

# Regulation Summary - February

## 2026

### General Corporate

#### 1. Draft Bill on the Third Amendment to Law No. 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition

Enforcement Date: -

Summary:

- Although the various types of prohibited agreements, activities and abuses of dominant positions that were originally set out under Law 5/1999 have been retained under the new framework, this Draft Bill now clearly sets out the various administrative sanctions that can be imposed in response to all such conspiracies (*persekongkolan*) and vertical integration violations. Furthermore, the phrase, “other parties”, as it relates to interactions between business actors that involve each of the aforementioned prohibitions, has now been revised to read, “other business actors and/or parties affiliated with other business actors”. This new nomenclature reflects a judicial review petition decision that was handed down by Indonesia’s Constitutional Court.
- The Draft Bill has also revised the minimum market share thresholds that should be used as indicators whenever determining prohibited dominant positions of business actors, which have now been set uniformly at 50% across all types of businesses or groups of businesses. Additionally, the Draft Bill also prohibits the attainment of any dominant positions, as well as any mergers or consolidations of business entities, or acquisitions of shares in other companies that result in monopolistic practices and/or unfair business competition.
- The Draft Bill also introduces an amnesty/penalty reduction program for business actors who admit/report their conduct and or provide information related to their conduct (“**Leniency Program**”). In this regard, any businesses suspected of violating provisions relating to price fixing, market allocations, cartels, exclusive agreements and agreements with foreign parties may participate in the Leniency Program. The aforementioned amnesty/penalty reductions apply to imposed administrative fines and can range from a 25% reduction up to a full 100% amnesty. However, if businesses violate the various requirements for participation in the Leniency Program, then said participation may be revoked.

## 2. Draft Bill on Consumer Protection

Enforcement Date: -

Summary:

- The 2025 Draft Bill on Consumer Protection (“**2025 Draft Bill**”) reaffirms its objective of properly accommodating Indonesia’s growing digital transactions ecosystem, as reflected in its revised definitions of “goods” and “services”, which now encompass transactions that are conducted both offline and online. This expansion is also reflected in the scope of consumer protection subjects, which now include business actors working with goods and service providers that operate both within and externally to electronic systems.
- In an effort to address structural imbalances in terms of bargaining power between consumers and businesses, the 2025 Draft Bill significantly strengthens the regulation of Standard Form Agreements through an expanded scope of prohibited standard clauses and by requiring all business actors working with goods and/or service providers to provide consumers with explanations prior to concluding any such Agreements. Any failure to comply with these requirements may result in the imposition of administrative sanctions ranging from written reprimands to business license revocations.
- The 2025 Draft Bill also revises the prevailing nomenclature for the country’s consumer dispute resolution institutions. In this regard, the name Consumer Dispute Resolution Agency (*Badan Penyelesaian Sengketa Konsumen/BPSK*) will be changed to the Alternative Institution for Consumer Dispute Resolution (*Lembaga Alternatif Penyelesaian Sengketa Konsumen/LAPSK*). Furthermore, this change must be implemented within **two years** of the 2025 Draft Bill coming into force.

## 3. Draft Regulation of the Government on Government Guarantees

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Regulation is set to expand and detail guarantees that are provided by the government (“**Government Guarantees**”), which will comprise the following types: 1) Project Government Guarantees (for public service and joint-business partnerships); 2) Loan Government Guarantees (e.g. direct, catalytic and commercial loans); 3) Bond Government Guarantees; 4) Business Feasibility Government Guarantees; 5) Risk Assumption Government Guarantees; and 6) Government Guarantees for Primary Guarantors.

- The Draft Regulation authorizes the Minister of Finance (“**Minister**”) to stipulate the maximum limits of the aforementioned Government Guarantees every fiscal year by taking several factors into account (e.g. fiscal sustainability, guarantee risk exposure and guarantee planning). Moreover, the Draft Regulation also addresses ring-fenced implementation (*pemagaran risiko*), which will separate and restrict the use of funds that are allocated for guarantee purposes in order to ensure controlled fiscal exposure and the preservation of the government’s fiscal credibility.
- Government Guarantees should be organized in line with various good governance aspects, which range from planning to the protection of guarantees. The Draft Regulation also affirms that Government Guarantees will be granted based on written applications that are submitted by relevant parties to the Minister. Furthermore, said applications should be preceded by pre-application consultations that are held with the Ministry of Finance and/or with a special guarantee entity.

## Banking

### 4. Regulation of the Bank Indonesia Board of Governors No. 1 of 2026 on the Amendment to Regulation of the Bank Indonesia Board of Governors No. 23 of 2025 on the Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units

Enforcement Date: 2 February 2026

Summary:

- The Amendment now details the various written reprimands and fines that may be imposed upon conventional commercial banks (*Bank Umum Konvensional* – “**BUK**”), sharia commercial banks (*Bank Umum Syariah* – “**BUS**”) and/or sharia business units (*Unit Usaha Syariah* – “**UUS**”) in relation to their macroprudential intermediation ratio (*Rasio Intermediasi Makroprudensial* - “**RIM**”) and/or macroprudential liquidity buffer (*Penyangga Likuiditas Makroprudensial* - “**PLM**”). These administrative sanctions remain similar to those originally outlined under Regulation of Bank Indonesia (“**BI**”) No. 20/4/PBI/2018, as amended several times, most recently through the issuance of Regulation of BI No. 24/16/PBI/2022.
- It should be noted that the Amendment will now allow BI to debit rupiah Giro accounts in response to any Giro RIM and/or PLM violations that exceed three business days under certain conditions (e.g. processes that are required in order to ensure that monetary penalties have been correctly determined).

## 5. Regulation of Bank Indonesia No. 2 of 2026 on the Fifth Amendment to Regulation of Bank Indonesia No. 20/4/PBI/2018 on the Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units

Enforcement Date: 2 February 2026

Summary:

- Previously, Regulation of Bank Indonesia (“**BI**”) No. 20/4/PBI/2018, as amended several times, most recently by Regulation of BI No. 24/16/PBI/2022 (collectively referred to as “**Regulation 4/2018**”), comprehensively outlined various forms of administrative sanctions. Said sanctions comprised written reprimands and fines and could be imposed upon any bank that violated its macroprudential intermediation ratio (*Rasio Intermediasi Makroprudensial* - “**RIM**”) or macroprudential liquidity buffer (*Penyangga Likuiditas Makroprudensial* - “**PLM**”). However, details relating to said sanctions no longer feature under the Fifth Amendment. Instead, details of a new set of administrative sanctions are set to be introduced under a forthcoming Regulation of the BI Board of Governors.

## 6. Regulation of the Board of Commissioners of the Financial Services Authority No. 1 of 2026 on the Organization of Information Technology by Commercial Banks

Enforcement Date: 1 March 2026

Summary:

- Following the enforcement of Regulation of the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) No. 11/POJK.03/2022, this Regulation now further details various requirements associated with the organization of Information Technology (“**IT**”) by commercial banks (“**Banks**”). Overall, this framework covers the following aspects: 1) The utilization of IT services providers (*Pihak Penyedia Jasa TI* - “**PPJTI**”); 2) Banks’ IT architecture; 3) Data management and personal data protection (“**PDP**”) requirements; 4) Risk management processes; and 5) Internal control and audits.
- With respect to the above PPJTI utilization, this Regulation further details the mandatory PPJTI-related policies and procedures, which includes requiring Banks to carry out due diligence during the selection of PPJTI and more aspects to be taken into account upon engaging materiality reassessment. Furthermore, this Regulation also further details the four phases in Bank’s IT architecture establishment.
- In relation to data management, this Regulation provides further details to such activity, including the requirement for Banks to set the applicable data

quality. Meanwhile, this Regulation also further specifies Banks' PDP governance requirements, which includes provisions that must be complied upon Securing consent for personal data processing from customers and clarified conditions that may trigger a mandatory preparation of a Data Protection Impact Assessment (DPIA).

## **7. Circular of the Deposit Insurance Corporation No. SE-5/ADK1/2025 on Procedures for Payments of Premiums and Fines for Underpayments and/or Late Payments of Premiums under the Banking Restructuring Program**

Enforcement Date: 29 December 2025

Summary:

- Prior to completing any Banking Restructuring Program (*Program Restrukturisasi Perbankan/PRP*) premium ("**Premiums**") payments to the Deposit Insurance Corporation (*Lembaga Penjamin Simpanan – "LPS"*), both conventional and sharia commercial Banks, as well as sharia business units (*Unit Usaha Syariah – "UUS"*), conventional rural Banks (*Bank Perekonomian Rakyat – "BPR"*) and sharia BPR (*BPR Syariah – "BPRS"*) (collectively referred to as "**Banks**") are first required to submit their Premium calculations.
- In particular, BPR and BPRS may only settle Premiums and/or fines for any underpayments and/or late payments of Premiums ("**Fines**") in accordance with the billed amounts that are stated for the relevant virtual account ("**VA**") numbers, and only after Premium calculations have first been submitted. Upon completion of a payment, a given Bank must submit proof of payment for the relevant Premium or Fine through the e-Laporan system or, if the system is experiencing technical disruptions, via email to: [penjaminan@lps.go.id](mailto:penjaminan@lps.go.id). It should be noted that this email address also serves as the contact point for any payment-related inquiries or coordination requests.
- Furthermore, conventional commercial Banks that maintain UUS must now differentiate between bank codes that are assigned to parent Banks and bank codes that are assigned to UUS. The list of partner banking applications that have been designated as official payment channels has also been updated. For example, Bank Negara Indonesia ("**BNI**") now utilizes the Wondr by BNI application, while Bank Syariah Indonesia ("**BSI**") uses the BYOND by BSI application.

## **8. Draft Regulation of the Financial Services Authority on the Requirement for People's Economic Banks to Provide Minimum Capital and Meet Minimum Core Capital Levels**

Enforcement Date: -

## Summary:

- If this Draft Regulation ultimately comes into force, then it will replace Regulation of the Financial Services Authority (*Otoritas Jasa Keuangan – “OJK”*) No. 5/POJK.03/2015 on the Requirement for Rural Banks to Provide Minimum Capital and Meet Minimum Core Capital Levels, as amended by Regulation of the OJK No. 1 of 2024 on the Quality of Assets of People’s Economic Banks (collectively referred to as “**Regulation 5/2015**”). While retaining the various deduction factors that constitute core capital, as set under Regulation 5/2015, the Draft Regulation has now expanded the scope of said factors through the introduction of abandoned property that is held for periods of over a year, as well as shortfalls between the asset quality assessment allowance (*Penyisihan Penilaian Kualitas Aset/PPKA*) and impairment reserves.
- Both Regulations set a minimum core capital threshold of Rp. 6 billion, however, the Draft Regulation has now introduced a fixed remediation period, meaning that if the capital held by a People’s Economic Bank (*Bank Perkreditan Rakyat – “BPR”*) falls below a certain threshold, then said BPR must remedy the shortfall within a maximum of six months from the date that it is identified in reports or examinations.
- Any BPR that are subject to administrative sanctions for failing to meet the minimum core capital requirement and that remain unable to satisfy this requirement will have to convert their operations to that of a microfinance institution (*Lembaga Keuangan Mikro – “LKM”*) or face the revocation of their business license. Furthermore, if a BPR does not comply voluntarily with this requirement, then the OJK can officially designate the entity in question as an LKM.

# Capital Market

## 9. Regulation of the Financial Services Authority No. 40 of 2025 on the Utilization of Proceeds from Public Offerings

Enforcement Date: 22 June 2026

## Summary:

- In addition to being required to submit realization reports (“**Realization Reports**”) on the use of proceeds from public offerings (“**Proceeds**”) to the Financial Services Authority (*Otoritas Jasa Keuangan – “OJK”*), issuers will now also have to publicly disclose their Realization Reports. Said disclosures should be completed through relevant issuers’ websites, while listed issuers should use the stock exchange’s website for this purpose.
- Under the public offering prospectus, the use of Proceeds has been limited to a four-level structure, specifically: 1) Level 1: Issuers themselves; 2)

Level 2: Subsidiaries or other entities that directly receive Proceeds from issuers; 3) Level 3: Indirect subsidiaries or other entities that receive Proceeds from Level 2 entities; and 4) Level 4: Indirect subsidiaries or other entities that receive Proceeds from Level 3 entities.

