

FFWPU Europe and the Middle East: UN Protests Japan's Mass Church Seizure

Knut Holdhus
March 7, 2026



French international human rights lawyer Patricia Duval in Tokyo February 5, 2025. She is a 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



UN Special Rapporteur on Religious Freedom: Nazila Ghanea

UN submission raises concerns over Japan's dissolution of the Family Federation, its rapid liquidation, and coordinated shutdown of 260 churches

On 4th March 2026, French international human rights lawyer Patricia Duval submitted a [statement](#) to the NGO Committee on Freedom of Religion and Belief at the United Nations Office in Geneva. [Her declaration](#) was prepared ahead of a meeting with the United Nations Special Rapporteur on Freedom of Religion or Belief, Nazila Ghanea [See editor's note below]. Duval's [statement was published](#) in the leading online human rights magazine [Bitter Winter](#) on 6th March under the headline [Japan: Hundreds of Thousands of Unification Church Believers Deprived of Places of Worship](#).

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Concerns About Religious Freedom in Japan

The [statement](#) raises serious concerns about the impact of a [court decision](#) in Japan, on the same day, that ordered the dissolution of the religious organization commonly known as the [Unification Church](#), formally called the [Family Federation for World Peace and Unification](#). According to the submission, the way this [decision](#) was implemented has had immediate and far-reaching consequences for the ability of

hundreds of thousands of believers to practice their religion.



The situation is particularly significant because Japan is a party to the [International Covenant on Civil and Political Rights](#) (ICCPR), an international treaty that protects fundamental freedoms, including the right to freedom of religion under Article 18. This [treaty](#) limits when governments may restrict religious activity, allowing restrictions only under very narrow circumstances related to public safety, order, health, morals, or the rights of others.



Notification of closure, put up on 260 churches nationwide on March 4, 2026 by the Japanese authorities

The events that followed the [court decision](#) have raised questions among international observers about whether these [international legal obligations](#) have been respected.

Closure of Churches Across Japan

On the morning of 4th March, the Tokyo High Court announced its [decision](#) to uphold an [order](#) dissolving the [Family Federation](#) as a religious corporation. Immediately after the [ruling](#), the appointed liquidator, Hisashi Ito (伊藤尚), contacted the [Federation](#)'s lead attorney, Nobuya Fukumoto (福本修也), to inform him that liquidation procedures would begin at once.

Within about an hour of the announcement, teams of lawyers accompanied by police officers reportedly [arrived simultaneously](#) at churches across Japan. Their mission was to explain the legal process of liquidation, take control of the buildings, and secure the organization's assets. Keys to the properties were confiscated, and the facilities were effectively closed.

This operation was carried out at approximately [260 church locations](#) nationwide. At the [organization](#)'s headquarters in the Shibuya district of Tokyo, about twenty liquidators entered the building and shut it down. Staff members were reportedly told that they were no longer allowed to enter their workplace and were instructed to remain at home.

Members of the [religious organization](#) later stated that the scale and coordination of the operation suggested that preparations had been made well in advance. For example, a website dedicated to the liquidation process had already been created before the court issued its decision. The domain name for the site had been registered several weeks earlier, on 13th February, and several documents outlining liquidation procedures had already been uploaded.

According to one [Family Federation](#) member, the rapid deployment of approximately one thousand lawyers and police officers across the country gave the impression of a large-scale law-enforcement operation. The member noted that this occurred despite assurances from government officials and courts that the dissolution of the [religious organization](#) as a legal entity would not interfere with the personal religious practices of its followers.

In practice, however, the [closure](#) of all [Federation](#) buildings meant that many believers suddenly found themselves without any place to gather for worship or communal religious activity.

Legal Basis for the Dissolution

The dissolution order was originally issued by a [district court](#) and later [upheld on appeal](#). The courts based their decision primarily on civil lawsuits that had been filed over several decades by former members seeking damages.

In those cases, civil courts had concluded that certain activities by the [organization](#) violated "social norms" or "social appropriateness". These judgments were then used as grounds to justify dissolving the [religious corporation](#).

Critics argue that this reasoning is problematic because the dissolution was not based on criminal convictions but on civil liability claims connected to past disputes.

Concerns Raised by United Nations Experts

Before the final decision was issued, four United Nations Special Rapporteurs [See editor's note below] [expressed concern](#) about the possible dissolution of the [religious organization](#). On 1st October 2025, they

released a [public statement](#) warning that dissolving a religious organization based on the vague concept of "public welfare" would conflict with international human rights law.

 <i>UN Special Rapporteur: Farida Shaheed (2016)</i>	 <i>UN Special Rapporteur: Nina Romero</i>	In particular, they noted that Article 18(3) of the ICCPR allows restrictions on religious freedom only in very limited circumstances and requires governments to demonstrate that such restrictions are necessary and proportionate. When the High Court eventually delivered its lengthy ruling, it addressed the concerns of the UN experts only briefly.
 <i>UN Special Rapporteur: Nicolas Levrat</i>	 <i>UN Special Rapporteur on Religious Freedom: Nazila Ghanea</i>	The court argued that dissolving a religious corporation simply removes its legal status as an organization and does not legally prevent individuals from continuing to practice their religion. However, critics argue that the immediate closure of all church facilities suggests that the real-world consequences of the decision are much broader. Without access to buildings, resources, and organizational structures, believers may find it extremely difficult to practice their religion

collectively.

