

# 16. Helmet

## 1. Definition of Category

In this report, the helmets used for motorcycle riding<sup>(Note)</sup>, sports and industrial labor in order to protect the head will be dealt with.

HS Numbers	Commodity
6506.10-200	Crash helmet

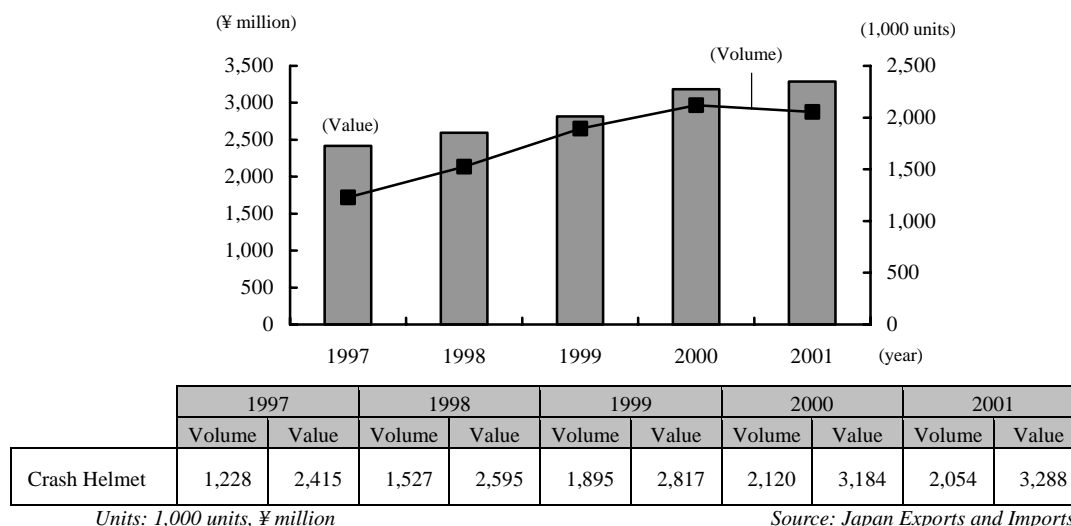
*Note: The helmets used for motorcycle riding, dealt with in this guidebook, are what those who drive a two-wheeled vehicle and a motorbike use in order to protect their heads.*

## 2. Import Trends

### (1) Recent Trends in Helmet Import

Helmet imports declined in 1996-1997, as it is supposed that helmet demand itself is stagnant in addition to the fact that their superiority in price compared with domestic products has been lost due to weakened yen. But from 1998 to 2000, imports have posted increase on both in terms of volume and value, and reached to 212 million units, worth ¥3.18 billion. The growth in helmet imports came to an end in 2001, as imports finished the year down 3.2% on a volume basis to 2.05 million units. On a value basis, though, imports rose by 3.3% to ¥3.29 billion.

**Fig. 1 Japan's helmet import**

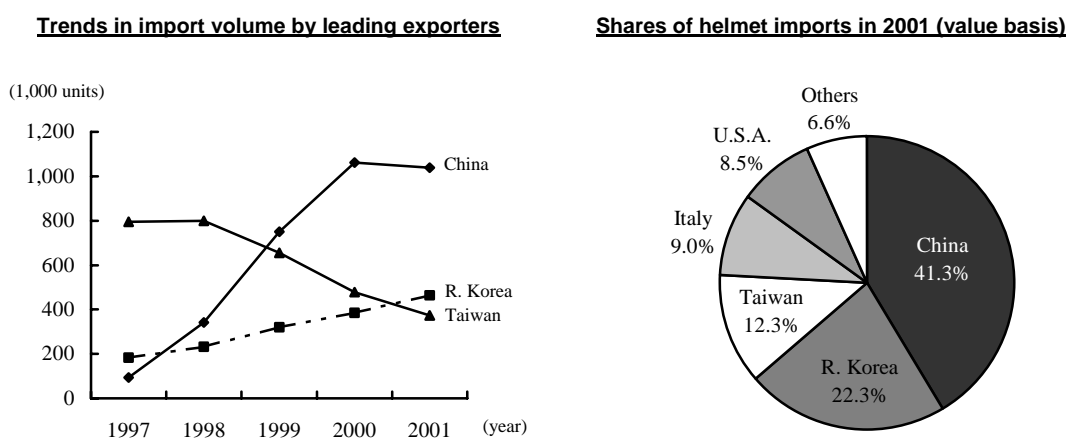


Helmets can be classified roughly into those for motorcycle riding, those for sports, and those for industrial labor. Because the helmet import volume on a use basis is not published, its breakdown is unknown. However, according to industry estimates, helmets for motorcycle riding should occupy a considerable part of it. The majority of helmet imports for motorcycle riding may supposedly be half-type helmets for motorbikes and small-sized two-wheeled vehicles. On the contrary, according to industry estimates, helmets marketed for sports are supposedly expanding reflecting a rise in popularity of sports in recent years, though their import volume is not very large.

