



公正取引委員会

Japan Fair Trade Commission

Fact-finding Survey on the Trading Environment for Creators at Film Production Sites [Key Points]

December 2025



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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: 1,607 companies Freelancers: over 2,000
Number of responses received	Production companies: 436 companies (27.1%) Freelancers: 143
Implementation period	June 9 to July 14, 2025

Information submission form (film and anime, common)

Number of responses: 219 in total

Interview survey

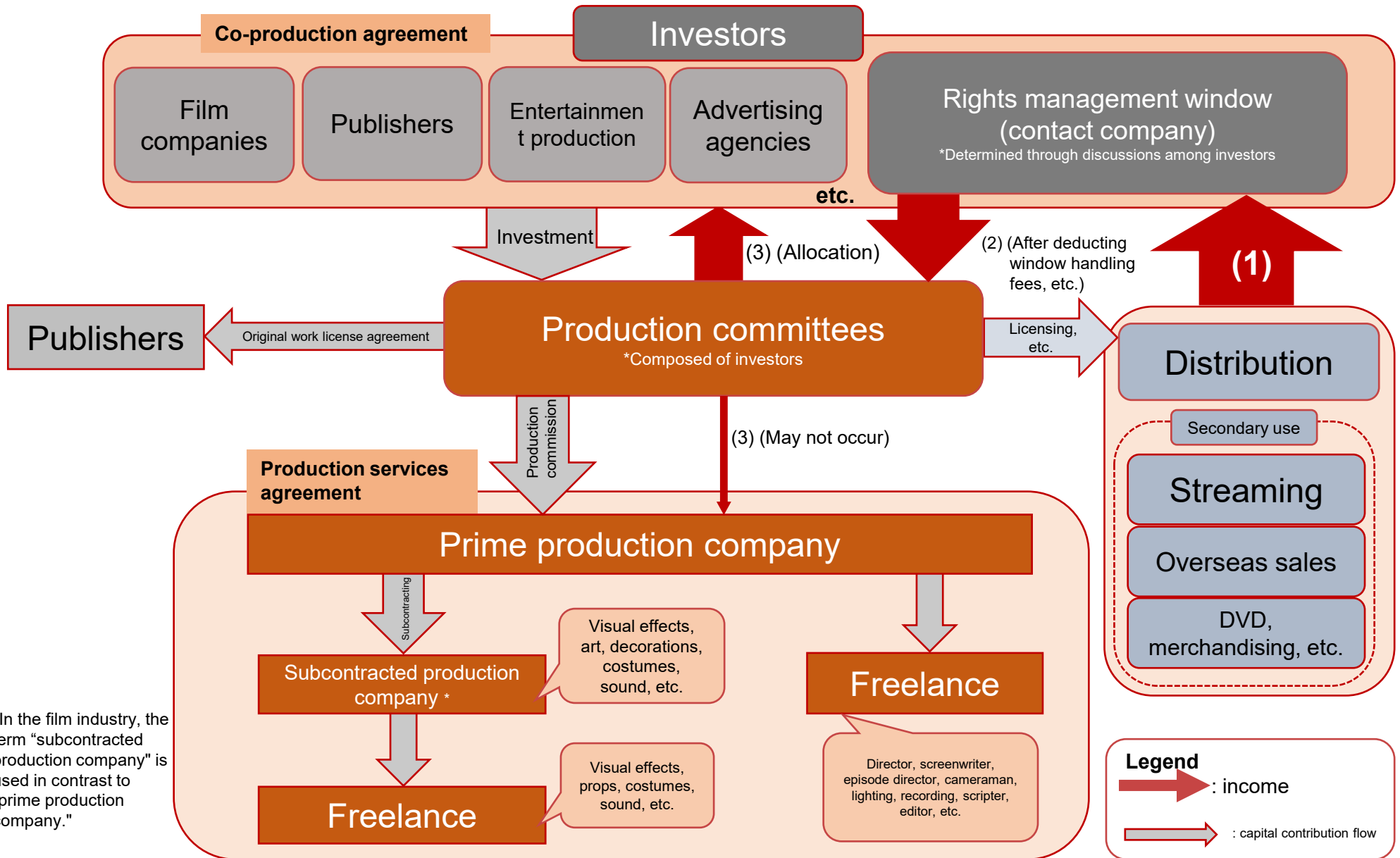
Production company	21
Freelance	22
Industry association	5
Production committee, etc.	14
Experts (lawyers, scholars, etc.)	5
Total	67

Response from 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 trade 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, **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 **will be formulated and published.**

Overview of the film production market (transaction entities)

Transaction entities and revenue structure (production committee system)



*In the film 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 the SME Transactions Act 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	
		◆ Reduction of payment; delay or non-payment	Reductions and delayed 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)
		◆ Reduction of payment; delay or 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)
		◆ Reduction of payment; delay or 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

*As the SME Transactions Act (revised SME Transactions Act) will enter into force on January 1, 2026, this report is drafted in accordance with the regulatory framework of the SME Transactions Act.