

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

Overview

Building on the first part of this two-part on Regulation of the Minister of Trade (“**Minister**”) No. 16 of 2025 on Import Policy and Provisions (“**Regulation 16/2025**”), which revokes the previous framework of Regulation of the Minister No. 36 of 2023, along with its various amendments (collectively referred to as “**Regulation 36/2023**”), this second and final part offers a more in-depth analysis of various sector-specific import provisions that have now been introduced across eight newly issued frameworks.

Previously, import arrangements for these sectors were addressed in a consolidated way under the Appendices to Regulation 36/2023. However, as part of the government’s ongoing deregulation agenda and in response to long-standing inefficiencies such as delayed permit processing and bureaucratic friction, eight additional Regulations have now been issued simultaneously alongside Regulation 16/2025 and these address general import licensing requirements and procedures.

Despite being pushed as a deregulation effort by the Government, this new framework more accurately reflects a redistribution that has been specifically tailored to certain commodities. Structurally speaking, each of the eight new sectoral Regulations comprises a main body and appendices, which, among other areas, detail applicable tariff post/harmonized system (“**HS Code**”) classifications, goods descriptions and units, as well as mandatory import business licensing requirements (e.g. Import Approvals [*Persetujuan Impor* – “**PI**”], Registered Importer [*Importir Terdaftar* – “**IT**”] or Producer Importer [*Importir Produsen* – “**IP**”]).

This regulatory shift has also emerged amid growing bilateral trade pressure, most notably from the United States. Indeed, in its *2025 National Trade Estimate Report on Foreign Trade Barriers*, the Office of the United States Trade Representative criticized Indonesia’s import regime as, “unpredictable, non-transparent and overly restrictive,” highlighting obstacles such as burdensome import licensing requirements and a prevailing lack of online systems integration. In order to address these concerns and avoid the imposition of any retaliatory measures, Indonesia recently initiated an inter-ministerial coordination meeting with the goal of simplifying the country’s import licensing processes. The results of this meeting break down as follows:

Commodities	Previous Import Restrictions	Updated Import Restrictions
Forestry Products	PI requirement: import declaration from the Ministry of Forestry.	No restrictions, but still requires an import declaration from the Ministry of Forestry
Subsidized Fertilizer	PI requirement: technical recommendation from the Ministry of Agriculture	No restrictions
Other Fuels	PI requirement: technical recommendation from the Ministry of Energy and Mineral Resources/Ministry of Industry	No restrictions
Plastic Raw Materials	Non-technical PI requirement	No restrictions
Saccharin, Cyclamate, Fragrance Preparations Containing Alcohol	PI in the form of a technical recommendation from the Ministry of Industry and a Surveyor's Report (<i>Laporan Surveyor</i> - "LS")	LS only
Certain Chemicals	PI in the form of a technical recommendation from the Ministry of Industry and an LS	LS only
Pearls	PI in the form of a technical recommendation from the Ministry of Marine Affairs and Fisheries and an LS	LS only
Food Trays	PI in the form of a technical recommendation from the Ministry of Industry and an LS	No restrictions
Footwear	Non-technical and an LS	LS only

Two-Wheeled and Three-Wheeled Bicycles	Non-technical and an LS	LS only
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In order to provide a comprehensive analysis and clear discussion of the various import policies and provisions that are applicable across the eight designated sectors, our analysis has been broken down into sections, each of which addresses a specific Regulation of the Minister:

I. Textiles and Textile Products

Regulation of the Minister No. 17 of 2025 (“**Regulation 17/2025**”) on Import Policy and Provisions on Textiles and Textile Products (*Tekstil dan Produk Tekstil* – “**TPT**”)

Aspect	Remarks
Types of Commoditie	<p>Imports of TPT goods that are regulated under Regulation 17/2025 include:</p> <ol style="list-style-type: none"> 1. Textiles, carpets and other textile floor coverings; 2. Batik textiles and batik-patterned textile products; 3. Other finished textile goods; and 4. Ready-to-wear clothing and clothing accessories.
Import Requirements	<p>For specific types of HS Code and goods descriptions, importers are required to secure PI before TPT enter customs areas. Said PI are issued by the Minister through the Director-General of Foreign Trade (“Director-General”) and apply to each of the aforementioned types of goods, regardless of whether the importer holds an Importer Identification Number (<i>Angka Pengenal Importir</i> – “API”) as General API (<i>API Umum</i> – “API-U”) or Producer API (<i>API Produsen</i> – “API-P”).</p> <p>Furthermore, imports that involve specific HS Codes and goods descriptions will also be subject to</p>

	<p>a verification or technical tracing (<i>Verifikasi/Penelusuran Teknis</i> – “V/PT”) obligation, which must be carried out by a surveyor appointed by the Minister. The results of this V/PT must be documented in an LS.</p> <p>It is important to highlight that this V/PT requirement is stipulated under Appendix I of each of the eight regulatory frameworks, and is marked in the checklist as “LS,” indicating that the corresponding goods are subject to the V/PT obligation.</p>
<p>Entry and Release of Goods into and from Special Economic Zones (<i>Kawasan Ekonomi Khusus</i> – “KEK”), Bonded Storage Areas (<i>Tempat Penimbunan Berikat</i> – “TPB”), Free Trade Zones and Free Ports (<i>Kawasan Perdagangan Bebas dan Pelabuhan Bebas</i> – “KPBPB)”</p>	<p>Entries of TPT into KPBPB, the importation of TPT into KEK and the entry of TPT into TPB are not currently subject to any import policies and/or Regulations in the form of mandatory PI, V/PT and/or destination port provisions.</p>
	<p>Conversely, said import policies and Regulations will apply to releases of TPT originating from outside customs territory from KPBPB, releases of imported TPT from KEK for subsequent use and/or releases of TPT from TPB to other locations within the relevant customs area for subsequent use.</p>
<p>Exemptions</p>	<p>Imports may be exempted from the aforementioned import policies and Regulations if they are conducted for any of the following purposes (collectively referred to as “General Exemptions”):</p> <ol style="list-style-type: none"> 1. Imports that are intended for non-commercial purposes, which may be granted to Importers who are able or unable to secure Business Identification Numbers (<i>Nomor Induk Berusaha</i> – “NIB”) that function as API; and 2. Imports that are intended for commercial purposes, which may be granted to Importers who are able to secure an NIB which have validity as API.

