

APLASH

Japan Electronics & IT Hardware Market Entry Guide

Regulatory Strategy for Foreign Companies

Published by Aplash | 2026 Edition
Classification: Public / Sample Report

aplash.io | Hong Kong · Osaka

About This Report

Written for executives, product managers, and legal teams at foreign electronics and IT hardware companies looking at Japan. It covers the main regulatory requirements, common structural errors, and what you need to think about before committing to market entry.

Aplash is a regulatory strategy and market entry firm. We do not do freight, logistics, or customs brokerage. Our work is understanding Japan's regulatory environment and structuring the entry correctly.

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01 Executive Summary

Japan is the world's third-largest economy and one of the harder markets to get hardware into. It is also one of the most consistently misread.

Companies entering Japan with hardware products tend to underestimate three things: the certification burden, how complicated the import process actually is, and what it costs when either goes wrong. A product that sails through CE and FCC can still be blocked at Japanese customs, pulled by METI, or create legal obligations that run for years after the first sale.

This guide covers the main regulatory requirements, the structural decisions that affect your cost and timeline, and the mistakes we see companies make when they go in unprepared.

Key facts at a glance:

- (a) Japan operates a mandatory product safety certification system (PSE / DENAN) under the 電気用品安全法 (Electrical Appliance and Material Safety Act). It is not equivalent to CE or UL. CE marks and FCC certifications do not substitute for PSE.
- (b) Wireless products (Wi-Fi, Bluetooth, cellular, NFC, and others) require separate compliance under the 電波法 (Radio Act), administered by MIC (Ministry of Internal Affairs and Communications), distinct from PSE and administered by a different ministry entirely.
- (c) A foreign company without a Japan entity cannot import into Japan without a Japan-side partner to coordinate the process. This affects how goods enter the country, how they are invoiced, and who holds the Notifying Supplier registration on PSE labels.
- (d) HS code misclassification affects duties, export control screening, and FEFTA applicability. In Japan, customs officers have reclassification authority at the border. Surprises happen.

None of this is insurmountable. The companies that run into trouble are usually the ones that assume Japan works like Europe or the US, or the ones that start regulatory work after they've already signed distribution agreements.

02 Why Japan Electronics Is Different

The Standards Divergence

Japan built its electronics safety standards independently of IEC and CENELEC, and while there's been some convergence, the differences that matter for hardware companies are still significant. The table below shows the key structural gaps.

Requirement	Japan	European Union	United States
Mains voltage	100V	230V	120V
Frequency	50Hz (east) / 60Hz (west)	50Hz	60Hz
Plug standard	Type A (JIS C 8303)	Varies (C / F / G)	Type A / B
Product safety	PSE / DENAN (電気用品安全法)	CE marking (LVD / RED)	UL / FCC (largely voluntary)
Wireless compliance	電波法 (Radio Act) via MIC	CE / RED	FCC Part 15
Non-resident import	Requires Japan-side coordination	Generally straightforward	Generally straightforward
Equivalent to CE?	No	n/a	No formal equivalence with PSE

CE and FCC do not carry over. The frameworks are independent and there is no mutual recognition.

Voltage and frequency catch more companies off guard than anything else at the pre-shipment stage. Japan runs at 100V, not 110V or 120V. Eastern Japan (Tokyo, Tohoku, Hokkaido) runs at 50Hz; western Japan (Osaka, Nagoya, Kyushu) runs at 60Hz. A 60Hz-only product cannot be sold nationally.

Plug type: Japan uses Type A (JIS C 8303). Non-Type A products need either adapter accommodation or physical plug replacement. This is a labelling and compliance matter, not just a consumer inconvenience.

The Ministry Complexity

Electronics in Japan routinely touch multiple ministries at the same time. There is no single regulatory window.

