

Tax Controversy

Japan Updates 2026

This article provides an overview of tax controversy trends and procedures in relation to national taxes (excluding customs duty) in Japan and of our tax controversy services.

1. Tax controversy trends

(1) Tax audits

According to the latest fiscal year (FY) 2025 statistics on tax audits (July 2024 through June 2025) published by Japan's National Tax Agency (NTA), the number of field audits of corporate taxpayers in FY 2025 decreased by 7.4% from FY 2024, and the total amount of income found by field audits in FY 2025 decreased by 15.8%. However, the total amount of corporation tax imposed by field audits in FY 2025 increased by 4.0%. The number of field audits on corporations for consumption tax in FY 2025 decreased by 8.0% from FY 2024, but the total amount of consumption tax imposed by field audits in FY 2025 increased by 11.4%.

While the number of corporation tax field audits has continued to decrease following FY 2024, the aggregated amount of corporation tax and consumption tax imposed through tax audits recorded was the highest in ten years (FY 2016-2025). Corporation tax imposed per case was also the second highest in ten years, suggesting improved audit effectiveness, aided by Artificial Intelligence (AI) and data analytics.

From the international perspective, the National Tax Agency has designated cases involving cross-border transactions and the use of differences among countries' tax systems for tax avoidance as one of its priority areas. In FY 2025, it identified 210 billion JPY as underreported income related to cross-border transactions, accounting for more than 25% of the total corporation income found in all corporate tax audits.

Audits, income found, tax imposed	FY 2024	FY 2025	Change (%)
Corporation tax field audits (cases)	59 thousand	54 thousand	-7.4
Total corporation income found (JPY)	974 billion	820 billion	-15.8
Total corporation tax imposed (JPY)	210 billion	219 billion	4
Corporation tax imposed per case (JPY)	3.58 million	4.02 million	12.3
Consumption tax field audits (cases)	57 thousand	53 thousand	-8
Total consumption tax imposed (JPY)	110 billion	122 billion	11.4
Consumption tax imposed per case (JPY)	1.9 million	2.3 million	21.1

(Source: NTA)

Regarding individual taxpayers, the number of field audits of individual taxpayers in FY 2025 decreased by 1.3% from FY2024, while the total amount of income found by field audits in FY 2025 increased by 5.4%. Accordingly, the total amount of individual income tax imposed by field audits in FY 2025 increased by 6.2%. The number of field audits on individual taxpayers engaged in business activities for consumption tax in FY 2025 increased by 5.1% from FY 2024; still, the total amount of consumption tax imposed by field audits in FY 2025 decreased by 1.1%.

A major tax audit target continued to be wealthy individuals. In particular, the individual income tax imposed per case for audits of such individuals engaged in overseas investments amounted to 15.95 million JPY, which is more than fivefold of the average for all individual income tax field audits.

Audits, income found, tax imposed	FY 2024	FY 2025	Change (%)
Individual income tax field audits (cases)	48 thousand	47 thousand	-1.3
Total income found (JPY)	552 billion	582 billion	5.4
Total individual income tax imposed (JPY)	107 billion	113 billion	6.2
Individual income tax imposed per case (JPY)	2.2 million	2.4 million	7.6
Consumption tax field audits (cases)	27 thousand	28 thousand	5.1
Total consumption tax imposed (JPY)	36 billion	36 billion	-1.1
Consumption tax imposed per case (JPY)	1.4 million	1.3 million	-5.9

(Source: NTA)

In FY 2026, the tax authorities are being more active in carrying out tax audit activity than in FY 2025. As such, taxpayers, especially those with international transactions, should prepare for tax audits in advance.

(2) Tax appeals and litigation

According to the latest FY 2025 statistics on tax appeals and litigation (April 2024 through March 2025), the number of first tier tax appeals filed with the tax authorities in FY 2025 decreased by 42.0% from FY 2024, and those completed in FY 2025 decreased by 23.1%. The number of second tier tax appeals filed with the National Tax Tribunal in FY 2025 decreased by 9.7% from FY 2024, while those completed in FY 2025 increased by 34.8%. The number of tax litigation cases initiated in FY 2025 increased by 3.7% from FY 2024 and those completed in FY 2025 decreased by 2.3%.

