

# Risk Management during Sport Activities: Analysis of the Recent Legal Case in Japan Regarding Foul Ball Damages on a Spectator in a Ballpark

Nobuki Ishii<sup>1,\*</sup>, Hiromi Nakamura<sup>2</sup>

<sup>1</sup>Faculty of Law, Setsunan University, Osaka, Japan.

<sup>2</sup>Japan Institute of Sports Sciences, Japan Sport Council, Tokyo, Japan.

**How to cite this paper:** Nobuki Ishii, Hiromi Nakamura. (2021). Risk Management during Sport Activities: Analysis of the Recent Legal Case in Japan Regarding Foul Ball Damages on a Spectator in a Ballpark. *The Educational Review, USA*, 5(4), 91-97.  
DOI: 10.26855/er.2021.04.002

**Received:** February 26, 2021

**Accepted:** March 27, 2021

**Published:** April 22, 2021

**Corresponding author:** Nobuki Ishii, Faculty of Law, Setsunan University, Osaka, Japan.

**Email:** [ishii@law.setsunan.ac.jp](mailto:ishii@law.setsunan.ac.jp)

---

## Abstract

Recent Japanese courts tend to recognize the civil liability of the stakeholders in the sport sector wider than ever. This paper studies a series of Japanese legal cases relating to the severe damages of the spectators caused by a foul ball in the Nippon Professional Baseball (NPB) games. At the US court, the responsibility of the Major Baseball League team had been exempted in most of the cases by applying so-called of “the ballpark rules”, which is printed on the back of the ballpark ticket as the condition of attending the games as a spectator. Meanwhile in Japan, there was no specific legislation or the sporting rules to define the safety standard regarding as the height of the fence which separates the spectator seating from the field of play. Then, defect in event hosting and the venue management had been mostly denied by widely applying the principle so-called of “the spectators’ assumption of risk in the stadium” until the case of 2015 in Sapporo. The Sapporo High Court asks the NPB clubs to consider the level of safety management for the spectators case-by-case, while admitting the certain level of attention by the spectators themselves to avoid the sports-related risks at the stadium should be taken as well. The ruling has significance when the sports sector is seeking the good balance of the safety management of fans on-site and the exciting way of live sports presentation.

## Keywords

Civil Liability, Foul Ball, The Ballpark Rules, The Nippon Professional Baseball, NPB, Sports Insurance

---

## 1. Aim

One of the key elements for solid sports development is risk management of accidents that are inherent in sports (Ishii, 2013). Considering the recent rulings in Japanese court that tends to recognize the civil liability of stakeholders in the sport sector wider than ever, it is worth examining the necessary measures of risk management of the sports clubs and organization. In addition, it would be vital to explore the related laws and policies to be set up by the government soon. Therefore, this paper studies a series of Japanese cases relating to the accidents in the Nippon Professional Baseball Organization (hereafter NPB) games—one of the most popular professional sports league in Japan, specifically in

which spectators were seriously injured by a foul ball, so that we can understand the civil liability of the concerned parties, and the safety measures taken by the sector as a consequence of these lawsuits.

## 2. Background

### 2.1. Japanese laws and regulations in sport

The supreme law in Japan is the Constitution of Japan that has no provision explicitly mentioning sport and exercise. Therefore, the Basic Act on Sport of 2011 currently serves as the fundamental law in the sport sector. To confirm the significance of sporting activities in our life, the Act states in its preamble that “Sport is a universally shared human culture”.

Regarding the prevention of sports accident, Article 14 of the Act defines as follows:

The national government and local government shall endeavor to train instructors, etc., improve sport facilities, disseminate knowledge on the preservation and development of physical and mental health and ensure safety in sport (including knowledge about the appropriate usage of sport goods) and implement other necessary measures in order to prevent or contribute to the reduction of sport accidents or other external injuries or problems caused by sport.

Base on this, it is possible to say that the Japanese government considers that accident prevention is an essential factor of sport development.

### 2.2. Claims for damages while spectating the NBP games

If a spectator is hit and injured by a foul ball during a game hosted by any NBP club, the spectator might want to seek compensation for the damage by suing the person who hit the ball. In such a case, a lawsuit would be filed under Article 709 of the Civil Code. The article defines tort liability as follows:

A person that has intentionally or negligently infringed the rights or legally protected interests of another person is liable to compensate for damage resulting in consequence.

