



公正取引委員会

Japan Fair Trade Commission



Fact-finding Survey on the actual transaction environment for creators at anime production sites [Key Points]

December 2025



公正取引委員会

Japan Fair Trade Commission

Survey purpose

◆ **Grand Design and Implementation Plan for New Capitalism, 2024 Revised Edition (Cabinet Decision, June 21, 2024)**

“In order to establish a transaction environment in which the creativity of individual creators in film and animation can be fully exercised, following fact-finding surveys in the music and broadcast program sectors, we will conduct a fact-finding survey on the transaction environment for creators at film and animation production sites from the beginning of 2025.” (A statement to the same effect appears in the 2025 Revised Grand Design and Implementation Plan for New Capitalism.)



◆ **To create a transaction environment that enables individual creators to fully realize their creative potential**, this survey examines transaction practices affecting creators at film and anime production sites.

Survey methodology

Questionnaire survey

| | |
|------------------------------|---|
| Number distributed | Production companies: 417 companies Freelancers: over 1,900 |
| Number of responses received | Production companies: 130 companies (31.2%) Freelancers: 165 |
| Implementation period | June 16 to July 22, 2025 |

Interview survey

| | |
|-----------------------------------|----|
| Production company | 34 |
| Freelance(r) | 16 |
| Industry association | 4 |
| Production committee, etc. | 14 |
| Experts (lawyers, scholars, etc.) | 7 |
| Total | 75 |

Information submission form (film and anime, common)