### (2) Imports by Place of Origin

Principal exporters of helmets to Japan can be largely divided into two groups, the countries of the Asia (including China, Taiwan, the Republic of Korea) and the Western countries (including the U.S. and Italy). Imports from China have grown significantly as Japanese makers have shifted production offshore. China nosed past Taiwan into the lead on a volume basis for the first time ever in 1999. China recorded further 41.3% increase in 2000. China accounted for 50.6% on a volume basis, and 41.3% on a value basis in 2001. Taiwanese manufacturers have shifted their production sites to China, and because of this, imports from Taiwan have fallen by half over the past five years. In 2001 Taiwan sank below fast-rising Republic of Korea into third place in the rankings.

**Fig. 2 Principal exporters of helmets to Japan**



	1997	1998	1999	2000		2001			
	Volume	Volume	Volume	Volume	Value	Volume	Value		
China	93	342	751	1,061	1,289	1,038	50.6%	1,360	41.3%
R. Korea	183	233	320	385	644	464	22.6%	732	22.3%
Taiwan	795	800	656	478	488	373	18.2%	405	12.3%
Italy	17	16	36	55	234	64	3.1%	294	9.0%
U.S.A.	98	73	75	87	380	60	2.9%	279	8.5%
Others	42	63	57	53	149	55	2.7%	219	6.6%
<b>TOTAL</b>	<b>1,228</b>	<b>1,527</b>	<b>1,895</b>	<b>2,120</b>	<b>3,184</b>	<b>2,054</b>	<b>100.0%</b>	<b>3,288</b>	<b>100.0%</b>
(E U)	37	39	58	73	324	88	4.3%	438	13.3%

Units: 1,000 units, ¥ million

Source: Japan Exports and Imports

Helmets imported from Asian regions such as China, Taiwan, and the Republic of Korea are predominantly the so-called half-type ones for motorcycle riding. Plastic fabricating plants that manufacture helmets are finding increasingly difficult to continue production in Japan due to strict environmental standards. Japanese makers of less expensive half-helmets are steadily shifting production to other Asian countries. Already they have a number of factories certified under the PS Mark and SG Mark programs, allowing their products to be sold in Japan with these marks displayed. Helmets produced at a certified factory are exempt from the lot inspection requirement normally imposed on products imported, and so most makers have obtained certification for their offshore factories.

On the other hand, as for helmets imported from Western countries such as the U.S., Italy and Germany, there might supposedly be a large number of jet-type and full-face type helmets for motorcycle riding, which are high value-added. The situation is different with motorcycle helmets. The motorcycle licensing system was modified as of June of 1996 to make it easier to obtain a license. As a result, sales rose in 1997 and 1998 of motorcycles with an exhaust volume of 401 cc or greater. This led to an increase in imports from the United States. After that, though, large motorcycle sales have been in a slump, and so imports from the United States have been off as well. For reference, helmets for such various sports as skiing, snowboarding, mountain climbing, mountain bike and American football are included in imports from Western countries. These helmet imports are playing roles to support imports from Western countries fundamentally; following out-door activities and the popularity of sports. In 2001 imports from the United States accounted for 8.5% on a value basis, and Italy and other EU member nations with 13.3% as well.

### (3) Imports' Market Share in Japan

Imports' share in the Japanese helmet market is unknown, since there are not any import statistics on a use basis. According to the Japan Automobile Industry Association, a downward trend continues in domestic sales of motorcycles. Sales declined from 1.22 million units in 1996 to just 750,000 units in 2001. As a result, demand for motorcycle helmets is also declining. Industry sources estimate imports' share of domestic helmet sales at around 70%. Most of these consist of half-helmets used with motorized bicycles, an area where imports have a virtual monopoly on the market. In the case of full-face helmets, though, increased demand for large-size motorcycles led to a slight increase in helmet imports. However, the two leading domestic helmet makers are also leading worldwide brands, so imports do not have a very large share of this market.