Appeals/litigation initiated by taxpayers	FY 2024	FY 2025	Change (%)
First tier tax appeals initiated (cases)	2,494	1,447	-42.0%
First tier tax appeals completed (cases)	2,278	1,752	-23.1%
Successful first tier tax appeals (cases)	149	91	-38.9%
Successful first tier tax appeal ratio (%)	6.5	5.2	-20.0%
Second tier tax appeals initiated (cases)	3,917	3,537	-9.7%
Second tier tax appeals completed (cases)	2,873	3,872	34.8%
Successful second tier tax appeals (cases)	279	693	148.4%
Successful second tier tax appeal ratio (%)	9.7	17.9	84.5%
Tax litigation initiated (cases)	189	196	3.7%
Tax litigation completed (cases)	172	168	-2.3%
Successful tax litigation (cases)	13	8	-38.5%
Successful tax litigation ratio (%)	7.6	4.8	-36.8%

(Source: NTA)

The number of successful first tier tax appeals in FY 2025 decreased by 38.9% from FY 2024, with the success ratio in FY 2025 decreasing by 20.0%. The number of successful second tier tax appeals in FY 2025 increased by 148.4% from FY 2024, with the success ratio in FY 2025 increasing by 84.5%. The number of successful tax litigation cases in FY 2025 decreased by 38.5%, with the success ratio in FY 2025 decreasing by 36.8%.

Following the surge in appeals and improved taxpayer outcomes in FY 2024, many cases that did not resolve at the first tier in FY 2024 appear to have rolled into FY 2025 and were processed in large volumes at the second tier, contributing to the marked increment in the number of cases and successful ratio.

As a result, FY 2025 delivered robust second tier resolutions with markedly higher taxpayer success, while first tier outcomes and litigation became less favorable. Accordingly, the notable improvement at the second tier in FY 2025 likely reflects the impact of a larger influx of carryover cases being pushed through and resolved at that stage, rather than any substantial change in the second tier decision framework. That said, the second tier tax appeal success rate of 17.9%—the highest since FY 2019—should be viewed as a welcome trend for taxpayers.

2. Tax audits

(1) Selection of audit targets

The NTA employs AI-driven predictive models to identify taxpayers most likely to require an audit. In addition to the noncompliance patterns flagged by the model, auditors review tax returns and a broad range of information held by the tax authority and ultimately decide whether an audit should be conducted. By pairing auditors' expertise with AI analytics, the agency conducts audits more efficiently and with greater precision.

(2) Advance notice

Before initiating a tax audit, the tax authorities generally are required to notify a taxpayer of the start date, time, and location of the field audit, as well as the tax items, books, documents and other materials and period to be audited. The taxpayer may request a change to the date and time of the audit if there is a legitimate reason to do so.

The tax authorities may commence a tax audit without notification where an advance notice may impede the precise finding of facts or otherwise limit their ability to appropriately conduct the audit.

During a tax audit, a taxpayer may be represented by a certified public tax accountant who may attend the meetings with the tax authorities.

(3) Field audits

A tax examiner in charge of a field audit who visits a taxpayer's office is required to bring and present an official identification card showing their title and name.

The tax examiner has the authority to require that the taxpayer provide relevant books, documents, and other materials for the tax examiner to inspect and may question the taxpayer if necessary.

Penalties may be imposed where the taxpayer does not provide (or provides incorrect) information in response to the tax examiner's questions, refuses to cooperate with the inspection, fails to present or provide books, documents, or other requested materials, or knowingly presents or provides materials with false information. In the case of an individual taxpayer or individual acting on behalf of the taxpayer, penalties may include imprisonment.

The tax examiner may keep the books, documents, or other materials (generally with the taxpayer's consent). Where materials are retained, the tax examiner must provide a receipt and return the materials to the taxpayer as soon as possible when they are no longer required.

