

# Part I - Redefining Indonesia's Import Policy: Revised Import Requirements, Licensing Procedures and Sector-Specific Provisions

## Overview

In an effort to promote greater ease of doing business within Indonesia, particularly in terms of foreign trade activities, the Minister of Trade ("**Minister**") recently issued Regulation No. 16 of 2025 on Import Policy and Provisions ("**Regulation 16/2025**"), which is set to enter into force on 30 August 2025. This new framework will simultaneously repeal and replace the previously applicable import-policy framework of Regulation of the Minister No. 36 of 2023, which has been amended multiple times, most recently through the issuance of Regulation of the Minister No. 8 of 2024 (collectively referred to as "**Regulation 36/2023**").

Generally speaking, Regulation 16/2025 represents part of the Indonesian Government's first deregulation package, which is aimed at safeguarding national economic stability amid ongoing uncertainties regarding global trade. Furthermore, the new framework will hopefully boost investment across a number of labour-intensive sectors, in turn creating new employment opportunities across the country. In this regard, the Coordinating Minister for Economic Affairs, Airlangga Hartanto, has explicitly stated that this new policy of deregulation is being focused on the simplification of the prevailing licensing regime and bureaucracy.

In line with this view, Regulation 16/2025 has been issued in response to concerns previously raised in the "2025 National Trade Estimate Report on Foreign Trade Barriers", which was published by the Office of the United States Trade Representative ("**USTR Report**"). The USTR Report specifically criticizes Indonesia's import licensing regime as burdensome and unclear, further complicating the overall licensing process.

In addition to Regulation 16/2025, the first deregulation package also encompasses eight supplementary Regulations of the Minister that address specific commodity clusters, which range from forestry products to chemical substances to salt commodities. As a result, these commodities, the import requirements for which were previously consolidated under the Appendices to Regulation 36/2023, have now been scattered across eight separate Regulations based on specific sectoral and commodity groupings.

Given the importance of this new deregulation policy to the national economy and to help relevant stakeholders gain an understanding of the updated import provisions that have now been introduced under Regulation 16/2025, as well as the other eight newly issued Regulations.

The first part of this publication focuses solely on Regulation 16/2025, with our discussion being broken down into the following sections:

- I. **Importer Status, Licensing and Enforcement Measures**
  - A. Revised Conversion Criteria for Importer Status
  - B. Revised Provisions on Verifications and Technical Tracing Requirements
  - C. Revised Import-Licenses Application Deadlines and the Amendment of Data
  - D. Revised Reporting Obligations and Administrative Sanctions
  - E. Transitional Provisions
- II. **Revised Provisions on Imports of Used Goods and Used Capital Goods**
- III. **Import Requirements for Non-Commercial Purposes**
  - A. Revised Scope of Non-Commercial Import Types
  - B. Revised Scope of Free-Import Goods and Goods Subject to Import Restrictions
  - C. Newly Introduced Imports of Government-Related Goods and Sporting Goods
- IV. **Imports of Sector-Specific Commodities**
  - A. Revised List of Imported Complementary, Market Testing, and/or After-Sales Services Goods Classified as Free-Import Goods
  - B. Commodity-Based Regulatory Delegation

# **I. Importer Status, Licensing and Enforcement Measures**

## **A. Revised Conversion Criteria for Importer Status**

Under the previous framework of Regulation 36/2023, any individual, institution or business actor that is intending to bring goods into Indonesia (collectively referred to as “**Importers**”) must initially secure Business Identification Numbers (*Nomor Induk Berusaha* - “**NIB**”), which will simultaneously function

as Importer Identification Numbers (*Angka Pengenal Importir* - “**API**”). Importers may select either General API (*API Umum* - “**API-U**”) or Producer API (*API Produsen* - “**API-P**”), depending on the nature of their import activities.

Accordingly, API-U are issued to Importers that import goods for sales or distribution purposes, whereas API-P are intended for Importers that import goods for internal use in supporting their production process, whether as capital goods, raw materials, auxiliary materials and/or materials that are used in production. It should also be noted that Regulation 36/2023 permits API-U to be converted into API-P, provided that certain criteria are met.