However, there has been no legal case in Japan against such a baseball player thus far. Instead, the injured persons sued a NBP club as an event host and/or a venue possessor/owner to seek a compensation. And in these cases, “Safety of the stadium” was the issue, specifically listed as follows:

1) ensuring structural safety of the venue (for example, installing a ball-proof net between the field of play and the seating area); and

2) ensuring functional safety during the games (for example, alerting spectators to foul balls via announcements in the venue) (Natsui, 2015; Hatanaka, 2015).

If the former becomes an issue, it can apply Article 717 of the Civil Code that defines the liability of a possessor and an owner of a structure on land as follows:

Civil Code: Article 717 (1) If a defect in the installation or preservation of a structure on land causes damage to another person, the possessor of the structure is liable to the person incurring damage in order to compensate for the damage; provided, however, that if the possessor has exercised the necessary care to prevent the damage, the owner must compensate for the damage.

In case the stadium owner is a public body, it is alternatively possible to apply the State Redress Act, of which the second article describes as following:

State Redress Act: Article 2 (1). When damage to another person is caused because of a defect in the placement or administration of a road, river, or other public structure, the State or public entity shall assume the responsibility to compensate therefore.

Here, “defect” referred to in the paragraph 1 of the Civil Code, and referred to in Article 2, Paragraph 1 of the State Redress Act should be considered the same meanings.

Regarding the second issue of the trials, i.e., “ensuring functional safety” of the NBP games, again by applying Article 709 of the Civil Code, a plaintiff can maintain the negligence of the concerned parties in term of their proper maintenance and operation the facility to secure the safety of spectators. In addition, Article 415 of the Civil Code, which stipulates “compensation for damages due to default”, can be applied.

Civil Code: Article 415 (1). If an obligor fails to perform consistent with the purpose of the obligation or the performance of an obligation is impossible, the obligee may claim compensation for loss or damage arising from the failure; provided, however, that this does not apply if the failure to perform the obligation is due to grounds not attributable to the obligor in light of the contract or other sources of obligation and the common sense in the transaction.

Accordingly, in a law case arguing civil liability of a severe damage on a spectator of the NPB games, the corresponding laws above mentioned will be applied to examine the issues detailed as follows:

- 1) negligence in terms of the duty of care to maintain and operate the facility to keep the spectators from an accident in the stadium, and
- 2) whether or not the safety equipment prepared in the stadium to ensure the level of safety that should be generally provided in the NBP game.

### 3. Case Analysis

#### 3.1. Case of dismissing the complaint of the plaintiff

##### 3.1.1. Case no.1—Sendai District Court (February 24, 2011) H21-(WA) No. 716

The plaintiff was injured when he was hit by a foul ball while spectating one of the NPB games in an infield seat of the stadium's third-base side. Consequently, based on Article 717, Paragraph 1 of the Civil Code, he sued A<sub>1</sub> (a NBP club as the event host and the stadium operator), as well as A<sub>2</sub> (the local government as the venue owner) based on Article 2.1 of the State Redress Act.

The Sendai District Court dismissed the plaintiff's claim, by stating that the structure and material of the fence between the field of play and the seating area, in addition to other safety measures taken at the stadium, should be considered rational and reasonable to ensure the spectators' safety at this stadium. Later, Sendai appeal court sustained the original judgment.

##### 3.1.1.1 Details of the Sendai District Court decision:

Regarding the judgement on "defects" of the stadium and its installments where the NBP games are held through the season, the court stated as follows.

"The judgement is to be made in term of harmony of the factors such as following; requirement to ensure the safety of the spectators, the degree of attention required to the spectators for his/her own safety, and the demand not to compromise the exciting experiences of watching a professional game on-site, i.e. sport presentation that is an essential element of the professional sports as entertainment." Then the court continued to examine the following two issues regarding the safety of the seating area where the plaintiff had taken:

- (A) the safety measures adopted by the defendants; and
- (B) Defendant's tort liability

##### A. the safety level of the structures and functions, including the measures taken at the stadium

Regarding the height of the fences installed in the infield seating area, all the thirteen stadiums where the official NPB games were held in 2008, the average height of the infield seat fences was about 4.59 meters. At the stadium in question, it was in range from 4.29 meters to 4.79 meters, which falls in average among the other NPB venues.

