

FFWPU Europe and the Middle East: Japan's Religious Freedom in Danger After Outlawing Family Fed

Knut Holdhus
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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



[Bitter Winter](#), the world's leading online magazine on religious liberty and human rights

Human rights expert points to dangerous precedent for faith and freedom in Japan as dissolution order puts Japan's basic human rights in jeopardy

The legal controversy surrounding Japan's [dissolution order](#) against the [Family Federation for World Peace and Unification](#) raises profound concerns about the protection of fundamental human rights, particularly the freedom of religion.

In an [analysis](#) published in [Bitter Winter](#) on 21st April, international human rights lawyer Patricia Duval frames the

Tokyo High Court's [4th March 2026 decision](#) not as a routine administrative measure, but as a potentially serious breach of both domestic constitutional guarantees and binding international legal obligations. At the core of the issue lies a tension between state authority and individual liberties: whether the dissolution of a religious organization can occur without infringing on the essential rights of its adherents.



**International Covenant on
Civil and Political Rights**

Japan's Constitution explicitly mandates adherence to international law through Article 98, paragraph 2, which requires the faithful observance of treaties ratified by the state. Among these is the [International Covenant on Civil and Political Rights](#) (ICCPR), a cornerstone document that protects freedom of thought, conscience, and religion under Article 18. This provision extends beyond private belief to include the public and communal expression of religion - through worship, teaching, and the establishment of institutions necessary for religious life. Duval argues that any state action interfering with these dimensions must meet strict criteria: it must be lawful, necessary, and proportionate to legitimate aims such as public

safety or the protection of others' rights.

The [Tokyo High Court's ruling](#), however, appears to downplay these obligations. By devoting minimal attention to international law considerations, the decision suggests a narrow interpretation of the legal consequences of dissolving a religious entity. The court maintains that stripping an organization of its legal personality affects only its "secular" functions - such as property ownership or financial management - while leaving believers' religious practices untouched. This distinction forms the backbone of the court's justification: if religious acts themselves are not directly prohibited, then no violation of religious freedom has occurred.

Yet this reasoning is deeply contested. Duval highlights a critical inconsistency in the court's own acknowledgment that dissolution inevitably leads to the [liquidation of assets](#), including [places of worship](#). Such outcomes, the court admits, may create obstacles for believers attempting to continue their religious activities. This concession undermines the claim that the measure is purely administrative. If the practical effect of dissolution is to disrupt communal worship, [limit access to religious spaces](#), and dismantle organizational structures, then it constitutes a tangible interference with the exercise of religion.

588 ADDED TO THE FEDERAL LIST OF EXTREMISTS/TERRORISTS (ROSFINMONITORING)

Being on this publicly accessible list stigmatizes believers, hindering their ability to find employment. Other consequences include having their bank accounts blocked and facing difficulties in obtaining or renewing insurance policies, selling property, managing investments, receiving inheritances, or even purchasing mobile phone SIM cards.

Persecution of Jehovah's Witnesses in Russia, where the authorities have managed to brand them as a terrorist organization. Screenshot from "[Eighth-Anniversary Special Report](#)", describing the situation as of 1st March 2025.

From a human rights perspective, this distinction between "legal personality" and "religious practice" is artificial. Religious freedom, as protected under international law, is not confined to internal belief or isolated acts of worship. It encompasses the collective dimension of religion - the ability of individuals to organize, gather, and sustain their faith communities over time. Removing the legal framework that enables these activities effectively erodes the substance of the right itself.

This interpretation is reinforced by international jurisprudence. The United Nations Human Rights Committee, which oversees the implementation of the [ICCPR](#), has consistently held that dissolving a religious organization can violate Article 18. In the 2023 case of Vladimir Yurlov and others v. Russia, the Committee found that the dissolution of a local religious association deprived its members of essential rights. Although the state argued that individuals remain free to practice their beliefs informally, the Committee emphasized that the loss of legal status stripped them of critical capacities: owning or renting property, maintaining bank accounts, securing legal protection, and conducting public religious activities. These are not peripheral privileges but integral components of religious life in modern societies.



Courtroom of the European Court of Human Rights in Strasbourg. (2014)

The same principle is echoed in European human rights law. The European Court of Human Rights has characterized the dissolution of a religious organization as one of the most severe forms of interference with religious freedom. Such a measure, it has stated, requires exceptionally strong justification to be considered necessary in a democratic society. The rationale is clear: dismantling an established religious structure does not merely regulate it - it effectively disables the community's ability to function.

Applying these standards to the Japanese context raises serious doubts about the proportionality and necessity of the [High Court's decision](#). Even if the state pursues legitimate objectives, such as addressing alleged misconduct, the means chosen must be the least restrictive available. Dissolution, by its nature, is an extreme remedy. It eliminates the institutional foundation upon which believers rely to practice their faith collectively. As such, it risks overstepping the permissible limits of state intervention.

Moreover, the implications extend beyond freedom of religion alone. Duval underscores that other rights protected under the ICCPR are also at stake, including freedom of expression and freedom of association. Religious organizations often serve as platforms for collective expression and social engagement. Their dissolution can therefore silence voices, fragment communities, and restrict individuals' ability to associate around shared beliefs. These overlapping areas reinforce the argument that the [High Court's ruling](#) cannot be viewed in isolation; it affects a broader ecosystem of civil liberties.