Although the above-described core requirements remain unchanged under the new framework, Regulation 16/2025 also makes a number of notable adjustments to the criteria that govern said conversions. A detailed comparison between the previously applicable and revised criteria is presented on the table below:

Regulation 36/2023	Regulation 16/2025
<ol style="list-style-type: none"> <li>1. An Importer holds a business license for the import sector and/or a Surveyor’s Report (<i>Laporan Surveyor</i> - “<b>LS</b>”) and has fully realized all ongoing imports; <b>and</b></li> <li>2. An NIB that is functioning as an API-U has been valid for at least one year.</li> </ol>	<ol style="list-style-type: none"> <li>1. An Importer does not currently hold a valid import business license, i.e. Import Approval (<i>Persetujuan Impor</i> – “<b>PI</b>”) and/or LS; <b>or</b></li> <li>2. An Importer holds a valid import business license (i.e. PI and/or LS) but is not currently engaging in any imports.</li> </ol>

Regulation 16/2025 has retained the provision originally included under Regulation 36/2023, which mandates that all Importers that wish to complete such conversions must submit a statement electronically through the Online Single Submission (“**OSS**”) system explaining the reason for the requested change in API status. However, the new framework now specifies that **any Importer that holds a valid PI and/or LS must also submit a statement confirming that they are not currently in the process of realizing any imports.**

It should be noted that, as briefly mentioned above, products that are imported under API-P are intended solely for internal use and it is strictly prohibited to sell or transfer any such items. However, while Regulation 36/2023 previously set out limited exemptions to this condition in line with certain purposes, Regulation 16/2025 has now expanded the scope of such exemptions. A detailed comparison between the available exemptions under both frameworks is summarized in the table below:

API-P Products Permitted to Be Sold or Transferred	Regulation 36/2023	Regulation 16/2025
Residual raw and/or auxiliary materials that are imported in accordance with applicable Laws	√	√
Capital goods that are imported in a new condition under API-P that have been used for at least two years	√	√
Manufactured goods that are imported as complimentary goods for market testing purposes and/or for after-sales service purposes	√	√
Goods that are sold or transferred by business actors that hold oil-and-gas processing licenses and trading business licenses	√	√
Capital goods, raw materials, auxiliary materials and or materials that are used to support production processes and that are re-exported in quantities that do not exceed those set out under the relevant declared import customs notifications		√

## ***B. Revised Provisions on Verifications and Technical Tracing Requirements***

Both Regulation 36/2023 and Regulation 16/2025 state that Importers must also secure business licenses for the import sector (i.e. PI, Registered Importers [*Importir Terdaftar* – “IT”] and Manufacturer Importers [*Importir Produsen* – “IP”]) (collectively referred to as “**Import Licenses**”) in order to import certain types of goods. In this regard, Regulation 36/2023 affirmed that all such imports would be subject to various verification or technical tracing requirements that would be amended through decisions made during coordination meetings held between relevant ministries and or non-ministerial government agencies. However, **Regulation 16/2025 does not describe any such mechanism** and instead states that details regarding said imports will be further addressed under a forthcoming ministerial regulation.

Furthermore, in terms of business licensing, it should be noted that Regulation 16/2025 no longer details the various data elements and or information that must be included in import licenses, which had previously been specified under Regulation 36/2023.