If necessary, the tax examiner may question a counterparty to a transaction with the taxpayer (including an individual taxpayer's employer) and request and inspect the counterparty's relevant books, documents, and other materials.

(4) Explanation of audit results

Where the tax authorities find that a tax return was incorrect or that the taxpayer failed to file a return, they will explain their audit findings, including any errors identified and the calculation and amount of any additional tax payable.

The tax authorities usually will encourage the taxpayer to file an amended tax return voluntarily. After doing so, the taxpayer cannot initiate a tax appeal without first requesting that the tax authorities issue an assessment notice decreasing the amount of tax.

Alternatively, where the tax authorities find that the tax return was not incorrect or that the taxpayer was not required to file a return, they will notify the taxpayer accordingly, in writing.

(5) Assessment notice

Where the tax authorities find that a tax return was incorrect or that the taxpayer failed to file a return, and the taxpayer does not file an amended return, the tax authorities will issue an assessment notice. When an assessment notice is issued or a request for assessment decreasing the amount of tax from a taxpayer is rejected, the tax authorities must state the reasons for doing so on the relevant notice.

The tax authorities generally must issue an assessment notice within five years after the statutory due date for filing the tax return (within six years for gift tax, seven years for transfer pricing matters, and ten years for matters in relation to net operating losses regarding corporation tax). The assessment period is seven years where the taxpayer reduces their tax liability or receives a tax refund based on false statements or misconduct.

A taxpayer should pay the principal tax due plus any penalty tax assessed within one month after the date the assessment notice is issued, as well as any delinquent tax, regardless of whether the taxpayer intends to appeal the assessment.

However, if the taxpayer is unable to pay the tax at one time, the tax authorities may suspend the tax payment (in full or part) for up to one year after the due date, but only if the tax is finalized one year or more after the statutory filing date of the return and if the taxpayer has made such a request by the due date for payment of the assessed tax.

(6) Penalty tax

Where, after filing a tax return by the statutory due date, a taxpayer files an amended tax return or receives an assessment notice, the taxpayer generally is subject to a penalty tax of 10% of the additional tax payable (5% if the taxpayer files an amended return after receiving advance notice of a tax audit but before anticipating the issuance of an assessment notice from the tax audit). Where the additional tax amount exceeds the tax originally disclosed on the return or JPY 500,000, whichever is larger, an additional 5% of the excess is added to the penalty tax otherwise due. However, if the taxpayer files an amended tax return before receiving advance notice of a tax audit and before anticipating the issuance of an assessment notice from the tax audit, the taxpayer is not subject to a penalty tax. Where the taxpayer conceals or disguises facts on which its taxable base or tax payable is calculated and files a tax return on that basis by the statutory due date, the taxpayer generally is subject to a penalty tax of 35% of the additional tax payable.

Where the taxpayer files a tax return or receives an assessment notice but did not file a tax return before the statutory due date, the taxpayer generally is subject to a penalty tax of 15% of the tax payable (10% if the taxpayer files a return after receiving advance notice of a tax audit but before anticipating the issuance of an assessment notice from the tax

audit). Where the additional tax payable exceeds JPY 500,000, an additional 5% of the excess is added to the penalty tax otherwise due, and where the additional tax payable exceeds JPY 3,000,000, an additional 10% of the excess is further added to the penalty tax otherwise due. However, if the taxpayer files a tax return before receiving advance notice of a tax audit and before anticipating the issuance of an assessment notice from the tax audit, the penalty tax is reduced to 5%. Where the taxpayer conceals or disguises facts on which its taxable base or tax payable is calculated and either fails to file a tax return or files a return based on the concealed or disguised facts after the statutory due date, the taxpayer generally is subject to a penalty tax of 40% of the tax payable.

(7) Delinquent tax

If a taxpayer fails to pay the principal amount of tax payable by the statutory due date, the taxpayer generally is subject to a delinquent tax on the late payment. For example, where the tax authorities issue an assessment notice, the taxpayer generally is subject to a delinquent tax of approximately 2.4% of the unpaid tax for the period after the statutory due date until the payment date. The tax rate varies depending on the period.

