

## A COMPARATIVE ANALYSIS OF THE LEGAL TERM “AGE OF MAJORITY” IN JAPAN AND IN FRANCE

### 1. Introduction

The age of majority in Japan was lowered from 20 to 18 on 1 April 2022, when the newly revised Civil Code came into effect. The age of majority refers to the age at which a person is granted by law the rights and responsibilities of an adult. On this day, in addition to those who had already turned 20, over 2 million young people aged 18 and 19 became legal adults. Japanese young people 18 years of age or older are now able to make their own life choices and their own decisions in various social situations. But, at the same time, they also have the responsibilities of adults. Various opinion polls, however, show a widespread lack of concrete understanding of people’s rights and responsibilities in Japan. This paper explores the meaning of the term 成年 *seinen* (age of majority) by comparing the case of France in order to shed light on the legal and common meaning of “attaining adulthood.”

Throughout history, societies have set standards for defining the border between adulthood and childhood. For example, in Japan since the Nara period, children of around 14–15 years old have been regarded as adults based on the tradition of *genpuku* 元服,<sup>1</sup> the ceremony of transition from child to adult status and the assumption of adult responsibilities. Since human beings first formed societies, they have defined words and concepts to create systems in which members share a common awareness. One such system, in which new members are created by their fulfilling formalized criteria for being “adults”, has functioned effectively for social management. To explore this issue, the author will first consider the definition of 成年 *seinen* (adult) from a historical point of view, and then compare it with the definition of “adult” in the Napoleonic Code, which has been long considered a model civil

---

DOI: 10.4467/23538724GS.23.023.19018

ORCID: 0000-0002-8356-501X

<sup>1</sup> *Genpuku* 元服 is a Japanese coming-of-age ceremony which dates back to Japan’s classical Nara period (710–794 AD). B. Faure, *The Red Thread: Buddhist Approaches to Sexuality*, Princeton 1998, pp. 251–272.

code and was treated in Japan as a source of concepts when establishing the Japanese Civil Code in the Meiji era.

In the next section, the following viewpoints are analysed in terms of the provisions stipulated in both the current Japanese Civil Code and the Napoleonic Code: i) voting age; ii) legal age to get married; iii) legal age at which you can conclude a contract; iv) legal age for becoming an adoptive parent; and v) legal age for drinking alcoholic beverages, smoking, and public gambling. This comparative analysis will offer some ideas for answering the question of whether Japanese society should treat 18-year-olds as adults.

Finally, in conclusion, the author summarizes the meaning of the revision of the Japanese Civil Code concerning the age of majority, pointing out various problems that arose at that time in regard to the meaning of the term “adult.”

The languages used for the purpose of this analysis were Japanese and French. In Japanese, the terms which mean “the age of majority” in the Civil Code are *seinen* 成年 and *seijin nenrei* 成人年齢, referring to the age at which a person enjoys full rights and responsibilities, in other words, full legal capacity. There are also the synonyms *seijin* 成人 and *seinensha* 成年者, which are often also used to mean “adult”, but as an antonym for the word *miseinensha* 未成年者 (minor). The above two words are not used in the Civil Code, so they are beyond the scope of the present research. On the other hand, as a French equivalent for the Japanese *seinen* 成年, we have two terms used in the Napoleonic Code, *majorité* and *majeur (eure)*. The word *adult(te)* is also used elsewhere. Since, like *seijin* 成人 and *seinensha* 成年者, the word (*adult(e)*) is not found in the relevant legal code, it also will not be dealt with in this study.

From a legal point of view, this study focuses on the Japanese Civil Code and the French Napoleonic Code. However, other laws related to the term “the age of majority,” such as Japan’s Juvenile Law, will also be considered as research material.

## 2. Historical background

### 2.1. In Japan

In Japan, up until the Edo period, the “the age of majority” varied from region to region. The male *genpuku* 元服 ritual, which still currently functions as a coming of age ceremony, became popular among common people during the Muromachi period,<sup>2</sup> and signals when boys, generally between 12 and 16 years of age, have reached adulthood<sup>3</sup>. In the *Collaborative Reference Database*,<sup>4</sup> Oishi indicates that in the

<sup>2</sup> The period in Japanese history running from approximately 1336 to 1573 CE.