- The realization of Proceeds must be accounted for at annual General Meetings of Shareholders (“**GMS**”) by public companies and through the submission of annual reports by non-listed issuers. Furthermore, in terms of changes that are made regarding the use of Proceeds, issuers may be required to secure approvals through GMS, general meetings of bondholders and/or general meetings of sukuk holders, depending on the applicable criteria. In addition, issuers are also required to deposit their Proceeds in special accounts that are maintained separately from their operational accounts.

#### **10. Circular of the Commodity Futures Trading Regulatory Agency No. 19/BAPPEBTI/SE/02/2026 on the Explanation of the Status of Cooperation Agreements Between Futures Exchanges and Futures Clearing Institutions**

Enforcement Date: 3 February 2026

Summary:

- This Circular stipulates that the various documents that are required in order to secure a business license as a futures exchange (“**Exchange**”) include the following: 1) Cooperation agreement between the Exchange in question and a Futures Clearing Institution (“**Clearing Institution**”) that will be utilized (“**Cooperation Agreement**”); and 2) Copies of the deed of establishment of the relevant Clearing Institution (if said institution forms part of the Exchange). In this regard, the Circular also clarifies that this Cooperation Agreement is one of the set of mandatory documents that is required in order to secure a permit as a Clearing Institution and constitutes an inseparable and binding unity between a prospective Exchange and a prospective Clearing Institution.
- It should be noted that the implementation and legal consequences of any utilized Cooperation Agreement will remain binding upon the relevant parties and will remain effective for as long as the licensed Exchange and Clearing Institution continue to actively engage in their business activities. Additionally, this Circular affirms that any Exchange and/or Clearing Institution that has secured a business permit may renew an existing Cooperation Agreement or enter into a new Cooperation Agreement by taking into account certain considerations (e.g. a newly drafted Cooperation Agreement has been drawn up for the purposes of further development and/or the strengthening of futures contracts that are traded through the Exchange).
- Furthermore, if an Exchange and/or Clearing Institution intends to revoke or mutually agree to terminate an existing Cooperation Agreement, then the Commodity Futures Trading Regulatory Agency (*Badan Pengawas*

*Perdagangan Berjangka Komoditi/Bappebti*) may gradually suspend the relevant business activities.

**11. Rule No. III-B - Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00023/BEI/02-2026 on Members of the Stock Exchange Authorized to Trade Securities Derivative Contracts and Liquidity Providers of Securities Derivative Contracts**

Enforcement Date: 12 February 2026

Summary:

- While retaining the majority of requirements and provisions that apply to stock exchange (“**Exchange**”) members (“**Members**”) regarding the trading of securities derivative contracts (“**Derivative Contracts**”) and the role of liquidity provider for Derivative Contracts (“**Liquidity Providers**”) that initially featured under the previous framework of Rule No. III-B (“**Previous Rule III-B**”), this new version of Rule No. III-B (“**Current Rule III-B**”) now incorporates various aspects relating to securities sale transactions for situations where the securities in question are not owned by sellers at the time that transactions are executed (“**Short-Selling Transactions**”).
- With the inclusion of the aforementioned Short Selling Transactions, Current Rule III-B now requires any Members who wish to become Liquidity Providers to comply with the following requirements: 1) Must appoint an official who will assume responsibility for Short Selling Transactions on underlying securities, as well as risk management in relation to these transactions; 2) Must establish a system capable of conducting Short-Selling Transactions on underlying securities; and 3) Must establish standard operating procedures and written internal risk management policies related to the implementation of Short Selling Transactions for underlying securities and must maintain databases related to Short-Selling Transactions for underlying securities for at least five years.
- Current Rule III-B also now clarifies that during reviews of applications for the trading of Derivative Contracts that are filed by Members, the Exchange is authorized to consider not only formal aspects but also the substance of the requirements. Moreover, Current Rule III-B also prohibits Liquidity Providers from making any quotations on products for which they have not received official approvals from the Exchange.

**12. Rule No. III-H - Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00024/BEI/02-2026 on the Amendment to Rule No. III-H on Auctions and Share Buybacks of Exchange Shares**

Enforcement Date: 12 February 2026

Summary:

- Previously, Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00008/BEI/02-2022 (“**Decree 8/2022**”) explicitly classified shares as either Category A (i.e. unissued/bought-back shares) or Category B (i.e. shares that were submitted by the relevant share owners in order to be sold by the stock exchange [“**Exchange**”]). Although the current Rule No. III-H (“**Rule III-H**”) no longer features these two A and B categories, the criteria that apply to these two types of shares have been retained.
- Shareholders are required to transfer any owned shares through the Exchange to other securities companies that meet the requirements that apply to Exchange members (“**Members**”) or to submit requests to the Exchange to sell Exchange shares to other Members who qualify for the Exchange within 36 months of the revocation of the relevant Member Approval Letters (*Surat Persetujuan Anggota Bursa* – “**SPAB**”). However, Rule III-H affirms that any shareholders who submit applications for share buybacks through the Exchange prior to the aforementioned 36-month period elapsing will be exempted from this requirement.
- Rule III-H affirms that in the event that PT Kliring Penjaminan Efek Indonesia (“**KPEI**”) requests an auction of Exchange shares, then said auctions will take precedence over other auctions of Exchange shares that are requested by shareholders and/or auctions of Exchange shares that have yet to be issued or that have been repurchased by the Exchange. The aforementioned Exchange shares requested by KPEI for auctions comprise shares that have been pledged through KPEI by shareholders who fail to complete an Exchange transaction. Meanwhile, the auction opening price should not be lower than the nominal value and should take into account the amount required in order to complete the Exchange transaction and/or the last auction price on the Exchange.
- Rule III-H also affirms that payments that are made to said shareholders in relation to buybacks must be completed within five Exchange days of the Exchange receiving full payment from the relevant auction winners. Previously, Decree 8/2022 set a timeframe of 10 Exchange days for share buyback payments.

### **13. Rule No. III-P - Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00022/BEI/02-2026 on the Amendment to Rule No. III-P on Liquidity Providers for Structured Warrants Through the Exchange**

Enforcement Date: 12 February 2026

Summary:

- In comparison with the previous framework of Rule No. III- P (“**Previous Rule III-P**”), the new version of Rule No. III-P (“**Current Rule III-P**”) has now expanded the scope of stock exchange (“**Exchange**”) members (“**Members**”) as follows: 1) Securities brokers (*Perantara Pedagang Efek* – “**PPE**”) that have secured business permits from the Financial Services

- Authority (*Otoritas Jasa Keuangan* – “**OJK**”); and 2) Other parties that have been approved by the OJK.
- Current Rule III-P now incorporates various aspects relating to securities sale transactions where the securities in question are not owned by the seller at the time that the transaction is executed (“**Short-Selling Transactions**”). As such, Members that wish to become liquidity providers for structured warrants (“**Liquidity Providers**”) should meet the following requirements: 1) Must appoint an official who will assume responsibility for Short-Selling Transactions involving structured warrant underlyings and for the risk management of said transactions; 2) Must establish a system capable of conducting Short-Selling Transactions of structured warrant underlyings; and 3) Must establish standard operating procedures and written internal risk management policies related to the implementation of Short-Selling Transactions of structured warrant underlyings and must maintain databases related to the aforementioned Short-Selling Transactions as a Liquidity Provider for at least five years.
  - When reviewing any application to become a Liquidity Provider that is filed by a Member, the Exchange is authorized to consider not only various formal aspects but also the substance of the requirements. Moreover, it should also be noted that the Current Rule III-P also requires any Members that wish to become Liquidity Providers to establish standard operating procedures and policies related to hedging (*lindung nilai*) mechanisms in their role as Liquidity Providers.
  - Ultimately, Current Rule III-P clarifies that Liquidity Providers may only provide quotations for structured warrants that it has issued and those that have been agreed to be quoted by Liquidity Providers and the relevant issuers (based on copies of the relevant appointment documents from issuers designating Liquidity Providers).

#### **14. Decree of the Board of Directors of PT Kustodian Sentral Efek Indonesia No. KEP-0004/DIR/KSEI/0126 of 2026 on Service Fee Incentives for Structured Warrants at PT Kustodian Sentral Efek Indonesia**

Enforcement Date: 20 January 2026

Summary:

- .In addition to exempting various parties from the obligation to pay initial securities registration fees for structured warrants, as featured under Rule of PT Kustodian Sentral Efek Indonesia (“**KSEI**”) No. VI-A, this Decree also sets out various annual fee incentives that can be enjoyed by issuers of structured warrants. These KSEI service fee incentives will remain valid between 2 January 2026 and 31 December 2026.
- The aforementioned incentives break down as follows: 1) Exemption from the obligation to pay annual fees for Series 1 to Series 35 structured warrants; and 2) A 50% reduction amounting to Rp. 5 million for Series 36 structured warrants onwards (if the issuance of structured warrants has

reached Series 35 since the beginning of the year and remains active). The now-revoked framework of Decree of the Board of Directors of KSEI No. KEP-0049/DIR/KSEI/1224 of 2024 did not previously feature the incentive outlined in point (1) above.

### **15. Draft Regulation of the Board of Directors of PT Bursa Efek Indonesia No. I-A on the Listing of Shares and Equity Securities Other Than Shares Issued by Listed Companies**

Enforcement Date: -

Summary:

- Shares and securities listing requirements are set to be revised through the adjustment of the minimum free-float requirement to 15%, which should be maintained for a period of one year after listing, replacing the previous threshold of 7.5%. Eligibility criteria for prospective listed companies have also been strengthened by requiring the employment of qualified accounting personnel, the organization of ongoing corporate governance training programs for board members, while any companies that are initially loss-making will be required to achieve operating and net profits within two years of their listing.
- The general listing requirements that apply to both the Main Board and the Development Board are also set to be tightened through the introduction of stricter financial thresholds and mandatory net tangible assets (NTA) for multiple years, as well as a new large-cap route with higher capitalization and equity requirements.
- The free-float requirements for both the Main Board and Development Board are also set for revision, with calculations now being based on share capitalization values instead of equity values, as well as higher minimum percentages and size thresholds that vary by capitalization. Finally, the minimum free-float must be maintained for a period of one year after listing, while calculations may differ depending on a given company's origin.

## **Employment**

16. Draft Bill on Gig Workers

Enforcement Date: -

Summary:

- If ultimately enforced, this Draft Bill will address rapid growth in the digital economy and the rise of app-based work. The Draft Bill emphasizes the various rights and obligations of gig workers, including the classification of nine service categories, the preparation of written service agreements that outline applicable rates, payment methods and fundamental worker rights. The Draft Bill also features provisions that will ensure that all agreements that are deemed less favorable to gig workers will be declared null and void.
- In terms of social security and occupational health and safety, the Draft Bill requires all platform organizers to register their gig workers with the Social Security Administration Agency's (*Badan Penyelenggara Jaminan Sosial/BPJS*) Self-Employed (*wiraswasta*) Social-Security Scheme. Under this scheme, regular deductions and remittance contributions will be made, while a digital system will be provided in order to monitor payments and contributions. Gig workers are entitled to be informed of any contribution shortfalls or excesses, while platforms must implement measures aimed at ensuring worker safety, health and welfare in accordance with BPJS guidelines.
- Any disputes that arise between gig workers and the entities that hire them should be resolved through the Gig Worker Tribunal ("**Tribunal**"), which will receive cases from conciliators or the Minister and which is required to issue decisions within a maximum of 30 days from the date of any last hearing. The Tribunal may order payments of compensation, restitution and interest of up to 6% annually. Alternatively, the Tribunal may also dismiss cases or mandate other necessary actions. Violations of Tribunal decisions may result in the imposition of criminal sanctions, including fines of up to Rp. 500 million, prison terms of up to two years, or both, with an additional fine of Rp. 5 million per day available if violations continue.