Ministry	Japanese Name	Relevant Role
METI	経済産業省	PSE / DENAN (電気用品安全法); product safety; export control

Ministry	Japanese Name	Relevant Role
MIC	総務省	Radio Act (電波法); 技適 certification; wireless spectrum
MOF / Japan Customs	財務省 / 税関	Import declarations; HS classification; duties; JCT
MHLW	厚生労働省	Medical-adjacent devices; certain chemicals

A connected device with Wi-Fi and a rechargeable battery can trigger METI for PSE on the appliance, METI again for the lithium battery (a separate Diamond PSE designation), and MIC for the wireless module. These are not coordinated submissions. Different bodies, different timelines, different laws.

The Non-Resident Importer Problem

In most markets, a non-resident company can act as importer of record directly, or use a simple power-of-attorney structure. Japan doesn't work that way. A foreign company without a Japan business registration cannot appear on a Japanese customs declaration (輸入申告) as the importer. This creates a structural decision that affects commercial terms, liability, and ongoing obligations, and it has to be sorted before the first shipment.

03 The Regulatory Stack

For a foreign electronics company entering Japan with physical hardware, compliance covers five distinct layers. Each is independent: clearing one does not clear any other.

Layer	Regulatory Area	Primary Law	Ministry	What Triggers It
1	Product Safety (PSE)	電気用品安全法	METI	Product appears on METI designated list (457 types total)
2	Wireless Compliance (技適)	電波法	MIC	Any wireless transmission capability (Wi-Fi, BT, cellular, NFC, satellite)
3	Import Compliance	関税法	MOF / Japan Customs	Every import shipment; requires Japan-side coordination for non-resident companies
4	HS Classification	関税定率法	MOF / Japan Customs	Every import shipment; drives duties and export control screening
5	Notifying Supplier Obligations	電気用品安全法	METI	PSE held by Notifying Supplier (届出事業者); continues post-sale

Layers 1 and 2 are product-level, resolved per model before market entry. Layers 3 and 4 are shipment-level, resolved per import. Layer 5 is ongoing, running for as long as PSE-labelled products are in the Japan market.

04 PSE / DENAN: Product Safety Certification

The Framework

The 電気用品安全法 (Electrical Appliance and Material Safety Act, or DENAN) requires certification for electrical products on METI's designated list. There are two categories, with meaningfully different paths, timelines, and ongoing obligations.

Diamond PSE vs Circle PSE

Attribute	Diamond PSE (特定電気用品)	Circle PSE (特定電気用品以外)
Products covered	116 designated higher-risk types	~341 additional types
Third-party certification	Mandatory (METI-designated RCAB)	Not required (self-declaration)
Factory inspection	Required	Not required
Validity period	3, 5, or 7 years	No formal expiration*
Factory audit	Per RCAB certification scheme (initial required; ongoing set by RCAB)	Not required
Renewal	Required at expiry	Only if design or standards change
CB report accepted	Yes (delta testing for Japan still required)	Yes (reduces lab cost and timeline)
Typical timeline	6 to 10 weeks	4 to 6 weeks

*Circle PSE has no formal expiry, but must be reassessed if the product design or applicable standards are revised.

Common Product Classification Reference

The table below reflects general classification guidance. Every product must be individually assessed against the current METI designated list before certification is initiated.

Product	PSE Category	Radio Act (技適) Required?
AC power adapter / mains charger	Diamond PSE	If wireless charging
Lithium-ion rechargeable battery	Circle PSE	No (but triggers dangerous goods rules)
Air conditioner	Diamond PSE	If Wi-Fi enabled

Product	PSE Category	Radio Act (技適) Required?
Electric water heater	Diamond PSE	No
Smart speaker	Circle PSE	Yes (Wi-Fi + Bluetooth)
Hair dryer	Circle PSE	No
Microwave oven	Circle PSE	If Wi-Fi enabled
Electric kettle	Circle PSE	No
LED lighting (smart)	Circle PSE	Yes (if wireless-controlled)
Television	Circle PSE	Yes (if built-in wireless)
Wall-plug USB charger (AC-to-DC)	Diamond PSE	No
Laptop / PC (unit itself)	Generally exempt	Yes (Wi-Fi + Bluetooth)
AC adapter bundled with laptop	Diamond PSE	If wireless charging
Low-voltage DC signal device (<50V)	Exempt (document reasoning)	Assess per device