	<p>Moreover, such exemptions also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of TPT from KPBPB to other places within customs territory, with the exception of batik textiles and batik-patterned TPT; 2. Releases of TPT from KEK and TPB to other places within customs territory; and/or 3. Imports of TPT in the form of batik textiles and batik-patterned TPT, ready-to-wear clothing and clothing accessories, as well as other finished textile goods, as part of import facilities for export purposes under the exemption scheme (“Import Facilities”). <p>In terms of the exemptions outlined above, the Director-General, acting on behalf of the Minister, will instead issue a Certificate (<i>Surat Keterangan</i> – “SK”).</p>
Importer Obligations and Sanctions	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers holding a PI and an SK must submit import realization reports, regardless of whether an import has been carried out or not; and 2. Importers holding an LS who have completed their import activities must also submit realization reports. <p>Non-compliance with any of these reporting obligations may lead to the imposition of administrative sanctions.</p>

Regulation 17/2025 also revises several provisions that previously featured under the Appendices to Regulation 36/2023, some of which are summarized in the following table:

Goods Type	Remarks
Textiles, Carpets and Other Textile Floor Coverings	In comparison with Regulation 36/2023, which stipulated that the maximum validity period of PI was one year, Regulation 17/2025 now

	<p>differentiates between validity periods as follows:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the commodity balance (<i>Neraca Komoditas</i> – “NK”) (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the relevant importer stating that the goods in question had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
	<p>Regulation 17/2025 also stipulates that the issuance of any new PI for textiles, carpet and other textile floor coverings will result in the revocation of any existing valid PI.</p>
	<p>Moreover, Regulation 17/2025 no longer features the following import categories in any detail, as previously outlined under Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Imports for use by government agencies/state institutions and/or in the public interest; 2. Goods for sporting purposes, as imported by national sports organizations or sports committees; 3. Goods that will be used for research and scientific development purposes; 4. Goods for use by foreign diplomatic missions and their officials stationed in Indonesia; 5. Goods for use by international bodies and their officials stationed in Indonesia; and

	<p>6. Goods that are imported by API-P holders who have been issued official Decrees by the Ministry of Finance recognizing them as Authorized Economic Operators (“AEO”) and/or designating them as Main Customs Partners with active status.</p> <p>However, Regulation 17/2025 introduces several new import categories, as follows:</p> <ol style="list-style-type: none"> 1. Samples, research and/or product development goods not intended for trade; 2. Goods for exhibition purposes; and 3. Promotional goods.
<p>Batik Textiles and Batik-Patterned Textile Products</p>	<p>Applies the same adjustment as applies to textiles, carpets and other floor coverings regarding the PI validity period.</p>
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transport prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.</p>
	<p>Clarifies that importers may only hold one active PI for Batik Textiles and Batik-Patterned Textile Products (API-P or API-U) during a single period.</p>
	<p>Regulation 17/2025 no longer features the following import categories in any detail, as previously outlined in Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods for research and scientific development;

	<ol style="list-style-type: none"> 2. Goods that are imported directly by foreign diplomatic missions and their officials stationed in Indonesia; 3. Goods that are imported directly by international organizations and their officials stationed in Indonesia; 4. Goods that take the form of grants, gifts or donations for religious worship; for charitable, social or cultural purposes; or for disaster relief. <p>However, it should be noted that Regulation 17/2025 has introduced the following new import categories:</p> <ol style="list-style-type: none"> 1. Goods for exhibition purposes; and 2. Promotional goods.
Other Finished Textile Goods	Applies the same validity period adjustment as applies to textiles, carpets and other floor coverings.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transport prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
	<p>Regulation 17/2025 no longer features the following import categories in any detail, as previously outlined under Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods to meet the needs of government agencies/state institutions and/or the public interest, as imported independently; 2. Goods for automotive sporting purposes; 3. Goods for sporting purposes that are imported by national sports organizations or national sports committees;

	<ol style="list-style-type: none"> 4. Goods for research and scientific development purposes; 5. Goods that are imported directly by foreign diplomatic missions and their officials stationed in Indonesia; 6. Goods that are imported directly by international institutions and their officials stationed in Indonesia; and 7. Goods that take the form of grants, gifts or donations for religious worship; for charitable, social or cultural purposes; or for disaster relief. <p>However, Regulation 17/2025 introduces several new import categories, as follows:</p> <ol style="list-style-type: none"> 1. Samples, research and/or product development goods not intended for trade; 2. Goods for exhibition purposes; and 3. Promotional goods.
<p>Ready-to-Wear Clothing and Accessories</p>	<p>Regulation 17/2025 amends one of the PI requirements, which previously required an annual import plan, as outlined under Regulation 36/2023, to now require data in the form of technical considerations issued by the Ministry of Industry, in cases where NK have not yet been determined.</p>
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transport prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.</p>
	<p>Regulation 17/2025 no longer features the following import categories in any detail, as previously outlined under Regulation 36/2023:</p>

	<ol style="list-style-type: none"> 1. Goods for use by government agencies/state institutions and/or in the public interest, as imported independently; 2. Goods for automotive sporting purposes; 3. Goods for sporting purposes that are imported by national sports organizations or national sports committees; 4. Goods intended for research and scientific development purposes; 5. Goods that are imported directly by foreign diplomatic missions and their officials stationed in Indonesia; 6. Goods that are imported directly by international institutions and their officials stationed in Indonesia; 7. Goods that take the form of grants, gifts or donations for religious worship; for charitable, social or cultural purposes; or for disaster relief. <p>However, Regulation 17/2025 has now introduced the following new import categories:</p> <ol style="list-style-type: none"> 1. Samples, research and/or product development goods not intended for trade; 2. Goods for exhibition purposes; 3. Promotional goods; and 4. Sample goods intended for the purpose of securing Certificates of Product Use of the Indonesian National Standard Mark (<i>Sertifikat Produk Penggunaan Tanda Standar Nasional Indonesia</i> – “SPPT SNI”).
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II. Agricultural and Livestock Products

