

Regulation Summary - September 2025

General Corporate

1. Regulation of the Head of the Batam Free-Trade Zone and Free Port Development Authority No. 5 of 2025 on the Organization of Fundamental Requirement Services, Business Licensing and Business Licensing to Support Business Activities Within the Batam Free-Trade Zone and Free Port

Enforcement Date: 15 August 2025

Summary:

- Following the introduction of Indonesia's most recent framework on Risk-Based Business Licensing (*Perizinan Berusaha Berbasis Risiko* – “**PBBR**”), specifically Regulation of the Government No. 28 of 2025 (“**Regulation 28/2025**”), this new framework now brings the most updated PBBR licensing regime into line with the authority of the Batam Free-Trade Zone and Free Port (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas* – “**KPBPB**”) Development Authority (*Badan Pengusahaan KPBPB Batam* – “**BP Batam**”) and the framework of Regulation 28/2025.
- In light of the above-described licensing alignment, the processing of fundamental requirements (*persyaratan dasar*), business licenses (*Perizinan Berusaha* – “**PB**”) and business licenses to support business activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* – “**PB UMKU**”) will now be implemented digitally through either the Online Single Submission (“**OSS**”) system or the OSS-integrated Indonesia Batam Online Single Submission (IBOSS) system.
- In line with the expanded scope of PBBR sectors set out under the new framework of Regulation 28/2025, this new Regulation now outlines a total of 16 business sectors for which the relevant PB and PB UMKU fall under the authority of the BP Batam (e.g. trade and legal metrology, creative economy and so forth). Moreover, this Regulation also outlines a list of fundamental requirements that have been newly revised and specified under Regulation 28/2025, as follows: 1) Marine Spatial Utilization Conformity (*Kesesuaian Kegiatan Pemanfaatan Ruang Laut/KKPRL*); 2) Environmental Approvals; and 3) Forest Area Utilization Approvals (*Persetujuan Penggunaan Kawasan Hutan/PPKH*). Detailed technical

guidelines that address each of these fundamental requirements are outlined comprehensively under Appendices I - III to this Regulation.

Banking

2. Draft Circular of the Financial Services Authority on Reporting by Sharia Commercial Banks and Sharia Business Units Through the Financial Services Authority Reporting System

Enforcement Date: -

Summary:

- The Draft Circular clarifies that Sharia Commercial Banks (*Bank Umum Syariah* - “**BUS**”), Sharia Business Units (*Unit Usaha Syariah* – “**UUS**”) and Representative Offices of Banks Domiciled Abroad (*Kantor Perwakilan dari Bank yang Berkedudukan di Luar Negeri* – “**KPBLN**”) are required to submit both periodic and incidental reports to the Financial Service Authority (*Otoritas Jasa Keuangan* – “**OJK**”). These reports should be submitted through the OJK’s Online Reporting Application (*Aplikasi Pelaporan Online OJK/APOLO*), which can be accessed at: <https://apolo.ojk.go.id>.
- The mandatory periodic reports are classified as daily, monthly, quarterly, semesterly and annual reports, and are categorized into four information groups, specifically: 1) Financial; 2) Risk and capital; 3) Products and activities; and 4) Main data information. In addition, incidental reports should also be submitted and these also break down into four specific information groups, i.e. supervisory information, institutional matters, business activities and other categories.
- In order to submit the above-outlined reports, each BUS, UUS and KPBLN must appoint an officer who will assume responsibility for the submission of said reports. When appointing a responsible officer, an appointment letter should be submitted offline to the OJK’s data and statistical management unit, while any subsequent changes or amendments that are made should also be reported in this way.

3. Draft Circular of the Financial Services Authority on Conventional Commercial Bank Reporting Through the Financial Services Authority Reporting System

Enforcement Date: -

Summary:

- This Draft Circular outlines the mandatory reporting requirements that must be met by all Conventional Commercial Banks (*Bank Umum Konvensional* – “**BUK**”) and Foreign Bank Representative Offices (*Kantor Perwakilan dari Bank yang Berkedudukan di Luar Negeri* – “**KPBLN**”). Reporting is mandatory if the BUK or KPBLN has to meet certain obligations, meets certain specific criteria and/or engages in certain activities in line with prevailing Laws and Regulations. Meanwhile, BUK and KPBLN must designate an office as an administrator that should then appoint an implementing officer responsible for reporting. Furthermore, the OJK should be notified if any changes are made to this office/officer.
- Reports comprise periodic reports and incidental reports, while the specific types of reports, required data groups and deadlines are further outlined under the Appendix to this Draft Circular. Reports must be submitted electronically through the Financial Services Authority’s (*Otoritas Jasa Keuangan* – “**OJK**”) Online Reporting System (*Aplikasi Pelaporan Online OJK/APOLO*). In this regard, reports will be designated as having been submitted once they have completed a server validation process, as evidenced by the possession of receipts that are issued through the system.
- When it eventually comes into force, this Draft Circular will revoke Circular of the OJK No. 26/SEOJK.03/2020, which bears the same title and which currently addresses similar matters.

Capital Market

4. Joint Decree of the Board of Directors of PT Bursa Efek Indonesia, PT Kliring Penjaminan Efek Indonesia and PT Kustodian Sentral Efek Indonesia No. Kep-00053/BEI/08-2025; KEP-068/DIR/KPEI/08-25; KEP-0029/DIR/KSEI/08-25 on the Revised Fee Policy for Providers of Structured Warrant Liquidity

Enforcement Date: 27 August 2025

Summary:

- Pursuant to the Joint Decree, the transaction fees that are applicable at PT Bursa Efek Indonesia (BEI), the exchange clearing fees that are applicable at PT Kliring Penjaminan Efek Indonesia (KPEI) and the exchange settlement fees that are applicable at PT Kustodian Sentral Efek Indonesia (KSEI) (collectively referred to as “**Transaction Fees**”) for providers of structured warrant liquidity (“**Liquidity Providers**”) have been set at 0.03% of the relevant exchange transaction values. These Transaction Fees comprise the following elements along with their corresponding rates: 1) Exchange transaction fees: 0.018%; 2) Exchange clearing fees: 0.009%; and 3) Exchange settlement fees: 0.003%.

- It should be noted that the Joint Decree exempts Liquidity Providers from the above-outlined Transaction Fees in relation to any transactions that are completed in order to fulfill their structured warrant quotation obligations. This exemption will be calculated on a daily basis and aims to enhance liquidity and encourage exchange members to take on the role of Liquidity Providers.
- Furthermore, any issuers of structured warrants who simultaneously act as Liquidity Providers are entitled to enjoy an incentive in the form of a Transaction Fee billing deduction equal to twice the relevant Transaction Fee for each structured warrant transaction that they execute through the regular market or cash market. This additional incentive will remain available until 27 August 2026 and will be subject to six-monthly reviews, with the possibility that said policy will be discontinued.

5. Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00060/BEI/09-2025 of 2025 on the Revocation of PT Bursa Efek Jakarta Rule No. II-A on Securities Trading

Enforcement Date: 18 September 2025

Summary:

- This Decree repeals and replaces Rule No. II-A (“**Rule II-A**”) as the Appendix to Decree of the Board of Directors (“**BoD**”) of PT Bursa Efek Jakarta (“**BEJ**”) No. Kep-565/BEJ/11-2003 on Securities Trading, along with all of its appendices.
- This revocation has been implemented in response to the merger of BEJ and PT Bursa Efek Surabaya. These two entities have now become PT Bursa Efek Indonesia (“**BEI**”). Based on an evaluation of all provisions set out under Rule II-A, BEI has now addressed matters pertaining to securities trading through the issuance of Rule No. II-A as the Appendix to Decree of the BoD of BEI No. Kep-00003/BEI/04-2025 on Equity Securities Trading.

6. Joint Circular of PT Kliring Penjaminan Efek Indonesia, PT Bursa Efek Indonesia and PT Kustodian Sentral Efek Indonesia No. SE-00005/BEI/09-2025, SE-006/DIR/KPEI/0925 and SE-0002/DIR-EKS/KSEI/0925 of 2025 on Improved Security for Fund Transfers from Customer Fund Accounts (RDN)

Enforcement Date: 16 September 2025

Summary:

- This Joint Circular mandates the rolling out of enhanced security measures for fund transfers that are completed from Customer Fund Accounts (*Rekening Dana Nasabah* – “**RDN**”). These new security measures are

aimed at the directors of stock exchange members, clearing members, securities companies and RDN banks. Under the Joint Circular, holders of PT Kustodian Sentral Efek Indonesia (“**KSEI**”) accounts and RDN banks will be required to comply with specific requirements, in particular concerning the use of host-to-host (“**API**”) connections during fund transfers.

- If KSEI account holders and RDN banks operate existing API connections between the KSEI account holders’ back-office systems and RDN banks’ systems, then they must cease daily use of said connections unless they meet the requirements that are specified under this Joint Circular. Moreover, if KSEI account holders and RDN banks intend to activate API connections, then they must adhere to adequate security standards, while any fund transfers or withdrawals that are completed from RDN banks will be restricted to specific destination account numbers (“**Whitelist**”).
- In addition, RDN banks are required to maintain secure and reliable mechanisms for the management of their Whitelists (including registrations, modifications and deletions). This mechanism should include measures such as approval processes or the use of Multi-Factor Authentication (MFA), which may be managed either internally or externally in line with adequate credential controls.

Employment

7. Regulation of the Minister of Indonesian Migrant Workers Protection/Head of the National Indonesian Migrant Workers Protection Agency No. 16 of 2025 on the Mapping of the Overseas Job Market

Enforcement Date: 26 August 2025

Summary:

- In essence, demand for Indonesian migrant workers (*Pekerja Migran Indonesia* – “**PMI**”) should be mapped in order to identify overseas job market potentials. Said mapping should address at least 19 components, which include: 1) Country of placement; 2) Relevant regulatory frameworks; 3) Organizers of worker placements or employer profiles; 4) Quota of job opportunities; 5) Relevant job sectors and available positions; and so forth. In this regard, the aforementioned mapping of demand for PMI should be implemented in two core phases that break down as follows: 1) Preparation (e.g. drafting of mapping request identification, coordination between relevant stakeholders, gathering of initial and supporting data); and 2) Implementation (e.g. gathering, identification and analysis of PMI demand, drafting of PMI databases and data recapitulation).
- Meanwhile, the mapping of PMI candidate supply aims to provide data on the availability of prospective PMI across various sectors and positions. This

supply mapping should be sourced from the following parties: 1) Educational institutions; 2) Relevant governmental agencies/ministries; and 3) Professional associations. The mapping of PMI candidate supply should address at least 10 components (e.g. name of the agency, relevant sectors, relevant skillsets and so forth) and be implemented in line with the following phases: 1) Preparation (e.g. identification of PMI candidate supply, drafting of identification forms and stipulation of mapping targets); and 2) Implementation (e.g. gathering, identification and analysis of supply data; and the drafting of supply database, maps and data recapitulations).

8. Regulation of the Minister of Indonesian Migrant Workers Protection/Head of the National Indonesian Migrant Workers Protection Agency No. 17 of 2025 on Fees for the Placement of Indonesian Migrant Workers

Enforcement Date: 26 August 2025

Summary:

- In contrast with the previous framework to address this area, i.e. Regulation of the National Indonesian Migrant Workers Protection Agency (*Badan Pelindungan Pekerja Migran Indonesia* – “**BP2MI**”) No. 9 of 2020, as amended by Regulation of the BP2MI No. 1 of 2021 (collectively referred to as “**Regulation 9/2020**”), this new framework has now redefined and reclassified the various expenses required in order to complete the Indonesian migrant workers (*Pekerja Migran Indonesia* – “**PMI**”) placement process (“**Placement Fees**”) into the following categories: 1) Placement preparation fees (e.g. training and certification, company services, local transportation to points of departure, work visas, departure and return tickets and/or accommodation); and 2) Placement-related fees (e.g. medical and psychological examinations, social security, apostille and/or documents required for employment in destination countries).
- Although the above-outlined Placement Fees should be borne by the relevant employers (a directive which is in line with the prohibition on PMI being required to pay their own fees, as originally mandated under Regulation 9/2020) this new Regulation now affirms that certain lines of work may result in the relevant Placement Fees indeed having to be borne by PMI that utilize government or other funding facilities based on the following factors: 1) Relevant regulatory frameworks, including frameworks that are applicable in relevant destination countries; 2) International law; 3) Bilateral, regional and/or multilateral treaties; and/or 4) Cooperation agreements between the organizer of the PMI placement and the relevant employer or business partner.
- Newly featured under this Regulation, PMI Placement Companies (*Perusahaan Penempatan Pekerja Migran Indonesia/P3MI*) are required to outline the applicable components and amounts of the above-mentioned Placement Fees that will have to be borne by PMI and/or employers under relevant placement agreements.