As for helmets for sports, various kinds of helmets are distributed. It is supposed that import shares of these are different respectively. According to the Consumer Product Safety Association, very few helmets for baseball (for regulation-ball) are imported. As for helmets used for sports originated in the West, import shares of them are increasing slowly. As for helmets for industrial labor, according to industry estimates, domestic products are dominant, thus it seems that import share is very small.

### 3. Key Considerations related to Importing

#### (1) Regulations and Procedural Requirements at the Time of Importation

There are some cases where the Consumer Product Safety Law is applied on helmets' import. Helmets for motorcycle riding are designated as "specific products." When importing for sale, importer must notify the commencement of business to the Director-General of the competent Bureau of Economy, Trade and Industry (or to the Minister of Economy, Trade and Industry, for importers with business sites in multiple areas) prior to commencing import operations.

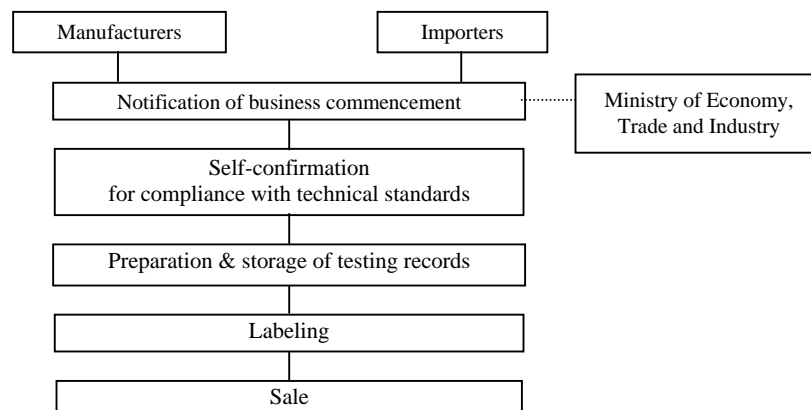
#### (2) Regulations and Procedural Requirements at the Time of Sale

On helmet sales, the Consumer Product Safety Law, the Road Traffic Law, the Industrial Safety and Health Law, and the Act Against Unjustifiable Premiums and Misleading Representations are applied according to uses.

##### 1) Consumer Product Safety Law

Helmets for motorcycle riding are designated as "specific products" under provisions of the Consumer Product Safety Law. Manufacturers or importers of helmets for motorcycle riding must carry out in-house testing, and preserve its records of self-confirmation for compliance with technical standards stipulated by the Minister of Economy, Trade and Industry. Products verified as compliant must label the name of the importer and usage instructions. Products that are not labeled in accordance with the Law, and without PS mark may not be sold or exhibited for a purpose of sale in Japan. (see 4. Labeling)

**Fig. 3 Procedures under the Consumer Product Safety Law**



<Note>

The four laws of consumer product safety—the Consumer Product Safety Law, the Gas Utility Industry Law, the LPG Law (the Law Concerning the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas), and the Electrical Appliance and Material Safety Law (former Electrical Appliance and Material Control Law) were revised in 1999. In principle, manufacturers or importers must confirm on their own that their products are compliant with technical standards, and must display required label items on the product to be sold in Japan. They are also required to prepare and maintain self-testing records. Any products imported and sold that are not compliant with the standards are subject to improvement orders or are prevented from displaying particular labels. Further, products with a high level of danger may be ordered recovered.

##### 2) Road Traffic Law

Though regulations of the Road Traffic Law do not restrict directly the sale of helmets for motorcycle riding, the Law applies to them in order to prevent dangers on the road and troubles owing to traffic accidents in case that riders run on the roads wearing them. Helmet standards provided by the Regulations for the Enforcement of the Road Traffic Law are as follows. Please refer to the Public Relations Department of the National Police Agency or the nearest police for details.

- a) To ensure sufficient field of vision both horizontally and vertically;
- b) To have such a structure such that its peak wouldn't disturb the field of vision while hanging down due to wind pressure;
- c) To have such a structure that such that it would not harm the rider's auditory capacity remarkably;
- d) To have an ability of shock absorbing and that its body has a tolerance against penetration;
- e) To have chin straps that can fix it so that it would not come off easily due to a shock;
- f) It weighs less than 2 kg;
- g) To have such a structure that it would not injure the human body.