Certain periods are excluded in calculating the delinquent tax amount. For example, where the taxpayer files a tax return by the statutory due date, but the tax authorities issue an assessment notice more than one year after that date, the period from one year after the statutory due date until the date the assessment notice is issued generally is excluded.

(8) Tax audit duration

The duration of a tax audit depends on the taxpayer's circumstances. Usually, an audit takes between one and six months but may take longer, particularly where a transfer pricing audit is conducted.

The tax authorities may conduct an additional audit of a tax period if, after the initial audit has been completed, they obtain new information indicating a position taken by the taxpayer is incorrect. This is the case even if as a result of the first audit, the taxpayer files an amended tax return, the tax authorities issue an assessment notice, or the tax authorities inform the taxpayer that the return was not found to be incorrect or that the taxpayer was not required to file a tax return for the period.

3. Tax appeals and litigation

After a tax audit, a taxpayer may challenge an assessment notice issued by the tax authorities as a result of a tax audit. When the notice is issued, the taxpayer either may accept the assessment or challenge it by initiating a tax appeal. Outside a tax audit, in the case that a taxpayer claims that the tax amount paid by the taxpayer was wrong and the true amount should have been lower, the taxpayer needs to first request that the tax authorities issue an assessment notice decreasing the amount of tax. The tax authorities will then, after examination, issue an assessment notice either favorable or unfavorable to the taxpayer, the latter of which may be challenged by the taxpayer by initiating a tax appeal.

In general, a taxpayer may appeal to the courts only after the taxpayer has filed a second tier tax appeal with the National Tax Tribunal and it has rendered a decision that is unfavorable to the taxpayer.

(1) First tier tax appeal

When the opinion of a taxpayer under tax audit differs from that of the tax authorities, the optimal solution generally would be to resolve the difference during the tax audit. However, if the difference cannot be resolved in the tax audit, the taxpayer may choose to file a first tier or second tier tax appeal. Filing a first tier tax appeal generally will offer the fastest manner to resolve any differences or address a contested fact pattern included in the assessment notice.

A first tier tax appeal to the tax authorities that issued the assessment notice generally must be initiated within three months after the date the notice is received by the taxpayer or the date the taxpayer acknowledges its issuance (if it is not received by the taxpayer).

First tier tax appeals are handled by a specific tax division, which often is the same division that internally reviewed the original assessment notice. The tax authorities generally aim to issue their decision on the appeal within three months. The first tier tax appeal essentially is a quick internal review process. An assessment may be overturned, for example, if it was based on inaccurate information or the taxpayer subsequently obtained favorable evidence that was not available during the tax audit. Even if the taxpayer's first tier tax appeal is denied, the reason for the decision will be disclosed in more detail, which is useful in conducting a second tier tax appeal if the reason for the assessment is not necessarily clear.

Where a taxpayer's first tier tax appeal is denied, the taxpayer still may file a second tier tax appeal with the National Tax Tribunal. In such a case, the second tier tax appeal generally must be filed within one month after the date the tax authorities' decision is delivered to the taxpayer. The taxpayer also may initiate a second tier tax appeal if no decision is rendered by the tax authorities within three months after the date the first tier tax appeal was initiated.

(2) Second tier tax appeal

By doing a second tier tax appeal, the taxpayer may seek a final decision on the matter by the administrative branch. The National Tax Tribunal hears arguments from both the taxpayer and the tax authorities, performs its own review of the evidence, and issues a decision. The process is independent, not open to the public, and free of charge and allows taxpayers to address a contested assessment on a timelier basis than if they were to pursue tax litigation. Even if tax litigation becomes necessary (i.e., if the National Tax Tribunal issues a decision that is unfavorable to the taxpayer), clarifying contentious points in advance should allow tax litigation to proceed more efficiently.

Where a taxpayer appeals directly to the National Tax Tribunal without making a first tier tax appeal, the second tier tax appeal generally must be initiated within three months after the date the assessment notice is received by the taxpayer or the date the taxpayer acknowledges its issuance (if it is not received by the taxpayer).