In addition, although Regulation 36/2023 exempted certain goods from the obligation to have Import Licenses secured for them from the Minister before they entered Indonesia customs territory, Regulation 16/2025 stipulates that the provisions on **NIB that function as API, Import Licenses and verifications or technical tracing do not apply to imports of goods that are destined for direct transit or onward carriage, in accordance with applicable Laws.**

### ***C. Revised Import-Licenses Application Deadlines and the Amendment of Data***

While retaining the overall procedures for the submission of new Import Licenses and extension applications, as originally outlined under Regulation 36/2023, the new framework provides further clarity regarding the deadlines for administrative reviews of business license applications, amendments and extensions, as well as for the submission of PI extension applications. The specific deadlines for these processes are outlined in the table below:

Process	Timeline
Administrative review of completeness and compliance with new business license application requirements	Maximum of 15 business days from the receipt of an application through the INATRADE system
Administrative review of completeness and compliance with business license amendment application requirements	
Administrative review of completeness and compliance with the import approval extension application requirements	
Submission of PI extension application	No earlier than 30 days and no later than two business days prior to the expiration of the relevant PI

In addition, Regulation 16/2025 has also expanded the various data elements of import business licenses that may be subject to amendments in comparison with Regulation 36/2023, as follows:

Data Elements Eligible for Amendment	Regulation 36/2023	Regulation 16/2025
NIB and importer identity	√	√

Tariff post/harmonized system	√	√
Type/description of goods	√	√
Quantity and number of units of goods	√	√
Country of origin	√	√
Country of loading		√
Destination port	√	√
Information/specifications of goods		√
Loading port		√
Loading port within Free-Trade Zones and Free Ports ( <i>Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB</i> )		√

Regulation 16/2025 also revises the validity periods of business licenses in the form of IT or IP in comparison with Regulation 36/2023, as follows:

Regulation 36/2023	Regulation 16/2025
<p>The validity period comprises:</p> <ol style="list-style-type: none"> <li>1. Start date and end date for registered importers or producer importers; or</li> <li>2. Start date and a note indicating ongoing validity for as long as the company engages in import-related business activities.</li> </ol>	<p>The validity period breaks down as follows:</p> <ol style="list-style-type: none"> <li>1. The start date must be before or the same as the manifest document date (BC 1.1); and/or</li> <li>2. The end date must be after or the same as the manifest document date (BC 1.1)</li> </ol>

Regulation 16/2025 has also now broadened the circumstances under which the issuance, amendment or extension of PI may be temporarily suspended in comparison with the circumstances originally outlined under Regulation 36/2023. The expanded grounds for suspensions break down as follows:

Grounds for the Temporary Suspension of PI Issuance, Amendment or Extension	Regulation 36/2023	Regulation 16/2025
For technical calculation and/or verification purposes	√	√
Due to Indonesia National Single Window (SINSW) and/or INATRADE system disruptions that have led to malfunctions	√	√
For inspection purposes in order to examine suspected violations of import policies and Regulations regarding specific types of goods and in response to post-border trade supervision undertaken by the Directorate-General of Consumer Protection and Trade Order		√

## ***D. Revised Reporting Obligations and Administrative Sanctions***

Although the reporting obligations originally introduced under Regulation 36/2023, which encompass import realizations, LS and distribution realization reports, remain unchanged, Regulation 16/2025 has now further clarified these obligations. In this regard, the new framework now mandates that **import realization reports must be submitted within 30 days of the relevant LS being utilized**. LS themselves serve as supporting customs documents that will be subject to inspections within the relevant customs areas or serve as import requirement documents that will be subject to inspections after goods have left customs areas (post-border).

Furthermore, the core administrative sanctions that can be imposed in response to any non-compliance with the various reporting obligations originally set out under Regulation 36/2023 remain applicable. However, Regulation 16/2025 has now introduced a more systematic and tiered approach for the imposition of sanctions in response to specific types of violations, which include:

1. Inconsistencies between licensing documents and the data/information provided in applications for new, amended or extended import licenses or certificates;
2. Importation of specific goods that differ in types or quantities from those stated in the relevant import licenses or certificates; or
3. Importation of goods without the required LS, in cases where LS are a mandatory prerequisite.

Sanctions that are imposed in response to these violations will be applied progressively. For a first-tier violation, Importers will receive a written reprimand. However, in the event of a repeated violation, a suspension of up to three months may be imposed. Such suspensions may ultimately affect the validity of current import licenses or certificates, delay the processing of new license or certificate applications, and limit access to verification or technical tracing services in cases where an LS is required.