### 3) Industrial Safety and Health Law

The Industrial Safety and Health Law regulates helmets for industrial labor, which are used for ensuring laborers' safety. Under the Law, helmets are among subject items of the model inspection as a "safety helmet." The "Rules of Industrial Safety and Health" prescribe workplaces where safety helmets have to be worn.

In case of importing helmets for industrial labor, and selling and using them, the importer must have the model inspected. It is prohibited to sell and use helmets that have failed inspection. The model inspection is executed by the model inspection agency (Industrial Safety Technique Association) under the Regulations of Machines, etc. In case of taking the initial inspection, one must submit four articles in question, of the model to be applied, attaching such documents as a structure drawing of the safety helmet and summarized reports of manufacturing inspection equipment, etc. to an application form of each model. In case of imported commodities, overseas manufacturer's documents relating to production and inspection facilities are required. Please refer to the Industrial Safety Technique Association for details of procedures. (see 11. Related Organizations)

### 4) Industrial Standardization Law

Though the Industrial Standardization Law itself is not among compulsory regulations, it is dealt with under this heading because Japanese Industrial Standards are used as safety standards and technical standards of the Consumer Product Safety Law. The Japanese Industrial Standards (JIS) defines safety and technical standards on helmets for motorcycle riding, bicycle riding, and industrial labor separately.

#### a) Crash helmet for motorcycle riding (JIS T 8133)

As for helmets for motorcycle riding, there are three sorts of standards, to which sorts of vehicles and inspection standards corresponding respectively are different.

**Fig. 4 Sorts of helmet for motorcycle riding**

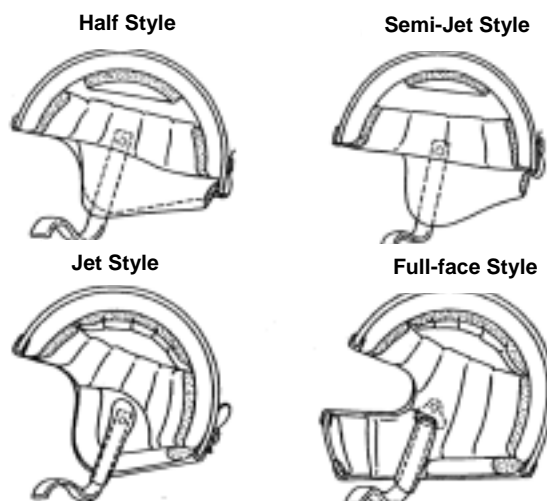
Type	Style	Notes
Type A	Half style, semi-Jet style	Mainly intended for riders of under 125cc motorbike, and passenger car drivers regulated under provisions of the Road Traffic Law. Safety.
Type B	Semi-jet style, jet style, full-face style	Mainly intended for drivers of motorcycles regulated under provisions of the Road Traffic Law. Safety visors for operators of racing motorcycles and racing cars also fall into this category.
Type C	Jet style, full-face style	Mainly intended for drivers of motorcycles regulated under provisions of the Road Traffic Law. Crash helmets for riders of racing motorcycles and racing cars also fall into this category.

#### b) Crash helmet for bicycle riding (JIS T 8134)

There are no any distinctions of sorts according to shape or use divisions particularly. Only a sole standard is provided.

#### c) Crash helmet for industrial labor (JIS T 8131)

As for helmets for industrial labor, there are four sorts of standards according to purpose of work. Their inspection standards are also different respectively.



**5) Act Against Unjustifiable Premiums and Misleading Representations**

**<Fair Competition Code Concerning Representations of Sporting Goods>**

The Fair Trade Conference of Sporting Goods has voluntarily adopted labeling guideline in order to assure consumer product choice availability and preserve fair competition, based on the Act Against Unjustifiable Premiums and Misleading Representation. This Code applies to helmets for sports. (see 4. Labeling)

**(3) Competent Agencies**

- Consumer Product Safety Law  
Product Safety Division, Commerce and Information Policy Bureau, Ministry of Economy, Trade and Industry  
TEL: 03-3501-1511 <http://www.meti.go.jp>
- Road Traffic Law  
Traffic Planning Division, Traffic Bureau, National Police Agency, National Public Safety Commission  
TEL: 03-3581-0141 <http://www.npa.go.jp>
- Industrial Safety and Health Law  
Safety Division, Industrial Safety and Health Department, Labour Standards Bureau, Ministry of Health, Labour and Welfare  
TEL: 03-5253-1111 <http://www.mhlw.go.jp>
- Industrial Standardization Law  
Technical Regulations, Standards and Conformity Assessment Policy Division, Industrial Science and Technology Policy and Environment Bureau, Ministry of Economy, Trade and Industry  
TEL: 03-3501-1511 <http://www.meti.go.jp>
- Act Against Unjustifiable Premiums and Misleading Representations (Fair Competition Code)  
Consumer Related Trade Division, Trade Practices Department, Fair Trade Commission of Japan  
TEL: 03-3581-5471 <http://www.jftc.go.jp>

**4. Labeling**

**(1) Legally Required Labeling**

On helmet sales, the Consumer Product Safety Law and the Industrial Safety and Health Law provide the obligations of labeling as follows.