## **17. Circular of the Minister of Manpower No. M/1/HK.04/II/2026 on the Obligation of Employers to Report Job Vacancies**

Enforcement Date: 10 February 2026

Summary:

- In essence, this Circular requires employers to report both available and filled job vacancies through the Employment Information System and Services Application (*Sistem Informasi dan Aplikasi Pelayanan Ketenagakerjaan – "SIAPkerja"*), which can be accessed via the following website: [karirhub.kemnaker.go.id](http://karirhub.kemnaker.go.id). All listed vacancy information is publicly accessible to job seekers, employers and both central and regional governments.
- It should be noted that this Circular mandates that regional manpower offices must guide and supervise employers operating within their relevant regions in terms of their compliance with their obligation to report job vacancies and jobs that have already been filled through the SIAPkerja platform. Moreover, this Circular also authorizes said manpower offices to impose administrative sanctions in the form of written reprimands upon any

non-compliant employers. Finally, manpower offices may also bestow awards upon any employers who consistently comply with the obligation to report their job vacancies via the SIAPkerja platform.

# Energy

## 18. Regulation of the Nuclear Energy Regulatory Agency No. 1 of 2026 on Physical Protection Systems for Nuclear Installations and Nuclear Materials

Enforcement Date: 19 January 2026

Summary:

- Upon entering into force, this Regulation officially repealed and replaced Regulation of the Nuclear Energy Regulatory Agency (*Badan Pengawas Tenaga Nuklir* – “**BAPETEN**”) No. 1 of 2009 (“**Regulation 1/2009**”). This new framework has now redefined nuclear installation entrepreneurs (*Pengusaha Instalasi Nuklir* - “**PIN**”), as originally addressed under Regulation 1/2009, who have now been divided into senders and recipients of nuclear materials who have secured official permits.
- Whereas PIN were previously mandated to establish their local Design Basis Threat (“**DBT**”) based on national guidelines, this new Regulation now places the responsibility for said DBT establishment with the Head of BAPETEN. Moreover, this Regulation also outlines a total of seven factors that should be taken into account in relation to the establishment of DBT. Said factors include insider and cyber threats, as well as acts of sabotage.
- Under this Regulation, relevant permit holders are required to complete vulnerability assessments in order to identify relevant risks and should subsequently design systems of protection that are based on the aforementioned established DBT. In essence, said assessments should identify the following matters: 1) Nuclear materials that are vulnerable to unauthorized transfers; 2) Nuclear materials and parts of nuclear installations that are vulnerable to potential acts of sabotage; 3) Perpetrators, target analyses and threats based on DBT; and 4) Threat scenarios.
- This new Regulation requires relevant permit holders to establish and maintain cybersecurity systems that are capable of preventing and mitigating cyber threats, including cyberattack prevention procedures and various cybersecurity levels that will be applied at the relevant facilities. The aforementioned cybersecurity systems should range from identification to recovery initiatives, while said systems should be functionally tested in accordance with relevant Laws and Regulations.

## 19. Regulation of the Minister of Energy and Mineral Resources No. 3 of 2026 on Indonesian Sustainable Palm Oil Certification for Palm Oil Bioenergy Businesses

Enforcement Date: 22 January 2026

Summary:

- This new Regulation will require all palm oil-based bioenergy companies (“**Bioenergy Companies**”) to secure Indonesian Sustainable Palm Oil (“**ISPO**”) Certification, with mandatory implementation commencing on 20 March 2027. Compliance will be evaluated in relation to three core pillars, specifically adherence to applicable Laws and Regulations, traceability of raw materials and continuous improvements to sustainable business.
- In order to secure ISPO Certification, Bioenergy Companies must apply to an accredited ISPO Certification Body (*Lembaga Sertifikasi ISPO* – “**LS ISPO**”) and submit various required supporting documents, including a relevant business license and previously secured ISPO Certification for palm oil plantation activities. The certification process is governed by formal certification agreements that are drawn up between Bioenergy Companies and LS ISPO and will be subject to administrative reviews, as well as on-site audits. ISPO Certification has a validity of five years, while the issuance of all such certification must be reported to the Minister within five business days.
- The new Regulation also sets out appeals and complaints mechanisms that will allow submissions to not only be made by Bioenergy Companies but also by affected communities and their authorized representatives. Finally, any failure to comply with the mandatory certification and reporting requirements may result in the imposition of administrative sanctions, including written warnings, fines and temporary suspensions of business activities.

## General Financial Services

### 20. Draft Regulation of the Financial Services Authority on the Application of Sustainable Finance by Financial Services Sector Business Actors, Issuers and Public Companies

Enforcement Date: -

Summary:

- This Draft Regulation requires all business actors operating within the financial services sector, issuers and publicly traded companies (collectively referred to as “**Business Actors**”) to comply with the sustainable finance

principles (e.g. principles relating to governance and responsible investment, as well as sustainable business practice and strategies) during their business activities. In this regard, Business Actors must engage in eight forms of activities in order to fully apply the sustainable finance principles, including the following: 1) Must implement relevant governance processes, controls and procedures in order to monitor and manage sustainability related risks and opportunities; 2) Must apply risk management processes in order to identify, assess, prioritize and monitor sustainability related risks and opportunities; 3) Must measure sustainability related metrics and targets; 4) Must implement business practices and investment strategies in ways that integrate economic, social and environmental aspects; and 5) Must develop products, transactions and services for the financing of sustainable activities, as well as transition financing.

- This Draft Regulation also requires Business Actors to draw up sustainable finance action plans and sustainability reports in line with sustainability disclosure standards and/or through the fulfillment of other required sustainability aspects. When preparing said action plans and reports, Business Actors should establish transition plans in order to manage the impacts associated with any risks and opportunities related to sustainability and the achievement of sustainability targets.
- The application of the above-outlined sustainable finance principles will be classified into three groups based on Bank Core Capital Categories (*Kelompok Bank berdasarkan Modal Inti/KBMI*) and boards operating within the stock exchange. In this regard, Business Actors that are classified under Groups 1 - 3 should submit their sustainable finance action plans at the same time as their sustainability reports. It should also be noted that any Business Actors that are classified under Groups 1 - 3 will be subject to mandatory independent third-party verifications of their sustainability reports, which will be undertaken by supporting professionals working for the Financial Services Authority (*Otoritas Jasa Keuangan – “OJK”*).
- Ultimately, the Draft Regulation affirms that any Business Actors that fail to comply with the above-described mandatory application of the sustainable finance principles will be subject to the imposition of administrative sanctions by the OJK. Said sanctions include written reprimands, prohibitions on the issuance of new products, cancellations of approvals, reductions in soundness levels and/or other measures, as stipulated by the OJK.

## **21. Draft Regulation of the Board of Commissioners of the Financial Services Authority on the Application of Sustainable Finance by Financial Services Sector Business Actors, Issuers and Public Companies**

Enforcement Date: -

Summary:

- In essence, this Draft Regulation contains a set of guidelines that specifically address the application of the sustainable finance principles by financial services sector business actors, issuers and publicly traded companies (collectively referred to as “**Business Actors**”). These guidelines should be used as a reference during the application of the minimum standards that must be met by Business Actors and broadly cover the following aspects (as detailed under the Appendices to this Draft Regulation): 1) Procedures for the implementation of the sustainable finance principles (based on determined groups); 2) Templates for sustainable finance action plans and sustainability reports; 3) Templates for sustainable credit/financing reports; and 4) Templates for sustainable finance instruments.
- This Draft Regulation also affirms that any Business Actors that fall under Groups 1 - 3 will be subject to mandatory independent third-party verifications of their sustainability reports. Detailed procedures for and the scope of said verifications are outlined comprehensively under Appendix I to this Draft Regulation.

## Infrastructure and Construction Services

### **22.Regulation of the Minister of Public Works No. 1 of 2026 on Procedures for the Implementation of Cooperation Between the Government and Business Entities During the Provision of Public Works Infrastructure**

Enforcement Date: 19 February 2026

Summary:

- Upon entering into force, this new Regulation simultaneously repealed and replaced Regulation of the Minister of Public Works and Public Housing No. 2 of 2021 (“**Regulation 2/2021**”) on Procedures for the Implementation of Cooperation Between the Government and Business Entities (*Kerjasama Pemerintah dan Badan Usaha – “KPBU*”) During the Provision of Infrastructure. Generally speaking, this new framework has significantly expanded the types of public works infrastructure that can be developed under the KPBU scheme, as were previously featured under Regulation 2/2021. The new types of infrastructure now include smart cities (e.g. waste-to-energy technology), industrial ecosystems, tourism (e.g. national parks and agro-tourism), and regional infrastructure such as local business entities, warehouses and logistical hubs.
- The new Regulation further introduces the Simple KPBU (*KPBU Sederhana*) framework, which can be applied to projects that meet the

following criteria: 1) Have a relatively simple structure or scope; 2) Use proven technologies that have previously been applied in similar projects; and 3) Prioritized projects that do not require any viability support from the government. In addition, the Regulation stipulates that any projects that are initiated by the government can transition to private initiatives if business entities can prove that they add value for money through innovation or better economic/financial feasibility, or if a previous government procurement has failed. Conversely, a project may be taken over by the government if the original proponent withdraws, the initiative permit expires or the relevant project is reclassified as a high-priority nationally strategic project.

- It is important to note that any project that is currently in progress must complete the stage that is currently being implemented in line with Regulation 2/2021 but must be brought into line with the requirements set out under the new Regulation for all subsequent stages. In addition, any initiating business entities that have held an initiative permit for more than two years without entering the transaction phase must immediately complete their supporting activities, as stipulated under the new Regulation.

### **23. Regulation of the Minister of Public Works No. 2 of 2026 on Procedures for Toll-Road Business Initiatives of Business Entities**

Enforcement Date: 19 February 2026

Summary:

- In comparison with the now-revoked framework of Regulation of the Minister of Public Works and Public Housing No. 23 of 2021 (“**Regulation 23/2021**”), which previously set out the procedures that govern toll-road business initiatives that are proposed by private entities, the new framework introduces updated terminology, clearer timelines and a dedicated mechanism for the transitioning of projects between the government and the private sector. Under the previous framework of Regulation 23/2021, the various stages involved in determinations of Toll Road Business Initiative Projects (“**Initiative Projects**”), as submitted by business entities to the Minister of Public Works (“**Minister**”), were referred to as involving a “principal permit” and an “initiative permit”. However, the new Regulation replaces these terms with “principal approval” and “initiative approval,” and designates the Minister as the Person in Charge of Cooperation Projects (*Penanggung Jawab Proyek Kerja Sama/PJPK*).
- While both frameworks require projects to be technically integrated and economically/financially feasible, the new Regulation sets out stricter criteria for projects that have not yet been included as a part of the National Master Plan. In this regard, said projects must improve the performance of existing toll roads, must not reduce the financial feasibility of existing roads beyond a certain limit and must be formally integrated into the National Road Network Plan before final approval can be granted. Furthermore, both Regulations address three primary forms of compensation that will be available to initiating business entities (“**Proponents**”), specifically a 10%

additional score during the tender process, the right to match the highest bid and the reimbursement of the initiative cost by the government or the winning bidder. However, the new Regulation also adds a flexible clause that will allow for other forms of compensation to be provided in line with applicable Laws and Regulations.

- Under the new Regulation, a government-initiated project may be converted into a private initiative if it is suitably innovative, represents improved value for money or is characterized by greater economic/financial feasibility. Conversely, a private initiative can be taken over by the government if the relevant Proponent withdraws, the relevant approval expires, the Proponent's status is revoked or the project becomes a high-priority nationally strategic project.

## Land & Property

### **24. Regulation of the President No. 4 of 2026 on the Control of the Conversion of Rice Field Land**

Enforcement Date: 4 February 2026

Summary:

- This new Regulation sets out a number of incentives for regional governments (e.g. the provision of agriculture supporting infrastructure). Said incentives will be granted if a given region designates protected rice fields as part of agricultural land for sustainable food production in its spatial plan. Said land should cover more than 87% of the total area of its existing rice fields.
- Meanwhile, any individuals who own and/or manage rice fields that have been designated on the protected rice fields map, as well as parties who utilize land until it is formally established as agricultural land for sustainable food production, will be eligible to enjoy incentives that fall into two categories: 1) Fiscal incentives (e.g. financial assistance and social-security contributions relief); and 2) Non-fiscal incentives (e.g. accelerated land certification processing and paddy marketing facilitation).
- The Regulation also mandates the integration of the protected rice fields map ("**Map**") into spatial planning documents. The Map must be referred to during the designation of any agricultural areas/land for sustainable food production within spatial plans by both the central and regional governments, and must also be fully integrated into the preparation and revision processes for spatial plans.