- Upon the enforcement of this Regulation, Regulation 9/2020 was officially repealed and replaced.

9. Regulation of the Minister for the Protection of Indonesian Migrant Workers/Indonesian Migrant Workers Protection Agency No. 18 of 2025 on Technical Guidelines for Community Business Credit for the Placement of Indonesian Migrant Workers

Enforcement Date: 29 August 2025

Summary:

- Indonesian Migrant Workers (*Pekerja Migran Indonesia* – “**PMI**”), as well as prospective PMI and prospective apprentices who are planning to work abroad (collectively referred to as “**Recipients**”) are now eligible to access Community Business Credit (*Kredit Usaha Rakyat* – “**KUR**”) in order to finance their placements in destination countries. In order to qualify for KUR, Recipients must meet certain requirements, including: 1) Must have secured a National Identification Number (*Nomor Induk Kependudukan*/NIK); 2) Must have registered through the Computerized PMI Protection System (*Sistem Komputerisasi Pelindungan PMI* – “**Sisko P2MI**”); and 3) Must have secured a placement-related agreement (e.g. placement agreement, placement cooperation agreement or work agreement).
- KUR is disbursed by financial institutions or cooperatives that have been designated for the disbursement of KUR for PMI placements (“**Disbursers**”). Said Disbursers are authorized to access prospective PMI/PMI data through Sisko P2MI, as well as to evaluate KUR applications. In return, Disbursers are obliged to provide explanations to Recipients regarding KUR disbursement and to report any related disbursement activities to the relevant authorities.
- KUR Disbursement may be carried out directly or through a channeling linkage pattern, with a maximum loan amount of Rp. 100 million and an effective interest rate of 6% per annum. KUR should be used to cover Recipients’ placement expenses, including preparation fees (e.g. training, visas, tickets and accommodation), as well as any placement-related fees (e.g. health checks, social security and travel documents). Loan terms are agreed between Disbursers and Recipients but cannot exceed the duration of a given work agreement or a maximum timeframe of three years.

10. Decree of the Minister of Manpower No. 317 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Processing Industry in the Main Group of Products Derived from Coal and Petroleum Refining Industry Within the Field of Aviation Fuel Quality Management and Control

Enforcement Date: 10 September 2025

Summary:

- Stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the Aviation Fuel (*Bahan Bakar Minyak Penerbangan* – “**BBMP**”) quality management and control sector. The SKKNI are comprehensively outlined under the Appendix to this Decree and will now serve as a reference during the development of national qualification levels, as well as during the implementation of education, training and competency certification.
- Upon its enforcement, this Decree simultaneously revoked Decree of the Minister of Manpower No. 286 of 2016, which addressed similar matters (“**Decree 286/2016**”). In comparison, Decree 286/2016 focused solely on BBMP quality control (handling), while this new Decree has now broadened the overall scope of regulation to include BBMP management and control (planning, evaluation and maintenance of facilities).
- In addition to expanding the regulatory scope, this Decree has also increased the number of competency units from the original 6 to 11 units, which now include: 1) Planning, implementation and supervision of BBMP reception, storage and distribution activities; 2) Implementation of Occupational Health, Safety and Environmental Protection (*Keselamatan, Kesehatan Kerja, dan Lindungan Lingkungan/K3LL*) aspects; 3) Planning, implementation and supervision of facility inspections; 4) BBMP sampling and field testing; and 5) Evaluation of BBMP operational and service management.

Energy

11. Decree of the Minister of Energy and Mineral Resources No. 282.K/MG.01/MEM.M/2025 of 2025 on the Amendment to Decree of the Minister of Energy and Mineral Resources No. 77.K/MG.01/MEM.M/2025 on Certain Natural Gas Users and Certain Natural Gas Prices Within the Field of Electrical Power Supply in the Public Interest

Enforcement Date: 19 August 2025

Summary:

- This Decree stipulates the adjustment of natural gas prices at the plant gate, as well as the allocation of natural gas usage volumes to certain natural gas companies, e.g. PT Bekasi Power, PT Cikarang Listrindo and PT Krakatau Chandra Energi. Details of these adjustments are further outlined in the Appendix to this Decree.

12. Decree of the Minister of Energy and Mineral Resources No. 283.K/MG.01/MEM.M/2025 on Installation and Equipment Standards for Oil-and-Gas Business Activities

Enforcement Date: 19 August 2025

Summary:

- This Decree specifically mandates the application of mandatory Indonesian National Standards (*Standar Nasional Indonesia* – “**SNI**”) in order to ensure the safety of all installations and equipment that are used in relation to oil-and-gas business activities. These mandatory standards may be applied in line with one of the following options: 1) SNI for oil-and-gas business activities along with their reference standards; 2) International Organization for Standardization (“**ISO**”) standards and their references; or 3) Other standards, as further listed under the Appendix to the Decree.
- Furthermore, this Decree introduces a structured and formal approval process for the use of standards not covered under the mandatory SNI or by the designated alternative standards. In this regard, oil-and-gas contractors or license holders may initially propose alternative standards to the Minister of Energy and Mineral Resources (“**Minister**”). After they have subsequently received approval from the Minister through the Director-General of Oil and Gas, the proposed alternative standards may then be applied.

13. Draft Regulation of the Nuclear Energy Regulatory Agency on Business Activities Standards and/or Product/Service Standards and the Organization of Risk-Based Business Licensing Within the Nuclear Energy Sector

Enforcement Date: -

Summary:

- Licensing within the nuclear energy sector is divided into business licensing for business actors and non-business licensing for non-business actors. The scope of licensing covers four subsectors, including: 1) Utilization of ionizing radiation sources; 2) Nuclear and nuclear materials installations; 3) Mining of nuclear minerals; and 4) Sub-sectors that support the electrical power sector.
- Business actors should apply for licenses through the Online Single Submission (OSS) System, which is integrated into the Balis System. Meanwhile, non-business actors should submit their applications directly via the Balis System. It is important to note that certain uses of certain radioactive substances, ionizing radiation sources and consumer goods are exempted from licensing obligations.

- License holders may request clearance determinations for any radioactive materials that have reached a certain clearance level. In this regard, applications must be submitted to the Head of the Nuclear Energy Regulatory Agency accompanied by the results of radiation exposure measurements or surface contamination level measurements, as well as analyses of activity concentrations and/or the quantities of the relevant radionuclides.

Environment

14. Regulation of the Minister of Environment/Head of the Environmental Control Agency No. 7 of 2025 on the Company Performance Rating Assessment Program for Environmental Management

Enforcement Date: 28 August 2025

Summary:

- Membership has now been redesignated from the previous title of Implementing Team (*Tim Pelaksana*) to Assessment Team (“**Assessors**”). The composition of this team has also been revised to encompass district/city-level Assessors working for local government agencies responsible for environmental affairs. In addition, while the team’s previous duties have been retained, a number of new responsibilities have now been introduced, including supervision of performance ratings by provincial and district/city-level Assessors. Furthermore, the overall division of authority between provincial and district/city-level Assessors has now been clarified, with both parties being tasked with evaluating the overall compliance of participants (“**Participants**”) in the Company Performance Rating Assessment Program for Environmental Management (*Program Penilaian Peringkat Kinerja Perusahaan Dalam Pengelolaan Lingkungan Hidup – “Proper”*) and with applicable Laws. Assessors will also assess Participants’ environmental management performances.
- A number of new aspects that relate to various areas, including environmental approvals, peatland ecosystem damage control, mandatory environmental audits, eco-innovation and green leadership have now been introduced. However, it should be noted that various aspects pertaining to transportation infrastructure and mining no longer feature. Several other areas have also been revised, including environmental approvals, wastewater quality compliance, monitoring of air pollution, management of hazardous waste and peatland restoration, among others. These aspects must now be verified in relation to their accuracy and conformity before the relevant parties are ultimately declared compliant or non-compliant as a part of official records. In addition, several assessment aspects have now been specified differently for certain business activities, including biomass

production and activities that are conducted on cultivated peatlands or by peat hydrological units.

- While the various performance ratings categories have been retained, the various assessment fields that form the ranking basis have now been changed in line with the revised aspects. Provisional results will now be communicated to Participants, who are allowed to contest them provided that they supply supporting data. Final rankings will then be established based on these responses. The results will subsequently be submitted to the Proper technical team and the advisory board. A number of revisions have also been made to the ranking conditions that relate to administrative sanctions, the suspension of rankings and the criteria that apply to Participants subject to enforcement, with emphasis now being placed on repeated red ratings and black ratings. Participants' rankings will also now be announced through print and/or electronic media.

15. Regulation of the Minister of Environment/Environmental Control Agency No. 10 of 2025 on the Organization of and Operational Procedures for the Environmental Law Enforcement Agency

Enforcement Date: 28 August 2025

Summary:

- This Regulation outlines the organization of and operational procedures for the country's Environmental Law Enforcement Centres (*Balai Penegakan Hukum Lingkungan Hidup – “Balai Gakkum LH”*), which are defined as Technical Implementation Units (*Unit Pelaksana Teknis/UPT*) that have been tasked with the enforcement of environmental law. As of the present, Balai Gakkum LH comprises five centers which are located in Jambi, Surabaya, Makassar, Banjarmasin and Sorong. Their specific names, locations and working areas, including those of related sections and posts, are detailed under the Appendix to the Regulation.
- The primary task of Balai Gakkum LH is to implement activities that are aimed at reducing disturbances, threats and violations of environmental law. In order achieve this outcome, Balai Gakkum LH performs various functions, including: 1) Development of plans, programmes and budgets; 2) Conducting of inventories and identification of potential pollution, damage, environmental law violations and land fires; 3) Management of complaints and handling of environmental law violations; 4) Supervision of the compliance of permit holders, government approvals and environmental Regulations; 5) Facilitation and resolution of environmental disputes; and so forth.

16. Regulation of the Minister of Environment/Environmental Control Agency No. 11 of 2025 on Wastewater Quality Standards and

Wastewater Treatment Technology Standards for Domestic Wastewater

Enforcement Date: 9 September 2025

Summary:

- Persons in charge of businesses and/or activities (collectively referred to as “**Business Actors**”) that generate domestic wastewater are required to complete domestic wastewater treatments (“**Treatments**”) prior to discharging said wastewater into the environment or utilizing it for primary, supporting or by-product activities in accordance with applicable Laws and Regulations. All Treatments must adhere to Domestic Wastewater Quality Standards (“**Quality Standards**”) and Treatment Technology Standards (“**Technology Standards**”).
- Quality Standards set permissible limits for pollutants prior to any discharge of wastewater into either water or soil. These limits are determined based on certain aspects, including treatment systems, domestic wastewater types and relevant discharge activities. Meanwhile, Technology Standards are based on wastewater discharge activities and daily volumes. Business Actors that produce $\leq 3\text{m}^3/\text{day}$ of wastewater are required to conduct sludge suction, hand over sludge or wastewater to licensed services and utilize standardized technology, with oil and grease separator units being required where applicable.
- Certain types of Business Actors that generate specific volumes of domestic wastewater on a daily basis are required to bring their Environmental Approvals or Statements of Commitment to Environmental Management and Monitoring (*Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan/SPPL*) into line with the updated standards by 9 September 2027.

17.Regulation of the Minister of Environment/Environmental Control Agency No. 12 of 2025 on Wastewater Quality Standards for Textile Businesses and/or Activities

Enforcement Date: 9 September 2025

Summary:

- This Regulation stipulates the obligation to fulfill wastewater quality standards before discharge into water media by textile businesses and/or through textile activities. Upon the enforcement of this Regulation, Article 16A and Appendix XLII of Regulation of the Minister of Environment No. 5 of 2014, which has been amended several times, most recently by Regulation of the Minister of Environment and Forestry No. P.16/MENLHK/SETJEN/KUM.1/4/2019, were simultaneously repealed and replaced.

- Wastewater quality standards can be implemented within wastewater treatment units through the following systems: 1) Separate systems, without their being combined with any wastewater treatments from other activities; or 2) Integrated systems, which combine wastewater from other activities. Provisions that address separate systems are outlined under Appendix I to this Regulation, while provisions on integrated systems are outlined under Appendix II to this Regulation.
- It is important to note that this Regulation requires textile businesses and/or activities for which Environmental Approval and/or Environmental Management and Monitoring Certificates (*Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL*) have already been secured to bring their respective wastewater quality standard policies into line with this new framework by 9 September 2027.