Meanwhile, there are no specific provisions in the concerning legal regulations such as the Building Standards Law, nor the sports rules that are the official professional baseball rules set by the NPB's rules committee. Consequently, in this case, the Sendai District court judged that the fence was high enough, by applying the standard shown in "the Guidelines for Construction of the Outdoor Sport Facilities" established by the Japan Sports Facility Association (hereafter JSFA), in addition to the fact mentioned above.

Regarding the additional actions taken by the defendants, as detailed below, to improve the safety level of the spectators in the infield seating area, the court judged they were effective and rational, and denied the defects of the defendants in term of management of the event and the venue.

- Visual warning—In the concerning stadium, the graphic warning was installed to remind the risk of objects flying into the spectator's area, such as "Be careful of foul balls", —approximately thirty graphic signs in the infield seating area and additional twenty signs in the peripheral area of the stadium. In addition, between the innings, staff members had walked around in the spectator's area with the signboard stating, "Be careful of foul balls".
- Audio warning—Approximately 30 minutes before of playball, a video was shown on the electric bulletin board to call the spectators' attention to the risk of foul ball. Additionally, during the game, all cases of a foul

ball flying toward the spectators' seating area, a still image was shown on the electric screen of the scoreboard that sent a message such "Watch out! Please be careful about the whereabouts of the ball", together with an announcement requesting the spectators' attention. Also, in case a foul ball enters the seating area, the horn is sounded.

- Game experiences of the spectators—During the three months after the official opening of the stadium (April to July 2005), several guests in the infield seating area had complained about the limited view of the game time on a daily basis. Later, on renewing the season ticket, there were considerable negative responses due to poor visibility from the seats, which ended up with fourteen cancellations of the subscription and thirty-nine moves of the designated seating. If the defendants had taken further measures to improve the level of stadium safety, such as raising the height of the infield fencing, it was highly likely to compromise their vivid way to present the games at the venue that is an essential element of watching the professional baseball games.

### **B. Tort liability of the A1 as an event host**

From the safety measures taken by the defendants as mentioned earlier, A<sub>1</sub> was recognized that it had fulfilled its obligation to pay proper attention to the spectators' safety. Consequently, A<sub>1</sub>'s negligence was denied.

#### **3.1.2. Case no. 2—Chiba District Court (October 28, 2011) H-H22-(WA) No. 631**

The plaintiff was sitting in the spectators' area (the outfield seats) of the stadium that is managed by B<sub>1</sub>, one of the NPB clubs, when he was hit in the face during the batting practice before playball. He suffered a severe injury involving a rupture to his right eyeball and sued B<sub>1</sub> for damages due to its tort. He claimed that the accident had happened because the defendant did not restrict entrance of spectators to the stadium that was in a hazardous status of pre-playball, which leads the negligence to make the spectators fully aware of the danger such as a fly-in object into the seating area.

However, Chiba District Court denied the necessity of entrance restrictions before the playball by reasoning as followings.

1) "During the batting practice, balls might fly into the outfield seating area more frequently than during the game time. Still, it cannot be said that the risk of being hit by such a fly-in ball had raised dramatically".

2) "It is a well-known fact for spectators that there is always a risk of losing sight of a flying object due to sunlight. In such a case, he or she should get prepared to avoid the danger by facing down, bending over, or covering one's head and face with one's arms". "There were staff members to alert the spectators against a fly-in object by blowing a whistle. Therefore, no additional effort would be needed, such as to set up a flag-raising staff to indicate the point where the ball would fall". "Accordingly, it cannot be said that there was negligence regarding the defendant efforts to alert the danger of a foul ball".

#### **3.1.3. Case no. 3—Kobe District Court, Amagasaki Branch (January 30, 2014) H24-(WA) No. 947**

The plaintiff attended a game of C<sub>1</sub> (a NBP club as the event host) at their home stadium in a seat near the third-base side's infield area. Then during in-play, a fracture of the broken bat flew over the fence and bounced into the infield seating area, then pierced the plaintiff's right cheek. By blaming improper fencing in the venue, the victim filed a case against the C<sub>2</sub> (as the stadium owner, also as the stadium operator for the NBP games under the commission by C<sub>1</sub>) to compensate its tort. The plaintiff also sued C<sub>1</sub> to cover the damages based on tort, alleging that its negligence as the event host.