**25. Circular of the Minister of Home Affairs No. 900.1.1/348/SJ of 2026 on Support for the Three Million Homes Development Program for Low-Income Communities under the Regional Revenue and Expenditure Budget**

Enforcement Date: 15 January 2026

Summary:

- This Circular specifically addresses the implementation of the Three Million Homes Program (“**Program**”), which is aiming to provide affordable housing for low-income citizens (*Masyarakat Berpenghasilan Rendah/MBR*). In this regard, regional governments, including governors, regents and mayors, are mandated to allocate and accelerate budgeting for the program through their Regional Revenue and Expenditure Budgets (*Anggaran Pendapatan Belanja Daerah/APBD*), which should be used in order to construct, renovate and/or repair houses based on sub-activity assessments, which are further outlined under Appendix I to this Circular. Program funding is categorized as follows: 1) Main expenditure (*belanja pokok*): i.e. activities that directly result in housing units and household improvements; and 2) Supporting expenditure (*belanja penunjang*): i.e. activities that facilitate the program but that do not result in any direct housing units.
- The Circular also establishes a bi-annual reporting cycle in order to monitor progress and that will hopefully ensure transparency. In this regard, regents and mayors must report to their relevant governors by 15 January and 15 July, while said governors should then consolidate these reports before submitting them to the Minister of Home Affairs by 20 January and 20 July. Any lack of correlation that emerges between supporting expenditures and actual housing provision must be formally explained in these progress reports.

**26. Circular of the Minister of Agriculture and Spatial Planning/Head of the National Land Agency No. B/PP.04.03/131/I/2026 of 2026 on Follow-up Measures for Controlled Conversions of Paddy Fields**

Enforcement Date: 30 January 2026

Summary:

- This Circular aims to achieve the target set under the National Medium-Term Development Plan (*Rencana Pembangunan Jangka Menengah Nasional/ RPJMN*) 2025 - 2029. In this regard, the specific goal is to designate 87% of the total Raw Rice Field Area (*Luas Lahan Baku Sawah - “LBS”*) as Sustainable Food Agricultural Land (*Lahan Pertanian Pangan Berkelanjutan - “LP2B”*) by 2029. Furthermore, any LBS that have already been classified as LP2B are prohibited from being converted into land for non-agricultural uses, except in situations where non-agricultural land rights

- have already been granted and if the land in question is allocated for the purposes of Nationally Strategic Projects (*Proyek Strategis Nasional*//PSN).
- Any regions that have designated more than 87% of their LBS as LP2B in their Spatial Plans (Rencana Tata Ruang - “RTR”) must adhere to the prevailing RTR provisions, while any proposed changes in land use will require a formal recommendation. Meanwhile, any regions that have not yet achieved the 87% threshold will be required to amend their Regional Spatial Plans (*Rencana Tata Ruang Wilayah*/RTRW) in order to meet the target, with a strict completion deadline of 2027 being set.
  - Until revisions are complete, the relevant regents/mayors may designate rice field areas that have been identified as LP2B based on data that have been approved by the Ministry of Agriculture and Spatial Planning/National Land Agency. Furthermore, if any region fails to complete this identification or revision, then all existing LBS operating within said region will automatically be classified as LP2B.

## **27. Draft Regulation of the Minister of Cooperatives on Business Activities Undertaken Within the Housing Sector by Cooperatives**

Enforcement Date: -

Summary:

- This Draft Regulation establishes a comprehensive framework that integrates cooperatives into the national strategy for affordable housing, thereby supporting the government’s Nationally Strategic (*Proyek Strategis Nasional*//PSN) Three Million Homes Program. Cooperative involvement takes two main forms, i.e. specialized Housing Cooperatives and Housing Business Units (*Unit Usaha Perumahan Koperasi*/UUP) that operate as a part of multi-purpose cooperatives as either primary or secondary cooperatives. The scope of permitted business activities is extensive and covers the entire housing value chain, including the following areas, among others: 1) Provision of building materials and supplies; 2) Financing and guarantees; 3) Construction and development; 4) Management of the ownership of housing assets; 5) Housing consultations and technical assistance; 6) Development and management of community housing; and/or 7) Construction and renovation of homes for members.
- Housing may be delivered through two principal schemes: 1) Collective ownership, through which land and buildings remain cooperative property, while members hold non-transferable occupancy rights; and 2) Rent-to-own (*huni dengan opsi*), through which members make monthly payments with the option of purchasing property over time. Any cooperatives that engage in housing activities are required to secure business licenses in accordance with the levels of risk that are associated with their activities, as regulated under prevailing Laws and Regulations.
- Cooperatives may fund their operations through a combination of equity capital (including core and mandatory savings, reserves and grants) and loan capital sourced from members, other cooperatives, banks, financial

institutions, cooperative bonds, medium-term notes or other legitimate channels of funding. In addition, cooperatives are also being encouraged to increase their levels of capital through the adoption of and participation in (*modal penyertaan*) various types of innovative financing mechanisms, including debt-to-savings conversions, asset revaluations, risk-sharing arrangements, housing endowment funds, crowdfunding, sharia-compliant financing, cooperative loans, syndication, self-financing and so forth.

## Manufacturing & Industry

### **28. Decree of the Minister of Investment and Downstream Industry/Head of the Investment Coordinating Board No. 286 of 2025 on the Designation of Industrial Zones for the Facilitation of Direct Construction**

Enforcement Date: 24 December 2025

Summary:

- Under the Appendix to this Decree, a total of 32 specific industrial estates have been designated under the Direct Construction Convenience (*Kemudahan Investasi Langsung Konstruksi/KILK*) program, along with their respective companies. These industrial estates are spread across several strategic provinces and include: 1) Riau Island: Batamindo Industrial Park and Panbil-Tembesi; 2) West Java: Jababeka, Karawang International Industrial City (KIIC) and Suryacipta Subang Smartpolitan; 3) Eastern Indonesia: Indonesia Huabao, Konawe and Weda Bay.
- Any business actors who have secured business licenses that have not yet been verified through the Online Single Submission (OSS) system will be permitted to commence construction work immediately, provided that they comply with the specific codes of conduct (*tata tertib*) that apply within the industrial estates in which they are located. However, when construction is already underway, relevant business actors are still required to simultaneously fulfill all of the necessary licensing requirements, while licenses must be fully secured prior to the initiation of any commercial operations or production.

### **29. Decree of the Minister of Industry No. 292 of 2026 on Guidelines for Good Formulation and Production Procedures for Pesticides**

Enforcement Date: 30 January 2026

Summary:

- This Decree sets out guidelines on good pesticide formulation and manufacturing practices (“**Guidelines**”), which are intended to serve as a technical and normative reference for industry players so as to ensure that all pesticide products are of a high quality, safe for users and environmentally sound, while enhancing national industrial competitiveness. The Guidelines are set out under the Appendix to the Decree and will apply to all industries that engage in the formulation and production of pesticide products, except those that have already secured Good Manufacturing Practices for Household Health Supplies (*Cara Produksi Perbekalan Kesehatan Rumah Tangga yang Baik/CPB PKRT*) certification. The Guidelines address four key aspects, including product safety systems, production environments and facilities, product and machine control, and personnel.
- In terms of product safety systems, the Guidelines require the implementation of management controls in order to ensure adequate product quality. These measures include document control, conformity between specifications and materials used, traceability of production batches and raw materials to suppliers, supplier evaluations and product recall procedures. Meanwhile, the production environments and facilities aspect regulates physical production settings, including buildings, layouts and production flows, machinery and equipment, laboratory functions and maintenance, employee facilities, sanitation and waste management.
- Furthermore, the personnel component emphasizes training and competency requirements for all staff members, including temporary workers, in accordance with their respective functions and associated risks. Companies are also required to provide and enforce the use of personal protective equipment (*alat pelindung diri/APD*) such as shoes, glasses, gloves and masks. Ultimately, regular assessments must be conducted in order to ensure ongoing employee competence.

### **30. Decree of the Minister of Industry No. 293 of 2026 on Guidelines for Good Retreaded Tire Production Procedures for Trucks and Buses**

Enforcement Date: 30 January 2026

Summary:

- The Decree sets out guidelines for good retreaded tire production procedures for trucks and buses (“**Guidelines**”), which aim to ensure that all retreaded tires comply with certain technical specifications relating to user safety and security. The Guidelines are set out under the Appendix to the Decree and will apply to four key aspects, specifically product safety systems, production environments and facilities, product and machine control, and personnel.
- In terms of product safety systems, the Guidelines require the implementation of stringent management controls in order to ensure adequate product quality. These measures include document management, alignment between specifications and materials used, traceability of

production batches and raw materials to suppliers, supplier oversight, and product recall mechanisms. Meanwhile, the production environments and facilities aspect regulates physical production settings, including buildings, layouts and workflows, machinery and equipment, laboratory functions and maintenance, employee facilities, and sanitation and waste management.

- Furthermore, the personnel component emphasizes training and competency requirements for all workers, including temporary workers, in accordance with their respective functions and associated risks. Companies are also required to provide and enforce the use of personal protective equipment (*alat pelindung diri/APD*) such as shoes, glasses, gloves and masks. Ultimately, regular assessments must be conducted in order to ensure ongoing employee competence.

## Monetary & Payment System

### **31. Regulation of the Bank Indonesia Board of Governors No. 2 of 2026 on the Second Amendment to Regulation of the Bank Indonesia Board of Governors No. 21 of 2025 on Foreign Exchange Monetary Operations**

Enforcement Date: 4 February 2026

Summary:

- Previously, Regulation of the Bank Indonesia Board of Governors (“**BI**”) No. 21 of 2025, as amended by Regulation of the Board of Governors of BI No. 29 of 2025 (collectively referred to as “**Regulation 21/2025**”), specifically addressed several characteristics of conventional sharia term deposit transactions that were undertaken in foreign currencies. One of these characteristics affirmed that all such transactions can be used to reduce the overall net foreign exchange position that conventional commercial banks (*Bank Umum Konvensional* – “**BUK**”) were required to maintain for conventional term deposit transactions and/or sharia commercial banks (*Bank Umum Syariah* – “**BUS**”) were required to maintain for sharia term deposit transactions at the end of the business day.
- However, the aforementioned transaction maintenance characteristics no longer feature under this Second Amendment. As a consequence, the applicable values of term deposit transactions, along with the requirement for BUK and/or BUS to report their total net foreign exchange positions upon the completion of accounting processes for term deposit transactions for deduction purposes, do not feature under this Second Amendment.

# Natural Resources

## **32.Regulation of the Minister of Cooperatives No. 12 of 2025 on the Implementation of Mineral and Coal Mining Business Activities by Cooperatives**

Enforcement Date: 31 December 2025

Summary:

- This new Regulation affirms the eligibility of cooperatives to participate in mineral and coal mining business activities through the introduction of specific provisions that will now govern the scope of permitted business activities and the types of licenses that may be secured by cooperatives, as well as their overall conformity with national mining law. Furthermore, it should be noted that the provisions set under this Regulation also apply to Red-and-White Village-Level and Subdistrict-Level Cooperatives.
- The allocation of Mining Business Licenses Areas (*Wilayah Izin Usaha Pertambangan* – “**WIUP**”) through the priority-based scheme involves a series of stages that will require compliance with various administrative, technical and/or commitment statement criteria. Said compliance will be verified through a dual-verification mechanism comprising legality verification and membership criteria verification. In contrast, WIUP allocation through the auction mechanism will be determined based on the sizes of relevant mining areas, specifically areas of up to 500 hectares or areas that exceed 500 hectares.
- In addition, this Regulation also mandates that cooperative management personnel should submit reports to the Minister of Energy and Mineral Resources, as well as to governors and regents/mayors in accordance with their respective regions and authorities. Said reports should address both institutional arrangements and the implementation of mining activities, with distinct reporting elements applying within each category.

## **33.Regulation of the Minister of Marine Affairs and Fisheries No. 1 of 2026 on Marine Tourism Villages**

Enforcement Date: 22 January 2026

Summary:

- One of the notable changes that this new Regulation makes to the now-revoked framework of Regulation of the Minister of Marine Affairs and Fisheries No. 93/PERMEN-KP/2020 (“**Regulation 93/2020**”) is the provision that marine tourism village areas will no longer be classified as parts of coastal villages and fishing ports. As a consequence, the

Regulation has now established a number of general criteria that will apply to marine tourism villages instead of dividing them into the two previously applicable categories. Said criteria include the following: 1) Potential marine tourism attractions; 2) Potential tourist visits; and 3) Clear land status for the placement of marine tourism facilities.