The Classification Problem

A lot of companies default to assuming everything requires Diamond PSE. That's wrong. Most consumer and commercial electronics fall under Circle PSE. Over-classifying adds cost and time; under-classifying creates compliance exposure. Start with a proper applicability assessment.

The correct process:

- (a) Assess applicability against the current METI designated list (the list is updated periodically; classification should always be verified at the time of engagement).
- (b) Determine Diamond vs Circle by checking the 特定電気用品 116-item list specifically.
- (c) For Circle PSE: confirm whether a CB test report is available (reduces lab cost and timeline materially).
- (d) For Diamond PSE: confirm RCAB selection and factory inspection logistics.
- (e) Run a parallel Radio Act assessment for any product with wireless capability.

The Notifying Supplier Requirement

For each product category, someone must register as the 届出事業者 (Notifying Supplier) with METI. That name goes on PSE labels in Japan. A non-resident company cannot hold this registration directly.

Where the client has no Japan entity, Aplash acts as Notifying Supplier. This is an ongoing role: record-keeping, audit readiness, METI correspondence. It runs for as long as the products are in the Japan market.

Ongoing Notifying Supplier obligations:

- (a) Retention of self-inspection records and technical documentation per DENAN enforcement regulations (statutory minimum: 3 years for self-inspection records).

- (b) Factory audit coordination for Diamond PSE products, per the registered conformity assessment body's scheme.
- (c) METI coordination in the event of a product recall or safety concern.
- (d) Registration transfer management if the foreign company later establishes a Japan entity.

The Notifying Supplier obligation runs indefinitely. It is not a one-time filing.

05 Radio Act (電波法): Wireless Compliance

Scope

Any product that transmits wirelessly needs to comply with Japan's 電波法 (Radio Act) before it can be operated in Japan. This is completely separate from PSE and sits under a different ministry (MIC, not METI).

Wireless Technology	Representative Standards	Radio Act Applies?
Wi-Fi	802.11 a/b/g/n/ac/ax (all bands)	Yes
Bluetooth	All versions including BT LE	Yes
Cellular	4G LTE, 5G NR	Yes
NFC	ISO 14443, ISO 15693	Yes
RFID	Frequency-dependent	Assess per band
Zigbee / Z-Wave / LoRa	IoT mesh protocols	Yes
Satellite (LEO / VSAT)	Starlink class, VSAT terminals	Yes (special rules apply)
Fixed-frequency IR remote	Standard consumer remote	Generally exempt

技適 Mark vs Experimental Station Licence

Depending on whether the hardware is entering Japan for commercial sale or for trials and demos, there are two compliance paths under the Radio Act.

	技適 (Type Certification)	実験局免許 (Experimental Station Licence)
Purpose	Commercial sale and regular operation	R&D, trials, and demonstrations only
Who may operate	Anyone (commercial authorisation)	Licensee and authorised trial participants only
Authorisation body	MIC-registered bodies (TELEC / JATE)	Regional Telecommunications Bureau (総合通信局)

	技適 (Type Certification)	実験局免許 (Experimental Station Licence)
Typical timeline	4 to 12 weeks (varies by product complexity)	Standard: 4–12 weeks; fast-track (特定実験試験局): ~2 weeks
Validity	Permanent (unless standard changes)	Fixed term, typically 1 year (renewable)
Mark required on product	Yes (技適 mark)	No mark; licence document covers use
Required before trade show demo?	No (実験局免許 is sufficient)	Yes, in advance of the event date
Required before commercial distribution?	Yes	No

A common mistake: Companies bring wireless hardware to Japan for a trade show or client demo and assume CE or FCC covers them. It doesn't. The moment a wireless device is switched on in Japan, the Radio Act applies. The Experimental Station Licence application has to be in well before the event.