To examine the liability of C<sub>2</sub>, Kobe District Court Amagasaki Branch explored the obligation set by Article 717, Paragraph 1 of the Civil Code, then ruled that there was no defect in term of installation of the back net and the infield fences of the stadium, specifically reasoning as following.

1) The height of the net and the fence of the stadium had met the standards of the guideline for the outdoor sport venues set by JSFA.

2) The spectators had been notified the risk and danger of a flying object into their seating area via the audio and visual warnings which mentioned not only a ball but also a bat. Their attention had been called on repeatedly before and during the game.

3) In order to avoid the danger, the spectators were repeatedly requested to pay a proper attention not only to the flying ball but also to the broken bat.

4) As the defendants also had to consider the way of sport presentation which is an essential element of a professional baseball game live on-site, it is difficult for C<sub>2</sub> to take further measures for safety such as expanding the size of the back net or raising the height of the infield fence.

Based on these facts, the court denied C<sub>2</sub>'s defect in securing the safety of the spectators in the stadium. The court also denied the responsibility of C<sub>1</sub> because the responsibility of C<sub>2</sub>, who acted as their agent in term of the stadium

operation, had been approved as reasonable.

### 3.1.4. Analysis on Case no. 1 through no. 3

While safety management of an event host and a venue owner/ operator in the professional sport has to meet at a certain standard to complete their duty of care, there are additional vital factors to be valued in the game management for fans such as an exciting way of sport presentation at the venue. Also, there is requirement of the spectators to take a reasonable action to avoid the risks inherent in the sport. From the three cases of the NPB games examined above, it is possible to say that Japanese courts consider the following two conditions to judge the liability of the event host and the venue owner/operator to keep the spectators safe, specifically when determining the presence or absence of “defects” in a stadium where the professional baseball games are held regularly through the season:

- 1) whether the height of the fence at the stadium meets the standards of the “Guidelines for Construction of Outdoor Sport Facilities” established by the JSFA, and
- 2) whether application of the safety measures taken in the stadium (such as visual and audio alerts at the stadium, etc.) were appropriate.

When both conditions are met, then the civil liability of the concerned parties is not necessarily held even when a foul ball had caused a severe injury to a spectator.

## 3.2. Cases in which the plaintiff’s complaint was accepted

### 3.2.1. Case no. 4—Sapporo District Court (March 20, 2015) H24-(WA) No. 1570.

The plaintiff attended a NPB game with her husband and their three small children, responding to the campaign of D<sub>1</sub> (a NPB club) that had invited elementary school pupils of the area to the stadium on the premise of being accompanied by a guardian. As the plaintiff was unfamiliar with the sport, she had little understanding of the dangers of a foul ball. While watching the game, a foul ball hit on her face directly and blinded her right eye. The plaintiff sued the following three parties by maintaining their defect in installing the safety measures to protect the spectators from foul balls: (1) D<sub>1</sub>, who hosted the baseball game, (2) D<sub>2</sub>, which has occupied the stadium, and (3) D<sub>3</sub>, the local government which owns the venue.

The Sapporo District Court accepted her claim by stating that “Those who do not know the rules of baseball like the plaintiff also could come to watch the game. These new fans of baseball should be provided the additional safety measures so that they could enjoy the experience safely”. “If there was an excessive bias by prioritizing excitement of the game presentation over safety of the fans, it would lead to the lack of harmony”. On top of that, the court said as follows.

- 1) The height of the fence in front of the concerning spectators’ seating area (where the victim was seated) was not enough to block a foul ball in this case.
- 2) Even though the safety measures were taken to complement the fence mentioned above, a possibility of a spectator being hit by a ball flying at a remarkably high speed cannot be dismissed—especially when the ball comes within a very short time—just in two seconds after a player hit a ball. Moreover, the concerning announcement in the stadium did not tell the spectators to keep their eyes on the ball through a whole play—from the very moment of throwing by the pitcher, the impact of hitting by the batter, then afterwards at least until you can tell the whereabouts of the ball goes”.

In addition, “The situation in the concerning seating area, the safety procedures applied in the stadium had failed to meet the standard of safety that should generally offer to the seating environment in this particular case, so there was a defect in the applied safety measures and the environment of the venue”. For that reason, the district court ordered D<sub>1</sub>, D<sub>2</sub> and D<sub>3</sub> to compensate the plaintiff for damages.