- While retaining the core stages involved in determinations of marine tourism villages, as originally outlined under Regulation 93/2020, the Regulation now clarifies that any proposals that are submitted by village governments must be based on proposals that originate from community groups or village-owned enterprises. Furthermore, the Regulation has also revised the various aspects that are required to be included in said proposals in comparison with Regulation 93/2020, which now include the following: 1) Potential marine tourism attractions; 2) Regional government support; and 3) Potential marine tourism attractions.
- While retaining Village Classifications 1 - 5, as previously outlined under Regulation 93/2020, the new Regulation has now simplified the applicable marine tourism planning indicators. For example, Village Classification 1 was previously associated with six indicators under Regulation 93/2020, however, the new Regulation now only stipulates the following three marine tourism planning indicators for Village Classification 1: 1) Must have at least one potential marine tourism attraction; 2) Must have the potential for tourist visits; and 3) Must have a central driving force within the tourism management group.

#### **34. Regulation of the Minister of Marine Affairs and Fisheries No. 2 of 2026 on the Empowerment of Micro-, Small- and Medium-Scale Enterprises Within the Marine and Fisheries Sector**

Enforcement Date: 29 January 2026

Summary:

- In essence, this new framework encourages micro-, small- and medium-scale enterprises (*Usaha Mikro, Kecil dan Menengah* - “**UMKM**”) operating within the marine and fisheries sector to strengthen their capacities and competitiveness. The new Regulation establishes an empowerment framework that covers the following areas: 1) Marine spatial management (e.g. salt farmers and marine tourism operators); 2) Capture fisheries and aquaculture activities; and 3) The processing and marketing of marine and fisheries products. The mandated empowerment efforts will be implemented through mapping, mentoring and business upgrading assessments.
- This Regulation will also provide guidance for UMKM that will cover various business aspects (e.g. legal compliance, products and finance). For example, bio-pharmacology business actors will receive support through improved access to financing and assistance with business licensing at a minimum. Meanwhile, any businesses that engage in the processing and marketing of marine and fisheries products may receive support in the form of the facilitation of standardization and certification for export purposes.

- This new Regulation also introduces a weighted assessment-based classification and upgrading system for UMKM. Said classifications range from Micro-Class 1 with a weighted score of less than or equal to 30 to the Pre-Large Class with a weighted score of between 90 and 100. Initial UMKM classification assessments cover various business aspects (e.g. legal compliance, production and finance). The assessment results will subsequently serve as the basis for the provision of assistance and for the assessment of business class upgrades after the implementation of the assistance program.

**35. Circular of the Minister of Forestry No. SE.2/MENHUT/SETJEN/PHL.02/2/2026 on Technical Considerations or Technical Recommendations and Technical Consideration Maps Submitted by Governors to the Minister of Forestry as a Part of Applications for Forest Utilization Business Licenses**

Enforcement Date: 5 February 2026

Summary:

- This Circular requires all applications that are submitted for Forest Utilization Business Licenses (*Perizinan Berusaha Pemanfaatan Hutan - "PBPH"*) to be supported by governor-issued technical considerations or technical recommendations, including relevant technical maps. These documents must confirm spatial conformity with the provincial-level spatial plan and must also disclose the presence of any communities living within or surrounding proposed areas.
- In this regard, this Circular mandates that relevant governors must ensure that proposed areas do not overlap with any existing PBPH applications or previously granted forest utilization permits (based on the most recent official thematic forestry map). Technical considerations must also expressly state either the acceptance or rejection of the proposed area.
- Furthermore, any PBPH applications that only contain proofs of receipt for technical considerations or technical recommendations will be returned to the respective applicants for resubmission along with the actual relevant technical considerations or technical recommendations in question. As such, this Circular grants applicants a 90-calendar-day window (commencing 5 February 2026) in which to complete and submit the required technical considerations to the Ministry. Any failure to comply within this timeframe may ultimately trigger a comprehensive evaluation of PBPH applications, with potential consequences including the suspension or termination of the licensing process.

## **Non-Banking Financial Services**

### **36. Regulation of the Board of Commissioners of the Financial Services Authority No. 48/PADK.06/2025 on the Application of Risk Management by Financing Institutions, Venture-Capital Companies, Microfinance Institutions and Other Types of Financial Services Institutions**

Enforcement Date: 30 December 2025

Summary:

- In essence, this new Regulation consolidates the risk management frameworks set by the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) and that apply to financing institutions, venture capital companies, microfinance institutions and other types of financial services institutions (collectively referred to as “**PVML**”) under a single framework. Specifically, the following four aspects that relate to PVML risk management efforts are outlined comprehensively under the Appendices to this Regulation: 1) The application of risk management; 2) Risk management guidelines; 3) Organizational structure of risk management; and 4) Risk level assessments.
- This Regulation stipulates that all implementing guidelines for risk management, as listed in point (2) above, require the active oversight of the relevant board of directors, board of commissioners, sharia supervisory board and management. Furthermore, said guidelines should encompass various policies, procedures, risk processes, information systems and internal controls across nine risk types that include: 1) Credit risks; 2) Market risks; 3) Operational risks; 4) Strategic risks; and 5) Liquidity risks. The risk management guidelines also mandate the assessment of inherent risk and the quality of the implementation of risk management.
- It should also be noted that the Regulation requires all PVML to bring their existing risk management strategies, policies, procedures and internal guidelines into line with those that are stipulated under this framework within six months of its enforcement, i.e. by 30 June 2026.

## **Pharmacies, Health Industry, and Foods & Drugs Standards**

### **37. Regulation of the Government No. 1 of 2026 on the Amendment to Regulation of the Government No. 86 of 2019 on Food Safety**

Enforcement Date: 5 January 2026

## Summary:

- The Amendment now makes a clear distinction in terms of the oversight and regulatory authorities of both the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – “**BPOM**”) for processed foods (*pangan olahan*) and the National Food Agency (*Badan Pangan Nasional* – “**Bapanas**”) for fresh produce (*pangan segar*). Consequently, the Amendment now incorporates the Head of Bapanas onto the list of various authorities that are associated with the regulation and oversight of food safety and quality, particularly in relation to fresh produce.
- The Amendment has also revised various food safety and quality aspects that have to be met in order to secure a business permit, including emphases being placed on different types of businesses (e.g. manufacturers of ready-to-eat processed foods and growers of fresh produce). Previously, food safety and quality assurance certification and registration numbers were required to be secured for these types of food products.
- It should also be noted that the Amendment has also now expanded the scope of the prohibition on the distribution of contaminated food so that it also applies to entities that manufacture said contaminated food. Previously, this prohibition only applied to individuals and/or corporations that distributed contaminated food.

### **38.Regulation of the National Food Agency No. 1 of 2026 on the Amendment to Regulation of the National Food Agency No. 13 of 2024 on Quality Standards for Local Food Products for Food Diversification Purposes**

Enforcement Date: 3 February 2026

## Summary:

- In addition to being utilized as a reference in relation to food products that are consumed by local communities (“**Local Foods**”), the Amendment now clarifies that Local Food product quality standards should also be utilized as a reference by food assistance programs (i.e. staple foods and other food assistance that is provided by the government in order to address food-related problems and food crises, increased food access for poor and/or food and nutrition-insecure communities, and also in relation to international cooperation). In this regard, the Amendment affirms that compliance with the Local Food product quality standards should be proven through conformity assessments.
- The Amendment has also now expanded the scope of Local Food product quality standards from six to a total of nine types of staple foods. The newly included staple foods break down as follows: 1) Bananas; 2) Elephant foot yams (*porang*); and 3) Breadfruit (*sukun*). Meanwhile, the following derivative products relating to the above-listed staple foods will also be subject to the Local Food product quality standards: 1) Banana flour and

banana starch (banana derivative products); and 2) Porang flour, porang starch and porang analog rice (porang derivative products). The Amendment also details various aspects of the Local Food product quality standards associated with the newly-included staple foods and their derivative products.

### **39. Regulation of the National Agency of Drug and Food Control No. 2 of 2026 on Technical Instructions for the Management of Operational Assistance Funds for Health, Drug and Food Control for the 2026 Fiscal Year**

Enforcement Date: 4 February 2026

Summary:

- Establishes a set of technical guidelines (“**Guidelines**”) that specifically address the management of health-related operational assistance funds that will be used to support operational priority programs relating to food and drug supervision (*Dana Bantuan Operasional Kesehatan Pengawasan Obat dan Makanan – “Funds*”). These Guidelines will now serve as the mandatory reference for use by both the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan/BPOM*) and regional health offices in order to ensure that the management of all Funds is effective, efficient and accountable.
- This Regulation categorizes uses of Funds under the following four menu activities: 1) Commitment supervision for Certificates of Compliance with Commitments (*Sertifikat Pemenuhan Komitmen/SPP*) for Home Industry Processed Food Production (*Produksi Pangan Olahan Industri Rumah Tangga – “IRT*”): this activity involves technical guidance for food safety counseling and examinations of Home Food Industry (*Industri Rumah Tangga Pangan – “IRTP*”) facilities in order to ensure that they meet the relevant production commitments; 2) Supervision of post-market IRTP facilities: this activity involves inspections of facilities after products have entered the marketplace, as well as the provision assistance in relation to corrective and preventive actions, and also technical guidance relating to Good Processed Food Production Methods (*Cara Produksi Pangan Olahan yang Baik/CPPOB*) for IRTP; 3) IRTP product supervision: this activity specifically involves the sampling and laboratory testing of home-industry food products (*produk industri rumah tangga – “PIRT*”), as well as the monitoring of PIRT advertisements; and 4) Pharmacy and drug store supervision: this activity involves inspections of pharmacies and drug stores in order to ensure that they comply with relevant standards and requirements, as well as the provision of technical assistance relating to licensing and medicine management.

**40. Circular of the Director-General of Disease Control No. HK.02.02/C/445/2026 on Vigilance Against Nipah Virus Disease**

Enforcement Date: 30 January 2026

Summary:

- In essence, this new Circular states that the following parties should engage in various preventative measures regarding the Nipah virus following recent reports of infections across the globe: 1) Regional health offices; 2) Technical health quarantine units; 3) Hospitals, community healthcare centers and other healthcare service facilities; and 4) Public health laboratories.
- In essence, the above-outlined parties have been mandated to engage in various activities, which include: 1) Early detection through monitoring of the development of cases and affected countries globally through the following official channels: <https://infeksiemerging.kemkes.go.id> and <https://www.who.int/emergencies/disease-outbreak-news>; 2) Provision of education to the general public so that they can play an active role in preventing the spread of Nipah virus disease; and 3) Immediately reporting discoveries of any suspected Nipah virus cases within 24 hours through the following official website of the Ministry of Health: <https://skdr.kemkes.go.id>.
- It should also be noted that any vehicles, individuals and goods arriving from abroad, particularly from countries that are affected by the Nipah virus, will be subject to increased vigilance and follow-ups through the monitoring of traveler health declarations (All Indonesia - SATUSEHAT Health Pass [SSHP]). Furthermore, temperature checks that are conducted through the use of thermal scanners will be deployed in order to check the signs and symptoms of all travelers who enter Indonesia through international arrival areas.

**41. Circular of the Director-General of Advanced Healthcare Services No. HK.02.02/D/539/2026 on the Prohibition on the Non-Acceptance of Patients with Temporarily Inactive JKN Membership Statuses**

Enforcement Date: 11 February 2026

Summary:

- This Circular requires hospitals to accept any patients whose National Health Insurance Program (*Jaminan Kesehatan Nasional* – “**JKN**”) membership status has been temporarily deactivated by the Social Security Agency for Health (*Badan Penyelenggara Jaminan Sosial Kesehatan* – “**BPJS Kesehatan**”). This prohibition will apply for a maximum period of three months from the date upon which a patient’s JKN membership status is declared temporarily deactivated.