If any non-compliance persists, then Importers may be subject to the revocation of their Import Licenses and/or certificates for a period of one year. This sanction may be accompanied by the continuation of any prior suspensions and may include a recommendation for the revocation of the relevant Importer's NIB.

Moreover, Regulation 16/2025 affirms that any **goods that are imported in violation of the applicable provisions must be re-exported, destroyed, withdrawn from distribution** or otherwise handled in accordance with prevailing Laws and Regulations. In addition, any expenses that are incurred during the implementation of such measures must be borne by the relevant Importers. Any Importers who fail to comply with these obligations will be **prohibited from submitting any applications for new PI and/or from accessing verification or technical tracing services for a period of one year.**

## ***E. Transitional Provisions***

However, more specifically, previously issued PI for certain specific commodities, regardless of whether such approvals were granted under API-U or API-P, have now been revoked under Regulation 16/2025. The affected commodities include the following:



As a consequence of this revocation, **Importers of any of the above-listed commodities will be required to apply for new approvals** in accordance with the provisions set out under the new framework of Regulation 16/2025. It is also important to note that any applications for the now-revoked PI that were submitted prior to the enactment of Regulation 16/2025 will not now be processed.



## II. Revised Provisions on Imports of Used Goods and Used Capital Goods

In line with Regulation 36/2023, Regulation 16/2025 reaffirms the general requirement for all imported goods to be in a new condition. Additionally, Regulation 16/2025 continues to permit the importation of used goods if such imports are permitted under prevailing Laws and Regulations, fall under the authority of the Minister and/or are based on proposals or technical considerations made by other relevant government agencies.

However, in contrast with Regulation 36/2023, which set out detailed criteria and conditions for the importation of used goods, Regulation 16/2025 removes such specifics and no longer outlines these requirements in any detail.

In terms of the temporary importation of used capital goods, Regulation 36/2023 included a detailed list of applicable tariff classifications/harmonized system codes, as specified under Appendix II. However, Regulation 16/2025 has now removed this list, while still requiring compliance with the applicable policies and Regulations that govern imports of used capital goods.

## III. Import Requirements for Non-Commercial Purposes

### ***A. Revised Scope of Non-Commercial Import Types***

Under Regulation 36/2023, Importers who engaged in non-commercial imports could be exempted from certain import requirements (e.g. possession of an NIB that functions as an API and relevant import licenses). While maintaining this provision, Regulation 16/2025 has now updated the various import type classifications that qualify for this treatment, as summarized in the table below:

Types of Imports Permitted for Non-Commercial Purposes	Regulation 36/2023	Regulation 16/2025
Imports of free-import goods by Importers who are unable to secure	√	√

NIB as API ( <b>“Non-Commercial Import Type I”</b> )		
Imports of goods subject to import restrictions by Importers who are unable to secure NIB as API ( <b>“Non-Commercial Import Type II”</b> )	√	√
Imports of both free-import goods and goods subject to import restrictions by Importers who are able to secure NIB as API ( <b>“Non-Commercial Import Type III”</b> )	√	√
Imports of both free-import goods and goods subject to import restrictions by Importers who are unable to secure NIB as API ( <b>“Non-Commercial Import Type IV”</b> )*	√	√
Imports of goods by government agencies/other state institutions ( <b>“Government-Related Goods”</b> )		√
Import of goods for sporting needs		√

It is important to note that under Regulation 36/2023, the category of Non-Commercial Import Type IV, as marked with asterisk [\*] above was previously titled, “*Imports of Consignment Goods by Specific Parties*”, which included:

1. Consignment goods of Indonesian migrant workers;
2. Personal consignment goods;
3. Passengers’ personal goods;
4. Personal goods of the crew members of transportation facilities;
5. Personal goods of border crossers;
6. Personal effects of both Indonesian and foreign citizens; and
7. Consignment goods for hajj pilgrims that are sent through postal organizers.