Meanwhile, D<sub>1</sub> maintained the event host’s discharge from compensation of the foul ball damages, which was defined by “the Terms and the Condition of the Ballpark Ticket”, which is commonly approved by all the NPB clubs. However, the court ruled that D<sub>1</sub> could not be exempt from liability, stating, “The damage caused to the plaintiff by the accident was because of a defect in installation and management of the stadium”. “It is considered as a breach of the obligation in term of the venue security defined by the Terms and the Conditions of the baseball ticket”.

However, the Sapporo High Court overturned the decision of the lower court, stating, “The height of the infield fence at the venue was not particularly low compared to the JSFA guidelines for the outdoor facility and the standards of the other NPB home stadiums. In addition, the infield fence of the stadium (especially near the seat of this case), together with the other safety measures implemented in the venue had reasonable rationality to ensure the safety of common spectators who are familiar to baseball (Hatanaka, 2016). Therefore, it cannot be said that the stadium lacked the safety status which should be normally provided at the NPB home venue”. “As a result, it is not recognized that the stadium

had a “defect” as prescribed in Article 717, Paragraph 1 of the Civil Code or Article 2, Paragraph 1 of the State Redress Act”. “There is no reason to recognize the failure of the three concerned parties”.

Meanwhile, the high court admit the liability of  $D_1$  regarding the victim’s damage but with a different reason from the lower court—a violation of “the Terms and Conditions of ballpark ticket” by  $D_1$ , regarding fulfillment of their obligation to keep the spectators safe in the stadium. The seats taken by the family were close to the field of play to offer the exciting sense of presence but also with the high risks of foul ball damages, were not suitable for a family with small children. It could lead to a serious accident which might cost the life or a body part of the spectators”. “It is reasonable to understand that the team was obliged to take extra safety measures as they had invited families with a pupil. Therefore, it should be understood that  $D_1$  did not take sufficient safety measures.” Still, the high court recognized the failures of the victims (the plaintiff fault to fail keeping her attention during the game, and her husbands who chose the seats on ticketing), therefore their partial responsibility by twenty percent (the rest of eighty percent had fallen on to  $D_1$ )”.

#### 4. Discussion

When Japanese courts make judgement on safety issues of the baseball games, more specifically “defect” in accident prevention in the spectators areas of the stadium where the NBP games are regularly held through the season, the courts seek the balance among the following factors: requirement on the event host and the venue owner/possessor to keep the spectators from any harms foreseeable to happen in the stadium, requirement on the spectators to pay a reasonable attention to avoid an accident which could be derived from the game, and preservation of good balance between the spectators’ safety and the excitement of the sports presentation. Therefore, the focus of this discussion could be identified as the following four points:

- 1) fulfillment of the JSFA’s guidelines on the outdoor sports facility;
- 2) reasonability of the safety measures taken in the stadium, such as a warning on a foul ball;
- 3) reasonability of the actions taken by the spectators to avoid the risks; and
- 4) preservation of excitement in the sports presentation.

On that note, none of the related cases in Japan have sustained the appeals of victims of foul ball accident before the case of Sapporo of 2015. The court did not automatically question the reliability of the possessors/owners’ action, either. Seemingly, the Japanese courts has paid more attention to the principle so called of the spectators’ assumption of risk in the stadium, that could be the combination of the factors such “as exciting experiences of the baseball fans” and “the spectators’ effort of keeping their attention to avoid the sports-related risks than other factors”. Therefore, it is fair to assume the stadium is not required to provide the foul ball-free seating which could be only provided by complete separation of the field of play and the spectators by screening with a ball-proof net or walling with acrylic screen.

That is, Japanese court had applied the same approach taken by the US court so called of “the Baseball rule”. Under this rule, the liability of the clubs in the Major League Baseball (hereafter, MLB) is limited as it was printed on the back of the ballpark ticket. Accordingly, MLB teams had never been charged their civil liability in the cases of the foul ball accidents at the American court (Juliano & Healey, 2009). However, in the recent cases, the US courts start showing the similar judgement of Sapporo to recognize the negligence of the MLB clubs. For example, Georgia Court of Appeals supported the ruling of the lower court maintaining that “the ballpark rules” are not the Georgian state legislations (*Atlanta National League Baseball Club Inc. v. F. F. Individually et al.*, A140398; Georgia Court of Appeals, 2014).