- This Circular also requires hospitals to continue to provide proper and non-discriminatory care during the aforementioned period of the prohibition on non-acceptance, as well as to prioritize emergency and life-saving services in line with medical and patient safety standards, and must ensure service continuity until a given patient is stable and can therefore be referred. Moreover, hospitals are also required to maintain proper administrative compliance (e.g. accurate recording, diagnosis and procedural coding, and reporting of health services).
- Ultimately, this Circular also mandates that all hospitals should coordinate with BPJS Kesehatan and relevant health offices, as well as implement proper administrative processes and submit claims in accordance with JKN program procedures, whilst maintaining complete supporting documentation for verification and auditing purposes.

#### **42. Decree of the Minister of Health No. HK.01.07/MENKES/84/2026 of 2026 on Technical Guidelines for Free Health Check-ups**

Enforcement Date: 9 February 2026

Summary:

- This Decree has now revoked Decree of the Minister of Health No. HK.01.07/MENKES/33/2025 (“**Decree 33/2025**”) on Technical Guidelines for Free Birthday Health Check-ups (*Cek Kesehatan Gratis* – “**CGK**”). While Decree 33/2025 was specifically designed to utilize birthdays as a reminder for individuals to seek CKG, the new Decree allows for more flexible scheduling by eligible participants. In terms of the target population, the Decree continues to include the same groups that originally featured under Decree 33/2025 but now reaffirms that school-age children and adolescents aged between 7 and 17 years of age have also been included.
- The Decree also explicitly integrates previously separate screenings into a single comprehensive CKG, which will include non-communicable diseases (*penyakit tidak menular/PTM*), screening of elderly persons, mental health and prospective bride/groom screenings. The Decree has also further broadened the scope of diagnostic testing in comparison with Decree 33/2025 to include: 1) For newborns: hepatitis B (HB0) immunization status and jaundice observations; 2) For children and adults: screening for infectious and dermatological conditions such as leprosy, scabies and yaws; and 3) Cervical cancer: updated intervals, if results are negative, then the next screening will be set for 10 years, while if positive tests results for non-16/18 types arise, then screenings will be undertaken every three years.
- While both Decrees mandate the use of primary healthcare facilities (i.e. Community Health Centers [*Pusat Kesehatan Masyarakat/Puskesmas*] and Primary Healthcare Facilities [*Fasilitas Kesehatan Tingkat Pertama/FKTP*]) in order to conduct CKG, the Decree has now expanded these facilities to also include: 1) Workplaces: formal workers can have their annual medical check-up results integrated into official CKG data; and 2) Community

settings: including screenings that are undertaken at Integrated Health Service Posts (*Pos Pelayanan Terpadu/Posyandu*), universities and other locations in coordination with local health offices.

#### **43. Draft Regulation of the Halal Product Guarantee Agency on Forms and Procedures for the Affixing of Non-Halal Remarks**

Enforcement Date: -

Summary:

- Following the enforcement of Regulation of the Government No. 42 of 2024, which exempts products with non-halal materials from mandatory halal certification, this Draft Regulation sets out criteria that will apply to non-halal products based on materials (e.g. animal/plant origins, containing alcohol and/or microorganisms) and production processes (e.g. locations, facilities and equipment that are contaminated by non-halal materials) that do not meet the halal standards.
- The Draft Regulation also sets out exemptions to the requirement to affix non-halal remarks to certain products (e.g. refillable cosmetics) or products that are sold in small packaging, the remarks for which may take alternative forms (e.g. brochures or shrink wrap). In this regard, processed food and beverage products containing pork will still be required to follow marking requirements that apply to specific parts, in line with clear visual standards.
- The Draft Regulation also sets visual standards that are different for non-halal remarks for food and beverage products than the ones that apply to non-food/non-beverage products, thereby ensuring that non-halal information is easily identifiable by consumers.

#### **44. Draft Decree of the Head of the National Agency of Drug and Food Control on the List of Pharmaceutical Raw Materials Used in Natural Medicines, Health Supplements, Quasi-Drugs and Certain Cosmetic Preparations**

Enforcement Date: -

Summary:

- This Draft Decree outlines a total of 14 materials that may be used as pharmaceutical raw materials and therefore used in natural medicines, health supplements, quasi-drugs and certain cosmetic preparations. These materials are outlined comprehensively under the Appendix to the Draft Decree and include: 1) Diethylene glycol monoethyl ether; 2) Diethylene glycol stearate; 3) Glycerin; 4) Lactitol; and 5) Maltitol.
- The above-outlined pharmaceutical raw materials may take the form of liquid internal medicines (for natural medicines) and oral solutions (for

health supplements). Meanwhile, external medication solutions can take the form of mouthwash (for quasi-drugs) and/or dental care preparations (for cosmetic products). Moreover, this Draft Decree also affirms that these listed pharmaceutical raw materials must comply with the following requirements: 1) Must fulfill the applicable standards and/or quality requirements in accordance with the Indonesian Pharmacopoeia (for natural medicines, health supplements and quasi-drugs); and/or 2) Must fulfill the applicable standards and/or quality requirements in accordance with the Indonesian Cosmetic Codex or other recognized standards and/or requirements in the event that they are not included under the Indonesian Cosmetic Codex (for cosmetics products).

## Profession

### **45. Regulation of the Minister of Law No. 10 of 2026 on the Implementation of the Know-Your-Service-User Principle by Notaries**

Enforcement Date: 6 February 2026

Summary:

- Under this new Regulation, notaries are required to implement enhanced measures in order to identify service users (“**Users**”) and Beneficial Owners (“**BO**”) within the context of the Know-Your-Service-User Principle (*Prinsip Mengenal Jasa Pengguna/PMJP*). These enhanced measures include processes of identification and reporting based on verification results that are secured through the official website of the Directorate-General of General Legal Administration (*Administrasi Hukum Umum – “AHU”*).
- Notaries are further required to ensure that the identities of all Users and BO are screened against certain designated lists (e.g. lists of suspected terrorists and terrorist organizations, and lists that address the financing of the proliferation of weapons of mass destruction). In any situation where a match is identified, then the notary in question must refuse and terminate the relevant business relationship before reporting the matter to the Financial Transaction Reports and Analysis Center (*Pusat Pelaporan dan Analisis Transaksi Keuangan/PPATK*) as a suspicious financial transaction.
- Any non-compliance with the above-outlined obligations may result in the imposition of administrative sanctions, which now encompass the following: 1) Written reprimands; 2) Temporary suspensions; 3) Honorable dismissals; or 4) Dishonorable dismissals. In certain circumstances, notaries may also have their accounts at the official website of the Directorate General of AHU blocked.

#### **46. Regulation of Minister of Marine Affairs and Fisheries No. 4 of 2026 on the Governance of Fishing Vessel Manning, Education and Training, and the Examination and Certification of Fishing Vessel Crew Members**

Enforcement Date: 6 February 2026

Summary:

- In essence, this Regulation requires all fishing vessel crew members (“**Crew Members**”) to fulfill the following requirements: 1) Must be at least 18 years of age; 2) Must have secured a fishing seafarer’s book; 3) Must have achieved a relevant level of competence; 4) Must be physically and mentally healthy (as proven through possession of health certification); 5) Must have registered as a program participant with the Social Security Agency for Employment (*Badan Penyelenggara Jaminan Sosial Ketenagakerjaan*/BPJS Ketenagakerjaan); 6) Must be in possession of a Sea Labor Agreement (*Perjanjian Kerja Laut* - “**PKL**”); and 7) Must be listed in the crew list book (*disijil*). It should also be noted that possession of the health certification listed in point (4) above is mandatory for Crew Members working on fishing vessels over 30 gross tonnage (“**GT**”) or vessels of up to 30 GT that operate for periods of longer than three days. However, it should be noted that any Crew Member that occupies a specific position on a fishing vessel must also secure an official confirmation of position, as proven through possession of a certificate of confirmation.
- This Regulation classifies the competencies of Crew Members into various levels of expertise, skills and competencies, which should be proven through relevant certification of expertise (e.g. nautical expert, engineering expert, fishing master and crew ratings expert) and certification of skills (e.g. Basic Safety Training – Fisheries [BST-F], fishing operations and fish handling skills). However, any Crew Members working on fishing vessels of 300 GT or more, or with engine powers of 750 kW (1,005 HP) or more, must also comply with the competency standards set under the 1995 International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F) and its various amendments.
- Under the Regulation, fishing vessel owners or operators (either individually or in groups) may draw up and establish collective labor agreements with the fisheries crew union that address the manning of fishing vessels. All such collective labor agreements will subsequently serve as a reference during the preparation of PKL. Furthermore, as Crew Members must work on fishing vessels based on PKL, this Regulation affirms that PKL comprise several types (e.g. limited-term for one fishing vessel operation period and indefinite-term) and must outline certain provisions, including the following: 1) Maximum working hours; 2) Minimum resting hours; and 3) Leave entitlements.

# Tax & Non-Tax Charges

## **47. Regulation of the Minister of Finance No. 1 of 2026 on the Fourth Amendment to Regulation of the Minister of Finance No. 81 of 2024 on Tax Provisions for the Implementation of the Core Tax Administration System**

Enforcement Date: 22 January 2026

Summary:

- This Fourth Amendment revises the tax treatment that applies in relation to the use of book value for asset transfers and acquisitions that are undertaken by State-Owned Enterprise (*Badan Usaha Milik Negara* – “BUMN”) taxpayers (“Taxpayers”) within the context of mergers, consolidations, acquisitions and spin-offs (collectively referred to as “Corporate Actions”) for BUMN restructuring purposes. This new framework also reflects an institutional shift from the Ministry of BUMN to the BUMN Regulatory Agency (*Badan Pengaturan/BP BUMN*).
- While maintaining the general requirements that apply to taxpayers who transfer or receive assets through the book value method, the Fourth Amendment has now specifically modified the criteria for meeting the business purpose test requirements. Through this revision, Taxpayers who receive transferred assets are now required to continue carrying out the relevant business activities for a minimum period of four years following the effective date of any Corporate Actions.
- In addition, the Fourth Amendment also introduces exemptions to the obligation to recalculate asset values based on market value in situations where Taxpayers, despite having secured approvals from the Director-General of Taxes, fail to fulfill certain post-approval requirements (such as the requirement to submit a registration statement to the Financial Services Authority or to satisfy the business purpose test). Said exemptions apply to Taxpayers who had secured approvals for the use of book value prior to the introduction of the Fourth Amendment, who have also satisfied the revised minimum business purpose test requirement and who subsequently undertake Corporate Actions in the wake of the Fourth Amendment coming into force.

## **48. Regulation of the Minister of Energy and Mineral Resources No. 4 of 2026 on Guidelines for the Utilization of Groundwater Resources and Procedures for the Imposition, Calculation, Payment and/or Deposit of Non-Tax State Revenue in the Form of Administrative Fines for the Issuance of Groundwater Utilization Permits and Approvals for Groundwater Utilization**

Enforcement Date: 22 January 2026

Summary:

- This new Regulation has now repealed and replaced several provisions that were originally stipulated under Regulation of the Minister of Energy and Mineral Resources No. 14 of 2024 on the Administration of Groundwater Exploitation Licenses and Groundwater Utilization Approvals (“**Regulation 14/2024**”), including the applicable mechanism for the issuance of groundwater utilization approvals. However, it should be noted that any applications for the issuance of groundwater utilization approvals that were submitted prior to the new Regulation coming into force will continue to be processed in line with Regulation 14/2024.
- Moreover, while most of the various types of administrative sanctions that were originally stipulated under Regulation 14/2024 remain unchanged, the new Regulation states that any Non-Tax State Revenue (*Penerimaan Negara Bukan Pajak* – “**PNBP**”) deriving from administrative fines that are imposed in relation to the securing of Groundwater Exploitation Licenses and Groundwater Utilization Approvals will be set at a rate of Rp. 0 or 0% for groundwater user groups that comprise non-business users, and micro- and small-scale enterprises, on the condition that groundwater usage does not exceed a withdrawal volume of 10 m<sup>3</sup> per day and is utilized in order to meet daily needs and/or the needs of operational office activities.
- In this regard, this new framework now sets out comprehensive provisions that specifically address PNBP in the form of administrative fines. In addition, under Appendix III to the Regulation, the formula that should be used in order to calculate PNBP in the form of administrative fines for regulatory arrangement purposes involves the multiplication of the progressive withdrawal volume by the fine tariff, coefficient and duration of the relevant violation. Meanwhile, Appendix III to the Regulation further details the applicable fine tariffs and groundwater withdrawal volume intervals based on groundwater user groups. Said groups range from Group 1 (non-business users) to Group 5 (large-scale enterprises).