Regulation of the Minister No. 18 of 2025 on Import Policy and Provisions on Agricultural and Livestock Products (“**Regulation 18/2025**”)

Aspect	Remarks
Types of Commodities	<p>Imports of agricultural and livestock goods that are controlled under Regulation 18/2025 include:</p> <ol style="list-style-type: none"> 1. Animals and animal products; 2. Rice (i.e. for general needs, as imported by State-Owned Enterprises (<i>Badan Usaha Milik Negara</i> – “BUMN”) that hold API-U; for other needs, as imported by an API-P holder; and to meet other needs, as imported by BUMN that hold API-U); 3. Sugar; 4. Corn; 5. Garlic; and 6. Horticultural products.
Import Requirements	<p>For specific types of HS Codes and goods descriptions, importers are required to secure PI prior to the relevant goods entering customs areas. Furthermore, imports that involve specific HS Codes and goods descriptions will also be subject to the V/PT obligation.</p>
Entries and Release of Goods into and from KEK, TPB and KPBPB	<p>Entry of goods from outside the customs area into KPBPB, imports of goods into KEK, and/or entry of goods in the form of animals and animal products, corn, as well as rice for other needs by an API-P holder into TPB are currently not subject to import policies and regulations (i.e. securing of PI and/or V/PT).</p>
	<p>Conversely, import policies and regulations will apply to releases of goods originating from outside customs areas from KPBPB, releases of imported goods for use from KEK and/or releases of goods for import purposes for use from TPB to other locations within customs areas.</p>
Exemptions	<p>In addition to General Exemptions, exemptions to the requirement to secure PI and/or V/PT also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of certain goods (i.e. animals and animal products, rice for other needs by an API-P holder and corn) from KPBPB, KEK and TPB to other places within customs areas;

	<ol style="list-style-type: none"> Imports of certain goods (i.e. sugar, rice for general needs by BUMN holding API-U, garlic and horticultural products) to TPB; and Imports of sugar, as part of official Import Facilities. <p>In this regard, the Director-General will issue SK for the exemptions outlined above.</p>
Importer Obligations and Sanctions	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> Importers holding a PI and an SK must submit import realization reports, regardless of whether the import has been completed or not; Importers holding PI for specific HS Codes and goods descriptions must also submit distribution realization reports; and Importers holding LS who have completed their import activities must also submit realization reports. <p>Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p>

Regulation 18/2025 also revises several provisions that previously featured under the framework of Regulation 36/2023, some of which are summarized in the table below:

Goods Type	Remarks
Animals and Animal Products	<p>In comparison with Regulation 36/2023, which set a maximum PI validity of one year or in line with a recommendation issued by the Ministry of Agriculture if the NK had not been determined, Regulation 18/2025 now differentiates between validity periods as follows: The PI validity period will follow the validity of the NK (if an NK has been determined); or</p> <ol style="list-style-type: none"> The PI validity period will adhere to the recommendation period set by the Ministry of Agriculture (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for</p>

	<p>the extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.</p>
	<p>Regulation 18/2025 adds a new PI requirement for imports of processed animal products for the market testing of imports from outside customs areas, KPBPB, KEK and TPB into the domestic marketplace, in the form of a technical consideration issued by the Ministry of Industry. Additionally, Regulation 18/2025 stipulates that relevant importers may only import BTP for a maximum of two years for the same commodity type.</p>
	<p>Adds 14 HS codes that specifically relate to animals and animal products to the list of commodities subject to post-border supervision, as part of strategic foodstuffs under the national corruption prevention strategy. These include: 1) 01.02 live cattle; 2) 01.05 live poultry such as chickens (<i>gallus domesticus</i>), ducks, geese, turkeys, and guinea fowl; 3) 02.01 fresh or chilled beef; and so forth.</p>
Rice	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 18/2025 now differentiates between the following validity periods:</p> <p>The PI validity period will follow the validity of the NK (if an NK has been determined); or</p> <ol style="list-style-type: none"> 1. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the relevant goods.</p>
	<p>The import categories that covered goods for research and product development purposes, as previously featured under Regulation 36/2023, have now been amended to include</p>

	sample goods, goods for research and/or product development purposes that are not intended for commercial use.
Sugar	<p>In comparison with Regulation 36/2023, which set a maximum PI validity of one year, Regulation 18/2025 now differentiates the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or 2. The PI validity period will adhere to the recommendation period set by the Ministry of Industry (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.
	The import categories that covered goods for research and product development purposes, as previously set under Regulation 36/2023, have now been amended to include sample goods and goods intended for research and/or product development purposes that are not intended for commercial use.
Corn	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 18/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the

	expiration of the relevant PI, along with the reason for the delay in the arrival of goods.
	The import categories that covered goods for research and product development purposes, as previously set under Regulation 36/2023, have now been amended to include sample goods and goods intended for research and/or product development purposes that are not intended for commercial use.
	HS Code 10.05 (corn suitable for human consumption used as industrial raw material and animal feed) has now been added to the list of commodities subject to post-customs clearance (post-border) supervision under the strategic foodstuffs category as part of the national strategy for the prevention of corruption.
Garlic	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 18/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity follows the NK period (if an NK has been determined); or 2. The PI is valid for a maximum of one calendar year (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.
	The import categories that covered goods for research and product development purposes, as previously set under Regulation 36/2023, have now been amended to now include sample goods and goods intended for research and/or product development purposes that are not intended for commercial use.
	One HS code has now been added, specifically 07.03 (onions, shallots, garlic, leeks and other types of vegetables, fresh or chilled), to the list of commodities subject to post-customs clearance (post-border) supervision under the

	strategic foodstuffs category as part of the national strategy for the prevention of corruption.
Horticultural Products	The PI validity period, which under Regulation 36/2023 was determined to be a maximum of one calendar year if an NK had been determined, has now been adjusted to also include a maximum of one year if an NK has not been determined.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.
	The exemption category that, under Regulation 36/2023, covered goods for research and product development purposes, has now been amended to include sample goods, and goods intended for research and/or product development purposes that are not intended for commercial use.