It should also be noted that, although Regulation 16/2025 has now adopted a revised structure for this area, its scope remains essentially the same. However, the new Regulation has also introduced a list of certain types of imported goods that are not eligible to be classified under this import type, as follows:

Rough diamonds	Non-pharmaceutical precursors	Nitrocellulose	Explosives
Ozone-depleting substances	Goods incorporating cooling systems	Hazardous materials	Hydrofluorocarbons
	Used lithium batteries	Non-hazardous and non-toxic waste	

## ***B. Revised Scope of Free-Import Goods and Goods Subject to Import Restrictions***

Consequent to the reclassification of non-commercial import types, as outlined above, the new Regulation has also now updated the lists of goods that are classified as free-import and that are classified as being subject to import restrictions. Originally, these types of goods were listed under Appendix IV to Regulation 36/2023 and applied only to Non-Commercial Import Type I and Type II goods.

However, under the new framework of Regulation 16/2025, this list is set out under Appendix I and now also applies to:

1. Non-Commercial Import Type III goods; and
2. Imports of free-import goods and goods subject to import restrictions that are undertaken for commercial purposes by Importers who are holders of NIB that function as API.

Furthermore, in comparison with Regulation 36/2023, Regulation 16/2025 now introduces a new exemption category that applies to investment-related imports of free-import goods and goods subject to import restrictions that are undertaken for commercial purposes by Importers who are holders of NIB that function as API. The key aspects of this exemption are summarized below:

Aspect	Remarks
Goods category	Encompass: 1) Free-import goods in used condition; 2) Restricted goods in both new

	and used condition; and 3) Restricted goods in used condition that are categorized as capital goods without any age limitation.
Importer	Importers who hold a master list or importers who have been designated by a master-list holder
Exemption basis	Exemptions are granted based on a master list issued by the Ministry of Investment/Investment Coordinating Board ( <i>Badan Koordinasi Penanaman Modal</i> – “ <b>BKPM</b> ”) or based on both a BKPM-issued master list and a letter of appointment from the company holding the master list to the importer.
Limitation	Exemptions only apply to investment-related goods listed in the master list issued by BKPM.

### ***C. Newly Introduced Imports of Government-Related Goods and Sporting Goods***

Previously, these two new import categories were grouped under the broader category of Non-Commercial Import Type I under Regulation 36/2023. However, Regulation 16/2025 has now separated these into two distinct categories, allowing for the introduction of more detailed regulatory elements.

The key aspects of these newly classified, non-commercial import types are summarized below:

Aspect	Remarks	
	Imports of Government-Related Goods	Imports of Sporting Goods
Types of importers	Imports may be conducted by:  1. Government agencies or other state institutions;	Imports may be conducted by:  1. National sports governing bodies, the National Sports Committee of Indonesia, the

	<ol style="list-style-type: none"> <li>2. Government agencies or other state institutions for the purpose of serving the head of state;</li> <li>3. Importers appointed by government agencies or other state institutions; or</li> <li>4. Importers appointed by such agencies or institutions in order to meet the specific needs of the head of state.</li> </ol>	<p>Indonesian Olympic Committee, the Indonesian Paralympic Committee, organizers of sporting events or participants in sporting events; or</p> <ol style="list-style-type: none"> <li>2. Importers designated by the above-listed entities.</li> </ol>
Types of imported goods	May include free-import goods or goods subject to restrictions, in either new or used condition.	
Exemptions	Imports will be exempted from the requirement to be covered by NIB that function as API or import licenses, as well as the requirement to undergo verifications or technical tracing, and/or to comply with restrictions on designated import destination ports.	
Prohibitions	Imports must not include any prohibited goods or be intended for commercial business activities.	
Additional requirements	<p>Importers appointed by government agencies or other state institutions must be supported by formal statements signed by the head of the relevant units and that set out certain specific information, including:</p> <ol style="list-style-type: none"> <li>1. Name of the appointed Importer;</li> <li>2. Harmonized system/tariff code;</li> <li>3. Declaration that the imported goods will not be misused for any non-governmental purposes; and so forth.</li> </ol>	Imports of free-import goods or goods subject to restrictions must be supported by statement letters issued by the Director-General on behalf of the Minister. This type of letter may be secured by submitting an application that is accompanied by a recommendation issued by the Ministry of Youth and Sports, which must, at the least, set out the relevant quantities and types of goods concerned, their intended use or purpose, and the validity period of

		the relevant recommendation.
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# IV. Imports of Sector-Specific Commodities