18.Regulation of the Minister of Environment/Environmental Control Agency No. 14 of 2025 on the Status and Condition of the Environment and Responses to Environmental Changes

Enforcement Date: 9 September 2025

Summary:

- This Regulation establishes a new framework for the evaluation of environmental status and conditions, as well as for the formulation of responses to environmental changes. This new framework simultaneously repeals and replaces Regulation of the Minister of Environment and Forestry No. 27 of 2021 on the Environmental Quality Index (*Indeks Kualitas Lingkungan Hidup – “IKLH”*).
- The IKLH is used to measure environmental status and conditions through two specific stages, i.e. planning and implementation. Planning involves determinations of monitoring locations in order to assess the quality of environmental media, as well as determinations of the timing and frequency of sampling or data collections. Meanwhile, implementation comprises index calculations, exposure, index establishment and the reporting and publication of findings via print and/or electronic media.
- Based on the reporting of established index results, the government is mandated to take responsive measures through the following programs at the least: 1) The Clean Rivers Program (for water media); 2) The Blue Sky Program (for air media); 3) The Sustainable Coasts Program (for marine water media); 4) The Green Indonesia Program (for land cover media); 5) The Sustainable Peatlands Program (for peatland media); and 6) The Pro-Biodiversity Program (for biodiversity).

19.Regulation of the Minister of Environment/Environmental Control Agency No. 15 of 2025 on Procedures for the Granting of the Kalpataru Award

Enforcement Date: 22 September 2025

Summary:

- This Regulation stipulates procedures for the granting of the Kalpataru Award by the central government to any individuals and/or community groups (collectively referred to as “**Recipients**”) who have been recognized as having had a pioneering, innovative and tangible impact in relation to environmental protection and management efforts, including through digital-based initiatives. Said Recipients must not currently be subject to any legal proceedings and must have been engaged in the relevant efforts for a minimum period of five consecutive years. While all individuals must be Indonesian citizens, community groups may take the form of associations, foundations or customary law communities, in accordance with provisions set out under applicable Laws and Regulations.
- The Kalpataru Award is granted to Recipients in the form of trophies, certificates, development grants and/or replication assistance at other locations through electronic and/or print media. Furthermore, monitoring and evaluations will be conducted on an annual basis through the administration of the Kalpataru Award and the implementation of Kalpataru replication.

General Financial Services

20. Regulation of the Financial Services Authority No. 19 of 2025 on Ease of Access to Financing for Micro-, Small- and Medium-Scale Enterprises

Enforcement Date: 2 November 2025

Summary:

- This Regulation mandates that commercial banks and rural banks (hereinafter referred to as “**Banks**”) and Non-Bank Financial Institutions (*Lembaga Keuangan Nonbank* – “**LKNB**”), including financing companies, venture-capital companies, microfinance institutions, financial technology peer-to-peer lending services and pawnshops, must all provide ease of access to financing for Micro-, Small- and Medium-Scale Enterprises (“**MSME**”) in ways that make the financing process easy, precise, fast, cheap and inclusive. In order to implement this mandate, Banks and LKNB are required to establish special financing policies, create special financing schemes, accelerate the business processes involved in financing distribution and set reasonable fees for MSME financing.
- Banks and LKNB are also required to operate dedicated units capable of facilitating ease of access to financing for MSME, implementing risk

management and incorporating MSME financing plans into their business plans. In addition, this regulation mandates the development of human resource competencies, encourages partnerships, supports the use of information technology and permits the write-off of bad debts in relation to the provision of ease of access to financing for MSME.

- Any Banks or LKNB that do not provide ease of access to financing for MSME may be subject to the imposition of administrative sanctions that take the form of written warnings or reprimands. Moreover, if a given violation continues after said administrative sanctions have been imposed, then the relevant Bank or LKNB may be subject to the following types of additional administrative sanctions: 1) Prohibition on the issuance of products or the ability to engage in any new activities; 2) Restriction on business activities; 3) Suspension of certain types of business activities; and/or 4) Downgrading of soundness level assessment results.

21. Circular of the Financial Services Authority No. 20/SEOJK.08/2025 on the Publication of Reports on the Handling of Complaints and Complaints Services

Enforcement Date: 1 January 2027

Summary:

- Circular of the Financial Services Authority (*Otoritas Jasa Keuangan – “OJK”*) No. 20/SEOJK.08/2025 (Circular 20/2025) establishes a new, structured framework for consumer complaint services within the financial sector. This new framework will require Financial Services Providers (*Pelaku Usaha Jasa Keuangan – “PUJK”*) to publish simplified complaints procedures, as well as to appoint a Board of Directors member responsible for the submission of reports. This Circular is set to come into effect on 1 January 2027.
- Reports now include a number of new components, such as complaints that escalate into disputes and negative media coverage of products or services, in addition to traditional elements such as types of complaints, resolution status and causes of complaints. In addition, PUJK must provide evidence of publication and also report the submission of their self-assessments.
- Submission procedures follow a tiered electronic system operated by the OJK, with mechanisms being made available for email or offline submissions during system disruptions. Reports will be considered duly submitted once the system issues a notification of completion or when the OJK issues official receipts for offline submissions.

22. Draft Regulation of the Financial Services Authority on Consumer Protection Lawsuits Filed by the Financial Services Authority Within the Financial Services Sector

Enforcement Date: -

Summary:

- The Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) has the authority to file lawsuits as a part of its consumer protection mandate whenever regulatory violations that occur within the financial sector cause material losses. Said lawsuits may be directed at Financial Services Business Actors (*Pelaku Usaha Jasa Keuangan* – “**PUJK**”) who currently possess or who have previously possessed a license issued by the OJK, and/or other parties (e.g. controlling shareholders) who act in bad faith.
- The objective of such lawsuits is to recover assets that belong to affected consumers from the parties responsible or from third parties who are holding said assets in bad faith, and/or to secure compensation for losses that consumers or financial institutions have sustained. It should be noted in this regard that consumers will not have to shoulder any of the fees that are associated with this type of legal process. In cases where compensation is rejected or the consumer cannot be reached, the OJK will transfer the relevant funds to the court or other authorized institution.
- This type of lawsuit follows a structured process and commences with the gathering of Information from PUJK, related institutions, professionals and other relevant parties. This is followed by the publication of a list of verified consumers who are eligible for inclusion in the lawsuit, along with an opt-out mechanism that requires the submission of supporting documents. Once filed, if a lawsuit is ultimately granted by the court, then the OJK will notify the relevant consumers of the compensation plan and oversee its distribution in line with the final court decision.

Infrastructure and Construction Services

23. Regulation of the President No. 89 of 2025 on the Second Amendment to Regulation of the President No. 4 of 2016 on the Acceleration of Electrical Power Infrastructure Development

Enforcement Date: 2 September 2025

Summary:

- This Regulation has now eliminated various provisions that address the procedures for and governance of licensing and non-licensing matters relating to the acceleration of Electrical Power Infrastructure Development (*Pembangunan Infrastruktur Ketenagalistrikan/PIK*) (e.g. timelines for the issuance of licenses). Furthermore, this Regulation introduces a new

framework that stipulates that all business licensing nomenclature and requirements must now be brought into line with prevailing Laws and Regulations on risk-based business licensing.

- The scope of cooperation between PT Perusahaan Listrik Negara (PLN) (Persero) subsidiaries and business entities has also been expanded and is no longer limited solely to foreign state-owned enterprises. Nevertheless, the Regulation also clarifies that whenever such cooperation does involve foreign business entities, then entities whose shares are owned by their respective governments should be prioritized.

24. Regulation of the Head of the National Public Procurement Agency No. 3 of 2025 on Guidelines for Procurements of Goods Resulting from Already Available Works in Relation to the Development of the National Food, Energy and Water Self-Sufficiency Zone

Enforcement Date: 22 September 2025

Summary:

- The scope of this Regulation covers procurement processes for finished goods or semi-finished goods that result from existing works in relation to the development of the National Food, Energy and Water Self-Sufficiency Zone during the 2024 - 2025 fiscal period. These procurement processes will support Directive of the President No. 14 of 2025 on the Accelerated Development of the National Food, Energy and Water Self-Sufficiency Zone (“**Directive 14/2025**”). Procurements of goods/services outside this scope should be undertaken in line with applicable Laws and Regulations on national-level public procurements.
- In the event that any procurements of finished or semi-finished goods result from existing works that are located on land owned by business actors, then the relevant land procurements should be undertaken in line with applicable Laws and Regulations that govern land procurements for developments in the public interest.

Land & Property

25. Regulation of the Minister of Social Affairs No. 10 of 2025 on the Granting of Land Ownership Recommendations for Social Welfare Institutions

Enforcement Date: 22 September 2025

Summary:

- The Minister of Social Affairs is authorized to grant land ownership for a legally incorporated Social Welfare Institutions (*Lembaga Kesejahteraan Sosial* – “**LKS**”) through the recommendation. In order to receive the Recommendation the head of LPS must first submit an application to the Minister through the Director General of Social Empowerment, accompanied by all required documents (e.g. the deed of establishment or amendment along with the legal entity approval decree and activity reports from the past two years).
- The recommendation process is carried out in four stages: 1) Verification of document completeness, which must be carried out within a maximum of 14 business days; 2) Correction of documents by the applicant in case of deficiencies, with a deadline of 7 business days; 3) Field inspection conducted by the working unit; and 4) Issuance of the recommendation no later than 14 business days after the field inspection is completed.

Manufacturing & Industry

26. Regulation of the Minister of Industry No. 35 of 2025 on Provisions and Procedures for Domestic Component Level Certification and Company Benefit Weighting

Enforcement Date: 11 December 2025

Summary:

- Domestic Component Levels (*Tingkat Komponen Dalam Negeri* - “**TKDN**”) are calculated for goods, industrial services and combined goods and services, with specific weighted factors that apply to various production costs. Meanwhile, Company Benefit Weight (*Bobot Manfaat Perusahaan* - “**BMP**”) values have been capped at a maximum of 15% and are assessed against an expanded set of determining factors, including employment absorption, new investments, supply chain partnerships, use of domestic machinery, adoption of green industry practices, Environmental, Social and Governance (ESG) and export performance.
- TKDN and BMP certification is processed by Independent Verification Institutions (*Lembaga Verifikasi Independen/LVI*) or via a self-declaration mechanism (for small-scale industries) through the National Industry Information System (*Sistem Informasi Industri Nasional/SIINas*). TKDN certification (for goods and industrial services) and BMP values generally remain valid for five-year periods, whereas TKDN statements (for combined goods and services) apply only to specific projects that are applied for.
- Administrative sanctions may be imposed upon any holders of TKDN certification that submit false documents, fail to comply with verified TKDN

values, produce goods or services that are inconsistent with submitted documents or falsify their certification. Said administrative sanctions may take the form of suspensions, revocations or blacklisting.

Monetary & Payment System

27. Regulation of the Board of Governors of Bank Indonesia No. 17 of 2025 on the Settlement of Bilateral Transactions Between Indonesia and China Through Banks Using the Rupiah and Renminbi Currencies

Enforcement Date: 8 September 2025

Summary:

- This Regulation has been issued in order to implement cooperation between Bank Indonesia (“**BI**”) and the People’s Bank of China (“**PBC**”) and to encourage bilateral transactions between Indonesia and China that utilize the rupiah and renminbi currencies. BI is mandated to regulate, develop and supervise Indonesian Appointed Cross-Currency Dealer Banks (“**ACCD Banks**”) and Indonesian customers who engage in bilateral rupiah and renminbi transactions. In this regard, banks may be appointed as ACCD Banks provided that they fulfil certain criteria (e.g. criteria relating to their size and levels of interconnectedness and complexity).
- Rupiah-renminbi bilateral transactions can be based on the following types of underlying transactions: 1) Current transaction activities that are undertaken between Indonesian and Chinese customers; 2) Capital transaction activities that are undertaken between Indonesian and Chinese customers; 3) Financial transaction activities; 4) Financing provided by Indonesian ACCD Banks to Indonesian customers; and 5) Other types of underlying transactions, as determined by BI. These underlying transaction types may utilize the Onshore Renminbi (“**CNY**”) or Offshore Renminbi (“**CNH**”) currency denominations. However, the use of other currencies is permitted, with the exception of Israeli currency, provided that payments are the equivalent of CNY or CNH.
- It is important to note that Indonesian ACCD Banks are required to submit periodic reports to BI that address their bilateral rupiah and renminbi transactions. Said reports should take the form of integrated conventional bank reports, foreign exchange traffic reports and other types of reports (such as foreign exchange transaction and financing position reports). In addition, Indonesian ACCD Banks will also be required to submit incidental reports if they are requested to by BI.