Satellite Terminals: A Special Case

Satellite terminals (VSAT, LEO-class) carry a regulatory cost that is disproportionate to their hardware value when used for demos. A terminal worth a few hundred dollars can require a licence process that costs several times that and takes 1 to 3 months. For Japan demonstration scenarios, using a Japan-authorized service subscription and commercially certified hardware is almost always the more practical route.

Multi-Agency Situations

A Wi-Fi-enabled smart appliance needs PSE (METI) for the appliance and 技適 (MIC) for the wireless module. Both must clear before commercial distribution. Timeline planning needs to account for two separate bodies with potentially different completion dates.

06 Import Structure: IOR and ACP

The Non-Resident Problem

A foreign company without a Japan business registration hits a structural wall at the point of import. Japan's customs framework requires a Japan-registered entity in the import process. Aplash addresses this through two service structures, depending on how the client wants to run its Japan operations.

IOR and ACP: How Aplash Coordinates Your Import

	IOR (Importer of Record)	ACP (Customs Procedural Management)
What Aplash does	Manages the full import transaction end-to-end on the client's behalf	Acts as the client's Japan-based representative for customs administration
Client's Japan entity required	No	No
Invoicing to Japan buyer	Coordinated through Aplash Japan	Client invoices directly
JCT management	Handled by Aplash	Client's own obligation
Appropriate when	Client wants Aplash to fully coordinate the import and distribution process	Client wants to manage the commercial relationship directly and needs Japan-side administrative support only

Both allow a foreign company to distribute in Japan without a local entity. Which structure fits depends on the client's commercial model, how much direct involvement they want, and what the long-term Japan plan looks like. We assess both options at the start of each engagement.

Practical Import Considerations

- (a) Customs duties on electronics vary by HS classification. Many IT hardware products enter Japan at low or zero duty rates, but the classification must be confirmed, not assumed.
- (b) JCT (Japan Consumption Tax) at 10% applies at import and must be accounted for in the import structure.
- (c) NACCS (Nippon Automated Cargo and Port Consolidated System) filing requirements affect shipment documentation and timing.
- (d) Japan's import quota system covers primarily protected agricultural and fishery categories. IT hardware and electronics are not subject to import quotas. Most IT hardware benefits from zero or low duties under Japan's WTO Information Technology Agreement (ITA) commitments, though HS classification must be confirmed to ensure the applicable rate is correctly applied.

07 HS Classification and Tariff Risk

Why Classification Matters More in Japan

HS classification sits at the foundation of import compliance. In Japan, getting it wrong has consequences across four areas:

- (a) **Duty rate:** Japan's tariff schedule (実行関税率表) is highly structured. Classification errors create overpayment or underpayment; the latter triggers customs penalties.
- (b) **Import control screening:** Certain HS headings correspond to items subject to import restrictions or additional approval requirements under Japan's trade control framework. Misclassification into an incorrect heading can mean that required import approvals are not obtained, creating customs compliance issues and potential penalties.
- (c) **Import licensing:** Some headings require prior import approval or are subject to Japan's import control framework. This is product-category specific and should be assessed per HS code.
- (d) **JCT base:** Calculated on CIF value including duties. Classification errors compound.

Common Classification Challenges for Electronics

Chapter 84 vs 85: Most IT hardware falls in Chapter 84 (machines) or Chapter 85 (electrical machinery). The line between integrated systems, components, and standalone devices is fact-specific and comes up regularly in border disputes.

Functional vs compositional classification: Japan Customs applies the WCO GRI strictly. A device that functions as a communication terminal gets classified by function (GRI 1), not by its dominant physical component (GRI 3), unless GRI 1 doesn't apply. Multi-function devices need careful analysis.