Upon receiving the appeal, the National Tax Tribunal notifies the tax authorities that issued the assessment notice that an appeal has been initiated, and the tax authorities file a response with the National Tax Tribunal. The taxpayer then may present further arguments and evidence. After the National Tax Tribunal considers the relevant arguments and evidence presented, it ends its examination and issues a decision in writing, generally within one year after the date the appeal was initiated.

More than half of the National Tax Tribunal's staff are seconded from the tax authorities as part of their job rotations. However, it is mostly headed by civil court judges, and attorneys, certified public tax accountants, and certified public accountants are usually hired as fixed-term appeal judges.

There are two major categories of issues in tax controversy: fact-finding and legal interpretation. In most tax appeal cases where the National Tax Tribunal reversed an assessment, it did so because it disagreed with the facts assumed and presented by the tax authorities. Fact-finding is an objective exercise and, by relying on objective facts, the National Tax Tribunal functions as a neutral arbiter of disputes between taxpayers and the tax authorities. However, the National Tax Tribunal rarely rejects the tax authorities' legal interpretations, possibly because it is mindful of the wider impact an interpretation may have on other taxpayers. In such cases, if it upholds the assessment, the taxpayer may bring the case to court. On the other hand, if the National Tax Tribunal issues a decision that is unfavorable to the tax authorities, the tax authorities may not appeal to the court.

(3) Tax litigation

When the difference of opinion is still not resolved through the second tier tax appeal, the taxpayer may then pursue tax litigation. By engaging in tax litigation, the taxpayer also may address any legal interpretations they disagree with, in the hope that the court will reject these interpretations.

If the taxpayer wants to continue to challenge an assessment after the decision of the National Tax Tribunal, the taxpayer may bring the case to court within six months after the date the taxpayer acknowledges the issuance of the tribunal's decision. The taxpayer also may bring the case to court if no decision is rendered by the National Tax Tribunal within three months after the date the appeal to the tribunal was initiated.

Japan has a three tiered judicial system comprised of the district courts (the first level), the high courts (the second level), and the Supreme Court (the final level). A taxpayer must file their initial lawsuit in the district court and may appeal an unfavorable decision to a high court. In general, the Supreme Court deals only with legal matters and has the discretion to refuse to consider cases.

The burden of proof generally lies with the tax authorities issuing the assessment notice, who must provide evidence to support their position.

The timeframe for tax litigation depends on the individual case. It usually takes around one and a half years at the district court and within one year at the high court. It may take longer than one year at the Supreme Court (if it accepts the case).

Although the successful tax litigation ratio is relatively lower compared with most other countries, the Japanese courts generally are considered reliable and free from bias, as we believe taxpayers' reasonable arguments tend to be actually accepted by the court.

4. Alternative dispute resolution

(1) No official settlement procedure

In Japan, there is no official settlement procedure between a taxpayer and the tax authorities during tax controversy procedures, other than the mutual agreement procedure (MAP) in an applicable tax treaty. However, the tax authorities

often recommend that a taxpayer file an amended tax return during the tax audit in accordance with a de facto agreement between the taxpayer and the tax authorities, which may function as an unofficial settlement.

(2) Mutual agreement procedure

When an assessment notice results in international double taxation for a taxpayer, the taxpayer may request that the tax authorities enter into a MAP with the relevant foreign tax authorities under provisions to resolve such double taxation contained in the applicable tax treaty.

Japan is a proponent of the MAP. Where a treaty contains MAP provisions, an affected taxpayer should consider filing a MAP request in addition to a tax appeal to the tax authorities or the National Tax Tribunal. The domestic tax controversy procedure may be suspended while the MAP negotiation is ongoing. If the MAP is not available or practical for any reason, Japan's domestic tax controversy procedures would be the last resort for the taxpayer.