<sup>3</sup> Since the Edo period, *genpuku* rituals have been held for girls as well.

<sup>4</sup> Collaborative Reference Database, National Diet Library, Japan. NDL online, [https://crd.ndl.go.jp/reference/detail?page=ref\\_view&id=1000089028](https://crd.ndl.go.jp/reference/detail?page=ref_view&id=1000089028) (accessed: 10.05.2022).

Edo period, boys around 15 years of age took part in the *genpuku* ceremony, during which they shaved their bangs as a symbol of their acquiring the status of adults, and that girls at around 14 years of age would tie *Shimada mage*<sup>5</sup> 島田髻 to celebrate becoming adults.<sup>6</sup> After the *genpuku* ritual, the boys would join a “Youth Group” (*wakamono gumi* 若者組) and assume roles such as cultivating the fields, organizing festivals, and maintaining security.

In the Edo period, although there was a general law that youth reached the age of majority at about 15 years of age,<sup>7</sup> according to the *Collection of National Customs* (*Zenkoku Minji Kanreirui Shū* 全国民事慣例類集), the “age of majority” depended on the region, with the age at which a child no longer needed guardianship ranging greatly: from 13, 17, or 20 to even as high as 22 or 23.<sup>8</sup> In addition, there were cases where the age of majority was not based on how many years had passed since birth. There are also examples of areas where marriage was the criteria for reaching the age of majority; other examples show that the criteria used could involve attaining some ability (for example, having engaged in commercial transactions). Other examples include whether one’s bangs had been shaved or not.<sup>9</sup> In short, there was no uniform age of majority, and each region set the age of majority and the qualification for being a “full-fledged adult” according to its own circumstances and needs. The boundary between “adult” and “child” was thus determined by one’s relationship with the local community.<sup>10</sup>

However, with the establishment of the modern nation-state system in the Meiji era, the boundary between “adult” and “child” was decided in the interests of the nation. The age of majority officially became 20 on 27 April 1897. In the *Current Laws and Regulations 14 Civil Law 1*, § 39, Art. 4 of the first volume of the Civil Code states that “the age of twenty is considered to be the age of majority,” and since that time there has been no amendment of this article.

However, the idea of becoming an adult at the age of 20 is older than the Civil Code. It was actually *Daijō-kan’s Declaration* (*daijōkan fukoku* 太政官布告) in 1876 that set the age of adulthood at 20. The *Civil Code Draft on Persons* (*minji sōan jiben* 民法草案人事編), issued in 1888, also declared that “20 is the age of majority”;

---

<sup>5</sup> Traditional Japanese hairstyles, which considered to be distinctive in their construction and social role.

<sup>6</sup> M. Ōishi, *Ōedo maruwakari jiten* (大江戸まるわかり事典), Tokyo 2005.

<sup>7</sup> K. Nakata, *Tokugawa jidai no bungaku ni miataru shihō* (徳川時代の文学に見えたる私法), Tokyo 1984.

<sup>8</sup> T. Iida, *Nihon ni okeru “seinen” “seido no naritachi to shakaiteki igi* (日本における「成年」制度の成り立ちと社会的意義.)” *Jiron* (持論) *Jiron February 2019/ Number 1528*, Tokyo 2019, p. 79.

<sup>9</sup> *Zenkoku minji kanreirui shū* (全国民事慣例類集) Dai ippen Dai kyu shou Dai ikkan (第1編第9章第1款) (*National collection of civil customs, Part 1 Chapter 9 Subsection 1*).

<sup>10</sup> T. Iida, *Nihon ni okeru...*, p. 80.

the reason given for this that “20 as the age of majority is mentioned in the current law.”<sup>11</sup> What is referred to here as the “current law” is *Daijo-kan's Declaration* No. 41 of 1897. *Daijo-kan's Declaration* states that “20 is the full-fledged age for *teinen* (丁年)”<sup>12</sup> *Teinen* 丁年 is a term used in reference to conscription into the *ritsuryō* system<sup>13</sup> (*ritsuryō seido* 律令制度), which originally refers to the age at which taxation and military service are obligatory.