**1) Consumer Product Safety Law**

Helmets for motorcycle riding designated as “specific products” under provisions of the Law must stuck the PS Mark on its product label, thereby indicating compliance with technical standards. Labeling must also include other specified items of information.

- The PS Mark must appear on the inside or outside of helmet in a readily visible location, and must be affixed so it will not readily come off or wear off.

**PS Mark  
(specific products)**



- The following items must also appear, affixed so they will not readily come off or wear off:
  - (1) Name of the applicant and approval symbol or code granted by the Minister of Economy, Trade and Industry.
  - (2) A notice to wear a helmet that fits one's head.
  - (3) A notice to tie chin straps correctly.
  - (4) A notice not to use any helmets that have received any great shock, regardless of their undamaged appearance.

## 2) Industrial Safety and Health Law

When selling helmets (safety helmets) for industrial labor, they are subject to labeling requirements to indicate compliance with safety standards.

Roken	
Inspection Compliance No.	H1475
Company name	ABC Company
Date	February 28, 2001
For ... use	

*Note: In case of imported commodities, name of the overseas manufacturer must be written as the name of the manufacturer. In case of inserting the name of the importing agency, selling agency, etc., show them outside the frame.*

## (2) Voluntary Labeling based on Provisions of Law

### 1) Industrial Standardization Law

The Japan Industrial Standard (JIS) applies to helmets for industrial labor, helmets for motorcycle riding and helmets for bicycle riding. The JIS mark may be attached to products conforming to the relevant standards established under the Industrial Standardization Law (JIS Law).

JIS Mark



Contacts:

- Japanese Standards Association      TEL: 03-3583-8005      <http://www.jsa.or.jp>

## (3) Voluntary Industry Labeling

### 1) SG Mark

Helmets for bicycle riding, baseball (including a Japanese version of baseball played with a hard rubber ball) and softball, catcher's helmets for baseball and softball, and helmets for mountain climbing picks, ice hammers are eligible for SG (Safety Goods) Mark designation by the Consumer Product Safety Association. Products that comply with safety criteria established by the Association are eligible to display the SG Mark. When consumers are injured during the use of a SG-approved product, each injured party is eligible to receive up to ¥100 million in damages. The guarantee is only valid, however, for personal injuries.

SG Mark



There are two methods for obtaining compliance certification: the lot inspection method, under which a test facility performs compliance testing on behalf of the Association, or the type approval system, under which Association approval is granted to registered factories. Lot inspection and factory registration may both be conducted abroad.

Contacts:

- Consumer Product Safety Association      TEL: 03-5255-3631      <http://www.sg-mark.org>

## 2) Fair Competition Code Concerning Representations of Sporting Goods

The Fair Trade Conference of Sporting Goods, which covers five sporting goods related trade organizations, defines the following labeling items which apply to the manufacture and sale of sporting goods. These are voluntary regulations for the sporting goods industry that apply to member companies of the Conference. While they are not legally binding on non-members, when the law is enforced they are considered equivalent to the Code, the legal effect of which often extends to non-members.

Contacts:

- The Fair Trade Conference of Sporting Goods      TEL: 03-3219-2531

**Fig. 5 Required label items for sporting goods**

Required items	Requirements for makers or importers			Requirements for retailers	
	Catalogue	Products	Instruction manual	Products at storefront	Flyers
1. Manufacturer name and trademark	O	O		O	O
2. Product and model name	O	O	O	O	O
3. Materials	O	O		O	
4. Dimensions or specifications	O	O		O	
5. Country of origin	O	O		O	
6. Description of accessories	O		O	O	O
7. Usage warning (only when required)	O		O		
8. Company name and address	O		O + Tel No.		O
9. Date of issuance	O				
10. Contacts for after-sales service and customer inquiries	O		O		
11. Retail price				O	O
12. Processing cost (only when required)				O	O
13. Sales quantity or sales term limitation, if applicable					O
14. Other items as required by regulation	O	O		O	