Natural Resources

28. Regulation of the Coordinating Minister for Economic Affairs No. 14 of 2025 on the Indonesian Sustainable Palm Oil Information System

Enforcement Date: 1 September 2025

Summary:

- This Regulation establishes the organization of Indonesian Sustainable Palm Oil (“**ISPO**”) Information System (*Sistem Informasi Kelapa Sawit Berkelanjutan Indonesia* - “**SI-ISPO**”), which is now responsible for the issuance of official ISPO Certificates and ISPO Appendices, both of which have a five-year validity. The available SI-ISPO services will encompass the following at a minimum: 1) The submission of applications for initial ISPO certification and re-certification; 2) Verification of ISPO Certificate data and ISPO Appendix data; and 3) Issuance of ISPO transaction sheets for trade purposes.
- The SI-ISPO will be managed by an agency responsible for the administration of plantation funds. Furthermore, this agency may collaborate with third parties with respect to the organization of the system. The SI-ISPO Administrator is required to ensure the security and confidentiality of all SI-ISPO data, as well as to ensure user access through the application of various authentication and authorization mechanisms.
- SI-ISPO users include members of the general public, as well as other types of authorized users who have been granted access rights (e.g. government agencies, business actors, importers and the authorities of export destination countries). Members of the general public will be able to access the following specific types of data: 1) ISPO-related general information and news; 2) ISPO-related policies and legal products; 3) A list of ISPO-certified smallholders and plantation companies; and 4) The organizational structure of the ISPO Committee.

29. Regulation of the National Food Agency No. 8 of 2025 on Certain Requirements and Commitments for Imports of Livestock and/or Animal Products under Certain Conditions from Countries or Zones Within Countries of Origin

Enforcement Date: 4 September 2025

Summary:

- Imports of livestock and/or animal products under certain conditions from countries or zones within countries of origin (“**Product Importation**”) may be carried out by State-Owned Enterprises (*Badan Usaha Milik Negara* –

“BUMN”), as well as by other businesses (collectively referred to as “Importers”). These certain conditions break down as follows: 1) Livestock (e.g. feeder, dairy cattle or buffalo) that originates from zones that meet certain requirements and procedures for livestock importation or that originate from countries that are not free from animal quarantine pests and diseases; and/or 2) Animal products (i.e. products that derive from cattle or buffalo) that originate from areas that have been declared free of foot-and-mouth disease (*Penyakit Mulut dan Kuku* – “PMK”) or from nations that continue to be affected by PMK.

- If the Head of the National Food Agency officially stipulates certain conditions, as well as the required quantities and allocations of imported livestock and/or animal products, then relevant Importers may electronically submit their Product Importation proposals and applications to the Head of Bapanas. As well as submissions of these documents, Importers are required to fulfill certain requirements (e.g. import plan, distribution plan, ownership of holding facilities and so forth). Importers must also submit commitment letters that underscore their commitment to supporting government programs aimed at maintaining supply availability and stable prices, as well as the distribution of livestock and/or animal products.
- Upon commencing any Product Importation, Regulation 8/2025 requires relevant Importers to electronically submit monthly reports that address the implementation of the importation of livestock and/or animal products. Said reports should be submitted by the 15th day of the month following the relevant reporting month. The aforementioned Product Importation applications and related supporting documents, as well as monthly reports on Product Importations, should be submitted via the Indonesia National Single Window System (*Sistem Indonesia National Single Window/SINSW*).
- Any failure to comply with the above-described obligations may result in the imposition of administrative sanctions, which may range from written reprimands to the issuance of recommendations for the revocation of issued business permits.

30. Regulation of the National Standardization Agency No. 7 of 2025 on Procedures for the Imposition of Administrative Sanctions on Indonesian Sustainable Palm Oil Certification Agencies

Enforcement Date: 28 October 2025

Summary:

- Reaffirming provisions originally stipulated under Regulation of the President No. 16 of 2025, Indonesian Sustainable Palm Oil (“ISPO”) certification agencies (“**Certification Agencies**”) are required to submit reports to the ISPO Committee and the National Accreditation Committee (*Komite Akreditasi Nasional* – “KAN”). These mandatory reports should be submitted by no later than the first day (or the first business day) of the month following the relevant reporting month and should feature the

following information: 1) Issued ISPO certificates (including certificates that have been suspended, re-activated and/or revoked); and 2) Business actors that are undertaking improvements in order to fulfil the ISPO principles and criteria in accordance with relevant Laws and Regulations.

- Any Certification Agencies that fail to comply with the above-outlined reporting mandate will be subject to the imposition of administrative sanctions by KAN. These administrative sanctions may range from written reprimands to the suspension of Certification Agencies' accreditation certification to the revocation of said certification. Moreover, administrative sanctions in the form of the suspension or revocation of Certification Agencies' accreditation certificates may also be imposed upon Certification Agencies that fail to adequately examine the fulfillment of the ISPO principles and criteria by relevant business actors.

31. Circular of the Director-General of Sustainable Forest Management No. 15 of 2025 on the Mechanism for the Implementation and Legal Assurance of Forestry Product Imports

Enforcement Date: 29 August 2025

Summary:

- Although forestry products are now exempt from import restrictions under Regulation of the Minister of Trade No. 16 of 2025, all imported products must continue to comply with various principles that relate to their legality through processes of due diligence and import declarations ("**Declarations**"). The aforementioned Declarations must be submitted via the Legality and Sustainability Information System (*Sistem Informasi Legalitas dan Kelestarian*/SILK), which can be accessed through the following official website of the Ministry of Environment and Forestry Affairs: <http://silk.menlhk.go.id>.
- The Circular also specifies the scope of forestry products that are subject to legal requirements through processes of due diligence. Said scope is extensive and covers 441 product categories based on tariff/Harmonized System (HS) codes (e.g. fuel wood, rough timber and paper), as detailed under the Appendix to this Circular.

32. Directive of the President No. 14 of 2025 on the Accelerated Development of National Self-Sufficiency Areas for Food, Energy and Water

Enforcement Date: 5 August 2025

Summary:

- This Directive mandates that a wide variety of central and regional government officials will now have to engage in measures that specifically relate to the development of Indonesia's national self-sufficiency in food, energy and water resources ("**Self-Sufficiency Areas**"). These measures encompass the following activities: 1) Planning, allocation, budgeting, implementation, monitoring, evaluation and control activities for the development of Self-Sufficiency Areas; 2) Mitigation and overcoming of any obstacles and challenges that emerge in relation to the development of Self-Sufficiency Areas; 3) Ensuring the integrated development of supporting infrastructure within planned Self-Sufficiency Areas; 4) Development of digital-based monitoring and evaluation systems for the Self-Sufficiency Areas; 5) Facilitation of private sector, cooperative and community involvement in the development of Self-Sufficiency Areas; and 6) Implementation of the principles of sustainable development by taking into account various aspects relating to environmental conservation and adaptation to climate change.

33. Letter of the Director General of Minerals and Coal No. T-1533/MB.07/DJB.T/2025 on Temporary Suspension Sanctions

Enforcement Date: 18 September 2025

Summary:

- In accordance to the article 29 and 50 of Regulation of the Government No. 78 of 2010 on Reclamation and Post-Mining, 190 Mining Business Permits (*Izin Usaha Pertambangan* – "**IUP**") holders shall be imposed with a Temporary Suspension of mining activities for up to 60 days. Nevertheless, during the suspension period, the IUP holders remain obligated to carry out their responsibilities, including the management, maintenance, care, and monitoring of mining activities and environmental aspects within their respective concession areas.
- IUP holders who have not fulfilled their obligations are required to promptly submit an Application for the Approval of the Reclamation Plan Document. The sanction of Temporary Suspension of Mining Activities will be automatically lifted once the IUP holder has obtained the approval letter and placed the required Reclamation Guarantee through 2025.

Non-Banking Financial Services

34. Draft Regulation of the Financial Services Authority on the Reporting of Funding Transaction Data Requests by Organizers of Information Technology-Based Joint Funding Services

Enforcement Date: -

Summary:

- Organizers of Information Technology-Based Joint Funding Services (*Layanan Pendanaan Bersama Berbasis Teknologi Informasi*/P2P Lending) (“**Organizers**”) are now required to submit funding transaction data (“**Data**”) reports to the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) through a data center that has been integrated into the OJK’s system (“**Data Center**”). These reports will generally have to be submitted in real time or on a daily basis if real-time submission has not yet become possible. Any Data inaccuracies that are discovered must be corrected either within 12 days if they are identified by Organizers themselves or in accordance with specific timelines that are agreed upon with the OJK during inspections.
- Furthermore, Organizers must inform fund recipients of the submission of their Data via the Data Center through easily accessible means, such as their own electronic systems, forms or emails. Organizers may additionally make online requests for certain information from fund recipients via the Data Center, while all such requests should be properly documented so that they include details such as dates, identification numbers, recipients’ names and the purposes of said requests. Notably, the Draft Regulation strictly limits the use of collected information to certain regulated purposes only, including ensuring smooth fund distribution, risk management and compliance with OJK requirements.
- In order to enforce compliance with this new framework, the Draft Regulation sets out various administrative sanctions that may be imposed upon any Organizers who fail to meet their obligations, as set out under the reporting and transparency provisions. These sanctions range from written reprimands to fines of up to Rp. 50 billion. In addition, the OJK may impose further measures, such as reducing health assessment results, re-assessing any primary parties responsible for violations and recording the track records of violating parties in the OJK’s electronic system.

35. Draft Regulation of the Financial Services Authority on the Offering of Digital Financial Assets

Enforcement Date: -

Summary:

- This Draft Regulation addresses offerings of digital financial assets, specifically tokenized assets and crypto assets (i.e. backed and unbacked crypto assets) (collectively referred to as “**Assets**”). In order to qualify for offerings, Assets must meet certain specific eligibility criteria, such as the requirement for all issuances or transfers to be completed through the use of distributed ledger technology, as well as the requirements for Assets to comprise financial assets that have not been recorded by any financial institutions and to comply with prevailing Laws and Regulations.

- Offerings must be conducted through merchants' trading systems in line with cooperation agreements that are drawn up between merchants and issuers. It should also be noted that offerings may take the form of single offerings (that last from three to five business days and that are applicable to all asset types) or continuous offerings (which are restricted to tokenized assets and backed crypto assets).
- The Draft Regulation is also set to impose a comprehensive set of reporting obligations on offering organizers, which will cover reports on offering activities, periodic reports and incidental reports. In addition, offering organizers are also required to report any suspicious financial transactions to the Financial Transaction Reports and Analysis Center (*Pusat Pelaporan dan Analisis Transaksi Keuangan*/PPATK).

36. Draft Circular of the Financial Services Authority on Guarantee Business Units

Enforcement Date: -

Summary:

- This Draft Circular mandates that conventional general insurance companies and sharia general insurance companies (collectively referred to as "**Companies**") are required to establish Guarantee Business Units (*Unit Usaha Penjaminan* – "**UUP**") that have a minimum equity of Rp. 250 billion. UUP may commence business activities only after they have secured a license from the Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**"). Licenses are secured through processes of evaluation of the completeness of documents, the fulfillment of equity requirements, the feasibility of work plans and compliance with the provisions set under relevant Laws and Regulations.
- UUP business activities involve a guarantee recipient, a guaranteed party and a guarantor. The scope of UUP business activities encompasses government-assigned guarantee business activities, particularly activities that relate to the risk of the failure of the guaranteed party to fulfill their financial obligations. Meanwhile, guarantees may take the form of direct guarantees, indirect guarantees or joint guarantees with other guarantee companies.
- In addition, UUP are required to mitigate any risk by reinsuring the entirety of their guarantee portfolios. UUP should also have their own retention for each guarantee based on the relevant risk and loss profiles. The applicable provisions that address said retention break down as follows: 1) A minimum of 20% of the guarantee value; and 2) A maximum of 10% of the UUP equity for each guaranteed party.