This is why even when the Meiji Civil Code was enacted in 1886, setting the age of majority at 20 years of age was hardly discussed. During *The Answer and Question Session at the Code Investigation Committee* (*Hōten chōsakai* 法典調査会), Kenjiro Ume said, “In many cases, both the established code, that is, the *Civil Code Draft on Persons* and *Daijo-kan's Declaration* defined 20 years of age as the age of majority.”<sup>14</sup> In other words, the age of majority was not particularly debated, and the age of 20 was not questioned during the drafting of the Civil Code.<sup>15</sup>

The reason why *Teinen* 丁年 was set at 20 years of age in *Daijo-kan's Declaration* was because of the *Taihō Legal Code* (*Taihō ritsuryō* 大宝律令),<sup>16</sup> which was established more than 1,000 years ago. Since the original text of the *Taihō Legal Code* is fragmentary, the contents of the *ritsuryō* system can be inferred from the *Yōrō Legal Code* 養老律令,<sup>17</sup> which came into effect in 757 CE. According to the *Yōrō* system, children under 3 years old should be called *ō* 黄, those 16 or less are called *shō* 小, those 20 or less are called *chū* 中, men of more than 21 are called *tei* 丁, those more than 61 are called *rō* 老, and men of more than 66 are called *kei* 耆. This means that people between the ages of 21 and 60 were called *tei* 丁 and were the basic target of the labour tax system.

In the Meiji era, when the Legislation Bureau was discussing how old one should be to be considered a *Teinen* 丁年, the opinion was expressed that “since the *Taihō Legal Code* stipulates that a 21-year-old should be a *Teinen* 丁年, 20 years of age,

---

<sup>11</sup> On original: *Imanoo man nijunen to nashitarumono wa genkōbonni yorumononari* 「今之ヲ満二十年と為シタルモノハ現行法ニ依ルモノナリ」.

<sup>12</sup> On original: *Jikon man nijunen o motte teinen to souteisouroujou koremunē hukoku sorōgato*. 「自今満二十年ヲ以ッテ丁年ト相定候条此旨布告候事」.

<sup>13</sup> The *ritsuryō* system refer to the national system and governance system based on the Chinese Tang Dynasty's decree and the establishment of a legal system in Japan. It started in the late 7th century and continued until around the 10th century.

<sup>14</sup> Ume Kenjiro 梅謙次郎 (July 24, 1860 – August 26, 1910) was a legal scholar in Meiji period in Japan.

<sup>15</sup> On original: *Hōten chōsakai minpōshushinsakai giji sokkōroku* 「法典調査会民法種審査会議事速記録」 (Record of proceedings of the Code Research Committee Civil Law Review Meeting).

<sup>16</sup> T. Iida, *Nihon ni okeru...*, p. 78.

<sup>17</sup> *Taihō ritsuryō* 大宝律令 is an administrative reorganisation enacted in 703 at the end of the *Asuka Period*.

calculated according to Japanese traditional age reckoning (*kazoe doshi* 数元年), should be the year one becomes an adult.”<sup>18</sup>

In this way, the age of majority was unified in the Meiji era, which had two important consequences. The first was it unified the concept of “adulthood”, which had varied from region to region, as described above. It became the standard for determining one’s obligations in terms of taxation and conscription during the Meiji era. The second was that it unified “adulthood”, which had also differed according to purpose, so that it was necessary to determine separately if one was of age to legally manage property. In order to unify the age at which one was subject to tax collection and conscription and also had the right to manage acquired property, Art. 4 of the Civil Code (Art. 3 before modernization) stipulated that the age of majority was to be 20.<sup>19</sup>

## 2.2. In France

To describe the historical background in France, it is first necessary to explain the following three terms: i) *l’âge nubile*, marriageable age (state of a person of marriageable age); ii) *l’âge de la majorité matrimoniale*, the age of matrimonial majority (age at which a person can marry without authorization from his or her parents or guardians); and iii) *la majorité civile*, the age of civil majority in France, from the *Ancien Régime* to the present day.

In France, under the Old Regime, canon law fixed the marriageable age and age of matrimonial majority at 12 for girls and 14 for boys. Under Henri III (*Ordinance of Blois of 1579*), the age of majority was fixed at 25 years, and the age of matrimonial majority was fixed at 25 years of age for women and 30 years of age for men. Under the First Republic, by the decree of 20 September 1792, (*Loi de Septembre 20, 1792*), the marriageable age was fixed at 13 for girls and 15 for boys, and the age of matrimonial majority as well as the age of civil majority was lowered to 21.

