

FFWPU Europe and the Middle East: UN Rights Expert on Japan's Illegal FFWPU Dissolution Request

Knut Holdhus
September 29, 2025



Attorney Patricia Duval, member of the Paris Bar Association, specializing in international human rights law. Earned a degree in public law from Sorbonne University. Has defended the rights of religious and faith minorities both in France and internationally, including at the European Court of Human Rights (ECtHR), the Council of Europe (CE), the Organization for Security and Co-operation in Europe (OSCE), the European Union (EU), and the United Nations. Author of numerous academic papers on religion and freedom of belief. Here, speaking at the UN Office in Geneva June 16, 2025

At Geneva side event on religious cleansing, legal expert accuses Japan of violating 45 years of UN human rights obligations in Family Federation dissolution case



The head table at the side event September 26, 2025 in Room 11 in the UN Office in Geneva, Switzerland organized by the Universal Peace Federation (UPF)

1st part of a message by Attorney Patricia Duval, a leading expert in legal matters at the intersection of religion, belief, and state regulation, delivered at a civil society side event 26th September organized by the NGO the Universal Peace Federation (UPF) in conjunction with the 60th regular session of the UN Human Rights Council (HRC60) in Geneva. The side event had as theme "Japan and Human Rights".

See 2nd part: [Using Schools to Break Faith: Japan's Policy](#)

I would like to address two points here today which are of serious concern under United Nations standards.

1) The illegality of dissolution under international human rights law:

The dissolution of the [Unification Church](#) [See editor's note 1 below] is based on Article 81 of the Religious Corporations Law which provides that a court may order dissolution if:



Ministry overseeing religious matters in Japan: MEXT



The English version of Toru Goto's new book: Battle for Survival - 4536 Days in Captivity. Published in Washington DC by The Washington Times Global Media Group, 2025



Human Rights Committee, a sub-webpage on the site of the UN Human Rights Office of the High Commissioner

(i) in violation of laws and regulations, the religious corporation commits an act which is clearly found to harm public welfare substantially.

In the present case, the Ministry which oversees religious matters, filed a request for a dissolution order from the Tokyo District Court and maintained the following (quote):

"From around 1980 to 2023, [Unification Church](#) believers caused significant damage to many people by making them [donate](#) by [restricting their free decision](#) and preventing their normal judgment - [Comment by Duval: 'This is the accusation of brainwashing.'] - which resulted in disrupting the peaceful life of many people including the family members."

But, as [Dr. Figel stated](#), Article 18 of the [International Covenant on Civil and Political Rights](#) (ICCPR) which Japan has committed to, does not allow for such a limitation to the right to manifest one's religion or belief.

Disturbing the life of many people is NOT a motive of public order [See editor's note 2 below] making state interference necessary to limit this right.

Displeasing some people is actually called freedom of belief.

I would like to underline here that for all the period of time which the Ministry is relying on in its claim, the government has given carte blanche to [extremist lawyers](#) and consensual religions to "deprogram" [See editor's note 3 below] [Unification Church](#) [See editor's note 1 below] members by force: kidnappings by trickery and illegal confinements by families, and imposed indoctrination against the [church](#) [See editor's note 1 below] beliefs by [protestant pastors](#).

So, my question is: who disturbed who exactly?

Those deprogrammers and their supporters broke families by the thousands. Around [4,300 members](#) were coercively subjected to "deprogramming" [See editor's note 3 below] over the four decades mentioned by the ministry, with the [government's blessing](#) and [voluntary inaction](#) which resulted in [thousands of families](#) devastated and unable to repair.

Thousands of [parents were abused](#) and talked into submitting their adult children believers to deprogramming [See editor's note 3 below].

The government should actually be the one held accountable for those family breakings.

In its claim of "disturbance", the Ministry relied on 32 adverse civil court decisions in cases filed by former members some 20 to 40 years before, after their "deprogramming" [See editor's note 3 below]. Those members were coerced by their deprogrammers and lawyers to file financial claims against the [church](#) to prove their real intention to abandon the faith and to be released from [confinement](#).

In each of these civil cases, the courts found torts against the [church](#) [See editor's note 1 below] based on the allegation that it violated so-called "social norms".

But "social norms" is a vague and arbitrary concept that has no place in matters of religious beliefs and practices and violates,

alike "public welfare", the duty of neutrality of Japan in religious matters and its commitment to abide by the [Covenant](#) (ICCPR).