37. Draft Circular of the Financial Services Authority on Assessments of the Soundness Levels of Organizers of Information Technology-Based Joint-Funding Services

Enforcement Date: -

Summary:

- Soundness level assessments of organizers of Information Technology-Based Joint Funding Services (*Layanan Pendanaan Bersama Berbasis Teknologi Informasi/LPBBTI*), which are commonly known as Peer-to-Peer (P2P) lending services (“**Organizers**”), will be implemented in line with four general principles and carried out via a self-assessment mechanism and an individual risk-based approach. Additionally, organizers that operate Sharia Business Units (*Unit Usaha Syariah/UUS*) are also required to carry out self-assessments, which will become integral elements of the self-assessments of the relevant parent company Organizers.
- In line with Regulation 40/2024, the aforementioned soundness level assessments should be implemented based on five factors, with each of these factors being rated on a scale of 1 - 5 and with the lower end of this scale reflecting a healthier condition in terms of the factor in question. The applicable assessment factors break down as follows: 1) Capital; 2) Quality of Funding; 3) Profitability (*Rentabilitas*); 4) Liquidity; and 5) Management. Organizers are required to submit their completed soundness level self-assessments by a deadline of 15 February of the following year.
- Any Organizers that meet certain criteria (e.g. that are assigned ratings for certain factors of 4 or 5, or that are rated with composite soundness levels of Composite Rating 4 or Composite Rating 5) will be required to submit action plans to the OJK that at the very least outline the clear corrective action that will be taken by the Organizer in order to resolve the identified issues, along with a target timeline for completion. Additionally, all such Organizers will be required to submit reports that address the implementation of their action plans. These reports should detail the realization and execution of action plans and should be accompanied by relevant supporting evidence.

Pharmacies, Health Industry, and Foods & Drugs Standards

38. Regulation of the Minister of Health No. 10 of 2025 on the Implementation of Special Allowances for Specialist Doctors, Subspecialist Doctors, Specialist Dentists and Subspecialist Dentists Serving in Underdeveloped, Border and Island Areas

Enforcement Date: 2 September 2025

Summary:

- Hospitals that are operated by regional governments and that are located in underdeveloped, border and island areas (*Daerah Tertinggal, Perbatasan dan Kepulauan* – “**DTPK**”) will now be entitled to receive allowances that will be distributed to specialist and subspecialist doctors and dentists (“**Special Allowances**”). Said Special Allowances will be further stipulated on an annual basis by the Minister of Health (“**Minister**”).
- In addition to meeting the location thresholds outlined in this Regulation, hospitals that are classified as entitled to receive the above-described Special Allowances must also already be implementing electronic medical records that they have integrated into the National Health Information System in accordance with applicable Laws and Regulations (however, it should be noted that this excludes hospitals that are experiencing difficulties in terms of their ability to implement electronic medical records). Moreover, hospitals to which relevant Special Allowance recipients (“**Recipients**”) are assigned must meet the following obligations: 1) Must submit proposals that address Recipients who meet the requirements and who demonstrate good performance; 2) Must provide statements of absolute responsibility declaring that any Recipient have performed their duties in accordance with applicable provisions; and 3) Must complete the monthly monitoring and evaluation of Recipients’ performances.
- In order to receive the above-outlined Special Allowance, prospective Recipients must satisfy the following requirements: 1) Must have opened a Satu Sehat SDMK account; 2) Must have received an official decree appointing them as a civil servant or BLUD employee; 3) Must have received an official letter assigning them relevant duties at a regional government-owned hospital located in a DTPK area; and 4) Must be a holder of a valid practice license or assignment letter at a regional government-owned hospital in a DTPK area.
- The above-outlined Special Allowances will be provided in the form of monetary compensation and will be transferred to Recipients’ bank accounts. The Special Allowance amount has been set at Rp. 30,012,000 and will be disbursed on a monthly basis in the month following the month in which a Recipient completes the relevant duties.

39. Regulation of the Minister of Environment/Environmental Control Agency No. 13 of 2025 on the Amendment to Regulation of the Minister of Environment and Forestry No. P.27/MENLHK/SETJEN/KUM.1/12/2020 on the Management of Medical Device Waste Containing Mercury

Enforcement Date: 9 September 2025

Summary:

- This Regulation amends Regulation of the Minister of Environment and Forestry No. P.27/MENLHK/SETJEN/KUM.1/12/2020 on the Management of Medical Device Waste Containing Mercury (“**Regulation 27/2020**”) by adding a standardized format for sets of handover minutes for handovers of medical device waste containing mercury to temporary storage facilities, as can be found under Appendix I to this Regulation. In addition, this Regulation also extends the deadline for the management of medical device waste containing mercury under its provisions to no later than 31 December 2030. Previously, a deadline of 31 December 2025 had been set.
- Furthermore, this Regulation also amends the document format that should be used in relation to the transportation of all medical device waste containing mercury. This format can be found under Appendix II to this Regulation.

40. Decree of the Minister of Health No. HK.01.07/MENKES/736/2025 on Medical Devices That Can Be Sold by Wholesale Traders of Household Equipment and Supplies, Hypermarkets, Supermarkets, Minimarkets and Other Retail Traders

Enforcement Date: 18 July 2025

Summary:

- Wholesale businesses that engage in the trading of household equipment and supplies, as well as hypermarkets, supermarkets, minimarkets and other types of retail businesses (collectively referred to as “**Wholesale Businesses**”) are permitted to sell medical devices that meet the following criteria: 1) Must have secured an Distribution Permit Number (*Nomor Izin Edar/NIE*); 2) Must be classified as low-risk medical devices; 3) The medical devices must be usable in locations that are external to healthcare facilities; 4) Must have a low misuse potential; 5) The benefits associated with the availability of the device must outweigh the risks; and 6) A device must not require any specific medical expertise in order to use. A total of 26 examples of these types of medical devices are outlined comprehensively in the Appendix to this Decree.
- In addition to being required to secure relevant business permits, the above-described Wholesale Businesses may only procure medical devices from manufacturers and distributors of medical devices that have secured relevant business permits in accordance with prevailing Laws and Regulations.
- Ultimately, this Decree mandates that Wholesale Businesses should take necessary steps in order to guarantee the safety, quality and efficacy of all medical device products that they sell.

41. Decree of the Head of the Halal Product Guarantee Agency No. 170 of 2025 on Guidelines for the Supervision of Halal Product Guarantees

Enforcement Date: 31 July 2025

Summary:

- The supervision of halal product guarantees (*Jaminan Produk Halal* – “**JPH**”) encompasses four core phases (i.e. planning, implementation, reporting and follow-up measures) and comprises the following forms: 1) Periodic JPH supervision (“**Supervision**”); and 2) Incidental (*sewaktu-waktu*) Supervision. These two types of Supervision should be implemented by officials who are authorized to supervise JPH (“**Supervisors**”) and should be targeted at the following objects: 1) Products that have been classified as halal in accordance with the sharia principle (“**Products**”); 2) Business actors; 3) Halal Inspection Institutions (*Lembaga Pemeriksa Halal* – “**LPH**”); and 4) Halal Product Process (*Proses Produk Halal* – “**PPH**”) assistants (*pendamping*) and PPH Assistance Institutions (*Lembaga Pendampingan PPH* – “**L3PH**”).
- Periodic Supervisions should be organized on a semesterly basis and should take into account of conditions that relate to the organization of JPH. In this regard, periodic Supervisions may be organized based on either of the following two Supervision methods: 1) The indirect method, which involves the examination of a business actor’s relevant documents via the integrated electronic system managed by the Halal Product Guarantee Agency (*Badan Penyelenggara Jaminan Produk Halal* – “**BPJPH**”) or by utilizing search engines or other electronic media; and/or 2) The direct method, which involves field inspections that are undertaken by the Supervision team. Said field inspections are preceded by an entry meeting and finalized through an exit meeting that is attended by both the Supervision team and the relevant business actor.
- Meanwhile, incidental Supervisions broadly aim to provide recommendations that are based on findings and/or reports of any alleged PPH-related violations in accordance with relevant Laws and Regulations. Reports of any such alleged PPH-related violations can be submitted by the following parties: 1) Individual Indonesian citizens; 2) Private or public legal entities; and 3) Social organizations (*Organisasi Kemasyarakatan*). It should be noted that examinations of received reports and/or findings of alleged violations should be carried out within 30 business days of any initial review being completed.

42. Decree of the Head of the Halal Product Guarantee Agency No. 190 of 2025 on Standard Operating Procedures for Halal Certificate Application Services and Implementing Guidelines on the Facilitation of Halal Certification for Micro- and Small-Scale Business Actors

Enforcement Date: 14 August 2025

Summary:

- Although the core procedures and processes for the submission of halal certification applications that were originally outlined under the previous framework have been retained, the new framework of Decree 190/2025 has now introduced a pre-paid and post-paid payment mechanism for halal certification services. Generally speaking, the pre-paid payment mechanism for halal certification, as featured under Decree 190/2025, is broadly similar to mechanism outlined under the previous framework, which generally involved the Halal Product Guarantee Agency (*Badan Penyelenggara Jaminan Produk Halal* – “**BPJPH**”) issuing certification fee invoices to facilitators and subsequently issuing a code for halal certification facilitation upon successful payment of an invoice by a facilitator.
- Meanwhile, the post-paid payment mechanism may only be utilized by facilitators from government agencies. In this regard, prior to the issuance of any certification fee invoice to a facilitator, BPJPH will issue a code for halal certification facilitation to the relevant business actors, who should then use this code until their halal certificate is officially issued.
- Aside from the above-described new certification payment schemes, Decree 190/2025 has also simplified the list of parties involved in the facilitation process, which should be outlined in a work contract that details the terms for implementation of the halal certification facilitation. In this regard, only relevant facilitators and BPJPH are required to be parties outlined in said work contracts. Moreover, in the event that a facilitator originates from a government body that utilizes the post-paid payment mechanism, Decree 190/2025 requires a statement letter to be attached confirming the ability of the relevant party to fulfill the payment obligation for halal certification facilitation.

43. Decree of the Head of the Halal Product Guarantee Agency No. 217 of 2025 on Guidelines on Complaint Management and Information Requests for the Halal Product Guarantee Agency

Enforcement Date: 11 September 2025

Summary:

- This Decree stipulates a new set of procedures that address the management of complaints and the provision of information through the Halal Product Assurance Agency (*Badan Penyelenggara Jaminan Produk Halal* – “**BPJPH**”). Complaints and requests have been classified into the following four categories: 1) Complaints related to rendered services that do not meet the applicable service standards; 2) Complaints related to alleged violations of Halal Product Assurance (*Jaminan Produk Halal* – “**JPH**”) mandates; 3) Complaints related to alleged disciplinary violations committed by BPJPH employees; and 4) Requests for JPH-related information.

- When submitting a complaint, the relevant complainant must provide various supporting details (e.g. personal identity and the nature and substance of the complaint). These details can be submitted either directly through the BPJP's One-Stop Service Center or indirectly (e.g. via the contact center). Officers will then record and input all such data into both the BPJPH system and the National Public Service Complaints Management System (*Sistem Pengelolaan Pengaduan Pelayanan Publik Nasional*/SP4N-LAPOR) and will then subsequently verify the complaint within one business day.
- This new Decree sets a timeframe for the handling of complaints and information requests based on type, as follows: 1) For information requests or normative complaints: must be addressed within three business days; 2) For complaints about inadequate services that do not meet the relevant standards but that do not require any field inspections: must be resolved within 14 business days; and 3) For complaints that require further supervision and field inspections: must be resolved within 60 business days.

44. Decree of the Head of the Halal Product Guarantee Agency No. 221 of 2025 on Procedures for the Registration of Foreign Halal Certification

Enforcement Date: 15 December 2025

Summary:

- The Decree specifically addresses new applications for the registration of Foreign Halal Certification (*Sertifikat Halal Luar Negeri* – “**SHLN**”). All SHLN must be registered prior to the distribution of the relevant products within Indonesia, while registration applications should be submitted for different product categories in line with prevailing Laws and Regulations. Registration applications must be submitted by relevant importers and/or their official representatives in Indonesia to the Halal Product Guarantee Agency (*Badan Penyelenggara Jaminan Produk Halal*/BPJPH) via the SIHALAL system, along with various types of supporting documents (e.g. Business Identification Number [*Nomor Induk Berusaha*/NIB] and information on storage warehouses).
- New SHLN applications may only be submitted for certificates if said certificates still have 13 business days of remaining validity prior to their expiration dates. Furthermore, SHLN registrations should be renewed by the relevant importers and/or their authorized representatives during a period that commences 60 business days prior to the expiration dates of SHLN registrations.