When the French Civil Code was enacted by Napoleon (*Loi de germinal XII*) on 21 March 1804, marriageable age was fixed at 15 for girls and 18 for boys, the age of matrimonial majority was fixed at 21 for women and 25 for men, and the age of civil majority was set at 21 according to Art. 488. During the Third Republic, the *Loi de Juin 21 1907* fixed the age of majority at 21 for everyone. On 5 July 1974, the newly elected president Valéry Giscard d’Estaing lowered the age of majority to 18, affecting 2.4 million French people.<sup>20</sup>

---

<sup>18</sup> *Yōrō* Legal Code 養老律令 was one iteration of several codes or governing rules compiled in early *Nara Period*.

<sup>19</sup> *Meiji hōsei keizaiishi kenkyū sho hen “genrōin kaigi hikki zenki (明治法制經濟史研究所編「元老院會議筆記前期」)* (*Meiji era Legal and Economic History Research Institute ed. “First half of Senate meeting notes”*) (1), Tokyo 1943.

<sup>20</sup> T. Iida, *Nihon ni okeru...*, p. 80.

The lowering of the age of majority to 18 in France was the result of a desire to lower the age of voting rights, which had an effect on the age of majority in the Civil Code. However, there was strong opposition in France to lowering the age of majority in the Civil Code. Opponents argued that, for example, the age of majority in the Civil Code did not prohibit minors from being granted universal suffrage, because the provisions of Art. 3 paragraph 4 of the French Constitution, which guarantees universal suffrage for adults. It was also argued that setting the age of majority at 21 in the Civil Code would not influence the right to vote at all; on the contrary, lowering the age of majority in the Civil Code would affect many laws in other domains, so that lowering the age of majority to 18 should be limited to the age of suffrage.

A report of the French National Assembly stated that the reason for the confusion in the debate on lowering the age of majority in the Civil Code was that the age of 21 had been accepted for centuries. Moreover, it was cited that the concept of “minors” had two meanings: “restriction of freedom” and “protection of minors.” In other words, trying to guarantee freedom and independence to young people meant at the same time their losing the protection of their parents and guardians. Respecting a person’s self-determination and protecting a person from the dangers of self-determination were seen as essentially incompatible. Therefore, lowering the age of majority from 21 to 18 raised concerns about the loss of protection for minors.<sup>21</sup>

### 3. Analysis of age classification in various laws and regulations in Japan and France

#### 3.1. Voting age

In Japan, the “Law to partially revise the Public Offices Election Act (*Kōshoku senkyōhō no ichibu o kaisei suru hōritsu* 公職選挙法等の一部を改正する法律)” has been in force since 19 June 2016, and now a person aged 18 or older is eligible to vote in a public election.<sup>22</sup> However, special provisions in the Juvenile Law regarding election crimes (related to Art. 5 of the Supplementary Provisions) were also added to protect young people from 18 to 20 years of age.<sup>23</sup>

---

<sup>21</sup> De L'INDRE (Un Service du conseil départemental de L'INDRE). L'âge de la majorité <https://www.archives36.fr/vos-recherches/boite-a-outils/lage-de-la-majorite> (accessed: 5.05.2022).

<sup>22</sup> M. Mizuno, *Minpō no kanten kara mita seinen nenrei bikisage. Minpō no genzai saikenbō kaisei nseinen nenrei bikisage* (民法の観点から見た成年年齢引き下げ 民放の現在 債権法改正・成年年齢引き下げ) 1392, no. 2010 1.1-15 (2010), Tokyo 2010, p. 163.

<sup>23</sup> *Senkyō* 選挙 (Election), [https://www.soumu.go.jp/senkyo/senkyo\\_s/naruhodo/naruhodo02.html](https://www.soumu.go.jp/senkyo/senkyo_s/naruhodo/naruhodo02.html) (accessed: 10.11.2023).

