

【Current Status on the Labor Conditions of Animation Creators in Japan】

～In response to the Findings in the Report of the United Nations Human Rights Council

Working Group (Released May 2024)～

The report from the United Nations Human Rights Council Working Group, released in May 2024, highlights the labor conditions of animators and production staff involved in the production of animation in Japan. The Association of Japanese Animations (AJA) has reviewed the current status of the issues raised in the report, using published data and various other sources, and hereby presents the following remark

1. Animation Production Creators in Japan and Related Laws

It is estimated that there are approximately 20,000 animators and production staff^{*1}, who are employed by animation studios, and freelancers^{*2} who work from the office or at home under outsourcing contracts with animation studios. According to a survey conducted during the COVID-19 pandemic in 2022, the percentage of employed workers increased to 49% compared to a previous survey in 2018, while freelancers accounted for 30.8%^{*3} of the workforce. The UN report states that freelance workers do not receive protections under labor laws. However, in Japan, freelance workers operating under outsourcing contracts are now protected by the Freelance Act (effective November 2024), as well as the Subcontract Act and the Antimonopoly Act^{*4}, while employed workers are protected by the Labor Standards Act, the Labor Contract Act, and other labor regulations.

2. Income of Animators and Production Staff

According to the UN report, the starting salary for animators is approximately 1.5 million yen per year^{*5}. However, a 2022 survey^{*6} indicated that the average annual income for employed and freelance animators and production staff aged 20-24 was 1,966,000 yen. The overall average income for all generations of animators and production staff was 4,555,000 yen, with 25% of respondents earning more than 6 million yen. Wages for full-time employment are set above the legal minimum wage in Minimum Wage Act^{*7}. While Freelancers are typically compensated based solely on output, such as the number of drawings completed, or a combination of a fixed monthly rate and a performance-based bonus. The total amount of work—such as the quantity and duration—is determined by an outsourcing contract. If the work is limited in amount, duration, or hours, the annual salary may fall below the average. Additionally, if an animator's skills are not yet sufficiently developed to produce a high volume of drawings etc., their performance-based earnings may be lower than average. Animation studios that hire animators and production staff and/or outsource work to freelancers need to pay attention to these circumstances, provide training for animators and production staff, and set the hiring and outsourcing conditions that enable newcomers to earn a fair wage.

3. Freelance Working Hours

The report by the United Nations points out that freelancers are often required to work excessively long hours. However, according to a 2022 survey, animators and production staff from all generations, including both employed and freelance workers, were estimated to work an average of 2,379 hours annually^{*8}. A subsequent survey conducted in 2023 indicated a higher average of 2,623 hours per year^{*9} for all animators and production staff, regardless of their employment status. For employment, the defined working hours, as defined by the Labor Standards Act, total 2,085 hours per year (for a 365 day year), based on an 8-hour workday and a 40-hour workweek. In special circumstances, when both labor and management come to an agreement, the annual upper limit can reach up to 2,805 hours^{*10}. Although these survey results reveal that the hours worked by animators and production staff exceeded the defined working hours, they also fell within the agreed-upon overtime hours allowed by labor-management agreements. Therefore, animation studios need to monitor the working conditions not only for their employed workers but also for freelancers who often set their own hours while working from home, and set healthy and appropriate working hours and days for all workers involved.

4. Contracts for Creators' Intellectual Property Rights, etc.

The report by the United Nations indicated that "creators often sign contracts that inadequately protect their intellectual property rights, creating an environment ripe for exploitation." However, animation studios are required to adhere to the Copyright Act concerning creators' moral rights and intellectual property rights. Animation Studios must also conclude business transactions and comply with the obligations and prohibitions such as provision of a document and setting of a payment date which are required under the Subcontract Act and its guidelines^{*11} and the Freelance Act. AJA has prepared and distributed a guidebook and a model contract to promote the adoption of appropriate contractual practices^{*12}.

This concludes our understanding and stance toward the report by the United Nations. Since before the COVID-19 pandemic, the animation production field in Japan has been improving in income and working hours. Based on the findings of our Report(this Current Status), AJA will continue to strive to understand the situation, enhance working conditions, and promote awareness and initiatives aimed at improving the working environment.

Footnotes:

^{*1}Please refer to the following table prepared by AJA.