## ***A. Revised List of Imported Complementary, Market Testing, and/or After-Sales Services Goods Classified as Free-Import Goods***

Building on the previous exemptions, the following section reviews changes to the classification of certain specific sectors under the new Regulation. While Regulation 16/2025 maintains most of the sectors and subsectors originally listed under Regulation 36/2023, it also reaffirms that goods eligible for import for complementary, market testing and/or after-sales service purposes are classified as free-import foods. However, the new framework also introduces a number of adjustments to the list of such free-import goods within the food, seafood and fisheries sector as follows:

Categories of Free-Import Goods in the Food, Seafood, and Fisheries Sector	Regulation 36/2023	Regulation 16/2025
Cooking Spices and Flavoring Industry	√	√
Bread and Cake Products Industry	√	√
Confectionery and Related Industry	√	√
Animal Food Ration Industry	√	√
Organic Basic Chemicals from Agricultural Sources Industry	√	√

Cereal Food Industry	√	√
Baby Food Industry	√	
Chocolate and Confectionery Food Industry	√	
Crude Oil and Vegetable Fat Industry	√	√
Other Sugar Processing Industry	√	√
Rice and Corn Flour Industry	√	

However, it should be noted that although the baby food industry and the chocolate and confectionery food industry are no longer listed under the category of food, seafood and fisheries industries, these industries remain listed under the beverage, tobacco and refreshment industries classification.

## ***B. Commodity-Based Regulatory Delegation***

To conclude this section, we offer a brief exploration of the comprehensive shift in regulatory control from centralized oversight to delegated sectoral ministries that has now been introduced. This shift in control is set out under eight new Regulations of the Minister. In this regard, several commodities that were previously regulated under Regulation 36/2023 have now been reclassified and separated under multiple Regulations. The table below summarizes the commodity-related provisions that now feature under the following Regulations:

1. Regulation of the Minister No. 17 of 2025 on Import Policy and Provisions on Textiles and Textile Products (“**Regulation 17/2025**”);
2. Regulation of the Minister No. 18 of 2025 on Import Policy and Provisions on Agricultural and Livestock Products (“**Regulation 18/2025**”);
3. Regulation of the Minister No. 19 of 2025 on Import Policy and Provisions on Salt and Fisheries Commodities (“**Regulation 19/2025**”);
4. Regulation of the Minister No. 20 of 2025 on Import Policy and Provisions on Chemicals, Hazardous Materials and Mining Materials (“**Regulation 20/2025**”);
5. Regulation of the Minister No. 21 of 2025 on Import Policy and Provisions on Electronic Goods and Telecommunications (“**Regulation 21/2025**”);

6. Regulation of the Minister No. 22 of 2025 on Import Policy and Provisions on Certain Industrial Goods (“**Regulation 22/2025**”);
7. Regulation of the Minister No. 23 of 2025 on Import Policy and Provisions on Consumer Goods (“**Regulation 23/2025**”); and
8. Regulation of the Minister No. 24 of 2025 on Import Policy and Provisions on Used Goods and Non-Hazardous and Non-Toxic Waste (“**Regulation 24/2025**”).

