

## Calling for transparent and meaningful stakeholder engagement for Guidelines on Respect for Human Rights in Responsible Supply Chains

Dear Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan's National Action Plan on Business and Human Rights,

We, a group of 5 human rights and civil society organizations, are writing to call for transparent and meaningful engagement with civil society by the Japanese government to strengthen Japan's newly adopted Guidelines on Respect for Human Rights in Responsible Supply Chains.

The guidelines, which were published on September 13, 2022, were introduced to promote Japanese business' efforts to respect human rights and facilitate the implementation of human rights due diligence in supply chains. The guidelines are developed through the Study Group on Guidelines for Respecting Human Rights in Supply Chains, established by the Ministry of Economy, Trade and Industry (METI)'s in March 2022.

The adoption of guidelines setting out business' responsibility to respect human rights could be an opportunity for Japan to demonstrate its leadership on human rights in the region and beyond.

The quality and credibility of the current version of the guidelines, however, were undermined by the government's missed opportunity to adequately consult Japanese and international civil society organisations during the drafting process. As a result, Japanese and international organisations had little opportunity to contribute to the study group's process for formulating the guidelines.

While METI did solicit public comments on the draft guidelines from 8 to 29 August, 2022, the short feedback window did not provide adequate time for stakeholders to formulate and submit comments. In addition, the final guidelines do not appear to have meaningfully integrated or responded to comments submitted during the consultation period.

Although the guidelines have now been adopted, it is not too late to revise them to take into account civil society and stakeholders' comments. We urge the Japanese government to review the public comments submitted on the guidelines and to undertake additional consultations to ensure that they align with international standards and cover company's full range of human rights responsibilities. We further request that any future process related to the guidelines, including monitoring and reviewing their implementation, should be fully transparent and include participation from civil society organisations and affected communities.

We commend the Japanese government for its initiative in developing guidelines to make clear business' responsibility to respect human rights. The full potential of the guidelines, however, will only be realized if Japan's government works in partnership with organisations and affected communities to develop the strongest possible standards and participatory processes for overseeing their implementation.

Sincerely,

Business & Human Rights Resource Centre, Center for Alliance of Labor and Human Rights (CENTRAL),  
Human Rights Now, Human Rights Watch, World Benchmarking Alliance