## Technology, Media, and Telecommunication

**49. Decree of the Minister of Communication and Digital Affairs No. 569 of 2025 on Technical Standards for Telecommunications Equipment and/or Mobile Telecommunications Devices Based on Long-Term Evolution Technology Standards and International Mobile Telecommunications Technology Standards-2020**

Enforcement Date: 19 January 2026

## Summary:

- This Decree establishes an updated set of technical standards that will now apply to mobile telecommunications hardware, with a specific focus on Long-Term Evolution (“**LTE**”) and 5G (IMT-2020) technologies. This new Decree has now repealed and replaced the previous framework of Decree of the Minister of Communication and Information Technology No. 352 of 2024 and mandates that all equipment, including subscriber stations, base stations and repeaters, must meet certain strict certification criteria in order to be legally traded or operated within the country.
- One significant requirement in this regard is the applicable Domestic Component Level (*Tingkat Komponen Dalam Negeri* – “**TKDN**”) threshold, which stipulates that all devices must contain a level of domestic components amounting to 35% - 40% at the least, depending on their specific functions. The new Decree also outlines various testing protocols for radiofrequency interference and should ensure compliance with international mobile equipment identity (IMEI) registrations.

## 50. Draft Regulation of the President on Ethics of Artificial Intelligence

Enforcement Date: -

## Summary:

- If the Draft Regulation ultimately comes into force, this framework shall serve as a reference for the development, organization and utilization of artificial intelligence (“**AI**”) technologies. In this regard, this framework now redefines the list of parties subject to the AI ethical values that were originally featured under Circular of the Minister of Communication and Informatics No. 9 of 2023 into the following parties: 1) Users (i.e. any parties that directly use AI systems through a user interface or AI-based services); 2) Sectoral actors (i.e. data providers and/or developers, providers and/or operators of AI systems); 3) Governmental ministries/agencies; and 4) Other stakeholders (e.g. parent companies or industry associations).
- This Draft Regulation now specifies that a set of risk identification and mitigation measures shall be applied during the development, organization and utilization of AI technologies. In terms of risk identification, the Draft Regulation mandates the aforesaid activities associated with the use of AI should be classified into three categories (i.e. unacceptable, high and low) categories based on the risks that may arise during its use. Moreover, sectoral actors are also required to engage in risk mitigation through the implementation of safeguard measures that span across eight aspects, which these measures include: 1) Actively monitor and evaluate the impact of AI systems throughout their lifecycle; 2) Conduct periodic algorithm impact testing to ensure operational fairness; and 3) Use clear agreements when integrating third-party content.
- Self-assessments are part of the mandatory monitoring and evaluation initiatives under the Draft Regulation that must be engaged and

subsequently reported by sectoral actors to relevant governmental ministries/agencies. Such assessment to broadly encompass the following questionnaire: 1) How are biases detected and mitigated; 2) Is there a clear process for accountability and corrective action; 3) Can the decision-making process of AI be explained to users; 4) What methods are used in the AI system to protect privacy; and 5) How are social risks evaluated.

### **51. Draft Decree of the Minister of Communication and Digital Affairs on Specific Absorption Rate Limits for Mobile Telecommunications Devices and Tablet Computers**

Enforcement Date: -

Summary:

- If this framework ultimately comes into force, then the Draft Decree will replace Decree of the Minister of Communication and Information Technology No. 177 of 2024, which bears the same title as the Draft Decree. Despite this revocation, the Draft Decree continues to mandate that Specific Absorption Rate (“**SAR**”) limits apply to any mobile phones and tablet computers that are used within a proximity of 20 cm to the human body with a radiated power of above 20 mW. Both the existing Decree and the Draft Decree require SAR testing to be completed in relation to head, torso and limbs in accordance with International Commission of Non-Ionizing Radiation Protection (“**ICNIRP**”) 1998 or ICNIRP 2020 standards.
- However, the Draft Decree is now set to introduce an exemption to the SAR requirement for heads for tablet computers that lack speaker facilities for voice communications when placed next to the ear. In order to qualify for this exemption, applicants must submit SAR test result reports, as well as formal statements proving that the relevant devices do not possess such facilities. The Draft Decree further stipulates a compliance deadline of 31 July 2027.

## **Trade**

### **52. Decree of the Minister of Trade No. 123 of 2026 on Export Benchmark Prices and Reference Prices for Mining Products Subject to Export Duty**

Enforcement Date: 12 February 2026

Summary:

- This Decree establishes a set of applicable Export Benchmark Prices (*Harga Patokan Ekspor* - “HPE”) for a total of 209 copper concentrate products and a total of four gold products, as comprehensively listed under the Appendices to the Decree. In addition, the Decree sets a reference price for gold products of US\$ 4,960.24 per troy ounce.
- Overall, HPE are determined based on average international market prices, with a specific referencing of the London Metal Exchange (LME) and the London Bullion Market Association (LBMA), and will be applicable between 15 February and 28 February 2026.

### **53. Decree of the Director-General of Domestic Trade No. 2 of 2026 on Restrictions on the Sale of Public Cooking Oil by Retailers**

Enforcement Date: 14 January 2026

Summary:

- This Decree sets a maximum daily purchase limit of 12 liters per person that will now apply to retailers who sell public cooking oil (*minyak goreng rakyat*) to consumers. This restriction has been introduced in order to ensure the fair and equitable distribution of cooking oil through traditional markets and other retail outlets, while maintaining prices in line with the highest retail price (*Harga Eceran Tertinggi/HET*).

### **54. Decree of the Director-General of Domestic Trade No. 3 of 2026 on Technical Guidelines for the Recognition of Export Rights Based on the Fulfillment of the Domestic Market Obligation for Public Cooking Oil**

Enforcement Date: 14 January 2026

Summary:

- This Decree sets out various technical guidelines for the recognition of export rights for business actors who have already fulfilled the Domestic Market Obligation (DMO) for public cooking oil (*minyak goreng rakyat*). The guidelines will now serve as a specific reference during calculations of export rights volumes for Refined, Bleached and Deodorized Palm Olein (RBDPL), which will be based on realized public cooking oil distribution amounts.

# Transportation and Logistic Services

## **55. Law No. 21 of 2025 on Airspace Management**

Enforcement Date: 24 December 2025

Summary:

- This newly issued Law defines the scope of Indonesian airspace, including its vertical and lateral boundaries, international airspace under Indonesian jurisdiction and foreign airspace in situations where air navigation services are delegated. This new framework also establishes a structured airspace management system that comprises four stages, specifically planning, utilization, control and supervision.
- This new Law further classifies airspace into various specific statuses (i.e. prohibited, restricted and dangerous airspaces), which can be designated to both national airspace and international airspace. The new framework also establishes six types of air areas, including zones for national security, civil and military aviation, air-defense identification, critical national infrastructure and Indonesian outer space. In addition, the Law also introduces a dual licensing system for airspace entry and activity permits, while affirming that all licenses issued under previous Laws will remain valid until their expiration dates.
- Furthermore, in order to ensure compliance and the effective enforcement of the new framework, stricter criminal sanctions have been introduced for violations, including prison terms of up to 15 years and fines of up to Rp. 7 billion for operating in prohibited airspace. Proportionate penalties have also been introduced for restricted airspace violations, unauthorized flights and unsafe activities. In this regard, corporations may also be held liable, including management personnel and beneficial owners, with the available fines subject to increases of up to one-third for said parties.

## **56. Regulation of the Minister of Transportation No. PM 1 of 2026 on Business Activity Standards and/or Product/Service Standards for the Implementation of Risk-Based Business Licensing Within the Transportation Sector**

Enforcement Date: 2 February 2026

Summary:

- Upon entering into force, this Regulation officially repealed and replaced Regulation of the Minister of Transportation (“**Minister**”) No. PM 12 of 2021,

as amended by Regulation of the Minister No. 13 of 2023 (“**Regulation 13/2023**”) (collectively referred to as “**Regulation 12/2021**”). As their titles suggest, both Regulation 12/2021 and the new Regulation address various business and product standards applicable within the transportation sector. However, under the Regulation, the various standard aspects that were previously set out under the Appendix to Regulation 13/2023 have now been revised so that they include the following: 1) Provisions on requirements; 2) Provisions on verifications; and 3) Provisions on obligations that have to be fulfilled.

- More specifically, this new framework has also expanded the scope of the Standard Classification of Indonesian Business Fields (*Klasifikasi Baku Lapangan Usaha Indonesia* – “**KBLI**”) codes that were previously set out under Regulation 13/2023. The applicable standards that are linked to these KBLI are detailed under the Appendix to the new Regulation and include: 1) KBLI Code 37011 on Non-Hazardous Wastewater Collection Transportation; 2) KBLI Code 37012 on Hazardous Wastewater Collection Transportation; 3) KBLI Code 52215 on Off-Street Parking Activities; and 4) KBLI Code 52214 on On-Street Parking Activities.

#### **57. Regulation of the Minister of Transportation No. PM 2 of 2026 on Civil Aviation Safety Regulations Part 19 Concerning Safety Management Systems of Aviation Service Providers**

Enforcement Date: 3 February 2026

Summary:

- This Regulation has now replaced Regulation of the Minister of Transportation (“**Minister**”) No. 62 of 2017 (“**Regulation 62/2017**”) on Civil Aviation Safety Regulations Part 19 Concerning Safety Management System (“**SMS**”) and Regulation of the Minister No. 74 of 2017 on Civil Aviation Safety Regulations Part 830 Concerning Procedures for Investigations of Civil Aircraft Accidents and Serious Incidents (“**Regulation 74/2017**”). This new framework will now serve as a comprehensive update to the SMS framework but places a much heavier emphasis on the safety reporting system.
- In this regard, the new Regulation affirms that all aviation service providers (“**Providers**”) must notify the National Transportation Safety Committee (*Komite Nasional Keselamatan Transportasi* – “**KNKT**”) immediately whenever any accident or serious incident occurs. If the KNKT ultimately investigates any such incident, then the relevant provider will be required to submit a report via the Director-General of Civil Aviation (*Direktorat Jenderal Perhubungan Udara* – “**DJPU**”) portal within 24 hours of receiving information from the KNKT. However, if the KNKT does not investigate an incident, then this report must be submitted via the DJPU portal within 72 hours. Operational personnel and Providers can also report any events that do not meet the mandatory criteria but that contain information that could ultimately prevent future hazards and incidents.

- Immediately after a mandatory report has been submitted via the DJPU portal, the relevant Provider will be legally required to conduct a review of the event criteria. If, based on the results of this review, the event indicates a significant risk affecting operational safety or is declared by the DJPU to require investigation, then the Provider in question must comply with the following three core obligations: 1) Must conduct a thorough safety investigation of the event; 2) Must implement preventive and/or corrective actions in order to mitigate the identified risks; and 3) Must report the final results of the investigation and the specific risk control actions taken to the DJPU portal within 90 business days.

**58. Circular of the Director-General of Air Transportation No. SE-DJPU 2 of 2026 on the Enhancement of Flight Situational Awareness Regarding Compliance with Minimum Flight Altitudes in Weather Conditions Requiring Instrument Flight Rules (Instrument Meteorological Conditions)**

Enforcement Date: 23 January 2026

Summary:

- In essence, this Circular sets out guidelines for use by flight operators who operate flights under Instrument Meteorological Conditions (“**IMC**”) and will now serve as a reference for use by pilots who are involved in flight planning and execution, as well as by air navigation service providers and aviation meteorological information service providers.
- In terms of the aforementioned IMC, this Circular outlines a wide variety of mandates that apply to the following parties: 1) Pilots (e.g. compliance with applicable minimum flight altitude requirements and maintaining of adequate situational awareness by relying on flight instruments and implementing procedures, as well as by coordinating with other pilots); 2) Flight operators (e.g. ensuring the availability of operational procedures and guidelines related to compliance with minimum flight altitudes, as well as the implementation and dissemination of said procedures and guidelines to pilots, and also ensuring that terrain database updates are completed in line with the relevant manufacturer’s cycle and recommendations); and 3) Air navigation service providers (e.g. ensuring the availability of alert and warning systems in relation to the use of radar and Automatic Dependent Surveillance - Broadcast [ADS-B] systems, ensuring that all instructions and clearances that are issued by ATC are in compliance with the minimum vector altitude limits and immediately issuing safety alerts if any discrepancies are identified that could ultimately pose a risk to flight safety).
- It should also be noted that this Circular also requires any responses to the Terrain Awareness and Warning System (“**TAWS**”) to be carried out in line with certain procedures, including the following: 1) Pilots must immediately respond in accordance with the applicable standard operating procedures and/or flight crew operating manual for the type of aircraft being operated; 2) Any responses to the TAWS must take priority over other tasks or

instructions (unless such actions are contrary to flight safety); and 3) Pilots are not permitted to ignore, delay or deactivate the system without having a valid operational basis for doing so and must effectively maintain coordination between pilots if the TAWS warning is activated.