5. Advance rulings

(1) Non-action letters

A taxpayer may seek a non-action letter from the tax authorities in relation to a transaction that either has taken place or will take place before the due date for filing the tax return reflecting the transaction. A non-action letter may not be requested where (i) there are various alternatives to the transaction, (ii) a tax audit or collection procedure is at issue, (iii) asset valuations or transaction consideration is at issue, (iv) the main purpose of the transaction is to decrease tax or the transaction has no economic rationale, or (v) further fact-finding is necessary.

The tax authorities generally try to issue a non-action letter within three months after the date the request is filed, but it may often take longer. Taxpayers, therefore, tend to seek an informal response from the tax authorities rather than seeking a non-action letter, or tend to adopt a position without any response or ruling from the tax authorities.

Another potential challenge for a taxpayer is disclosure. A non-action letter generally will be published within two months after its issue date, although the taxpayer may request the tax authorities delay publication for up to one year after the decision is made. Where a taxpayer does not want details of the transaction to be disclosed, they should not seek a non-action letter.

(2) Advance pricing arrangements

Japan advocates the conclusion of advance pricing arrangements (APAs). To ensure transfer pricing certainty, taxpayers may request the tax authorities to enter into a unilateral APA or a bilateral APA with the relevant foreign tax authority.

The tax authorities' APA team is separate from the tax examination team, and, in practice, no information is exchanged between the two teams. However, the APA team will rigorously investigate profits and losses in respect of transactions with foreign related parties.

In respect of a unilateral APA, the APA team applies a more theoretical approach, although they usually request a premium in the range of 1-2%. In bilateral APA negotiations, the APA team tends to adopt a stronger negotiating stance and opening position.

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Tax controversy is a means of defending taxpayers against tax assessments.

Guide to tax controversy services

Deloitte Tohmatsu defends taxpayers against tax assessments through tax controversy.

Deloitte Tohmatsu has a proven track record of resolving tax issues by providing comprehensive services, ranging from submitting rebuttal letters and legal opinions to representing taxpayers in tax appeals and tax litigation, thereby defending taxpayers against tax assessments.



The first step

When a taxpayer faces differences in opinion with the tax authorities during a tax audit, the first step is to submit a rebuttal letter that outlines the taxpayer's viewpoint and the reasons behind it.

Cases where a rebuttal letter is effective

For example, submitting a rebuttal letter is effective in the cases where it is necessary to counter the tax examiner's points by considering case law, or to argue that the tax examiner's interpretation of contracts or factual findings is incorrect.

Rebuttal letter service

We quickly submit an initial rebuttal letter under the taxpayer's name based on the facts discernible from the documents provided at the time of the order. We do this for a fixed fee, and we can handle all types of Japanese taxes. We also offer services for further consultations with tax examiners and the submission of additional rebuttal letters, billed on an hourly basis.

The trump card

When submitting a rebuttal letter does not resolve the differences in opinion with the tax authorities, a legal opinion becomes the taxpayer's trump card.

Cases where a legal opinion is effective

In the case where the issue at hand is critical due to the amount of additional tax, it is necessary to submit a legal opinion, negotiate with the tax examiner and, if needed, submit additional legal opinions to ensure the taxpayer's viewpoint is accepted.

Legal opinion service

We offer comprehensive representation, not only in submitting a legal opinion under the name of a lawyer but also in negotiations with tax examiners and the submission of additional legal opinions, based on a success fee or hourly fee. Before providing these services, we will review the relevant materials in advance to assess the likelihood of the taxpayer's viewpoint being accepted.

Speaking up in tax matters

When the tax authorities issue a tax assessment, taxpayers can file an appeal with the tribunal to seek a final administrative decision. Filing an appeal can be considered a means of speaking up in tax matters. The tribunal listens to the viewpoints of both the taxpayer and the tax authorities and makes a decision based on the evidence presented.

Tax appeal process

An appeal must be filed with the tribunal within three months of receiving the notice of assessment. Typically, there are about three to four exchanges of briefs during the appeal process. The entire process usually takes about one year until a decision is reached.