45. Circular of the Head of the Halal Product Guarantee Agency No. 7 of 2025 on the Publication of Halal Products and the Mandatory Affixation of Indonesian Halal Labels to Halal-Certified Products

Enforcement Date: 28 August 2025

Summary:

- Reaffirming existing Regulations, business actors are still required to affix Indonesian halal labels to all of their halal-certified products. Meanwhile, if any products continue to bear the halal logo of the Indonesian Ulama Council (*Majelis Ulama Indonesia*/MUI), then the relevant business actors may continue to sell any such halal-certified products under limited conditions, including efforts to deplete packaging stock, up until a deadline of 2 February 2026, and should gradually apply new labels or redesign their packaging.
- Halal labels must be affixed to packaging, certain parts of products or other designated areas in line with technical guidelines set out under applicable Laws and Regulations. Furthermore, the Halal Product Guarantee Agency (*Badan Penyelenggaraan Jaminan Produk Halal* – “**BPJPH**”) will directly supervise the affixation of all halal labels in order to ensure uniformity, accuracy and consumer confidence in relation to all halal-certified products.
- In addition, business actors are also required to publish information on all of their halal-certified products through their electronic or social-media accounts. At a minimum, this product information must include Indonesian halal labeling as used in advertisements, catalogues, testimonials or other promotional materials, while links to all such content must be submitted to BPJPH.

46. Draft Regulation of the National Agency of Drug and Food Control on Business Activity and Product Standards for the Implementation of Risk-Based Business Licensing Within the Food and Drug Sub-Sector

Enforcement Date: -

Summary:

- This Draft Regulation establishes various standards for business activities and products in terms of the implementation of risk-based business licensing (*Perizinan Berusaha Berbasis Risiko* – “**PBBR**”) within the drug and food subsector, as comprehensively outlined under the Appendix to this Draft Regulation. Broadly speaking, PBBR aims to support the operational and/or commercial aspects of business activities and covers: 1) Medicines and pharmaceutical ingredients; 2) Natural medicines, health supplements, quasi-medicines and cosmetics; and 3) Processed foods.
- PBBR is implemented via the Online Single Submission (“**OSS**”) system or via the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – “**BPOM**”) system if the OSS system has not yet been integrated or if applicants do not meet the criteria set under Regulation of the Government No. 28 of 2025 on the Implementation of PPBR.

- When it is ultimately promulgated, this Draft Regulation will revoke and replace Regulation of BPOM No. 10 of 2021, which bears the same title.

47. Draft Regulation of the National Agency of Drug and Food Control on the Certification of Good Cosmetics Manufacturing Practices

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Regulation ("**Draft Regulation**") will ultimately serve as a whole new framework on the Certification of Good Cosmetics Manufacturing Practices (*Cara Pembuatan Kosmetika yang Baik* – "**CPKB**"), replacing the previous framework of Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – "**BPOM**") No. 33 of 2021 ("**Regulation 33/2021**"). In essence, this Draft Regulation no longer requires cosmetics manufacturers that share production facilities with conventional or traditional medicine manufacturers to submit building plan approval applications for the relevant industry during the submission of their CPKB and CPKB Aspect Fulfillment certification (collectively referred to as "**Certificates**").
- In addition to household healthcare supplies (*Perbekalan Kesehatan Rumah Tangga/ PKRT*), the Draft Regulation will allow cosmetics manufacturers to share their cosmetics production facilities with facilities that are used to manufacture quasi-drugs. Overall, the procedures for securing approvals for this type of joint-production facility are similar to those that apply for the securing of the Certificates. Furthermore, in this regard, it should be noted that facility inspections can be conducted or waived based on the results of routine inspections and/or the histories of the cosmetics products that are being circulated.
- While maintaining the majority of the administrative sanctions that can be imposed upon cosmetics manufacturers that violate any of the CPKB-related provisions that originally featured under Regulation 33/2021, the Draft Regulation is now set to expand the list of said sanctions as follows: 1) Temporary closures of online access for submissions of notification applications (up to a maximum period of one year); 2) Suspension of Certification; and/or 3) Temporary closures of online access for submissions of Certification (up to a maximum period of one year).

48. Draft Regulation of the National Agency of Drug and Food Control on Procedures for the Submission of Cosmetics Notifications

Enforcement Date: -

Summary:

- Under the current framework of Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat Dan Makanan* – “**BPOM**”) No. 21 of 2022, exemptions to the requirement to secure a distribution permit only apply to cosmetics products that are imported through the special access scheme. However, once this Draft Regulation ultimately comes into force, the scope of exemptions to the distribution permit requirement through notifications will be expanded. In this regard, said exemptions are also set to encompass: 1) Domestically produced cosmetics products that are used for research purposes or used in exhibitions in limited quantities; 2) Imported cosmetics products that are placed in designated bonded areas and that are not distributed within Indonesia and not subject to import policies; and 3) Refillable perfumes.
- The Draft Regulation also introduces a new set of requirements that apply to business actors who are applying for cosmetics notifications, who must now guarantee and ensure that: 1) Cosmetics products for which notifications are provided do not contain any prohibited substances and have been designated official notification numbers; and 2) Cosmetics products for which notifications are provided have not had their notification numbers revoked or cancelled by BPOM.
- The Draft Regulation also states that applications for imported cosmetic notifications can only be submitted by cosmetic importers (i.e. for finished products or bulk materials), including products that are intended for primary packaging by domestic manufacturers.

49. Draft Regulation of the National Food Agency on Product Standards for the Implementation of Risk-Based Business Licensing, Supervision and the Imposition of Administrative Sanctions Within the Fresh Food Subsector

Enforcement Date: -

Summary:

- This Draft Regulation sets out various product standards that will apply during the implementation of risk-based business licensing within the fresh food sub-sector, as specifically set out under the Appendix to the Draft Regulation. The Draft Regulation requires any persons who produce, store, distribute and/or circulate any plant-based, fresh food products (“**Business Actors**”) to ensure the safety and quality of all of their fresh food, as evidenced through the possession of Business Licenses to Support Business Activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* – “**PB UMKU**”). PB UMKU for the fresh food sub-sector cover operational and/or commercial support for business activities related to handling facilities, as well as the circulation of fresh food, and also safety assurances for fresh food products that are intended for export.
- Furthermore, this Draft Regulation mandates routine and incidental supervision of compliance with the various PB UMKU-related requirements and obligations. In this regard, routine supervision should be conducted

through the examination of reports that are submitted by Business Actors and/or through regular field inspections. In addition, incidental field inspections may also be conducted at certain times on the following bases: 1) Public complaints; 2) Complaints and/or needs that arise from Business Actors; and/or 3) Indications that Business Actors are engaged in activities that are deemed to be inconsistent with PB UMKU.

- Administrative sanctions that may be imposed in response to PB UMKU violations may take the form of written warnings, temporary suspensions of business activities, the imposition of administrative fines, the imposition of coercive police measures and/or the revocation of PB UMKU. Said administrative sanctions may be imposed on a cumulative or progressive basis, based on the level of risk associated with the relevant violation, which may encompass the use of hazardous substances and breaches of food safety.

50. Draft Regulation of the National Agency of Drug and Food Control on the Promotion and Advertisement of Drugs

Enforcement Date: -

Summary:

- This Draft Regulation mandates that pharmaceutical manufacturers, Pharmaceutical Wholesalers (*Pedagang Besar Farmasi* – “**PBF**”), pharmaceutical service facilities, providers of electronic pharmaceutical systems and/or other facilities may only promote and/or advertise both prescription and non-prescription drugs (collectively referred to as “**Drugs**”) for which marketing authorization has first been secured. In this regard, all Drugs must be promoted and/or advertised objectively, comprehensively and in a non-misleading way, while also adhering to advertising ethics. Furthermore, non-prescription Drugs may be promoted and/or advertised among the general public, whereas prescription Drugs may only be promoted and/or advertised through scientific media that are intended for consumption by medical and healthcare professionals.
- Promotions and advertisements must meet the following criteria: 1) Must be objective and must provide information that is in accordance with actual facts, while not deviating from the efficacy and safety information relating to the Drugs in question, as outlined on the most recently approved labeling; 2) Must be comprehensive, i.e. must provide all relevant product information that has been approved under the marketing authorization for promotion or as otherwise required for advertisements; and 3) Must be non-misleading in nature, i.e. must provide information that is honest, accurate, accountable, will not lead to any misleading impressions or perceptions, and will not lead to any irrational use of Drugs or pose any significant health risks.
- Pharmaceutical industries, PBF, pharmaceutical service facilities, providers of electronic pharmaceutical systems and other facilities that violate these provisions may ultimately find themselves subject to the imposition of

administrative sanctions in the form of warnings, stern warnings, temporary suspensions of activities, revocations of marketing authorization and/or revocations of Good Distribution Practice (*Cara Distribusi Obat yang Baik*/CDOB) certification.

Profession

51. Circular of the Director-General of General Legal Administration No. AHU-AH.02-85/2025 on the Re-Registration of Notary Data

Enforcement Date: 18 August 2025

Summary:

- The Circular requires all notaries to re-register their data electronically via: *daftarulang.ahu.go.id* within 60 business days of 28 August 2025. The objective behind this requirement is to update and organize notary records, prevent the misuse of accounts (e.g. the use of accounts belonging to deceased notaries) and to ensure the overall accountability and security of the Online General Legal Administration (*Administrasi Hukum Umum/AHU*) system.
- Any notaries who fail to complete their re-registrations within 60 business days will have their accounts blocked. However, access to any such blocked accounts may be automatically restored once the relevant re-registrations have been completed. Ultimately, though, if a notary has not completed their reregistration within a maximum duration of 90 business days from the date of their account being blocked, then a tiered examination will be initiated by the Notary Supervisory Council.

Tax & Non-Tax Charges

52. Regulation of the Minister of Finance No. 61 of 2025 on Value Added Tax on Deliveries of Certain Special Animals in the Form of Horses and Their Supporting Equipment Borne by the Government for the 2025 Fiscal Year

Enforcement Date: 1 September 2025

Summary:

- The Indonesian Government will bear 100% of Value Added Tax (*Pajak Pertambahan Nilai* – “**PPN**”) on transactions that involve cavalry horses and their supporting equipment until 31 December 2025. This initiative is being solely facilitated in order to support the Ministry of Defense and/or the Indonesian National Armed Forces in the interests of national defensive readiness. The various types of cavalry horses and supporting equipment that are covered by this initiative are further detailed under the Appendix to the Regulation.
- Taxable Entrepreneurs (*Pengusaha Kena Pajak* – “**PKP**”) who supply the specific types of horses and equipment that are covered by this initiative must draw up tax invoices and reports on the realization of this government-borne PPN. It should be noted that the PPN will not be borne by the government if any PKP fail to draw up said invoices and/or the realization reports.

53. Regulation of the Minister of Finance No. 62 of 2025 on the Second Amendment to Regulation of the Minister of Finance No. 26/PMK.010/2022 on the Implementation of the Goods Classification System and the Imposition of Import-Duty Tariffs on Imported Goods

Enforcement Date: 15 September 2025

Summary:

- This Regulation introduces a 0% import-duty incentive for four-wheeled, battery-powered electric vehicles (BEV) which have been designated certain harmonized system (“**HS**”) codes (e.g. HS Code 8703.80.17, HS Code 8703.80.18, HS Code 8703.80.97, etc.). In order to enjoy this incentive, relevant importers must submit approval letters that address the utilization of the incentive and should also include facility code 87 in the import requirements/facilities fulfillment column. An approval letter will then subsequently be issued by the Minister of Investment and Downstreaming/Head of the Investment Coordinating Board (*Badan Koordinasi Penanaman Modal/BKPM*).

54. Circular of the Minister of Home Affairs No. 900.1.13.1/4528/SJ of 2025 on the Revision of Determined Regional Tax and Regional Retribution Policies

Enforcement Date: 14 August 2025

Summary:

- This Circular is specifically aimed at all governors and regents/mayors across Indonesia and addresses a revised set of regional tax and regional retribution policies. In this regard, governors and regents/mayors must

consider the overall conditions of their communities in order to avoid burdening them, particularly low-income groups, whenever determining Rural and Urban Land and Building Tax (*Pajak Bumi dan Bangunan Perdesaan dan Perkotaan* – “**PBB-P2**”) and increasing any Tax Object Sale Value (*Nilai Jual Objek Pajak* – “**NJOP**”).