Source: The Fair Trade Conference of Sporting Goods

**(4) Labeling under Voluntary Industry Restrictions**

**<SNELL Standard>**

This is an inspection standard of helmets for motorcycle riding established by the “SNELL Memorial Foundation” in U.S. Since the standard is revised some every five years, it is transcribed, for example, like “SNELL95 (the standard in 1995)” in order to tell what year’s standard the one is. Though there aren’t any obligations to fit this standard in Japan, it is broadly used under the leadership of the front-running manufacturers even in Japan, as SNELL Standard becomes more severe every time it is revised.

SNELL Mark



**5. Taxes**

**(1) Customs Duties**

Different tariff rates are applied to helmets according to sub-classification by place of origin. The WTO rates (4.4%) are applied to imports from WTO member nations, and general rates (5.3%) are used for non-member nations. Preferential rates are applied for imports from developing countries and regions, including China, the Republic of Korea, and Taiwan. In order to apply for preferential tariff rates, the importer should submit a certificate of origin issued by the Customs or other issuing agency in the country of export (not required if the total value of the shipment is no greater than ¥200,000). For more details, please contact the Customs and Tariff Bureau, Ministry of Finance.

**Fig. 6 Customs duties on helmet**

HS No.	Description	Rate of Duty (%)			
		General	WTO	Preferential	Temporary
6506.10	Safety headgear				
-200	Other safety headgear, not of leather or containing fur skin	5.3%	4.4%	Free	

Note: Refer to “Customs Tariff Schedules of Japan” (published by Japan Tariff Association) etc. for interpretation of tariff table.

**(2) Consumption Tax**

(CIF + Customs duty) x 5%

**6. Product Characteristics**

Helmets are variously devised in order to ensure safety. Especially as to the quality of their material, which influences largely the quality of helmets, each manufacturer continues studying. The Ministry of Economy, Trade and Industry has begun the “Accident Information Collection System”<sup>(note)</sup>, which purposes are enriching steps required for the sake of safety measures of the products for consumer life, and prevention and relapse prevention of accidents.

*Note: Accident Information Collection System:*

*It pigeonholes and analyzes accident information collected from all quarters at the Product Valuation Technique Center, and executes Accident Information Management Tests on the required ones. The Ministry of Economy, Trade and Industry gives its direction for manufacturers, etc. to take measures to prevent relapses based on the results of the test. Please refer to the Product Valuation Technique Center of the Ministry of Economy, Trade and Industry for details.*

Since helmet specifications differ from article to article, their specifications are described on a use basis as follows.

### **1) Helmets for motorcycle riding**

Though helmets for motorcycle riding can be classified into some 4 types on a shape basis, typical ones, half-type and full-face type helmets will be described here. As for pricing, there is a considerable difference between the two, as the half-type is about ¥6,000 on the average at the retail price while full-face type is, though some are extremely expensive, about ¥25,000 on the average. As for the quality of the material, ABS resin and FRP are mainly used, though it differs according to the commodities' price. As for half-type helmets, which account for the greater part of imported helmets, it can be said that there isn't a conspicuous difference between imported commodities and domestic products. As for full-face type helmets, while the two biggest domestic manufacturers are highly competitive on a global basis regarding their quality and brand power, helmets of American renowned brands are also popular. Besides, as to full-face type helmets imported from Italy and the like, it is said that there are a lot of models excellently designed. From Germany, German renowned manufacturers' helmets for riding on a motorbike and so on are imported.

### **2) Helmet for sports**

Though the quality of the material and shape of helmets for sports differs according to sports subject, their functions regarded as important are shock absorbing capability and safety. Since helmets for various sports are recently on sale in the domestic market, it is said that some articles of imported commodities sell well. As for helmets for mountain bikes, the ones of American brand that is famous for helmets for motorcycle riding are popular, and it is said that their beautiful form, functions and safety gain public favor. As for helmets for skiing, since helmets coordinated with ski suits, etc. is imported; it seems that not only safety but also tastes of fashion are pursued. Among overseas manufacturers of helmet for sports, such cases can be seen as some plot to improve their brand power by hiring European celebrated players as their advisors. Imported helmets for sports are expected to grow well, because their designs are abundant and the price gap between domestic and foreign products is declining.