Tax appeal service

We provide comprehensive representation for taxpayers' appeals, based on a success fee or hourly fee. We handle all aspects of the appeal process, including the preparation of documents and negotiations with the tribunal judges.

Further means of speaking up

If the tribunal issues a decision that denies the taxpayer's viewpoint, the taxpayer can file a tax litigation in court to seek a judicial decision. A tax litigation represents a further means of speaking up in tax matters. While it may be difficult to correct erroneous interpretations of tax law at the tribunal level, it is possible to do so in court.

Tax litigation process

A tax lawsuit must be filed within six months of becoming aware of the tribunal's decision. First Instance: The period until a judgment is usually around one and a half years. Appeal: The period until a judgment is usually within one year. Final Appeal: It may take more than a year to reach a judgment.

Tax litigation service

We provide comprehensive representation for taxpayers in tax litigation, from the first instance to the appeal and final appeal, based on a success fee or hourly fee. We handle all aspects of the process, including the preparation of documents and attendance at oral arguments.

Tax reform proposal is a means of changing the tax rules themselves.

Guide to tax reform proposal support service

Deloitte Tohmatsu supports efforts to change or clarify the tax rules themselves through tax reform proposals or advance rulings.

Deloitte Tohmatsu has a proven track record of resolving tax issues by advising taxpayers on tax reform proposals or advance rulings and changing or clarifying the tax rules themselves.

Cases where a tax reform proposal or advance ruling is effective

Even if there are issues with the current tax rules, once a tax assessment based on those rules is issued, judicial resolution of tax issues becomes difficult. However, by amending laws or administrative circulars or obtaining advance rulings, it is possible to change or clarify the problematic tax rules themselves, thereby resolving tax issues legislatively or administratively. In cases where it is necessary to change or clarify the tax rules themselves, a tax reform proposal or advance ruling proves to be effective.

Tax reform proposal support service

We provide advice to taxpayers on tax reform proposals or advance rulings based on a success fee or hourly fee, supporting efforts to change or clarify the tax rules themselves. We carefully examine the issues with the current tax rules, propose feasible amendments to laws or administrative circulars or advance rulings, prepare the rationale for why such amendments or advance rulings should be implemented, and strongly back up the tax reform proposals or advance rulings.

Our strong credentials in resolving tax issues make us a top choice.

Track record of tax controversy & tax reform proposal support services

We have a proven track record of resolving tax issues through tax controversy and tax reform proposals or advance rulings.

We strive to resolve tax issues as swiftly as possible. In numerous cases that we have undertaken or been involved in, we have resolved tax issues through tax controversy and tax reform proposals or advance rulings. Some recent examples where tax issues were resolved are as follows.

2026	Advance ruling	Consumption tax	Advance ruling	Reorganization tax regime
	Legal opinion	Consumption tax	Legal opinion	Stamp tax
2025	Rebuttal letter	Director's remuneration	Legal opinion	CFC regime
	Advance ruling	Earnings stripping rules	Rebuttal letter	Stamp tax
	Legal opinion	Accrual basis principle	Rebuttal letter	Inheritance tax
	Rebuttal letter	Requirements for re-examination	Rebuttal letter	Consumption tax
	Tax appeal	Entertainment expenses	Legal opinion	CFC regime
2024	Rebuttal letter	Donations	Legal opinion	Heavy penalty tax
	Tax litigation	Article 132-2 of Corporation Tax Act	Tax appeal	Revocation of blue form tax return approval
	Legal opinion	CFC regime	Tax appeal	Property tax
2023	Legal opinion	Bad debt losses	Legal opinion	Entertainment expenses
	Legal opinion	Article 132-2 of Corporation Tax Act	Legal opinion	Advantageous placement of shares
	Tax litigation	CFC regime		
2022	Legal opinion	Property tax	Tax appeal	Deemed capital gains
	Tax appeal	Corporate gains on donations	Legal opinion	Deemed capital gains
2021-20	Tax appeal	Reorganization tax regime	Legal opinion	Stamp tax

What to do if there's a dispute over tax?

Let's learn from the latest tribunal case where a taxpayer won and think together!



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