- Furthermore, governors and regents/mayors have the authority to postpone or revoke Regional Head Regulations (*Peraturan Kepala Daerah* – “**Perkada**”) that implement tariff increases and/or NJOP increases for PBB-P2 and may instead apply the previous year’s Perkada, especially if the planned increases are considered burdensome to the community and are not in tune with local conditions. However, it is important to understand that the establishment of any Perkada on regional tax and retribution must first be coordinated with the Minister of Home Affairs through the Directorate-General of Regional Finance for their consideration, and also potentially with the ministry responsible for state finance.

Technology, Media, and Telecommunication

55. Regulation of the Public Television Broadcasting Institution No. 2 of 2025 on One Data for the Public Television Broadcasting Institution of the Republic of Indonesia

Enforcement Date: 2 September 2025

Summary:

- This Regulation will serve as a set of guidelines for application by the Public Television Broadcasting Institution of the Republic of Indonesia (*Televisi Republik Indonesia* – “**TVRI**”) during the management of data governance in order to support processes of planning, implementation, evaluation and developmental control. Specifically, this new framework sets out a number of provisions that address the various principles, organizational structures, stakeholder participation and funding mechanisms for TVRI One Data (“**Satu Data TVRI**”), the institution’s data governance policy.
- The scope of this policy covers both Statistical Data (i.e. numerical data on population characteristics) and Geospatial Data (i.e. data on the geographical locations and characteristics of natural or man-made objects). The implementation of Satu Data TVRI involves the assigning of roles to Data Custodians and Data Producers, which may also involve other parties, such as central agencies, local governments, public legal entities, universities and research institutions.

56. Draft Regulation of the Minister of Communications and Digital Affairs on Business Activity and Product/Service Standards for Risk-Based Business Licensing Within the Postal, Telecommunications and Broadcasting Sector, and the Electronic Systems and Transactions Sector

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this new Draft Regulation (“**Draft Regulation**”) will repeal and replace Regulation of the Minister of Communication and Informatics No. 3 of 2021 (“**Regulation 3/2021**”) as the umbrella framework that sets out the applicable standards for business activities and products/services within the postal and telecommunications sector, as well as the electronic systems and transactions sector (“**Business Standards**”). Broadly speaking, the new Draft Regulation has now incorporated various broadcasting-related services onto the list of Business Standards that were originally outlined under the original framework of Regulation 3/2021 and has also expanded the scope of businesses subject to the Business Standards to a total of 23 business activities that have been classified into two main sectors. Regulation 3/2021 previously only outlined a total of eight Business Standards.
- In addition to outlining various requirements and obligations that courier agent services that fall under the Standard Classification of Indonesian Business Fields (*Klasifikasi Baku Lapangan Usaha Indonesia* – “**KBLI**”) Code 53202 will be required to comply with, the Draft Regulation also outlines various applicable prerequisites for regular courier activities that fall under KBLI Code 53201 onto the official list of the Business Standards. In this regard, it should be noted that the various requirements and obligations that apply to regular and courier agent services are also in line with Regulation of the Minister of Communication and Digital Affairs (“**Minister**”) No. 8 of 2025 on Commercial Postal Services.
- As briefly outlined above, this Draft Regulation now specifies a new set of applicable requirements and obligations that must be met by all parties that engage in the following types of private broadcasting business activities: 1) Private radio broadcasting (KBLI Code 60102); and 2) Private television broadcasting and programming (KBLI Code 60202). In this regard, while not being explicitly detailed in the way that these new standards are comprehensively outlined under the Draft Regulation, it should be noted that various applicable requirements and obligations that apply to these types of broadcasting services are also outlined under the existing framework of Regulation of the Minister of Communication and Informatics No. 6 of 2021 on the Organization of Broadcasting, as amended by Regulation of the Minister of Communication and Informatics No. 11 of 2021.

Trade

57. Regulation of the Minister of Trade No. 29 of 2025 on the Official Mark for the Year 2026

Enforcement Date: 17 September 2025

Summary:

- This Regulation stipulates the Official Mark for the Year 2026, which will have to be affixed and/or attached to all measuring instruments, measuring devices, weighing instruments and components that are verified or reverified between 1 January 2026 and 31 December 2026, as specifically addressed under Appendix I to this Regulation. In the event that the Official Mark for the Year 2026 cannot be affixed and/or attached to weighing components themselves, then it should be affixed to a seal that is placed over a written certificate, as specifically addressed under Appendix II to this Regulation.
- An Official Mark for the Year 2026 will remain valid from the date of its affixation and/or attachment until: 1) 30 November 2041, for electrical power measuring instruments that take the form of Class 2/Class A and Class 1/Class B electromechanical/dynamic kWh meters; 2) 30 November 2038, for fixed spherical tanks; 3) 30 November 2036, for diaphragm gas meters, Class 2/Class A and Class 1/Class B electronic/static kWh meters and Class 0.5/Class C kWh meters; 4) 30 November 2032, for fixed vertical cylindrical tanks for crude oil and related products, ships' tanks that are tested through the application of the ship tank calibration method and barge tanks; 5) 30 November 2031, for water meters with nominal diameters of ≤ 50 mm, Class 0.2/Class D kWh meters and electric vehicle supply equipment; 6) 30 November 2029, for ships' tanks that are tested through the use of custody transfer measuring systems and water meters with nominal diameters of 50 mm - 254 mm; 7) 30 November 2028, for automatic level gauges and fuel-oil truck tanks; and 8) 30 November 2027, for other types of measuring instruments, measuring devices, weighing instruments and components.

58. Regulation of the Minister of Trade No. 31 of 2025 on the Amendment to Regulation of the Minister of Trade No. 18 of 2025 on Import Policy and Provisions on Agricultural and Livestock Products

Enforcement Date: 6 October 2025

Summary:

- While maintaining core aspects of the import policy and provisions that apply in relation to agricultural and livestock products, this Amendment now incorporates cassava and its derivative products (collectively referred to as "**Cassava Products**") onto the list of products subject to the

aforementioned import policy and provisions. Overall, Cassava Products break down as follows: 1) Cassava, arrowroot, salep, Jerusalem artichokes, sweet potatoes and similar roots and tubers with high starch or inulin content; 2) Flour, meal and powders made from dried leguminous vegetables; and 3) Starch.

- Although Cassava Products have now been incorporated onto the import policy and provisions list, mandatory business licensing for the import sector and relevant technical verifications or tracing (collectively referred to “**Import Provisions**”) for all imports of Cassava Products into Bonded Storage Areas (*Tempat Penimbunan Berikat* – “**TPB**”) have not yet been enforced. Similarly, these Import Provisions have also yet to be enforced for imports of Cassava Products that involve the securing of Export-Oriented Import Facilities (*Kemudahan Impor Tujuan Ekspor/KITE*) in the form of import-duty and tax exemptions for export purposes.
- Additionally, Appendix I to the Amendment also outlines a wide array of requirements for imports of Cassava Products, including the requirement for all such imports to be covered by Import Approvals (*Persetujuan Import/PI*). In this regard, the Amendment also affirms that business actors that are eligible to import Cassava Products must have secured Manufacturer Importer Identification Numbers (*Angka Pengenal Importir – Produsen/API-P*).

59. Regulation of the Minister of Trade No. 32 of 2025 on the Amendment to Regulation of the Minister of Trade No. 20 of 2025 on Import Policies and Provisions for Chemicals, Hazardous Materials and Mining Materials

Enforcement Date: 6 October 2025

Summary:

- This Regulation has now expanded the scope of the chemicals, hazardous materials and mining materials that are subject to import regulation, which now also encompasses other types of fuel. Accordingly, the regulated commodities now break down as follows: 1) Base oil; 2) Clinker and cement; 3) Rough diamonds; 4) Non-pharmaceutical precursors; 5) Crude oil, natural gas **and other types of fuel**; 6) Nitrocellulose; 7) Commercial explosives; 8) Ozone-depleting substances; 9) Hazardous materials; 10) Hydrofluorocarbons; and 11) Certain chemicals.
- This Regulation also amends Appendices I – V of Regulation of the Minister of Trade No. 20 of 2025 on Import Policies and Provisions for Chemicals, Hazardous Materials and Mining Materials, which have now been replaced in their entirety by Appendices I – V to this Regulation.
- The provisions of this Regulation will not apply to imports of other types of fuel that were shipped prior to the entry into force of this new framework, as evidenced by the dates on relevant Bills of Lading or Air Waybills, provided that said items arrive at their destination ports by no later than 31 October

2025, as evidenced through customs documents in the form of manifests (BC.1.1).

60. Regulation of the Commodities Futures Trading Regulatory Agency No. 4 of 2025 on Technical Guidelines for Procedures of Approval as a Registration Center in the Warehouse Receipt System Sector

Enforcement Date: 22 September 2025

Summary:

- The Regulation stipulated to obtain approval as a Registration Center, a limited liability company must meet several requirements (e.g. having a minimum capital Rp. 250 million and at least 3 years of experience). Furthermore, if the Warehouse Receipt and Warehouse Receipt Derivatives (collectively referred to as “**Warehouse**”) administration system uses cloud services, the company must implement ISO 27017 (cloud security) and ISO 27018 (cloud privacy), evidenced by valid certification.
- The Registration Center is also required to obtain an ISO 27001 (information security management system) certificate for the Warehouse administration system within one year of approval, as well as an ISO 9001 certificate within two years. These certificates must be issued by certification bodies registered or recognized by the government authority responsible for information security.

61. Regulation of the Director-General of Customs and Excise No. PER-9/BC/2025 on the Amendment to Regulation of the Director-General of Customs and Excise No. PER-22/BC/2023 on the Governance of Entries and Releases of Goods into and from Areas Established as Free-Trade Areas and Free Ports Through Goods Transported by Passengers and Transportation Vehicle Crews

Enforcement Date: 26 August 2025

Summary:

- Passengers and transportation vehicle crews (collectively referred to as “**Carriers**”) may now choose either to follow the goods release service line (i.e. green or red line) and to directly and verbally notify customs officials via the red service line (if the Carrier in question chooses the red line) during the submission of their verbal customs notifications (“**Notifications**”) whenever transporting their goods through areas that are established as free-trade areas and free ports (collectively referred to as Free Trade Zones – “**FTZ**”). Moreover, in addition to specific locations that are stipulated by the Director-General, verbal Notifications may also be submitted by certain

Carriers that include: 1) Individuals aged 60 years or over; 2) Persons with disabilities; 3) Regular hajj pilgrims; and so forth.

- Newly featured under the Amendment, Carriers are now permitted to import their goods from outside customs-and-excise areas ("**Customs Areas**") to final destinations in other locations within Customs Areas, provided that settlements have been completed for all such goods at the relevant FTZ arrival terminal. The aforementioned goods settlements should be implemented in line with relevant Laws and Regulations, including the mechanism that is specifically outlined under Regulation of the Minister of Finance ("**Minister**") No. 203/PMK.04/2017, as amended by Regulation of the Minister ("**Minister**") No. 34 of 2025 (collectively referred to as "**Regulation 203/2017**").
- Personal goods (which exceed the determined customs values) and/or non-personal goods (which do not exceed the determined quantity/value thresholds) that are carried by Carriers to other locations within Customs Areas are now subject to the following taxation treatments, as stipulated under Regulation 203/2017: 1) Import-duty tariffs; 2) Collection of additional import duties; 3) Stipulation of customs values; and 4) Tariffs and collections of taxes for releases of goods from FTZ. Furthermore, the Amendment has also now clarified that income-tax treatments for the above-described personal goods, which applied from 1 January 2025 up until the enforcement of this Amendment, are governed by relevant Laws and Regulations, including the mechanism outlined under Regulation 203/2017.

62. Decree of the Minister of Trade No. 1855 of 2025 on Export Benchmark Prices for Mining Products Subject to Export Duty

Enforcement Date: 29 August 2025

Summary:

- This Decree outlines the applicable Export Benchmark Prices (*Harga Patokan Ekspor/HPE*) for a total of 209 copper concentrate products, as comprehensively listed under the Appendix to the Decree. These prices range from US\$ 1,510.58/WE to US\$ 7,579.91/WE.

63. Decree of the Minister of Trade No. 1899 of 2025 on Benchmark Export Prices for Mining Products Subject to Export Duty

Enforcement Date: 12 September 2025

Summary:

- This Decree stipulates a new list of benchmark export prices for various mining products that are subject to export duty, including copper concentrate, as further detailed under the Appendix to the Decree. The

highest average price used as the basis for determinations of benchmark export prices has been set as the highest average price recorded between 19 August 2025 and 9 September 2025.