The UN Human Rights Committee, which has been created by the [Covenant](#) (ICCPR) to monitor its implementation by state parties, has consistently urged Japan to stop using the notion of public welfare to limit freedom of religion or belief.

Japan ratified the [Covenant](#) (ICCPR) in 1979 and therefore accepted the Committee's (HRC) authority for this monitoring.

Since 1980 - so one year later - the Committee (HRC) has denounced the inclusion in Japanese law of the concept of public welfare to limit civil liberties and made the following recurrent demand:

"The Committee reiterates its concern that the concept of 'public welfare' is vague and open-ended [...] and urges the State party to refrain from imposing any restriction on the right to freedom of thought, conscience and religion unless they fulfil the strict conditions set out in article 18."

It can be concluded that the Japanese authorities have known for 45 years that they had to review their internal laws in order to conform to the [Covenant](#) (ICCPR) but have consistently refused to do so under fake pretense and therefore have consistently violated their international commitments.

They are actually about to eliminate an entire religion on this illegal basis.



Demonstration against the [court order](#) to dissolve the [Family Federation](#), Shinjuku, Tokyo, Japan May 11, 2025

Additionally, the concept of "social appropriateness" opens the door to discrimination and domination by consensual religions (like what happened with the [Protestant deprogrammers](#)).

It directly conflicts with all the standards set by the Human Rights Committee in its Comment n° 22 on article 18 (quote):

"The terms 'belief' and 'religion' are to be broadly construed. Article 18 is not limited in its application to traditional religions or to religions and beliefs with institutional characteristics or practices analogous to those of traditional religions. The Committee therefore views with concern any tendency to discriminate against any religion or belief for any reason, including the fact that they are newly established, or represent religious minorities that may be the subject of hostility on the part of a predominant religious community."

Therefore, in the absence of any statute law violation or crime, public opinion hostility can never be a

justification for courts to limit the right to manifest one's religion or beliefs on the basis of religious practices lacking "social appropriateness".

Yet, this has been the basis for the 32 civil tort decisions on which the [dissolution order](#) was issued.

Continued in 2nd part: [Using Schools to Break Faith: Japan's Policy](#)

[Editor's note 1: Although Patricia Duval uses the name "Unification Church" and also the word "church", please be aware that the [Unification Church](#) in Japan in 2015 changed its name to [Family Federation for World peace and Unification](#).]

[Editor's note 2: "NOT a motive of public order" - Duval is here arguing that "disrupting the peaceful life of many people" (the Ministry's claim) does not legally qualify as a public order justification under the [ICCPR](#). People being upset, displeased, or harmed by someone else's religious practices is not enough for the government to dissolve a religious group. "Public order" in international law means serious threats to societal stability or safety (e.g., riots, violence, terrorism, large-scale lawlessness) - not just that some individuals suffered emotionally, financially, or socially.

So, "disturbing people's lives" is not a valid public order concern. "Public order" is a high threshold involving social peace and security. Duval is pointing out that Japan is framing the issue as harm to individuals, but international human rights law requires a much stronger reason (a real public order threat) to restrict religious freedom. By saying "NOT a motive of public order," the writer is underlining that the ministry's justification does not meet the legal standard for restricting or banning a religion under the [ICCPR](#).]

[Editor's note 3: Coercive faith-breaking ("deprogramming") in Japan refers to the practice of coercively attempting to separate individuals from their religious affiliations or beliefs, typically through intervention by family members, professional faith-breakers (deprogrammers) or organizations hostile to new religious movements (NRMs). This phenomenon often targets members of such movements, e.g. relatively large faiths like the [Family Federation](#) or Jehovah's Witnesses, but also smaller groups like Happy Science (Kōfuku no Kagaku) and other newer religious movements.



Also subject to faith-breaking attempts: Members of Soka Gakkai. Here students belonging to the faith in 2001

However, also Soka Gakkai, a Buddhist-based lay organization with more than 8 million Japanese members, and affiliated with Nichiren Buddhism, has occasionally been subject to faith-breaking attempts.