### **3) Helmets for industrial labor**

As for the quality of the material, various resins those are each outstanding on such phases as weather-resistance, heat-resistance, electricity-resistance, etc. are used according to uses. According to industry estimates, helmets used for construction work and the like are frequently renewed on the spot as unit prices of them are, mostly, comparatively inexpensive. There are some cases where helmets for industrial labor are sold as ones for disaster prevention in their distribution stage. In these days, even imported colorful helmets are sold as ones for DIY (Do It Yourself), etc. at some major home centers.

## **7. Domestic Distribution System and Business Practices**

### **(1) Domestic Market Conditions**

Japanese market conditions are as follows on a use basis.

#### **1) Helmets for motorcycle riding**

As for helmets for motorcycle riding, though there is a demand for renewal, it seems that mainly the market environment is closely related with domestic selling conditions of two-wheeled vehicle. Sales of two-wheeled vehicle dropped below the 1 million unit mark in 1999 for the first time since 1959, and in 2001 sales fell another 3.7% to just 750,686 units. The chronic recession has depressed demand for motor scooters and mid-range and small size sports bikes. Also, the 1996 amendments to the Road Traffic Law made it easier to get a driver's license for large motorcycles, which pushed up sales of 400 cc and larger motorcycles and further diminished demand for motorbikes. Imports of prestige brand motorcycles from the United States and Germany are also in decline, so difficult market conditions for motorcycle helmets appear likely to continue.



**2) Helmet for sports**

Since there are various kinds of helmet for sports, its market scale is unknown. Though it seems that its market scale is small compared with that of helmet for industrial labor and helmet for motorcycle riding, on which demands have taken a firm hold relatively, it also seems that the market scale of sports goods as a whole develops a tendency to expand because various sports are taking a firm hold on leisure activities owing to the out-door boom, the health trend, etc.

**3) Helmets for industrial labor**

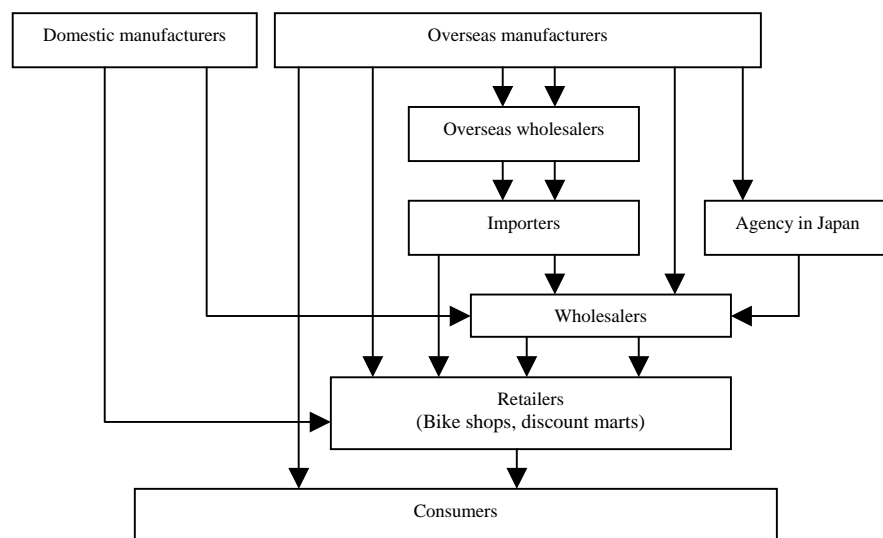
Though its market scale is not known accurately, the total sale volume of 24 domestic companies was some 7.16 million, according to the Japan Safety Helmet industry Association. The total demand reflects the movement of the construction demand because almost all-final consumers of helmets for industrial labor are builders. There are some views that it can not be expected that the private construction demand will grow on a large scale under the current economic situation.

**(2) Distribution Channels**

**1) Helmets for motorcycle riding**

In most cases of imported products from the West, major wholesalers import them directly from overseas manufacturers or wholesalers, or deal in large quantities through Japanese agencies of overseas manufacturers. Among such major wholesalers, most of them import boots for motorbikes and rider suits as well. On the other hand, as to imports from overseas plants of domestic manufacturers, products are supplied directly to domestic wholesalers or retailers not through importers. While most retailers acquire commodities through major importers or wholesalers, some major motorbike shops and discount stores import directly from overseas manufacturers.