III. Salt and Fisheries Commodities

Regulation of the Minister No. 19 of 2025 on Import Policy and Provisions on Salt and Fisheries Commodities (“**Regulation 19/2025**”)

Aspect	Remarks
Types of Commodities	Imports of salt and fisheries commodities that are regulated under Regulation 19/2025 include: <ol style="list-style-type: none"> 1. Salt; 2. Pearls; 3. Broodstock (<i>calon induk</i>), parent stock, fish seeds and/or pearl nuclei; and 4. Fisheries products.
Import Requirements	For specific types of HS Codes and goods descriptions, importers are required to secure PI before the relevant commodities will be permitted to enter customs areas. Furthermore, said specific HS Codes and goods descriptions will also be subject to the V/PT obligation.

<p>Entry and Release of Goods into and from KEK, TPB and KPBPB</p>	<p>Entries of commodities from outside customs areas into KPBPB, imports of commodities into KEK and/or entries of commodities into TPB are not yet subject to any import policies and Regulations (i.e. securing of PI or V/PT and/or adherence with provisions at destination ports).</p>
	<p>However, said import policies and provisions will instead apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of commodities originating from outside customs areas from KPBPB into customs areas; 2. Releases of the imported commodities from KEK for use within customs areas; and 3. Releases of commodities from TPB that are intended for use within customs areas.
<p>Exemptions</p>	<p>In addition to various General Exemptions, exemptions to import policies and Regulations also apply to releases of commodities from KPBPB, KEK and TPB to other places within customs areas.</p> <p>In this regard, the Director-General, acting on behalf of the Minister, will issue SK in line with the exemption conditions outlined above.</p>
	<p>Specifically, import of commodities as part of official Import Facilities will also be exempted from PI and V/PT requirements.</p>
<p>Importer Obligations and Sanctions</p>	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers holding a PI and an SK must submit import realization reports, regardless of whether the import has been completed or not; and 2. Importers holding an LS who have completed their import activities must also submit realization reports. <p>Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p>

Regulation 19/2025 has also revised several provisions that were previously set out under the Appendices to Regulation 36/2023, some of which are summarized in the table below:

Goods Type	Remarks
Salt	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 19/2025 now differentiates between validity periods, as follows:</p> <p>The PI validity period will follow the validity of the NK (if an NK has been determined); or</p> <ol style="list-style-type: none"> 1. The PI validity period will be set at a maximum of one year (if the NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.</p>
Pearls	<p>In comparison with Regulation 36/2023, Regulation 19/2025 no longer features any new PI requirements, PI amendments, extensions, validity periods, extension provisions or other provisions for pearls.</p>
Broodstock, Parent Stock, Fish Seeds and/or Pearl Nuclei	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 19/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).

	<p>The PI extension requirement has now been revised, as previously noted. Additionally, Regulation 19/2025 stipulates that if an NK has not been established, then the PI validity for non-World Organisation for Animal Health (WOAH) countries (for both API-P and API-U holders) will follow the validity of the relevant verification report, recommendation or technical consideration issued by the Ministry of Marine Affairs and Fisheries.</p>
<p>Fisheries Products</p>	<p>Import categories for goods intended for government agencies or to serve the public interest, as self-imported by relevant institutions, have now been removed. Instead, Regulation 19/2025 introduces two new exemption categories, specifically goods intended for research and scientific development purposes and goods intended for exhibition purposes.</p>
	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 19/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for the extension, as supported by information on the delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of goods.</p>
	<p>The import categories for goods intended for government agencies or to serve the public interest, as self-imported by relevant institutions, have now been removed.</p>

IV. Chemicals, Hazardous Materials and Mining Materials

Regulation of the Minister No. 20 of 2025 (“**Regulation 20/2025**”) on Import Policy and Provisions for Chemicals, Hazardous Materials and Mining Materials (collectively referred to as “**Materials**”)

Aspect	Remarks
Types of Commodities	<p>Imports of Materials that are addressed under Regulation 20/2025 include:</p> <ol style="list-style-type: none">1. Lubricant raw materials;2. Clinker and cement;3. Rough diamonds;4. Non-pharmaceutical precursors;5. Crude oil and natural gas;6. Nitrocellulose (“NC”);7. Explosives for commercial industry;8. Ozone-depleting substances (“ODS”);9. Hazardous materials (<i>Bahan Berbahaya</i> – “B2”);10. Hydrofluorocarbons (“HFC”); and11. Certain chemicals (<i>Bahan Kimia Tertentu</i> – “BKT”).
Import Requirements	<p>PI must be secured for imports of all types of Materials, alongside IT/IP for Materials with specific HS Codes, prior to any such Materials entering customs areas. Furthermore, imports involving specific HS Codes and goods descriptions may be subject to the V/PT obligation.</p>
Entry and Release of Goods into and from KEK, TPB, and KPBPB	<p>Entries of the following goods into TPB, KEK or KPBPB from outside customs areas are not currently subject to any import policies or Regulations (i.e. the requirement to secure PI and IT/IP, V/PT and/or adherence to destination port provisions):</p> <ol style="list-style-type: none">1. Lubricant raw materials;2. Clinker and cement;3. Crude oil and natural gas; and

	<p>4. BKT.</p> <p>At KPBPB Sabang specifically, import Regulations and policies will not apply to the entry of any materials from outside customs areas.</p> <p>However, it should be noted that the following goods <i>are</i> now subject to import requirements and Regulations when entering TPB, KEK or KPBPB from outside customs areas:</p> <ol style="list-style-type: none"> 1. Rough diamonds; 2. Non-pharmaceutical precursors; 3. NC; 4. Explosives for commercial industry; 5. ODS; 6. Hazardous materials; and/or 7. HFC.
<p>Exemptions</p>	<p>In addition to General Exemptions, exemptions from import policies and Regulations also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of goods such as lubricant raw materials, clinker and cement, crude oil and natural gas, and/or certain chemicals from KPBPB, KEK or TPB into other areas within customs areas; and/or 2. Entries or imports of non-pharmaceutical precursors and/or hazardous materials into KPBPB, KEK and TPB as part of official Import Facilities. <p>In this regard, the Director-General will issue SK in line with the exemption conditions outlined above.</p>
<p>Importer Obligations and Sanctions</p>	<p>Importers are required to electronically submit the following types of reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers holding a PI and an SK must submit import realization reports, regardless of whether the import has been completed or not; and