This table presents the total estimated number of creators by job type involved in each stage of animation production,

including producers, production desk and production assistants who manage the production process, but not including sound production and voice actors. The figures represent the estimated number of domestic workers based on the creators listed in the end credits of programs and productions, as well as the number of individuals deemed to produce the released minutes of animation each year (not including voice actors and sound production). It also accounts for production carried out by overseas subsidiaries and international partners related to animation, color finishing, and background art.

Job type, employment type, order units/compensation calculation units, and estimated number of people in animation production.

Job Type		Employment Type	Order Units/Compensation Calculation Units	Estimated number of people (approximate)
Director		Mostly Freelance	Per series or per episode/per episode	400
Scriptwriter		Mostly Freelance	Per episode/per episode	600
Episode director		Mostly Freelance ・ Some Employment	Per series or per episode/per episode	800
Storyboard (Excluding Director)		Mostly Freelance	Per episode/per episode	400
Animator/ Drawing	Animation Director	Mostly Freelance ・ Some Employment	Per episode/per episode	500
	Layout	Mostly Individual Subcontracting	Per scene/per cut	500
	Key Animation	Mostly Freelance ・ Some Employment	Per scene/per cut	1000
	Animation Inspection	Mostly Freelance ・ Some Employment	Per episode/per episode	500
	In-Between-Animation	Mostly Freelance ・ Some Employment	Per cut/per number of in-between-animations	3000
Color Finishing	Color Design	Mostly Freelance ・ Some Employment	Per series/per cut	400
	Color Coordination	Mostly Freelance ・ Some Employment	Per episode/per episode	600
	Color Finishing	Mostly Freelance ・ Some Employment	Per episode/per intermediate	2000
CG		Mostly Employed	Per cut/primarily person-hour	2000
Background Art	Art Director	Mostly Employed	Per series/per episode	300
	Background Art	Mostly Employed	Per episode/per cut	800
Filming	Cinematographer	Half Freelance ・ Half Employment	Per series/per episode	300
	Camera Operator	Half Freelance ・ Half	Per episode/per episode	600

		Employment		
Editing		Both Freelance and Employment	Per episode/per episode	400
Production Management	Producer	Mostly Employed	Per series/per series	300
	Production Desk	Mostly Employed		600
	Production Assistant	Mostly Employed	Per episode/per episode	2000
Total				18000

*2 The “Animator Survey 2023” was conducted by the Japan Animation Creators Association (JAniCA) in FY2022 on behalf of the Agency for Cultural Affairs. The survey involved a total population of 419 participants, primarily consisting of animators, along with directors, episode directors and production managers (hereafter referred to as the JAniCA 2022 survey). In “39. In terms of workplace,” 25.1% of creators reported that they work from home.

<https://www.janica.jp/survey/survey2023Report.pdf>

*3 The JAniCA2022 Survey shows that 49% are employed (including full-time and contract positions), while 30.8% work as freelancers in “18. The work status of animators.” A similar survey, the “Animator Fact-Finding Survey 2019” (with a population of 382 and occupations nearly identical to those in the JAniCA 2022 survey, hereafter referred to as the JAniCA 2018 survey.) “4.2 type of works” in the JAniCA 2018 survey shows that 23.3% of animators were employed (as company executives, regular employees, contract employees, and part-time workers), while 50.5% were freelancers.

*4 Please refer to the following table prepared by AJA.

Laws Governing the Work of Animation Production Creators

Abbreviations	Subject	Overview
Labor Laws and Regulations	Employment contracts between employers and workers	Multiple laws and regulations establish the conditions and environment, including salaries, work hours, days, and overall workload of employees. To enhance the working conditions for employed individuals, the “Work Reform Related Laws” were implemented starting in April 2019, through amendments to various labor laws and regulations.
Subcontract Act	Certain types of outsourcing contracts exist between businesses and businesses (including private businesses) in animation production, which applies to transactions involving defined capitalization sizes for specific types of work.	The purpose of this Act is to ensure fairness in subcontracting transactions and to protect subcontractors. It outlines the obligations and prohibitions for large procuring enterprises, including obligation to provide a written document immediately upon order and to ensure payment is made within 60 days.
Freelance Act	Outsourcing agreements with private businesses (applicable to transactions between animation studios and freelancers)	Entered into force on November 1, 2024, this new act establishes regulations similar to those outlined in the Subcontract Act. It establishes obligations to clarify transaction conditions, establish due dates for remuneration payments, and specifies prohibited acts for businesses that outsource work to freelancers. Additionally, this act introduces regulations akin to those found in labor legislation. These include the obligation to provide accurate information at the time of recruitment, to take account of compatibility with childcare and nursing care, establishment of systems to prevent harassment, and necessity of providing notice upon termination or non-renewal of contracts.