The upcoming review by [Japan's Supreme Court](#) is thus of critical importance. It presents an opportunity to reassess the balance between state authority and individual rights, and to ensure that domestic law aligns with international commitments. A failure to do so would not only impact the members of the [Family Federation](#) but could set a precedent with far-reaching consequences for religious freedom in Japan.

In essence, the [dissolution order](#) is not merely about one organization but about the integrity of human rights protections in a democratic society. If the dissolution of a religious entity can proceed under the assumption that it leaves believers' rights intact, despite clear evidence of practical rights violations, then the safeguards enshrined in both national and international law risk becoming hollow. Duval's analysis calls for a more rigorous and principled approach - one that recognizes that the deprivation of institutional support is, in effect, a deprivation of the freedom it is meant to sustain.

Text: Knut Holdhus, editor

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Legal Offensive Enters Asset Distribution Phase

April 22, 2026 • Knut Holdhus

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For many, dissolution and liquidation mean the Japanese state steals properties members built with their own hands and years of investment to realize their dream. Here, the sanctuary of the Family Federation's Koriyama Church. Photo: Yasuhiko Nagano (長野康彦)

The continuation of Japan's controversial legal offensive to crush religious minority based on disputed civil cases: from dissolution to assets seizure and now assets distribution

The Japanese liquidation of the religious organization formerly known as the *Unification Church* – since 2015 named *Family Federation for World Peace and Unification* – marks a decisive phase in one of Japan's most consequential legal and social reckonings with a persecuted religious movement originating in South Korea.

See also [Religious Freedom in Jeopardy After Dissolution](#)

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Following a [dissolution order](#) issued by the *Tokyo High Court* on 4th March 2026, court-appointed [liquidator](#) attorney Hisashi Ito (伊藤尚) has begun the complex process of identifying, securing, and distributing the [religious organization's](#) assets while addressing claims from alleged "victims" represented by a hostile network of lawyers, allegedly working to maximize such claims.



Two reports on 22nd April – one from [NHK World](#) and another from [Sankei Shimbun](#) – offer complementary perspectives on this process, highlighting

both the administrative scale of the [liquidation](#) and the broader implications for "victims", employees, and institutional accountability.

[NHK World](#) frames the developments primarily through the lens of victim compensation, emphasizing that individuals who claim to have suffered harm linked to the [organization](#) will be able to apply for compensation beginning 20th May 2026. According to [NHK](#), this application window will remain open for one year and is widely regarded as the final opportunity for persons claiming to be victims to seek financial redress.

In parallel, [NHK](#) notes that the [liquidation](#) team – comprising 415 members – has already visited more than 400 facilities nationwide and secured at least ¥40 billion (approximately \$250 million) in deposits and savings. However, it also points out that this figure is roughly 40 percent lower than the asset level cited in the [dissolution order](#) for fiscal year 2024.



One of 400 facilities nationwide targeted by liquidators: The headquarters building of the [Family Federation](#) in Japan, located in Shibuya, Tokyo. Photo: Asanagi / Wikimedia Commons. [Public domain](#) image. Cropped

[Sankei Shimbun](#), by contrast, provides a more procedural and legalistic account of the [liquidation](#) process. It reports that the [liquidator](#) has frozen the [religious organization's](#) bank accounts to preserve assets totaling at least ¥40 billion, aligning with [NHK's](#) figures

but adding operational detail about the mechanisms used to secure these funds.

[Sankei](#) also highlights that a formal report was submitted to the *Tokyo District Court* on 20th April and subsequently made public, reinforcing the judicial oversight underpinning the process. Like [NHK](#), [Sankei](#) confirms that more than 400 church facilities were inspected and that key accounting records were obtained, suggesting a comprehensive effort to map the [organization's](#) financial structure.

Both outlets converge on the issue of workforce reduction, though with slightly different emphases. [NHK](#) reports that the [religious organization](#) had approximately 1,900 employees as of early March, with around 340 voluntarily resigning shortly after the [dissolution order](#), leaving about 1,400 staff members. Of these, roughly 900 who are not directly involved in [liquidation](#) will be dismissed as of 20th May.

[Sankei](#) corroborates the figure of 900 layoffs but frames it as a policy decision tied to operational necessity, specifying that only personnel in essential functions such as accounting and general affairs will be retained temporarily.

On employee compensation, the two reports again align but differ in nuance. [NHK](#) states that the [liquidator](#) will not provide additional retirement payments or merit-based bonuses to those who resigned voluntarily, indicating that this decision has received court approval. [Sankei](#) expands on this point by explaining that such payments had initially been planned during January and February as part of a voluntary resignation program, but were later suspended because their legal basis was deemed unclear.

Finally, both reports address the handling of the [religious organization's](#) real estate holdings – estimated at around 200 properties. [NHK](#) notes that these assets will be sold, prioritizing those not currently in use, while [Sankei](#) adds that decisions regarding these properties, as well as nine [cemeteries](#) and memorial parks, are still under consideration. Both sources also confirm that creditors and claimants must file their claims within a one-year period starting 20th May, as announced in the government journal *Official Gazette*.

[NHK World](#) and [Sankei Shimbun](#) present a consistent but multidimensional picture: a tightly supervised [liquidation](#) process balancing asset preservation, workforce reduction, and compensation for persons claiming to have suffered harm.

See also [Religious Freedom in Jeopardy After Dissolution](#)

Text: Knut Holdhus, editor

Featured image above: Japan's legal campaign against the [Family Federation](#) – the [liquidation](#) phase. Illustration: ChatGPT, 22nd April 2026.

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