	<p>2. Importers holding an LS who have completed their import activities must also submit realization reports.</p> <p>Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p>
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Regulation 20/2025 also revises several provisions that were previously set out under the Appendices to Regulation 36/2023, some of which are summarized in the table below:

Goods Type	Remarks
Lubricant Raw Materials	<p>Regulation 20/2025 no longer features in detail the following import categories, as previously outlined under Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods for research and scientific development purposes; 2. Sample goods not intended for commercial use; and 3. Goods to meet the needs of government institutions/agencies and/or to meet the public interest, as imported directly by the institution/agency concerned. <p>However, Regulation 20/2025 has now introduced the following new categories:</p> <ol style="list-style-type: none"> 1. Goods for research and scientific development purposes; and 2. Sample goods that are not intended for commercial use.
Clinker Cement and Cement	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 20/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or

	<p>2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).</p>
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
Rough Diamonds	<p>In comparison with Regulation 36/2023, which stipulated a maximum PI validity period of one year, Regulation 20/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity period will follow the validity of the NK (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
Non-Pharmaceutical Precursors	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
	<p>Changes the requirement provisions from support/recommendation letters from relevant ministries/agencies to product research or development letters from importers.</p>
Crude Oil and Natural Gas	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 20/2025 now differentiates between the following validity periods:</p>

	<ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or 2. The PI validity period will be set at a maximum of one year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
	<p>The import category previously titled, “Goods for Automotive Sports Purposes” under Regulation 36/2023 has now been revised under Regulation 20/2025 to, “Goods for Research and Product Development Purposes”.</p>
NC	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
	<p>Regulation 20/2025 no longer regulates import policy and provisions on NC Imports, as previously outlined under Regulation 36/2023.</p>
Explosives for Commercial Industry	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>

	Regulation 20/2025 also no longer governs import policies on explosives, as previously set out under Regulation 36/2023.
ODS	No major changes.
B2	<p>Previously, Regulation 36/2023 stipulated that all PI validity periods were limited to one year or followed the validity of recommendations and V/PT. Regulation 20/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. IT B2 are valid for up to three calendar years from their dates of issuance; 2. IP B2 are valid for as long as the relevant importers engage in B2 import activities; 3. Amendments to IT B2 will remain valid for the remaining period of the original IT B2; and 4. Amendments to IP B2 will remain valid for as long as importers engage in B2 import activities.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
	The import category previously titled, “Goods for Scientific Research and Development” under Regulation 36/2023 has now been revised under Regulation 20/2025 to, “Goods for Research and Product Development Purposes”.
HFC	<p>In comparison with Regulation 36/2023, which set a maximum PI validity of one year, Regulation 20/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or

	2. A maximum of one calendar year (if an NK has not been determined).
Certain Chemicals	The “Goods for Scientific Research and Development” import category has now been revised to “Goods for Research and Product Development Purposes”.

V. Electronic Goods and Telecommunications

Regulation of the Minister No. 21 of 2025 on Import Policy and Provisions on Electronic and Telecommunications Goods (“**Regulation 21/2025**”)

Aspect	Remarks
Types of Commodities	Imports of electronic and telecommunications goods that are regulated under Regulation 21/2025 include: <ol style="list-style-type: none"> 1. Multifunction color machines, color photocopiers and color printers; 2. Cellphones, handheld computers and tablet computers; 3. Electronic goods (i.e. electronics based on cooling systems and electronics not based on cooling systems); and 4. Refrigerated goods (cooling-based goods).
Import Requirements	Imports of goods with specific HS Codes and goods descriptions must have IT and/or PI secured for them before said goods may enter customs areas. Furthermore, specific HS Codes and goods descriptions may also be subject to the V/PT obligation.
Entry and Release of Goods into and from KEK, TPB and KPBPB	Entries of the following goods into TPB, KEK and/or KPBPB from outside customs areas are currently not subject to any import policies and Regulations (i.e. IT and/or PI, V/PT and/or destination port provisions): <ol style="list-style-type: none"> 1. Multifunction color machines, color photocopiers and color printers;

	<ol style="list-style-type: none"> 2. Cellphones, handheld computers and tablet computers; 3. Electronics that are not based on cooling systems. <p>For KPBPB Sabang specifically, import Regulations and policies do not apply to the entry of any electronic and telecommunications goods from outside customs areas.</p> <p>Conversely, the following goods <i>are</i> now subject to import requirements and Regulations when entering TPB, KEK and/or KPBPB from outside customs areas:</p> <ol style="list-style-type: none"> 1. Goods based on cooling systems and/or 2. Electronics based on cooling systems.
<p style="text-align: center;">Exemptions</p>	<p>In addition to the General Exemptions, exemptions from import policies and Regulations also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of electronic and telematics goods, such as multifunction color machines, color photocopiers, color printers, cellphones, handheld computers and tablet computers, as well as electronics not based on cooling systems from KPBPB, KEK, and TPB to other places within customs areas; and/or 2. Import or entry of the same types of goods as part of Import Facilities. <p>In this regard, the Director-General will issue an SK for the exemption conditions outlined above.</p>
<p style="text-align: center;">Importer Obligations and Sanctions</p>	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers who hold PI and SK must submit import realization reports, regardless of whether the import has been completed or not; and 2. Importers who hold LS and who have completed their import activities must also submit realization reports.

	Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.
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Regulation 21/2025 also revises several provisions that previously featured under the Appendices to Regulation 36/2023, some of which are summarized in the following table:

Goods Type	Remarks
Multifunction Color Printers, Color Photocopiers and Color Printers	In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 21/2025 now differentiates between the following validity periods: <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or 2. The PI will remain valid for a maximum of one calendar year (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Cellphones, Handheld Computers and Tablet Computers	The validity period of PI has now been revised to match the NK (if determined) or a maximum of one calendar year otherwise.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.

	<p>If an NK has not been set, then a certificate of telecommunications tools and devices will no longer be required and instead only IT and Product Registration Marks (<i>Tanda Pendaftaran Produk</i> – “TPP”) will be needed.</p> <p>Regulation 21/2025 no longer features the following import categories previously outlined under Regulation 36/2023 in any detail:</p> <ol style="list-style-type: none"> 1. Goods for use by government agencies/state institutions and/or in the public interest and that are imported independently; 2. Goods for automotive sporting purposes; and 3. Goods for sporting purposes that are imported by national sports organizations or national sports committees. <p>However, Regulation 21/2025 introduces the following new categories:</p> <ol style="list-style-type: none"> 1. Goods as grants, gifts or gifts for the purposes of public worship; charitable, social or cultural purposes; or for the purpose of natural disaster relief; 2. Goods for exhibition purposes; 3. Goods for the purposes of museums and zoos, and goods for nature conservation; 4. Test sample goods that are used to secure SPPT-SNI; 5. Sample goods and goods for research and/or product development purposes that are not for sale; and 6. Sample goods for goods certification purposes. <p>In addition, additional provisions are set out in the information section regarding electronics that are not exempt from the LS provisions.</p>
<p>Electronics</p>	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 21/2025 now differentiates between the following validity periods:</p>

	<ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or 2. The PI will remain valid for a maximum of one calendar year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
	<p>A new provision has been added on V/PT implementation, which states that said implementation can be conducted abroad, specifically at the following locations:</p> <ol style="list-style-type: none"> 1. Country of loading; 2. Port of loading; or 3. Country of origin of goods.
	<p>Regulation 21/2025 no longer features in any detail the following import categories, as previously outlined under Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods for use by government agencies/state institutions and/or in the public interest that are imported independently; 2. Goods for automotive sporting purposes; and 3. Goods for sporting purposes, as imported by national sports organizations or sports committees. <p>However, Regulation 21/2025 introduces the following new categories:</p> <ol style="list-style-type: none"> 1. Goods for scientific research and development purposes; 2. Goods as grants, gifts or gifts for the purposes of public worship; charitable, social or cultural

	<p>purposes; or for the purpose of natural disaster relief;</p> <ol style="list-style-type: none"> 3. Goods of representatives of foreign countries and their officials during periods of duty in Indonesia; 4. Goods for the purposes of international bodies and their officials during periods of duty in Indonesia; 5. Goods for the purposes of museums and zoos, and goods for nature conservation; 6. Goods for the special needs of persons with disabilities; and 7. Goods that are imported by the owning company (API-P) that will be used as capital goods, raw materials and/or supporting materials in relation to relevant industries. <p>Furthermore, a number of additional provisions address output exemptions in the form of the fulfillment of V/PT provisions, as well as additional provisions within the information section regarding electronics that are not exempted from LS provisions.</p> <p>There are also various new provisions set out under Regulation 21/2025 that address electronic refrigeration-based systems and that stipulate provisions that are applicable to PI and ports of destination, as well as various other provisions.</p>
<p>Refrigerated Goods (<i>Barang Berbasis Sistem Pendingin</i>)</p>	<p>Regulation 21/2025 does not feature any provisions on import policies and Regulations on imports of refrigeration-system-based goods, as previously set out under Regulation 36/2023.</p> <p>Regulation 21/2025 introduces several new import categories as follows:</p> <ol style="list-style-type: none"> 1. Goods used for scientific research and development purposes; 2. Goods as grants, gifts or gifts for the purposes of public worship; charitable, social or cultural purposes; or for the purpose of natural disaster relief; 3. Goods of representatives of foreign countries and their officials during periods of duty in Indonesia;

	<ol style="list-style-type: none"> 4. Goods for the purposes of international bodies and their officials during periods of duty in Indonesia; 5. Goods for museums and zoos, as well as goods for nature conservation; and 6. Goods for the special needs of persons with disabilities.
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VI. Certain Industrial Goods

Regulation of the Minister No. 22 of 2025 on Import Policy and Provisions on Certain Industrial Goods (“**Regulation 22/2025**”)

Aspect	Remarks
Types of Commodities	<p>Imports of certain industrial goods that are regulated under Regulation 22/2025 include:</p> <ol style="list-style-type: none"> 1. Iron or steel, alloy steel and their derivative products; 2. Tires; 3. Semi-finished hand tools; 4. Ceramics; 5. Flat glass and safety glass; 6. Saccharin, cyclamate and alcohol-containing fragrance preparations; 7. Raw materials for alcoholic beverages; 8. Downstream plastics; 9. Valves.
Import Requirements	<p>For specific HS Code and goods descriptions, importers are required to secure PI before commodities enter customs areas. Furthermore, said specific HS Codes and goods descriptions will also be subject to the V/PT obligation.</p>
Entry and Exit of Goods into and from KEK, TPB and KPBPB	<p>The entry of industrial goods into KPBPB and/or imports of certain goods into KEK from outside customs areas, as well as imports into TPB, are not currently subject to any import policies and Regulations (i.e. securing of PI and V/PT and/or adherence to provisions on designated port).</p>

	Conversely, import policies and Regulations will apply to releases of goods originating from outside customs areas from KPBPB and KEK for importation for use, including from TPB to other places within customs areas.
Exemptions	<p>In addition to General Exemptions, exemptions from import policies and regulations also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of specific industrial goods from KPBPB, KEK and TPB to other places within customs areas; and 2. Imports of ceramics, as part of Import Facilities. <p>In this regard, the Director-General will issue SK in line with the exemption conditions outlined above.</p>
Importer Obligations and Sanctions	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers who hold PI and SK must submit import realization reports, regardless of whether said imports have been completed or not; and 2. Importers who hold LS and who have completed their import activities must also submit realization reports. <p>Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p>