Dual-use flag risk: Some HS headings correspond to entries on Japan's export control lists under the 外為法 and 輸出貿易管理令. Misclassifying into or out of a sensitive heading in either direction carries compliance consequences.

Advance Rulings (事前教示)

Japan Customs has a formal Advance Ruling (事前教示) process under the Customs Act. The importer or their representative files for a binding classification opinion before the shipment arrives. It's binding on Japan Customs for that specific product and takes roughly one month.

For high-value shipments, new products, or anything near a classification boundary, an advance ruling is worth doing. The filing cost is a small fraction of what a post-import reclassification dispute will run.

08 The Six Most Expensive Mistakes

These are the errors that generate the most expensive remediation work, in our experience. The pattern is the same each time: the mistake surfaces later than it should have, and the cost scales with how far along the commercial process the company was when it did.

Mistake	Typical Discovery Point	Consequence if Not Caught Early
Assuming CE covers Japan	At shipment or customs	Emergency cert timeline; product in bonded warehouse at cost
Starting compliance after commercial terms agreed	When launch date is missed	Distributor agreement breach; non-compliant market entry
Blanket Diamond PSE classification	During quotation or certification	Over-investment; delayed timeline vs Circle PSE path
Not disclosing ongoing Notifying Supplier obligations	At contract renewal or exit	Unmanaged PSE labels in market; METI compliance exposure
Missing Radio Act for wireless products	When distributor flags	Products cannot be legally operated; reshipment or recertification
Voltage mismatch not caught before ordering	At customer complaint or product failure	Recall coordination; reputational exposure

Mistake 1: Assuming CE certification covers Japan.

It doesn't. PSE is a separate regime, under different standards, with different certification requirements, run by a different ministry. CE-marked products need a full PSE applicability

assessment and, in almost every case, separate Japan certification. Companies that find this out at the shipment stage end up with delayed market entry, rushed certification timelines, and product sitting at customs or in bonded storage accruing costs.

Mistake 2: Starting compliance after commercial terms are agreed.

Diamond PSE takes 6 to 10 weeks from engagement. Radio Act Type Certification is 4 to 12 weeks depending on the product and test results. Advance ruling requests take roughly a month. Companies that sign distribution agreements with hard Japan launch dates and then start regulatory work miss their dates. Some breach their distributor agreements. Some go to market non-compliant.

Mistake 3: Blanket Diamond PSE classification.

The instinct is to assume everything needs the most rigorous certification path. In practice, most consumer and commercial electronics fall under Circle PSE (self-declaration), not Diamond PSE (third-party certification). The difference in cost and timeline is significant. A proper applicability assessment sorts this out early.

Mistake 4: Not disclosing ongoing Notifying Supplier obligations.

The PSE certification is the visible cost. The ongoing obligation is the less visible one: documentation retention, factory audit coordination under the RCAB scheme, recall handling. Companies that use a Notifying Supplier service without understanding that these obligations run indefinitely sometimes try to end the relationship without managing the transition. PSE labels remain in the market under an unmanaged registration. That creates METI compliance exposure.

Mistake 5: Ignoring Radio Act for wireless-capable products.

Any product with Wi-Fi, Bluetooth, cellular, NFC, or other wireless capability needs 技適 under the 電波法, separately from PSE. Different ministry, different body, different process. Products without 技適 cannot be legally operated in Japan. Distributors typically find the gap when the product is already ready to ship.

Mistake 6: Voltage mismatch not caught before ordering.

Japan runs at 100V, not 110V or 220V. Products made for 110V can be sold in Japan but need a voltage assessment and label disclosure. Products rated for 220V only need a transformer, which is a non-starter for most consumer and commercial use cases. Catch it at assessment stage and it's a labelling issue. Miss it and you're dealing with customer complaints or product failures.

09 Timeline and Sequencing

Below is a realistic timeline for a foreign electronics company bringing a standard consumer or commercial hardware product into Japan. Phases 2 and 3 run concurrently where certification and METI registration can be initiated at the same time.