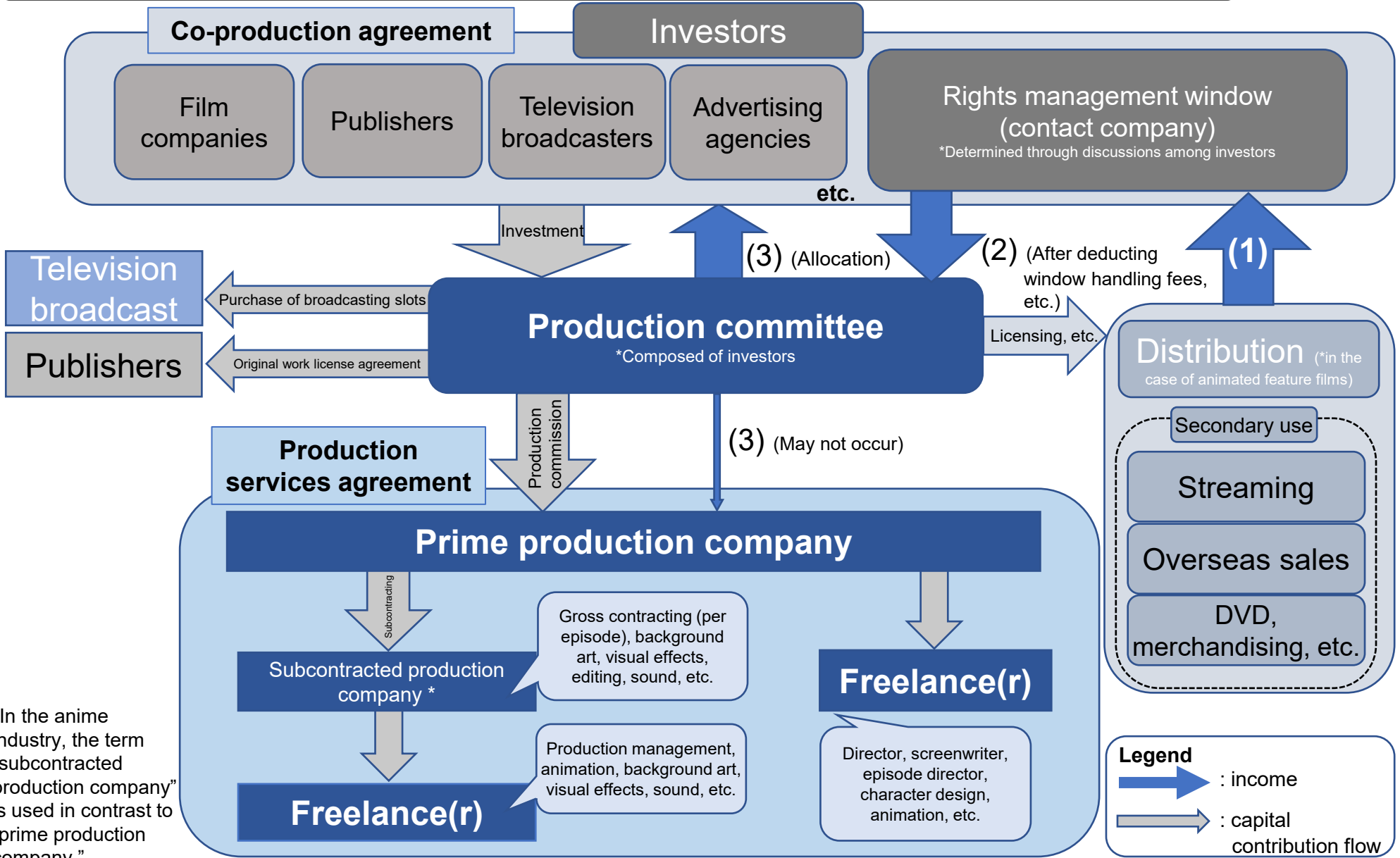
Number of responses: 219 in total

Response of the Japan Fair Trade Commission

- To prevent conduct that may raise issues under the Anti-Monopoly Act, the SME Transactions Act, and the Act on the Improvement of Transactions between Freelancers and Enterprises, **the Commission will disseminate the contents of this report to relevant industry associations etc.**
- **In coordination with relevant ministries and agencies, the Commission will monitor the progress of initiatives undertaken by relevant businesses and will respond strictly and appropriately to any violations of the Anti-Monopoly Act and other applicable laws.**
- Based on this report, the Commission plans to formulate and **publish guidelines** setting out specific interpretations under the Anti-Monopoly Act, the SME Transactions Act, the Act on the Improvement of Transactions between Freelancers and Enterprises, and competition policy.

Transaction entities and transaction flow

Transaction entities and revenue structure (production committee system)



*In the anime industry, the term “subcontracted production company” is used in contrast to “prime production company.”

Key findings of this report

| | Transaction stage | Potentially problematic actions | Possible types of violations and applicable laws and regulations |
|--|---|--|--|
| Transactions between production committees and prime production companies | Contract stage | ◆ Insufficient or delayed disclosure of transaction terms | Obligation to disclose transaction terms (the SME Transactions Act) Conduct that induces abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Extremely low consideration (production commission fees) and unilateral determination of consideration | Unjust price reductions and unilateral determination of payment without engaging in consultation (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Uncompensated transfer of copyright | |
| | Production process Payment stage | ◆ Order cancellation | Unjust modification/retakes of the content of benefit payments (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Non-payment of additional production commission fees arising from extensions of the production period | |
| | | ◆ Late payment (non-payment) | Late payment (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| Transactions between prime production companies and subcontracted production companies | Contract stage | ◆ Insufficient or delayed disclosure of transaction terms | Obligation to disclose transaction terms (the SME Transactions Act) Conduct that induces abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Extremely low consideration (production commission fees) and unilateral determination of consideration | Unjust price reductions and unilateral determination of payment without engaging in consultation (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | Production process Payment stage | ◆ Order cancellation | Unjust modification/retakes of the content of benefit payments (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Non-payment of additional production commission fees arising from extensions of the production period | Unjust modification/retakes of the content of benefit payments (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | | ◆ Deductions and delayed payment (non-payment) | Reductions and delayed payment (the SME Transactions Act) Abuse of superior bargaining position (Anti-Monopoly Act) |
| | Transactions between production companies and freelancers | Contract stage | ◆ Insufficient or delayed disclosure of transaction terms |
| ◆ Extremely low remuneration levels | | | Unjust price reductions (the Act on the Improvement of Transactions between Freelancers and Enterprises, the SME Transactions Act) |
| ◆ Non-payment of surcharges arising from short delivery deadlines | | | Unilateral determination of payment without engaging in consultation (the SME Transactions Act) |
| Production process Payment stage | | ◆ Order cancellation | Unjust modification/retakes of the content of benefit payments (the Act on the Improvement of Transactions between Freelancers and Enterprises, the SME Transactions Act) |
| | | ◆ Non-payment of additional remuneration arising from extensions of the engagement period | Unjust modification/retakes of the content of benefit payments (the Act on the Improvement of Transactions between Freelancers and Enterprises, the SME Transactions Act) |
| | | ◆ Deductions and delayed payment (non-payment) | Reductions and delayed payment (the Act on the Improvement of Transactions between Freelancers and Enterprises, the SME Transactions Act) |
| | | | Potentially problematic conduct |
| Transactions between streaming service providers and prime production companies | | | Unilateral determination of payment without engaging in consultation (the SME Transactions Act), and disclosure of information such as view counts |