In France, according to Art. 3 of the Constitution, the electorate consists of “all electors, under conditions determined by law, all French nationals of full age of both sexes, enjoying civil and political rights.”<sup>24</sup> Therefore, the legal age (age of majority) for voting has been set at 18 since 1974.<sup>25</sup>

### 3.2. Legal age to get married

In the present Civil Code, Articles 731 to 737 stipulate the following requirements concerning marriage: firstly, the male partner must be 18 years of age or older and the female partner must be 16 years of age or older; secondly, a person who is under 20 years of age cannot get married in Japan without a parent's approval.

After the amendment, the marriage age for women was raised to 18, so the marriage age for men and women was now equal.

In France, on 4 April 2006, the minimum age to authorize the marriage of young women was raised from 15 to 18 years of age. Since the introduction of the Napoleonic Code, which has been in force since 1804, the minimum age for marriage had been 18 for men and three years younger for women.<sup>26</sup>

### 3.3. Legal age at which you can conclude a contract

A current stipulation in the Japanese Civil Code allows contracts signed by 18- and 19-year-olds to be cancelled if they were entered into without parental consent.

According to the Japanese Civil Code, reaching the age of majority has the following two meanings. One is reaching the “contract age” (契約年齢), and the second is to cease being of the “age subject to custody” (親権の対象となる年齢). In other words, when you reach the age of majority, you can enter into a contract on your own initiative without the consent of your parents, though after 1 April the “minor revocation right” (未成年者取消権) that currently applies to minors will no longer apply. That means there is a danger of young people falling into debt by taking out consumer and credit card loans or falling victim to unscrupulous business practices.

In France, as in Japan, contracts can be concluded after one reaches the age of 18. However, from the age of 16, it is possible to conclude a labour contract, and it is possible to work from the age of 16, regardless of the type of contract

---

<sup>24</sup> Senkyo hanzai toni tuiteno shōnenhōno tokurei (*busoku dai go jō kankei*)選挙犯罪等についての少年法の特例(附則第5条関係)(Special provisions of the Juvenile Law regarding election crimes, etc. (related to Article 5 of the Supplementary Provisions)) [https://www.soumu.go.jp/senkyo/senkyo\\_s/news/senkyo/senkyo\\_nenrei/](https://www.soumu.go.jp/senkyo/senkyo_s/news/senkyo/senkyo_nenrei/) (accessed: 10.11.2023).

<sup>25</sup> « La loi favorise l'égal accès des femmes et des hommes aux mandats électoraux et fonctions électives, ainsi qu'aux responsabilités professionnelles et sociales ». (*Texte intégral en vigueur à jour de la révision constitutionnelle du 23 juillet 2008*).

<sup>26</sup> *Quelles sont les conditions pour voter?*, 13.10.2021, <https://www.vie-publique.fr/fiches/23926-quelles-sont-les-conditions-pour-voter> (accessed: 5.05.2022).

(CDI: Permanent employment contract, CDD: Fixed-term contract, temporary contract). All minors must be authorized by their “legal representative”, that is, by a person designated by law to represent and defend the interests of another person. Similarly, a person with parental authority (a parent) or guardian must act as a representative when a minor under their authority buys or sells real estate, signs lease agreements, etc.<sup>27</sup>

### 3.4. Legal age for becoming an adoptive parent

To be an adoptive parent in Japan, you must have a spouse (be a couple), and the couple must carry out the adoption together (Art. 817, Para. 4 of the Japanese Civil Code). In addition, the adoptive parents must be at least 25 years old. However, if one of the adoptive parents is 25 years of age or older, the other can adopt if they are 20 years of age or older.<sup>28</sup>

In France, adoptive parents or partners must be able to provide proof of living together for at least one year or of both being over 26 years of age. Before the reform promulgated on 22 February 2022 (*Loi de février 21 2022*) aimed at reforming adoption, spouses had to demonstrate two years of marriage or be 28 years old. However, if a person is married or in a civil partnership, they must obtain the agreement of their spouse (Art. 343, Para. 1 of the Civil Code).

### 3.5. Legal age for drinking alcoholic beverages, smoking and public gambling

In Japan, the legal age for drinking, smoking and public gambling remains set at 20. Drinking and smoking is prohibited for persons under the age of 20. This is written into Japanese law under the Underage Drinking Prohibition Law (*Miseinensha inshu kinshi hō* 未成年者飲酒禁止法) and the Underage Smoking Prohibition Law (*Miseinensha kitsuen kinshi hō* 未成年者喫煙禁止法), which define the first two prohibitions. Concerning gambling, public gambling such as horse racing was prohibited under the age of 20, as it remains today. There are four types of public gambling in Japan: horse racing, bicycle racing, boat racing, and auto racing, and the relevant laws on them are: The Horse Racing Law; Bicycle Racing Law; Motor Boat Racing Law; and Small Car Racing Law. These laws prohibit people under 20 years of age from buying or taking over betting tickets.

