 - 16.1% of the respondents regularly reviewed their designated/handled distributors (hereinafter, "designated distributors, etc.") in the last five fiscal years. However, there was not much change in designated distributors, etc.
 - In order to ensure reasonable uniform prices and transparent, some schools hold bids to select manufacturers/distributors.
- 2 Selling prices of school uniforms (pages 8 to 11 of the summary)
 - The most popular price range of a school uniform set (school uniforms with the related items that each school specifies such as shirts) is from ¥30,000 (incl.) to ¥35,000 (excl.).
 - There is a tendency that average uniform selling prices are lower in the local governments that standardize their school uniform specifications than the ones in other local governments.
 - There is a tendency that average selling prices of school uniform are lower when the number of designated distributors, etc. is more than four than the ones when the number is one.
 - There is a tendency that average selling prices of school uniform are lower when schools are involved in the determination of selling prices.
- 3 Ensuring fair competition in trades of school uniforms (pages 12 to 16 of the summary)
 - When a school is involved in trades of school uniforms, the school is expected to take the following actions so that competition works effectively between manufacturers and between distributors.
 - In selecting manufacturers and designated distributors, etc., the school selects manufacturers by a method of competition, also increases the number of designated distributors, etc. by accepting new entrants.
 - When a school is involved in the determination of selling price of school uniforms, the school requests that manufacturers be to submit wholesale price, not retail price, in competitions, also requests that manufacturers/distributors be to offer lower selling prices for a new school uniform at a price lower than the one for an existing uniform when the school carries out a competition, etc.
 - When a school is involved in trades of school uniforms, it should be noted that depending on how school acts, the involvement might induce violation of the AMA by manufacturers or distributors.
 - Not to mention violations attributable to themselves, manufacturers and distributors must keep in mind that they would be held legally liable for acts violating the AMA even if those result from the involvement of schools.
 - The JFTC will actively distribute the results of this survey widely to school officials, keep monitoring trades of school uniforms at public junior high schools and take strict actions against any violations of the AMA.