**Fig. 7 Distribution channel for helmets for motorcycle riding**



**2) Helmets for sports**

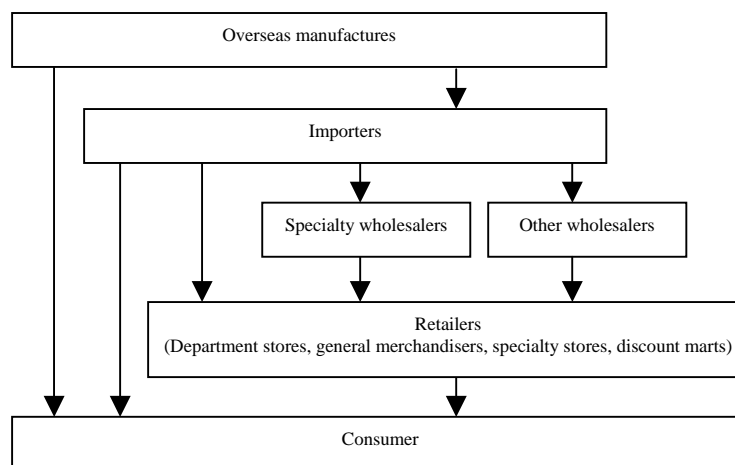
As for helmets for sports, since importers with selling ability deal in all sports goods, they sell the goods directly to retailers or consumers not through wholesalers. On the other hand, small and medium-sized importers, which import only helmets, supply products to retailers through wholesalers. Among these wholesalers, there are sporting goods specialty wholesalers, and other general wholesalers, who deal in helmets together with motorcycle goods, clothing, etc. As for the sale of sporting goods, since distribution channels have increased as far as all-around large-scale specialty stores specializing in overseas brand commodities and even stores under the direct management of the Western brands, in addition to usual specialty stores, it is said that selling competition is also becoming cutthroat. (see Fig. 8)

**3) Helmets for industrial labor**

A special feature of the distribution channel for helmets for industrial labor is that main final consumers are not individuals but main building contractors or construction companies. In case of being used as ones for disaster prevention and the like, individuals might become end users, however, their quantity seems to be limited compared with the whole demand.

The distribution channels are well established. As for helmets produced by domestic manufacturers, some are sold directly to major construction companies, but some are sold to comparatively small-sized traders through small and medium-sized local agencies and processors. There are other routes for ordinary consumers as well. In case of imported helmets, they are mainly sold at home centers, etc. through wholesalers.

**Fig. 8 Distribution channel for helmets for sports**



### (3) Key Considerations for entering the Japanese Market

As for the helmets being the subject commodities of PS Marks or SG Marks, it is essential to have acquired these marks. Moreover, it is necessary to pay attention because there are various legal controls according to uses. As for imports of helmets for sports, whose market has not matured yet in Japan, it seems that potential of first entering is large. It seems to be the key whether one can specify appropriate helmets, and secure advantageous importing routes and selling routes since selling competition is becoming cutthroat in these days.

## 8. After-Sales Service

Since helmets are commodities which purpose is safety and protection of the head, after-sales service is required to be able to adequately cope with the worst cases of trouble, including such steps as compensation. It is necessary to pay sufficient attention to quality control because an importer will bear responsibility under the PL (Product Liability) Law when it is proved that imported commodities were defective and harmed human bodies.

## 9. Related Product Categories

As for related product categories to helmets, there are headgears for rugby, boxing, wrestling, etc., however, there are no legal regulations particularly on importing or selling them. As for “safety helmets” made of leather and fur, which include those for horse-riders, there are no legal regulations on importing or selling them, provided that they do not violate the Washington Convention.

## 10. Direct Imports by Individuals

As for direct imports of helmets by individuals, there are no legal regulations, however, when in use, they are required to meet safety standards. In addition, for helmets, which purpose it is to protect the head, it is very important to fit the heads. Therefore it is necessary to pay attention on direct imports of helmets by individuals.

## 11. Related Organizations

- |   |                   |   |
|---|-------------------|---|
| • The Industrial Safety Technique Association | TEL: 03-3455-3957 | <a href="http://www.ankyo.or.jp">http://www.ankyo.or.jp</a> |
| • Japan Vehicle Inspection Association        | TEL: 03-5902-3455 | <a href="http://www.jvia.or.jp">http://www.jvia.or.jp</a>   |
| • The Japan Safety Goods Association          | TEL: 03-5804-3125 | <a href="http://www.jsaa.or.jp">http://www.jsaa.or.jp</a>   |
| • Japan Safety Helmet Industry Association    | TEL: 03-5804-3125 |   |