In France, the Public Health Code precisely regulates the drinking of alcohol by young people: no alcoholic beverage may be sold or offered to a minor under the age of 16. Concerning tobacco, a law banning the sale of tobacco to those under 18 was adopted in 2009 as part of the law “Reforming hospitals and relating to

---

<sup>27</sup> Loi no 2006-399 du 4 avril 2006 « renforçant la prévention et la répression des violences au sein du couple ou commises contre les mineurs » (accessed: 5.05.2022).

<sup>28</sup> République Française, *À partir de quel âge peut-on travailler?*, <https://www.service-public.fr/particuliers/vosdroits/F1649> (accessed: 10.11.2023), official website of the French administration.



patients, health and territories (known as the law HPST)” (Art. L3511-2). Regarding gambling, as with consuming alcoholic beverages and tobacco, a minor cannot enter a casino, even if they do not gamble or are accompanied by a person over 18 (including a parent). The casino must systematically check the age of anyone accessing its gaming rooms.<sup>29</sup>

#### 4. Conclusions

In conclusion, I would first like to explain the reasons for the changes made by the Japanese Ministry of Justice. Here is an English translation of the text found on the official website of the Ministry of Justice in Japan: “In recent years (since 2016), the voting age has been set at 18 years of age by the Constitutional Amendment Law (National Voting Law) and the Public Offices Election Act. In addition, a policy of treating 18- and 19-year-old people as adults has been promoted in determining important matters in national affairs. Based on this policy, it has been argued that it is appropriate to treat people over the age of 18 as adults also in the Civil Code, which is the basic law regulating people’s lives. Around the world, it has become mainstream to consider 18 as the typical age for attaining legal adulthood. Lowering the age of adulthood to 18 respects the right to self-determination of young people aged 18 and 19 and is aimed at encouraging them to participate in society actively.”<sup>30</sup>

And here is a quote from the opinion of the Legislative Council held in 2009. “With modern Japanese society’s rapidly declining birthrate and aging population, young people are expected to play an active role in society and the economy.”<sup>31</sup>

---

<sup>29</sup> Ministry of Health, Labor and Welfare HP, <https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000169158.html> (accessed: 10.11.2023).

<sup>30</sup> Republique Française, <https://www.service-public.fr/particuliers/vosdroits/F1649> (accessed: 10.11.2023), service public – fr. le site officiel de l’administration française.

<sup>31</sup> In Japanese: 近年、憲法改正国民投票の投票権年齢や、公職選挙法の選挙権年齢などが18歳と定められ、国政上の重要な事項の判断に関して、18歳、19歳の方を大人として扱うという政策が進められてきました。こうした政策を踏まえ、市民生活に関する基本法である民法においても、18歳以上の人を大人として取り扱うのが適当ではないかという議論がされるようになりました。世界的にも、成年年齢を18歳とするのが主流です。成年年齢を18歳に引き下げるとは、18歳、19歳の若者の自己決定権を尊重するものであり、その積極的な社会参加を促すことになると考えられます。Kinnen, *kenpō kaisei kokumin tōhyō no tōhyō ken nenrei ya, kōshokusenkyōhō no senjyōken nenrei nadoga jubassai to sadamerare, kōkuseijou no juyō na jikō no bandan ni kanshite, jubassai, jukyusai no kata o otonatoshite atsukan toiu seisakuga susumerarete kimashita. Koushita seisaku o humae, shiminseikatsu ni kansuru kibonhō dearu minpō ni oitemo, jubassai ijō no hito o otonatoshite toriatsukaumoga tekitoō deva naikatoiu girōnga sareruyouni narimashita. Sekaitekinimo seinen nensei o jubassai to surunoga sburyu desu. Seinen nensei o jubassai ni hikisagerukoto na jubassai jukyusai no*

In summary, the main reasons for lowering the age of majority to 18 years of age are:

- i) young people should participate in society sooner, as Japan is struggling with a declining birth rate and an aging population;
- ii) because 6 years ago the voting age in Japan was lowered to 18, the age of majority in the Civil Code should also be lowered;
- iii) the age of majority should be adapted to the mainstream trend overseas.