Regulation 22/2025 also revises several provisions that previously featured under the Appendices to Regulation 36/2023, some of which have been summarized in the table below:

Goods Type	Remarks
Iron or Steel, Alloy Steel and Their Derivative Products	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the

	expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
	The exemption for goods imported independently by government agencies for public interest purposes under Regulation 36/2023 has now been removed.
	A new provision sets value and/or quantity limits of no more than 5 PCE or 100 KGM per Certificate of Explanation submission.
	<p>Regulation 22/2025 no longer features in detail any of the following import categories, as previously outlined in Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods for public use by government agencies; 2. Goods for diplomatic missions and their officials in Indonesia; 3. Goods for international organizations and their officials in Indonesia. <p>However, Regulation 22/2025 introduces the following new import categories:</p> <ol style="list-style-type: none"> 1. Goods that are shipped via postal services; and 2. Test samples for SPPT-SNI certification.
Tires	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 22/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity follows the NK period (if an NK has been determined); or 2. The PI will remain valid for a maximum of one calendar year (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the

	expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
	<p>Regulation 22/2025 no longer features the following import categories in any detail, as previously outlined under Regulation 36/2023:</p> <ol style="list-style-type: none"> 1. Goods for public use that are imported by government agencies; 2. Goods for use by diplomatic missions and their officials; 3. Goods for use by international organizations and their officials; 4. Goods for sporting purposes that are imported by national sports organizations; and 5. Goods for scientific research and development. <p>However, the new framework introduces the following new categories:</p> <ol style="list-style-type: none"> 1. Goods that are shipped via postal services; 2. Test samples for SPPT-SNI certification; and 3. Goods for product research and development.
Semi-Finished Hand Tools	The previous restriction set under Regulation 36/2023, which didn't allow exemptions for non-commercial imports undertaken by API holders, has now been removed.
Ceramics	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Flat Glass and Safety Glass	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the

	expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Saccharin, Cyclamate and Alcohol-Containing Fragrance Preparations	The exemption that was previously available for government and public-interest imports has now been removed.
Raw Materials for Alcoholic Beverages	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 22/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or 2. The PI validity will be set at a maximum of one calendar year (if an NK has not been determined).
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Downstream Plastics	The exemption for government and public-interest imports has been removed.
Valves	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
	The category of goods imported by government agencies in the public interest has now been removed.

VII. Consumer Goods

Regulation of the Minister No. 23 of 2025 on Import Policy and Provisions on Consumer Goods (“**Regulation 23/2025**”)

Aspect	Remarks
Types of Commodities	<p>Imports of consumer goods that are regulated under Regulation 23/2025 include:</p> <ol style="list-style-type: none">1. Food and beverages;2. Traditional medicines and health supplements;3. Cosmetics and household health supplies;4. Toys;5. Bags;6. Alcoholic beverages (i.e. alcoholic beverages for consumption whose sales are subject to tax and that are only intended for distribution to other places within customs areas (duty paid), as well as alcoholic beverages for consumption whose sales are not subject to tax and that are only intended for distribution to duty-free shops (duty not paid), and other types of alcoholic beverages);7. Footwear; and8. Two-wheeled and three-wheeled bicycles.
Import Requirements	<p>Only imports of alcoholic beverages require importers to secure IT and/or PI prior to said goods entering customs areas. Meanwhile, consumer goods other than alcoholic beverages with certain HS Codes and goods descriptions may be subject to the V/PT obligation.</p>
Entry and Release of Goods into and from KEK, TPB and KPBPB	<p>Entries of consumer goods into KPBPB and/or imports of consumer goods into KEK from outside customs territory are not yet subject to any import policies and Regulations (i.e. IT and/or PI, V/PT and/or destination port provisions). This also applies to imports of the following goods into TPB:</p> <ol style="list-style-type: none">1. Food and beverages;2. Traditional medicines and health supplements;3. Cosmetics and household health supplies;4. Toys;5. Bags;6. Footwear; and

	<p>7. Two-wheeled and three-wheeled bicycles</p> <p>It is also important to note that importation of both duty-paid and duty-not-paid alcoholic beverages into other areas within customs territory may only be carried out through Bonded Logistics Centers (<i>Pusat Logistik Berikat</i>/PLB) and must be intended for distribution purposes.</p> <p>Conversely, import policies and Regulations apply to releases of goods originating from outside customs areas from KPBPB, releases of imported goods for use from KEK and releases of goods for use from TPB to other locations within customs areas.</p>
<p>Exemptions</p>	<p>In addition to the General Exemptions, exemptions from import policies and Regulations also apply to the following activities:</p> <ol style="list-style-type: none"> 1. Releases of consumer goods from KPBPB, KEK and TPB to other places within customs areas; and 2. Importation of consumer goods, as part of Import Facilities. <p>In this regard, the Director-General, acting on behalf of the Minister, will issue SK in line with the exemption conditions outlined above.</p>
<p>Importer Obligations and Sanctions</p>	<p>Importers are required to electronically submit the following reports to the Minister:</p> <ol style="list-style-type: none"> 1. Importers who hold PI and SK must submit import realization reports, regardless of whether imports have been completed or not; and 2. Importers who hold LS and who have completed their import activities must also submit realization reports. <p>Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p>

Regulation 23/2025 revises several provisions that were previously set out under the Appendices to Regulation 36/2023, some of which are summarized in the following table:

Goods Type	Remarks
Food and Beverage	Eliminates import categories for goods intended for use by government agencies/state institutions and/or for the public interest that are imported independently, as well as goods for sporting purposes that are imported by the relevant parent sports organizations.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Traditional Medicines and Health Supplements	Eliminates the import categories for goods that are intended for use by government agencies/state institutions and/or in the public interest that are imported independently.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Cosmetics and Household Health Supplies	Eliminates the import categories for goods that are intended for use by government agencies/state institutions and/or in the public interest that are imported independently.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.