^{*5}The UN Human Rights Council working group's report is based on a document submitted by Netflix Japan to the Japan Fair Trade Commission in 2020. The document is titled "On the State of Freelance Workers Supporting the Content Industry: Awareness of Issues Through the Netflix Business." It states that "the annual salary of a new animator is 1.5 million yen," and it is inferred that this information was quoted by Netflix Japan from the 2018 survey report conducted by JAniCA^{*6}.

https://www.jftc.go.jp/cprc/katsudo/bbl_files/258th-bbl.pdf

^{*6} JAniCA2022 Survey "41. Average annual income by age group." According to the JAniCA 2018 survey, creators aged 20-24 earned an average annual income of 1,546,000 yen in animation production. The average annual income was 1,210,000 yen in 2015.

^{*7} In Japan, minimum wages are set by region according to the Minimum Wage Act. As of November 2024, the minimum wage in Tokyo is 1,163 yen per hour. If we estimate the annual minimum wage based on 1,800 hours of work per year, which is still less than the 2,085 hours per year (which is calculated based on a legal maximum of 8 hours per day and 40 hours per week), the annual minimum wage would amount to approximately 2,090,000 yen. The Minimum Wage Act applies across all industries and job categories, so any job will typically offer a salary above 2,000,000 yen per year.

^{*8} JAniCA2022 Survey "35. Average work hours" (230.98 hours per month = 2771.8 hours per year according to the JAniCA 2018 survey)

^{*9}A 2023 survey conducted by the Nippon Anime & Film Culture Association, "Figure 2: the distribution of average monthly working hours for animation industry workers (not including voice actors)." This survey's population is 323 respondents (including production management and voice actors), of whom 59% are animators, 13.6% are episode directors. Among the total respondents, 32% were employed, with a higher percentage found in art, CG (computer graphics), and production management roles. Additionally, this survey indicates that employees generally work longer hours.

<https://nafca.jp/survey02/>

^{*10}The Labor Standards Act, revised in April 2019, establishes a limit on overtime work. The standard working hours are 8 hours per day and 40 hours per week, and employees are entitled to at least one statutory holiday each week. The defined working hours per year (365 days) is total 2,085 hours. In principle, the maximum allowable overtime is 45 hours per month and 360 hours per year, which requires that a labor-management agreement be concluded and submitted. Even in cases where there is a temporary and special circumstance and both labor and management agree, overtime hours cannot exceed 720 hours per year. Additionally, the combined total of overtime and holiday work cannot exceed 100 hours per month, and the average overtime hours over a period of two to six months cannot exceed 80 hours per month. The maximum legal overtime of 45 hours per month can only be applied for up to six months in a year. The new act started applying to large companies in April 2019 and to medium and small companies in April 2020. To comply with these working hour regulations, some animation studios close their offices during non-working hours and holidays, prohibiting access. It is deemed that freelancers who work at the offices of the animation studios are treated in the same manner.

^{*11}The "Guidelines for the Promotion of Appropriate Subcontracting Transactions in the Animation Production Industry" were prepared by the Ministry of Economy, Trade and Industry, incorporating input from relevant stakeholders. These guidelines explain how the Subcontract Act applies to the animation production sector.

https://www.chusho.meti.go.jp/keiei/torihiki/guideline/16_animation.pdf

^{*12}The Association of Japanese Animations, under the "Workshop for the Dissemination of Appropriate Contractual Relationships for Animation Producers and Production Studios" project commissioned by the Agency for Cultural Affairs, developed a guidebook that complies with the Subcontract Act including both video and text. Additionally, AJA creates and distributes a model contract for nearly every job category, which clearly outlines compensation, duration of work, and handling of copyright.

https://aja.gr.jp/r5_bunka_kensyu_guide_infomov