According to Japanese law, the age of majority is the threshold of adulthood. The word *majority* here refers to having lived for eighteen years or more, and thus, being of full age, as opposed to *minority*, the state of being a minor. However, most of Japan's youth will continue on to some sort of post-high school education and will receive financial support from their parents during this time, so the change will not have a visible effect on everyone. The age of majority should not be confused with the age of maturity; rather, it should be understood as the age of a prolonged adolescence, of an emerging adulthood. For this reason, Japan is now conducting consumer education for young people with the aim of fostering consumer independence. Such an education also helps young people make better decisions and live independently, and also makes them more aware that their consumption behaviour affects society, the economy, and the environment.

## References

- Collaborative Referene Database, National Diet Library, Japan. NDL online. [https://crd.ndl.go.jp/reference/detail?page=ref\\_view&id=1000089028](https://crd.ndl.go.jp/reference/detail?page=ref_view&id=1000089028) (accessed: 10.05.2022).
- Faure B., *The Red Thread: Buddhist Approaches to Sexuality*, Princeton 1998
- Iida T., *Nihon ni okeru "seinen" seido no naritachi to shakaiteki igi jiron* (日本における「成年」制度の成り立ちと社会的意義.) *Jiron* (持論) February 2019 / Number 1528, Tokyo 2019.
- Mizuno M., *Minpō no kanten kara mita seinen nenrei shikisage. Minpō no genzai saikenbō kaisei seinen nenrei hikisage Juristo N. 1392* (民法の観点から見た成年年齢引き下げ." 民法の現在 債権法改正・成年年齢引き下げ" ジュリスト No. 1392), 2010 1.1-15, Tokyo 2010.
- Nakata K., *Tokugawa jidai no bungaku ni miataru shihō* (徳川時代の文学に見えたる私法), Tokyo 1984.
- Ōishi M., *Oedo maruwakari jiten* (大江戸まるわかり事典), Tokyo 2005.
- Quelles sont les conditions pour voter?*, 13.10.2021, <https://www.vie-publique.fr/fiches/23926-quelles-sont-les-conditions-pour-voter> (accessed: 5.05.2022).

---

*wakamono no jikoketteike o sonchō surumonodeari, sono sekkyokuteki na shakaisanka o unagasukotoni naruto kangaearemasu.*

## SUMMARY

The age of majority in Japan was lowered from 20 to 18 on 1 April 2022 when a newly revised Civil Code came into effect. Japanese young people 18 years of age and older will now be able to make their own life choices and decisions in various social situations. At the same time, they will also have the responsibilities of adults. Various opinion polls, however, show a widespread lack of concrete understanding of people's rights and responsibilities in Japan. This paper explores the meaning of the term 成年 *seinen* (age of majority) by comparing the case of France on the basis of the French Civil Code in order to shed light on the legal and common meaning of "attaining adulthood."

## STRESZCZENIE

### ANALIZA PORÓWNAWCZA TERMINU PRAWNEGO „WIEK PEŁNOLETNOŚCI” W JAPONII I WE FRANCJI

W Japonii 1 kwietnia 2022 r. wszedł w życie zmieniony kodeks cywilny. W myśl jego przepisów wiek pełnoletności obniżono z 20 do 18 lat. Młodzi Japończycy w wieku 18 lat i starsi będą teraz mogli dokonywać własnych wyborów życiowych i podejmować decyzje w różnych sytuacjach społecznych. Jednocześnie dotyczą ich także obowiązki dorosłych. Różne badania opinii publicznej wskazują jednak na powszechny brak konkretnego zrozumienia praw i obowiązków przez Japończyków. W artykule przedstawiono wyniki badania znaczenia terminu 成年 *seinen* („wiek pełnoletności”) poprzez porównanie przypadku Francji na podstawie francuskiego kodeksu cywilnego, aby rzucić światło na prawne i potoczne znaczenie terminu „osiągnięcie pełnoletności”.