Toys	<p>Eliminates the import categories for goods that are intended for use by government agencies/state institutions and/or in the public interest that are imported independently.</p>
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
Bags	<p>Eliminates the following import categories:</p> <ol style="list-style-type: none"> 1. Goods used to meet the needs of government agencies/state institutions and/or for the public interest that are imported independently; 2. Goods for automotive sporting purposes; and 3. Goods for sporting purposes that are imported by parent sports organizations or sports committees, whether imported directly or indirectly by said organizations or committees.
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
Alcoholic Beverages	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 23/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or

	2. The PI validity will be set at a maximum of one calendar year (if an NK has not been determined).
	Imports of alcoholic beverages by holders of Alcoholic Beverage Duty Paid PI (API-U) can only be carried out through Bonded Logistics Centers.
Footwear	Regulation 23/2025 does not feature any detailed provisions that address PI for footwear, as previously featured under Regulation 36/2023.
	<p>Eliminates the following import categories:</p> <ol style="list-style-type: none"> 1. Goods to meet the needs of government agencies/state institutions and/or in the public interest that are imported independently; 2. Goods for automotive sporting purposes; and 3. Goods for sporting purposes that are imported by parent sports organizations or sports committees, whether imported directly or indirectly by said organizations or committees.
	One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.
Two-Wheeled and Three-Wheeled Bicycles	Regulation 23/2025 does not feature any detailed provisions on PI for two-wheeled and three-wheeled bicycles, as previously featured under Regulation 36/2023.
	Eliminates the exemption category for goods intended for use by government agencies/state institutions and/or in the public interest that are imported independently, and goods for sporting purposes that are imported by relevant parent sports organizations.

VIII. Used Goods and Non-Hazardous and Non-Toxic Waste

Regulation of the Minister No. 24 of 2025 (“**Regulation 24/2025**”) on Import Policy and Provisions on Used Goods and Non-Hazardous and Non-Toxic (*Non-Bahan Berbahaya dan Beracun* – “**Non-B3**”) Waste

Aspect	Remarks
Types of Commodities	<p>Imports of used goods and Non-B3 Waste that are addressed under Regulation 24/2025 include:</p> <ol style="list-style-type: none">1. Used Capital Goods (<i>Barang Modal Dalam Keadaan Tidak Baru</i> – “BMTB”);2. Used lithium batteries; and3. Non-B3 Waste as industrial raw materials.
Import Requirements	<p>Imports of used lithium batteries must have IP secured for them, while BMTB and Non-B3 Waste as industrial raw materials must have PI secured for them prior to any such goods entering customs areas. Furthermore, imports of goods with certain specific HS Codes and goods that meet certain descriptions may be subject to the V/PT obligation.</p>
Entry and Release of Goods into and from KEK, TPB and KPBPB	<p>Entries of goods under the following conditions will be subject to import policies and Regulations (i.e. securing of IP or PI, V/PT and/or adherence to provisions that address ports of destination):</p> <ol style="list-style-type: none">1. Entries of goods from outside customs areas into KPBPB;2. Exit of BMTB originating from outside customs areas, which, at the time of entry into KPBPB, had not yet fulfilled the import policy and arrangements;3. Exit of BMTB from KPBPB to other places within customs areas where, at the time of entry into KPBPB, the goods were in a new condition and classified as import-free goods;4. Imports of goods from outside customs areas into KEK;5. Imports of goods from outside customs areas into TPB; and/or

	6. Imports of goods for processing, assembly or installation for export purposes under the Import Facility for Export Purposes exemption.
Importer Obligations and Sanctions	<p>Importers holding an IP and/or PI are required to electronically submit import realization reports, regardless of whether the relevant imports have been completed or not. Any non-compliance with these reporting obligations may lead to the imposition of administrative sanctions.</p> <p>Moreover, it should also be noted that imports of Non-B3 Waste must be completed in line with the following conditions:</p> <ol style="list-style-type: none"> 1. Unpackaged Non-B3 Waste must be transported directly from the relevant port of loading to the designated destination port; or 2. Non-B3 Waste packaged in containers must be transported either directly or by transiting through another port, without any container seals being opened at the transit port, as proven through container numbers and seal numbers issued by surveyors.

As well as regulatory provisions, Regulation 24/2025 also revises several provisions that previously featured under the Appendices to Regulation 36/2023, some of which are summarized in the following table:

Goods Type	Remarks
BMTB	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 21/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or

	<p>2. The PI will remain valid for a maximum of one calendar year (if an NK has not been determined).</p>
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods.</p>
Used Lithium Batteries	<p>Stipulates that an importer may now only hold one valid IP for Used Lithium Batteries during one single period, as issued by each relevant licensing authority.</p>
Non-B3 Waste as Industrial Raw Materials	<p>In comparison with Regulation 36/2023, which set a maximum PI validity period of one year, Regulation 21/2025 now differentiates between the following validity periods:</p> <ol style="list-style-type: none"> 1. The PI validity will follow the NK period (if an NK has been determined); or 2. The PI will remain valid for a maximum of one calendar year (if an NK has not been determined).
	<p>One of the PI extension requirements has been amended from requiring a statement letter explaining the reason for an extension, as supported by information on a delay caused by specific circumstances, to a letter of absolute responsibility from the importer stating that the goods had been loaded onto the means of transportation prior to the expiration of the relevant PI, along with the reason for the delay in the arrival of the goods</p>

Conclusion

The issuance of Regulations 17/2025 to Regulation 24/2025 marks a significant change in Indonesia's management of its import system. In this regard, instead of applying a single set of centralized rules across all types of goods, the government has now introduced different frameworks for different types of goods, based on the relevant risks and needs. Although this reform has resulted in the introduction of multiple Regulations, overall, it remains consistent with the objectives of deregulation by streamlining processes for importers, removing overlapping licensing requirements for certain commodities and placing technical oversight in the hands of relevant sectoral authorities.

With clearer and more targeted rules now in place, the government should be better able to respond to the needs of industry and ongoing international trade concerns. However, while this new regime offers improved legal certainty and reduced procedural complexity in general, its effectiveness will ultimately depend on strong coordination between agencies, as well as uniform implementation and the timely issuance of sharply focused technical guidelines.