- The above-mentioned export benchmark prices will apply between 15 September 2025 and 30 September 2025.

64. Decree of the Minister of Finance No. 28/KM.4/2025 on Determinations of Export Prices for Calculations of Export Duty

Enforcement Date: 15 August 2025 - 31 August 2025

Summary:

- A total of 209 types of processed mineral products are outlined comprehensively under the Appendix to this Decree, along with their corresponding export prices, and should be utilized in order to complete calculations of export duties. The aforementioned 209 export prices include prices that are applicable to copper concentrate commodities with various levels of copper (Cu) content ranging from 15% to 33%, as well as gold content ranging from 0 ppm up to more than 50 ppm. The established prices have been set at between US\$ 1,520.17/WE and US\$ 7,608.88/WE.

65. Decree of the Minister of Finance No. 29/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 24 of 2025 on Import Policy and the Regulation of Used Goods and Non-Hazardous and Non-Toxic Waste

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 24 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 79 types of used goods and non-hazardous, non-toxic waste. Details of said goods and waste encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. used lithium batteries and non-hazardous waste), all of which are set out under the Appendix to this Decree.

66. Decree of the Minister of Finance No. 30/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 23 of 2025 on Import Policy and the Regulation of Consumer Goods

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 23 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 218 types of consumer goods. Details of said goods encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. bags, alcoholic beverages and footwear), all of which are set out under the Appendix to this Decree.

67. Decree of the Minister of Finance No. 31/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 22 of 2025 on Import Policy and the Regulation of Certain Industrial Goods

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 22 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 543 types of industrial goods. Details of said goods encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. valves and iron or steel), all of which are set out under the Appendix to this Decree.

68. Decree of the Minister of Finance No. 32/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of

Trade No. 21 of 2025 on Import Policy and the Regulation of Electronic and Telematics Goods

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 21 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 142 types of electronic and telematics commodities. Details of said commodities encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. mobile phones and electronics), all of which are set out under the Appendix to this Decree.

69. Decree of the Minister of Finance No. 33/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 20 of 2025 on Import Policy and the Regulation of Chemicals, Hazardous Substances and Mining Materials

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 20 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 202 types of commodities. Details of said commodities encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. non-pharmaceutical precursors, crude oil and natural gas), all of which are set out under the Appendix to this Decree.

70. Decree of the Minister of Finance No. 34/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 19 of 2025 on Import Policy and the Regulation of Salt and Fisheries Commodities

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 19 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of five types of salt products. Details of said products encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (i.e. salt), all of which are set out under the Appendix to this Decree.

71. Decree of the Minister of Finance No. 35/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 18 of 2025 on Import Policy and the Regulation of Agricultural and Livestock Products

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 18 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 19 types of agricultural and livestock products. Details of said products encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. rice and sugar), all of which are set out under the Appendix to this Decree.

72. Decree of the Minister of Finance No. 36/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 17 of 2025 on Import Policy and the Regulation of Textiles and Textile Products

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 17 of 2025, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- This Decree establishes restrictions on the importation of 1,002 types of textile products. Details of said products encompass Harmonized System (HS) codes, product descriptions, types of import licenses and commodity classifications (e.g. textiles, carpets and ready-made garments), all of which are set out under the Appendix to this Decree.

73. Decree of the Minister of Finance No. 37/KM.4/2025 on Goods Restricted for Import Based on Regulation of the Minister of Trade No. 16 of 2025 on Import Policy and Regulation

Enforcement Date: 29 August 2025

Summary:

- This Decree stipulates that the supervision of goods subject to import restrictions, as specifically addressed under the framework of Regulation of the Minister of Trade No. 16 of 2025 on Import Policies and Arrangements, also applies to entries and releases of goods into and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Zones (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).
- Through the enforcement of this Decree, several previously in force provisions have now been repealed and replaced, specifically: 1) Decree of the Minister of Finance No. 8/KM.4/2024; 2) Decree of the Minister of Finance No. 15/KM.4/2024; and 3) Decree of the Minister of Finance No. 17/KM.4/2024, all of which governed goods subject to import restrictions.

74. Circular of the Commodity Futures Trading Regulatory Agency No. 305/BAPPEBTI/SE/09/2025 on the Elucidation of the Implementation of the Obligation of Futures Brokers Participating in the Alternative Trading System to Enter into Cooperation Agreements with the Directorate-General of Population and Civil Registration at the Ministry of Home Affairs

Enforcement Date: 8 September 2025

Summary:

- This Circular stipulates the obligation for futures brokers who participate in the Alternative Trading System (“**Futures Brokers**”) to enter into Cooperation Agreements (*Perjanjian Kerja Sama* – “**PKS**”) with the Directorate-General of Population and Civil Registration (*Direktorat Jenderal Kependudukan dan Pencatatan Sipil* – “**Ditjen Dukcapil**”) in order to gain the right to access population data. Through this obligation, futures brokers are expected to implement the Know Your Customer (KYC) principle, as well as processes of Customer Due Diligence (CDD) and/or Enhanced Due Diligence (EDD) through the identification and verification of both customers and prospective customers within the context of the Anti-Money Laundering and Counterterrorism Financing Program.
- In order to carry out this mandate, Futures Brokers must fulfill the various document-related requirements that are stipulated under Regulation of the Minister of Home Affairs (“**Minister**”) No. 17 of 2023 on the Amendment to Regulation of the Minister No. 102 of 2019. In addition, futures brokers are also required to secure a Memorandum of Understanding (“**MoU**”) with Ditjen Dukcapil or to submit a recommendation application to the Commodity Futures Trading Regulatory Agency (*Badan Pengawas Perdagangan Berjangka Komoditi* – “**Bappebti**”).
- If any MoU/PKS between the Ministry of Home Affairs and the Ministry of Trade is still in the process of being renewed, then the PKS document obligation that must be met by Futures Brokers and Ditjen Dukcapil will be temporarily replaced with a statement of commitment that sets out the deadline for the submission of applications and a commitment to complete strict verifications of all customers and prospective customers (either on a face-to-face basis or via electronic means that encompass two-stage authentication factors).

Transportation and Logistic Services

75. Circular of the Director-General of Sea Transportation No. SE-DJPL 26 of 2025 on the Preparation of Indonesian-Flagged Ships for the Concentrated Inspection Campaign (CIC) on Ballast Water Management 2025

Enforcement Date: 3 September 2025

Summary:

- This Circular will serve as a set of guidelines for use by port authorities as a part of efforts to ensure the compliance of Indonesian-flagged ships with provisions set out under the International Convention for the Control and Management of Ships’ Ballast Water and Sediments, 2004 (“**BWM**”

Convention”). Said compliance is essential in order for Indonesia to maintain its white-list status under the Tokyo Memorandum of Understanding (MoU) and to prevent ships from being detained.

- Under this Circular, port authorities are directed to: 1) Disseminate information regarding the BWM Convention to ship owners/operators; 2) Complete seaworthiness inspections of Indonesian-flagged ships in accordance with the BWM Convention; and 3) Ensure that Port Clearance documents are only issued to ships that meet national and international legality requirements. Meanwhile, recognized organizations and classification bodies must ensure that all surveyors understand the provisions that are set out under the BWM Convention, report the results of statutory inspections related to the BWM Convention to the Director-General of Sea Transportation and conduct additional inspections of all high-risk ships.
- In addition, owners/operators of Indonesian-flagged ships are required to implement the following measures: 1) Ensure the availability and validity of International Ballast Water Management Certification and Ballast Water Management Plans (“**BWMP**”); 2) Ensure that their Ballast Water Management Systems have been approved and are being operated normally by trained crews; 3) Maintain the completeness and accuracy of their Ballast Water Record Books; 4) Manage all ballast water sediment in line with their BWMP; and 5) Discontinue ship operations if a ship fails to meet the requirements set out under the BWM Convention.

Miscellaneous

76.Regulation of the Minister of Higher Education, Science and Technology No. 39 of 2025 on Higher Education Quality Assurance

Enforcement Date: 2 September 2025

Summary:

- While maintaining the majority of the core aspects of the National Higher Education Standards (*Standar Nasional Pendidikan Tinggi* – “**SN Dikti**”) that originally featured under Regulation of the Minister of Education, Culture, Research and Technology No. 53 of 2023 (“**Regulation 53/2023**”), this Regulation no longer sets any mandatory minimum duration for off-campus learning via internships. Instead, this Regulation mandates that the durations and learning loads that are associated with said internships should be independently determined by institutions of higher education.
- In terms of master’s and applied master’s degree programs specifically, this new framework sets a minimum of 36 semester credit units (*Satuan Kredit Semester* – “**SKS**”) over a duration of three semesters. In contrast, the previous framework of Regulation 53/2023 featured a minimum of 72 SKS

that spanned three to four semesters for all such master's or applied master's degree programs.

- In terms of higher education institution accreditation, this new Regulation states that said accreditation may be pursued by National Accreditation Agencies for Higher Education (*Badan Akreditasi Nasional Perguruan Tinggi* – “**BAN-PT**”) in relation to higher education institutions based on the fulfillment and exceeding of the SN Dikti standards. Accreditation status encompasses the following categories: 1) Accredited; 2) Superior accreditation (indicating that the relevant higher education institution has exceeded the SN Dikti standards); or 3) Not accredited. Previously, the superior accreditation category for BAN-PT, as listed in point (2) above, did not feature under Regulation 53/2023.
- This Regulation has also revised the applicable grace period that higher education institutions have in which to apply for a full accreditation status from BAN-PT or Independent Accreditation Agencies (*Lembaga Akreditasi Mandiri/LAM*) for their institutions or programs, once they have first secured initial or temporary accreditation, from nine months under Regulation 53/2023 to two years under this new framework.
- Upon the enforcement of this new Regulation, Regulation 53/2023 was officially repealed and replaced.

77. Regulation of the Constitutional Court No. 9 of 2025 on the Stages, Activities and Schedules for the Handling of Disputes Relating to the Results of the General Election of Governors, Regents and Mayors Following the Constitutional Court Decision

Enforcement Date: 27 August 2025

Summary:

- Following the simultaneous elections that were held in Indonesia in 2024, the Constitutional Court (*Mahkamah Konstitusi* – “**MK**”) is anticipating that it will receive new petitions that specifically address the 2025 election results. These petitions necessitate the introduction of this new Regulation, through which the MK has now established the various stages, activities and timelines that are associated with the processing of such cases, as detailed under the Appendix to this Regulation. Furthermore, the MK permits modifications to be made to these procedures based on evolving circumstances and provides for the organization of Judicial Deliberation Meetings in order to address any unforeseen issues.

78. Draft Bill on the Third Amendment to Law No. 8 of 2019 on the Implementation of Hajj and Umrah Pilgrimages

Enforcement Date: -

Summary:

- This Draft Bill has now removed the various age and marital status requirements that were previously imposed under the framework of Law No. 8 of 2019 on the Implementation of Hajj and Umrah Pilgrimages (“**Law 8/2019**”). This new Draft Bill also extends the minimum interval between pilgrimages for pilgrims who have already performed the Hajj from 10 years to 18 years. In addition, the Draft Bill grants various new rights to Hajj pilgrims, including special services that will be made available to elderly pilgrims and pilgrims who have been designated as being at high health risk. The obligations that have to be met by special Hajj pilgrims have also been simplified and said pilgrims will now no longer be required to report to regency/city offices of the Ministry of Religious Affairs through Special Hajj Pilgrimage Organizers (*Penyelenggara Ibadah Haji Khusus* – “**PIHK**”).
- This Draft Bill also revises the mechanism for determinations of Indonesia’s Hajj quota by requiring the Minister of Hajj and Umrah (“**Minister**”) to engage in deliberations with and ultimately secure joint approvals from the House of Representatives. In addition, the official quota for Hajj officers, which was previously combined with the pilgrims’ quota, has now been stipulated separately. Furthermore, any additional Hajj quota that is granted by the Government of the Kingdom of Saudi Arabia must be allocated to both regular and special Hajj pilgrims and will have to be announced online on a regular basis.
- Meanwhile, the Draft Bill also recognizes non-quota Hajj visas, which were previously prohibited under Law 8/2019. In this regard, any Indonesian citizens who hold such visas must either depart via the use of PIHK services or report their visa and service packages to the Minister. Finally, any PIHK that facilitate the departure of Indonesian citizens who have secured non-quota Hajj visas will be required to enter into written agreements with the relevant pilgrims and report said agreements to the Minister.