Commodities	Regulation
Animals and Animal Products	Regulation 18/2025
Rice	Regulation 18/2025
Corn	Regulation 18/2025
Pearl	Regulation 19/2025
Used Lithium Batteries	Regulation 24/2025
Non-Hazardous and Toxic Waste as Industrial Raw Materials	Regulation 24/2025
Sugar	Regulation 18/2025
Silviculture Products	Unidentified
Garlic	Regulation 18/2025
Horticultural Products	Regulation 18/2025
Prospective Broodstock, Broodstock, Fish Seeds and/or Pearl Nuclei	Regulation 19/2025
Iron or Steel, Alloy Steel and Their Derivative Products	Regulation 22/2025
Tires	Regulation 22/2025
Multifunctional Color Printers, Color Photocopiers and Color Printers	Regulation 21/2025
Plastic Raw Materials	Unidentified
Lubricant Raw Materials	Regulation 20/2025

Please note that the eight new Regulations will be discussed further in the next edition of this publication.



Semi-Finished Hand Tools ( <i>Perkakas Setengah Jadi</i> )	Regulation 22/2025
Cement Clinker and Cement	Regulation 20/2025
Ceramics	Regulation 22/2025
Flat Glass and Safety Glass	Regulation 22/2025
Salt	Regulation 19/2025
Fisheries Products	Regulation 19/2025
Cellphones, Handheld Computers and Tablet Computers	Regulation 21/2025
Saccharin, Cyclamate, Alcohol-Containing Odor Preparations	Regulation 22/2025
Rough Diamonds	Regulation 20/2025
Food and Beverage	Regulation 23/2025
Traditional Medicines and Health Supplements	Regulation 23/2025
Cosmetics and Household Health Supplies	Regulation 23/2025
Other Finished Textile Goods	Regulation 17/2025
Toys	Regulation 23/2025
Bags	Regulation 23/2025
Apparel and Apparel Accessories	Regulation 17/2025
Textiles and Textile Products	Regulation 17/2025
Textiles, Carpets and Other Textile Floor Coverings	Regulation 17/2025
Textiles, Batik Textile Products and Batik Motifs	Regulation 17/2025
Alcoholic Beverages	Regulation 23/2025
Raw Materials for Alcoholic Beverages	Regulation 22/2025

Footwear	Regulation 23/2025
Electronic Goods	Regulation 21/2025
Two-Wheeled and Three-Wheeled Bicycles	Regulation 23/2025
Downstream Plastics ( <i>Plastik Hilir</i> )	Regulation 22/2025
Non-Pharmaceutical Precursors	Regulation 20/2025
Petroleum, Natural Gas and Other Fuels	Regulation 20/2025
Nitrocellulose	Regulation 20/2025
Explosive Materials for Commercial Use	Regulation 20/2025
Ozone-Depleting Substances	Regulation 20/2025
Refrigerated Goods ( <i>Barang Berbasis Pendingin</i> )	Regulation 21/2025
Hazardous Materials ( <i>Barang Berbahaya/B2</i> )	Regulation 20/2025
Certain Chemical Materials	Regulation 20/2025
Hydrofluorocarbons	Regulation 20/2025
Valves ( <i>Katup</i> )	Regulation 22/2025
Goods That Are Not in New Condition	Unidentified
Capital Goods That Are Not in New Condition	Regulation 24/2025

## Conclusion

Regulation 16/2025 represents a fundamental restructuring of Indonesia's import governance framework. By moving from a centralized to a sectoral oversight model, the new framework enhances regulatory precision through the introduction of stricter timelines, an expanded sanctions mechanism and more clearly defined exemptions. Moreover, this framework may also be seen as part of Indonesia's effort to address concerns raised in the USTR Report, particularly regarding the complexity and opacity of import licensing procedures.

Moving forward, the success of Regulation 16/2025 will depend largely on the clarity and consistency of its implementation. In this regard, robust coordination between relevant ministries and technical agencies will be essential if overlaps, confusion and regulatory blind spots are to be avoided during the transition period. Nevertheless, with proper execution and continued regulatory refinement, Regulation 16/2025 has the potential to create a more transparent, efficient and investment-friendly import regime for Indonesia, one that is not only capable of facilitating trade but also safeguarding the national interest within the context of a rapidly evolving global landscape.