The court also argued that actions considered civil wrongs under Japanese law - and deemed harmful to the public welfare - could be interpreted as falling within the categories of harm listed in Article 18(3), such as threats to public order or the rights of others.

A Broader Human Rights Debate

According to [Patricia Duval's statement](#), what she calls the Japanese authorities' "tautological and highly fallacious reasoning" creates a circular argument: because the court determined that the [organization](#) harmed the public welfare, the dissolution is therefore considered justified under international human rights standards.

From the perspective presented in the [statement](#), this approach risks undermining the strict safeguards that international law places on restrictions of religious freedom.

As a result, the case has become a subject of growing debate among legal experts and human rights advocates about the balance between protecting the public interest and safeguarding fundamental freedoms.

Patricia Duval ends her [statement](#) with clear words of warning,

"This [decision](#) constitutes a blatant violation of international law and shows profound contempt for international institutions and the human rights commitments that Japan pretended to join after World War II."

See also [Social Ostracism for Believers After Legal Loss](#)

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Text: Knut Holdhus, editor

[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.

These experts frequently conduct fact-finding missions to investigate human rights violation allegations in different countries. In addition to these missions, they regularly review complaints from alleged victims of human rights abuses. If a complaint is verified, they send an urgent letter or appeal to the concerned government. Even without a specific complaint, Special Rapporteurs can intervene on behalf of individuals or groups at their discretion.]

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State Grabs 260 Churches After Dissolution

March 6, 2026 • Knut Holdhus

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Family Federation believers voice rights concerns as access to hundreds of churches blocked by state after dissolution order



Tokyo, 5th March 2026 – Published as an article in the Japanese newspaper [Sekai Nippo](#). Republished with permission. Translated from Japanese. [Original article](#).

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A notification of closure by the liquidators, on the door of a *Family Federation* place of worship 5th March 2026 in Odawara (小田原市 – population 185,000), Kanagawa prefecture, Japan. Photo: *FFWPU*

Following the *Tokyo High Court’s decision* ordering the dissolution of the *Family Federation for World Peace and Unification* (formerly the *Unification Church*), liquidation procedures began on 4th March. A court-appointed lawyer acting as a liquidator has taken control of the *religious organization’s* assets in order to compensate victims of “donation-related damages”.

Believers have expressed shock that religious activities were restricted immediately.

According to reports, a team numbering in the hundreds of personnel has been organized to investigate roughly 300 churches nationwide. Soon after the *High Court’s ruling* was issued, the liquidator entered the *religious organization’s* headquarters, and staff members were no longer allowed to enter the premises or conduct religious activities such as worship services.

Liquidators simultaneously entered church facilities across the country. On social media, members of the *Federation* posted comments such as:

- “We can no longer enter our church.”
- “Our place of prayer has been taken away.”

Nozomi Kojima (小嶋希晶), head of the *Association of Second-Generation Believers for the Protection of Believers’ Human Rights*, wrote the following on her X (formerly Twitter) account:

“When I passed in front of the headquarters just now, there was a notice posted. As soon as the result was announced at 11 a.m. today, liquidators came to churches nationwide all at once and closed them.

There was even a website prepared – when did they start preparing all this?

We were told that only the corporate status would disappear and that our religious life could continue unchanged, but that’s completely different.

We cannot enter the church, and we cannot hold worship services. All staff are prohibited from religious activities. We can’t do anything anymore.”



Nozomi Kojima, representative of “The Second-Generation Association for Protecting the Human Rights of Believers”, here speaking at a press conference on 26th March 2025 in Shibuya, Tokyo. Photo: Screenshot from video recording by *FFWPU*.

Guidelines issued by Japan’s *Ministry of Education, Culture, Sports, Science and Technology* (MEXT) in October 2024 regarding the liquidation of designated religious corporations state:

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“When managing or disposing of the assets of a corporation under liquidation, the liquidator should, insofar as it does not interfere with liquidation duties, and taking into account the degree of necessity, permit believers to use facilities and otherwise give consideration to the freedom of religion of believers belonging to the religious organization that currently exists.”

However, the guidelines also note that if liquidation procedures continue for a long period, the use of facilities may be restricted. This could significantly affect believers’ religious practices, raising concerns that the freedom of religion guaranteed by the Constitution may be undermined.



Oze Cemetery, owned by the [Family Federation](#), in Katashina Village, Gunma Prefecture. Photo: Takahide Ishii (石井孝秀)

On 5th March, a liquidator also entered the [Oze Cemetery](#), owned and managed by the [religious organization](#) in Katashina Village, Gunma Prefecture. Restrictions that had been feared – such as limits on funeral ceremonies, memorial services, and grave visits – are beginning to become a reality.

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Featured image above: The Japanese headquarters of the Family Federation for World Peace and Unification (formerly the Unification Church) in Shibuya, Tokyo, where a court-appointed liquidator has entered. Photo taken on 4th March 2026. Photo: [Sekai Nippo](#)

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