In a situation like the Case no. 4, in which a spectator who cannot make enough effort to protect him/herself from the sports-related danger, the court requires the NPB club and the stadium owner/operator to provide additional care for the sake of their safety. The court also said that simply showing the fact of their installation of the structural and functional safety measures at the stadium is not enough for the defendants if they wished exemption from the concerned responsibility. The court pointed out that “Those who do not know the rules of baseball like the plaintiff also could come to watch the game. These new fans of baseball should be provided the additional safety measures so that they could enjoy the experience safely”.

The Sapporo lower court’s ruling has recognized responsibilities of the event host and the venue owner at the highest expectation. In other words, the lower court seems to believe that application of “the Ball Park rules” should not be automatic. Rather, on its application, the court seems to believe that the situation of each case should be examined carefully.

Meanwhile, Sapporo high court denied defect in the venue management but negligence of the event host. It did recognize the requirements of the spectators to take reasonable actions by asking them to pay attention to the ball all the time of in-play so that they could avoid the sport-related risks. Consequently, the event host and the venue owner/operator of the NPB should be able to assume such an effort by the spectators when seeking the good balance of the spectators’ safety and the excitement of the sport presentation at the stadium (Hatanaka, 2016). As long the stadium

properly calls the attention of the spectators against a flying object such as a foul ball or a piece of a broken bat, they can keep the net and fence around the seating area reasonably low.

It should have a huge significance in term of the NPB business as an entertainment. It would allow an event host and a venue owner/operator to offer their fans more excitement of the game with little limitation of the views from the stand while allowing the team to keep using the current home stadium without any major modification to improve the safety level of the spectators. However, they are still required to complete their duty of care which should meet the suitable level of each spectator. In failing to do so, they might be sued more often than ever in term of the defect of the game/venue management.

## 5. Implication

If we hope to increase the number of new baseball fans who would enjoy watching a game on-site, it would be worth considering to set up the comprehensive system of the insurance for the sports sector, not just to get the stakeholders prepared to such a legal risk, but also for the sake of salvation of the victims of the sports-related accidents. It will not be easy to set up such a thorough insurance system which can cover the civil liability of all the sports organizations involving hosting the events and competitions, especially when considering securing its financial resources. To make this happen, it is highly desirable to be pursued with the public support. In fact, Article 8 of the Sport Basic Act states “The government shall implement legislative, financial or taxation measures or other measures necessary to implement the measures concerning sport”.

On that note, some countries have already obligated the stakeholders in the sport sector, such as the national sports federation and their coaches, staffs, and members to buy a sports insurance policy. One example of such countries we can learn from is France whose Code du sport, L.321-1 is applied. Meanwhile in Japan, it would be also possible to find a good starting point, such as a sports insurance policy that is set up by the Japan Sports Safety Association in 2015, which is designed to cover the relevant risks of the sports service providers such as a community-based sports club, a local sports association, and a local and national sport federation. For further development of sports, the network for helping the legal risk management of sports organization to be sought.

## References

- Hatanaka, H. (2015). Case Recognizing Civil Liability Regarding the Damages of Injury Caused by a Foul ball. *Sin-Hanrei Watch*, 99.
- Hatanaka, H. (2016). Spectators' Injury Caused by a Foul Ball, the Defect Liability of the Stadium and the duty of care of the baseball team. *Sin-Hanrei Watch*, 121.
- Ishii, N. (2013). Civil Liability for Accidents during Sports Activities: A Study Focusing on Sports Organizations in France. *Japan J. of Phys. Educ., Hlth & sport sci.*, 58, 637-662. doi.org/10.5432/jjpehss.120834
- Juliano J. and Healey, A. C. (2009). Update: Ballpark Liability and the Baseball Rule. *Legally Speaking (Winter)*. Retrieved from [http://www.legallyspeakingonline.com/archive\\_winter09-10\\_update.html](http://www.legallyspeakingonline.com/archive_winter09-10_update.html).
- Natsui, T. (2015). Civil Liabilities for Blindness of a Spectator Caused by a Foul Ball during the Professional Baseball Game. *Case Study for Local Governance*, 393, 90.
- Sport Safety Association. The Civil Liability Insurance for the Sport and Cultural Organization. Retrieved from <http://www.sportsanzen.org/hojin/>.