The practice gained attention in the latter half of the 20th century, particularly in the 1980s and 1990s. Parents or concerned family members often hired faith-breakers who taught them how to abduct and forcibly detain believers. Almost all such cases involved confining the individual believer and cutting him or her off from the religious community. During the confinement, the believer was subjected to intense questioning or indoctrination designed to break his or her faith. The aim was to "rescue" the person from what the family often had been tricked by faith-breakers or lawyers to regard as harmful influence from the religious organization.

Critics of forced de-conversion argue that it violates fundamental human rights, including freedom of thought, religion, and association. Reports of psychological trauma and accusations of unlawful detention have sparked debates over its ethical and legal implications. In response, some religious groups, particularly NRMs, have lobbied for greater protections against such practices.

Japanese courts have been inconsistent in addressing cases of coercive faith-breaking. While some verdicts have condemned the practice as illegal detention, others have been more lenient, citing family concerns about "mental health" or alleged "exploitation" as mitigating factors.]

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Japan: Ex-EU Envoy Warns Of Religious Crackdown

- September 27, 2025
- Knut Holdhus

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Former EU-Envoy Jan Figel' slams Japan's faith ban at UN Human Rights Council side event in Geneva discussing the country's religious cleansing and elimination of an entire faith



The head table at the side event 26th September in Room 11 in the UN Office in Geneva, Switzerland organized by the Universal Peace Federation (UPF). Screenshot from video by UPF.

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A video message by Jan Figel, former EU Special Envoy for Freedom of Religion, and current president of [Forum for Religious Freedom Europe](#) (FOREF), delivered at a civil society side event 26th September organized by the NGO the Universal Peace Federation (UPF) in conjunction with the 60th regular session of the UN Human Rights Council (HRC60) in Geneva, and more specifically connected to the Universal Periodic Review (UPR) process or the human rights review of Japan from 8th September to 8th October 2025. The side event had as theme “Religious Cleansing in Japan: Eradication of an Entire Faith Community”.

See also [UN Expert: “Japan’s Illegal Dissolution Request”](#)

See also [Using Schools to Break Faith: Japan’s Policy](#)

Distinguished participants, greetings to all of you in Geneva.

In March 2025, the *Tokyo District Court*, under the Civil Code, ordered the dissolution of the *Family Federation for World Peace and Unification*, formerly known as *Unification Church*.

Since this unprecedented decision, I am deeply concerned. The order lacks a constitutional legal basis and clearly violates Japan’s obligations under the *International Covenant on Civil and Political Rights* (ICCPR).



Such a measure endangers not only one minority faith, but also others, because injustice against one community always threatens others.

The ruling will have its implications for religious freedom in Japan. The decision is based on questionable evidence and accusations. It lacks substantive foundation and appears to have been driven more by political motives than by law.

What in particular troubles me about this ruling? The court’s decision is arbitrary, unconstitutional and unlawful. It violates basic principles of due process.

For example, the hearings have been conducted behind closed doors. Article 81 of the *Religious Corporations Act* allows dissolution only when an organization commits illegal acts that seriously harm public welfare.

Yet the *Tokyo District Court* expanded this to include 32 civil cases spanning 40 years involving former members.

The *Ministry of Education, Culture, Sports, Science and Technology* (MEXT) even changed its interpretation of the law in order to request dissolution – something unprecedented.



Furthermore, missionary activity and donations were judged to violate social norms and social fairness.

But these concepts are far too vague, opening the door to arbitrary use of state and judicial power. The *United Nations Human Rights Committee* has already recommended that Japan refrain from restricting religious freedom on the basis of public welfare. Article 18 of the *International Covenant on Civil and Political Rights* does not allow such restrictions.

The logo of MEXT. Photo: 文部科学省 (MEXT Japan) / Wikimedia Commons. License: CC Attr 4.0 Int

On the contrary, states are obliged to protect minority religions against hostility from dominant groups. Instead, Japan tolerated forced deprogramming by Protestant pastors.

Many plaintiffs in this case were themselves subjected to coercion and confinement. Even worse, the *Tokyo District Court* adopted the unscientific mind control theory, assuming victimhood without evidence.

This is proof of bias and arbitrariness. Legitimate courts must not be swayed by political pressure or media campaigns.

The future of Japanese democracy depends on transparency, accountability, respect for human dignity, and the protection of fair justice for all.