Phase	Duration	Key Activities	Gate / Output
1. Pre-entry assessment	Weeks 1 to 2	PSE applicability per product (Diamond / Circle / Exempt); Radio Act screening; HS classification review; IOR vs ACP structure decision; voltage / plug / frequency assessment	Written assessment with per-product determinations and recommended certification path
2. Certification and regulatory filings	Weeks 3 to 12+	Circle PSE: lab testing + self-declaration (4 to 6 wks); Diamond PSE: RCAB engagement + factory inspection (6 to 10 wks); 技適: TELEC / JATE	PSE certificate per product; 技適 mark authorisation;

Phase	Duration	Key Activities	Gate / Output
		submission (4 to 12 wks); advance ruling if required (~4 wks)	advance ruling (if applied for)
3. METI Notifying Supplier registration	Weeks 7 to 10	Pre-market filing (届出) per product category; registration confirmation	METI registration confirmed; PSE label production authorised
4. First shipment readiness	Weeks 10 to 12	IOR / ACP engagement finalised; customs documentation prepared; Japan-language labels confirmed; first commercial shipment scheduled	First lawful commercial shipment into Japan
5. Post-market (ongoing)	Continuous	Annual Notifying Supplier maintenance; Diamond PSE factory audit coordination; renewal planning at 3 / 5 / 7-year intervals; regulatory change monitoring	Maintained compliance posture

Summary timelines:

Entry Path	Estimated Time to First Lawful Shipment
Circle PSE only (no wireless)	10 to 12 weeks
Circle PSE + Radio Act (技適)	10 to 14 weeks
Diamond PSE (no wireless)	12 to 16 weeks
Diamond PSE + Radio Act (技適)	14 to 20 weeks

Companies that start this process after agreeing Japan launch dates with distributors typically find themselves 2 to 4 months behind before anything has gone wrong. Assessment has to come before commercial commitment.

10 How Aplash Structures a Market Entry

Our approach is regulatory strategy first. Understand the full compliance picture before any commercial commitments are made. Sequence the regulatory work to match the commercial timeline. Structure the import and distribution arrangement around the company’s actual Japan strategy, not around what’s easiest to arrange quickly.

Phase 1: Assessment

We assess every product against the current METI designated lists, Radio Act applicability, HS classification with FEFTA sensitivity in mind, and the voltage/plug/frequency profile. The output is a written assessment with per-product determinations, a recommended certification path, and a sequenced timeline. Everything commercial follows from that.

Phase 2: Certification Management

We manage PSE certification as Notifying Supplier (届出事業者), coordinating with RCABs for Diamond PSE and accredited labs for Circle PSE. Radio Act Type Certification runs through TELEC and JATE. We file the METI pre-market notification (届出) and confirm registration is in place before the first shipment.

Phase 3: Import Structure

We put together the import arrangement that fits the client's commercial model, whether that's Aplash running the full import process or providing Japan-side administrative support while the client handles the commercial relationship. We assess the right structure at the start of each engagement.

Phase 4: Ongoing Compliance

We manage annual Notifying Supplier obligations, Diamond PSE audit support, and regulatory monitoring. Japan's regulatory environment for electronics does not stay still: standards update, METI designated lists get revised, Radio Act frequency allocations change. We track these for our clients.

What we don't do: Freight forwarding, shipping, or customs brokerage. Our role is regulatory strategy and compliance management. We work alongside logistics providers.

About Aplash

Aplash is a regulatory strategy and market entry firm. We help foreign companies understand Japan's requirements and get their market entry structured properly.

Our work covers product safety certification (PSE / DENAN), Radio Act compliance (電波法 / 技適), import structure (IOR, ACP), HS classification and advance rulings, company establishment (KK / GK), and related regulatory areas.

We do not do logistics, freight forwarding, or customs brokerage.

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