Politically, I must say that the movement against the *Family Federation* has roots in the *Japanese Communist Party’s* activities decades ago. Marxist atheism lies at the root of this long-standing hostility much to the regret of those who have attached themselves to the

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nostility. Such ideology often inspires radical attempts to exclude faith in God and suppress religion because religion liberates people from the worship of secular values and authoritarian state power.

I know this from my experience. I lived half of my life under Communist dictatorship in Czechoslovakia. My young uncle Jan was killed by the secret police. The regime sought to crush both historic and new religions through many forms of coercion. But it ultimately failed and then peacefully collapsed in 1989.



Slovakia (in red). Together with its western neighbor Czechia they formed Czechoslovakia, which existed 1918-1939 and 1945-1992. Photo: TUBS / Wikimedia Commons. License: CC ASA 3.0 Unp. Cropped

In Slovakia, the main force behind the peaceful resistance and the fight for freedom was the Christian community, especially the Catholic Church in dissent.

If the District Court [decision](#) is confirmed, it will damage Japan's image and credibility as a democracy and may endanger other minority religions, including smaller and newer groups such as *Jehovah's Witnesses*.

Japan should learn from the harm caused worldwide by state-imposed ideologies and religious oppression, which have often led to deep internal divisions.

The state exists to serve all citizens, not just the majority or a favored group.

Ladies and gentlemen, religious freedom is a litmus test for all human rights. Why?

Freedom of religion is inseparable from freedom of thought and conscience. It belongs to everyone – believers, non-believers and atheists alike.

This inner freedom is guaranteed by Article 18 of the [Universal Declaration of Human Rights](#) and the [International Covenant on Civil and Political Rights](#).

If this inner freedom is not respected, the outer freedoms, freedom of speech, press, assembly, association will also be endangered. It begins inside each person and is expressed outwardly through acts of faith, family and community.

Internal freedom is absolute and must be fully respected by state and institutions.

External expression can be regulated only if restrictions are legal, necessary and proportionate.

I opposed the dissolution of the [Family Federation](#) from the beginning. I wrote personally to Japan's Prime Minister and Foreign Minister, but so far received no reply.

However, opposition abroad is growing. Japan has long been respected as a moderate democracy, but its reputation is now at risk. I hear concerns, shock and even protests from governments and civil society worldwide.

How a country treats minorities, not its majority, is the true measure of its democratic credibility.

Through the *UN Special Rapporteur on freedom of religion or belief* at the *Human Rights Council*, Nazila Ghanea, the UN should be able to lead dialogue with Japan.

The *UN Special Rapporteur* [\[See editor's note below\]](#) on *Freedom of Religion or Belief*, Nazila Ghanea, requested to visit Japan to investigate possible violations of minority rights. Unfortunately, the Japanese government has not allowed her a visit. Japan should engage in dialogue with her and with the United Nations.

The [Family Federation](#) appealed against



Nazila Ghanea, UN Special Rapporteur on Religious Freedom [\[See editor's note below\]](#). **Ghanea has sent formal UN request to Japan, but has so far received no reply.** Nazila Ghanea

the District Court [verdict](#) and the case is now before the *Tokyo High Court*. There is still hope for a fair and positive judicial resolution.

holds the position since February 2023. Photo: GiovannaKa / Wikimedia Commons. License: CC ASA 4.0 Int

Ladies and gentlemen, even democratic countries are not fully immune against ideologies or abuse of power. Therefore, people, society must remain vigilant on protection of human dignity for all and human rights for all.

Thank you for your attention and support.

See also [UN Expert: "Japan's Illegal Dissolution Request"](#)

See also [Using Schools to Break Faith: Japan's Policy](#)

Featured image above: Jan Figel delivering his video address in Geneva 26th September 2025. Screenshot from video by UPF.

[Editor's note: A **Special Rapporteur** (or Independent Expert) is an independent human rights expert appointed by the United Nations (UN) to provide reports or advice on human rights issues from either a thematic or country-specific perspective. These experts are selected by the UN Human Rights Council and operate independently of any government, playing a crucial role in monitoring the actions of sovereign nations and democratically elected governments.

Special Rapporteurs do not receive financial compensation from the United Nations for their work. However, they receive support from the Office of the United Nations High Commissioner for Human Rights and are often funded by charities and corporations. Annually, they convene in Geneva to discuss common issues, coordinate their efforts, and engage with various stakeholders, including states and civil society organizations.

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