### **59. Decree of the Director-General of Sea Transportation No. KP-DJPL 34 of 2026 on Guidelines for the Implementation of Education and Training Programs and the Issuance of Certification for People's Shipping Officers and People's Shipping Motor Operators**

Enforcement Date: 26 January 2026

Summary:

- The Decree contains a set of guidelines (“**Guidelines**”) that specifically address the organization of education and training programs, as well as the issuance of certificates for People's Shipping Officers (*Mualim Pelayaran Rakyat*) and People's Shipping Motor Operators (*Juru Motor Pelayaran Rakyat*), as outlined under the Appendix to the Decree. The Guidelines apply to Technical Implementation Units (*Unit Pelaksana Teknis/UPT*) operating under the Directorate-General of Sea Transportation and maritime training institutions operating under the Human Resources Development Agency (*Badan Pengembangan Sumber Daya Manusia Perhubungan/BPSDMP*).
- Said certification will serve as official proof that a crew member possesses the skills necessary in order to safely operate people's shipping vessels in the navigation areas of local, limited ports, rivers and lakes. The vessels covered include: 1) Vessels powered entirely by wind; 2) Vessels under 500 GT (“**Gross Tonnage**”) that use wind as their primary source of propulsion and motors as an auxiliary power source; and 3) Vessels ranging from 7 GT to 174 GT in size. However, the applicable certification requirements do not cover traditionally built motorized sailing ships that are used specifically for tourism and recreational purposes within local and limited sailing areas.
- These certificates have a validity of five years and are eligible for extension.

## **Miscellaneous**

### **60. Regulation of the Corruption Eradication Commission No. 1 of 2026 on the Amendment to Regulation of the Corruption Eradication Commission No. 2 of 2019 on the Reporting of Gratification**

Enforcement Date: 20 January 2026

## Summary:

- While retaining the 16 types of gifts (e.g. money, goods, facilities and so forth) (“**Gratification**”) that were originally exempted from the mandatory reporting obligation that applies to civil servants and other state administration officials (“**State Administrators**”), this Amendment no longer differentiates between non-monetary gifts that are exchanged among co-workers on certain occasions (e.g. farewells, retirements, transfers or birthdays) and other non-monetary gifts that are unrelated to official duties. In this regard, the Amendment also raises value thresholds for certain types of Gratification that are subject to the aforementioned mandatory reporting requirements, which now break down as follows: 1) Gifts related to social events: a maximum of Rp. 1.5 million per giver (previously set at a maximum of Rp. 1 million per giver); and 2) Gifts that are exchanged between co-workers that do not take the form of money: Rp. 500,000 per gift per person (previously set between Rp. 200,000 and Rp. 300,000) or an annual accumulated value of no more than Rp. 1.5 million (previously set at a maximum of Rp. 1 million).
- This Amendment newly allows civil servants or State Administrators to report the refusal of Gratification through applicable reporting procedures that are consistent with existing Gratuity reporting procedures. Moreover, perishable foods and/or beverages are now specifically no longer required to be addressed in Gratuity reports that are submitted alongside their objects under specific conditions (e.g. if an object requires an originality test and/or for verification and analysis purposes).
- This Amendment has also shortened the timeframe in which parties that are reporting Gratification have in which to complete any incomplete reports to within 20 business days of the relevant Gratification report being submitted. Previously, a deadline of 30 business days applied. Furthermore, this Amendment also affirms that the value of any Gratification objects will no longer be used as the basis for ownership status stipulations, while the ownership status of any Gratification that are reported beyond the 30-day timeframe will be stipulated as state property.

## **61. Regulation of the Minister of Women’s Empowerment and Child Protection No. 2 of 2026 on Guidelines for the Organization of Training on the Prevention and Handling of Crimes of Sexual Violence**

Enforcement Date: 18 February 2026

## Summary:

- Training on the Prevention and Handling of Crimes of Sexual Violence (*Tindak Pidana Kekerasan Seksual* – “**TPKS**”) (“**Training**”) is organized in three main stages, specifically planning, implementation, and finally monitoring, evaluation and reporting. During the planning stage, qualified instructors must be arranged in line with a curriculum of at least 38

instructional hours that is taught through an adult learning (andragogical) approach. Meanwhile, relevant modules will be stipulated by the Minister of Women's Empowerment and Child Protection.

- Training may be delivered in-class, via distance learning through the use of learning management systems and/or via blended learning methods. These various Training methods encompass lectures, brainstorming, simulations and case studies. Meanwhile, the implementation of all Training will be monitored by legal training centers or regional governments based on five parameters, i.e. implementer performance, participants, instructors, curriculum and methods, as well as infrastructure and facilities.
- Nine subject areas have been included in the curriculum, specifically an introduction to TPKS, gender perspectives and their relation to sexual violence, women's and children's rights in relation to sexual violence, and various additional core topics relevant to TPKS prevention and handling efforts.

## **62.Regulation of the Minister of Social Affairs No. 3 of 2026 on Requirements and Procedures for the Alteration of Health Insurance Contribution Recipient Data**

Enforcement Date: 22 January 2026

Summary:

- Upon entering into force, this new framework simultaneously repealed and replaced Regulation of the Minister of Social Affairs No. 21 of 2019 ("**Regulation 21/2019**"). Under the new Regulation, health insurance contribution assistance recipients are no longer determined based on integrated social welfare data, as was previously the case under Regulation 21/2019. Instead, said determinations will be based on National Socio-Economic Single Data (*Data Tunggal Sosial dan Ekonomi Nasional – "DTSEN"*), which is established through the integration of social and economic registration data, integrated social welfare data and data targeting the accelerated eradication of extreme poverty. This data will also be integrated into population data and periodically updated under the management of Statistics Indonesia (*Badan Pusat Statistik*). However, the new Regulation also stipulates that, in addition to DTSEN, several conditions may also serve as the basis for determinations of assistance recipients. Said conditions range from disasters to government policies and/or directives that are issued by either the Indonesian President or Vice-President.
- Given that DTSEN will now be used as the primary basis for determinations of assistance recipients, the Regulation stipulates that said recipients must register with the DTSEN system within two data updating periods. Moreover, the new Regulation has also revised one of the requirements for the removal of assistance recipients, which was previously addressed under Regulation 21/2019. In this regard, the original requirement to no longer be listed under the integrated social welfare data has now been changed to no

longer being categorized as poor or underprivileged within the DTSEN system.

- In addition to removing various requirements, the Regulation has also amended various requirements relating to the replacement of assistance recipients. In this regard, the original requirement to be listed under the integrated social welfare data but not yet registered with the BPJS Health master file as active participants has now been changed to no longer being categorized as poor or underprivileged within the DTSEN system. Furthermore, the Regulation has also expanded the available sources for replacement assistance recipients to include the following, among others: 1) DTSEN; 2) Workers who have been terminated and who remain unemployed for periods of longer than six months; and 3) Victims of disasters.

### **63. Regulation of the Minister of Social Affairs No. 4 of 2026 on the Second Amendment to Regulation of the Minister of Social Affairs No. 4 of 2015 on Direct Assistance in the Form of Cash for Disaster Victims**

Enforcement Date: 23 January 2026

Summary:

- In comparison with the framework of Regulation of the Minister of Social Affairs No. 4 of 2015 ("**Regulation 4/2015**"), this Second Amendment has now redefined subsistence assistance and has also simplified and expanded the eligibility criteria. Previously, Regulation 4/2015 set out eligibility criteria that covered various categories of beneficiaries (individuals, families, groups and/or communities), that limited the assistance period to the post-emergency response transition phase, and that allowed assistance to be granted after victims had returned home. However, under the Second Amendment, eligibility is now focused on individual disaster victims who are still residing in temporary shelters or permanent housing.
- Moreover, the Second Amendment has also increased the available amount of subsistence assistance from Rp. 10,000 to Rp. 15,000 per day, while maintaining the same assistance period of up to 30 days, which may be extended to a maximum of 90 days. Furthermore, in terms of the available distribution mechanism, instead of being channeled through the social assistance bank accounts of provincial social service agencies, assistance will now be provided directly to family heads or family members within affected households.
- In addition, the criteria that apply to recipients of economic recovery assistance for disaster victims have now been further detailed and reinforced. Previously, under the framework of Regulation 4/2015, eligibility for said assistance was limited to disaster-affected families operating impacted small businesses or victims/families from socio-economically disadvantaged backgrounds. However, the Second Amendment now

categorizes recipients under two additional groups, specifically disaster-affected families whose businesses or business initiatives have been lost or impacted, and disaster-affected families requiring assistance, provided that they are categorized under socio-economically poor or near-poor conditions.

**64. Decree of the Director-General of Vocational Training and Productivity Development No. 2/375/LP.00.00/I/2026 of 2026 on the Registration of Special Work Competency Standards for Company Liquidations by the Indonesian Certified Liquidators Association**

Enforcement Date: 14 January 2026

Summary:

- This Decree formally establishes a set of Special Work Competency Standards (*Standar Kompetensi Kerja Khusus* – “**SKKK**”) for company liquidations under the Indonesian Certified Liquidators Association (“**Association**”). The new SKKK will apply to the Association for a period of three years. The Appendix to the Decree outlines the following five competency units: 1) Preparation of pre-liquidation processes; 2) Management of the implementation of liquidation processes; 3) Disbursement of liquidation assets (“**Assets**”); 3) Distribution of the proceeds from Asset settlements; and 5) Termination of liquidation processes.
- Registrations under the SKKK will be revoked once these competencies have been formalized as a new set of Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia*/SKKNI) for the same scope-of-competence unit.

**65. Decree of the Head of the Supreme Court No. 19/KMA/SK.OT1.1/I/2026 on the Amendment to Decree of the Head of the Supreme Court No. 28/KMA/SK.OT1.1/II/2025 on the Names, Classes, Types, Locations and Jurisdictions of Appellate Courts and First Instance Courts Within the Supreme Court and Relevant Subordinate Judicial Agencies**

Enforcement Date: 22 January 2026

Summary:

- In essence, the Amendment has now revised the list of courts located across the country that originally featured under Decree of the Head of the Supreme Court No. 28/KMA/SK.OT1.1/II/2025. These courts are detailed comprehensively under the Appendices to this Amendment, while the courts that have ultimately been affected by this revision broadly break down as

follows: 1) General courts (the lists of Class IA, Class IB and Class II district courts have been revised); 2) Religious courts (the lists of Class IA, Class IB and Class II religious courts have been revised); and 3) Military courts (the total of number of this type of court has now been increased from 23 to 28 courts in total, including a revised list of high military courts and Type-A military courts).

**66. Decree of the Director-General of Vocational Training and Productivity Development No. 2/678/LP.00.00/I/2026 of 2026 on the Registration of Special Work Competency Standards Within the Construction Services Sector for Dam Implementation Working Positions at the Directorate-General of Construction Development at the Ministry of Public Works**

Enforcement Date: 27 January 2026

Summary:

- This Decree formally establishes a set of Special Work Competency Standards (*Standar Kompetensi Kerja Khusus* – “SKKK”) for the construction services sector, specifically for dam implementation job positions at the Directorate-General of Construction Development at the Ministry of Public Works (“**Directorate-General**”). These standards are applicable for a three-year period at the Directorate-General. A total of eight competency units are outlined under the Appendix to the Decree, including the following, among others: 1) Implementation of a Construction Safety Management System; 2) Preparation of construction work; 3) Development of weekly work plans based on project implementation schedules; and 4) Preparation of daily reports; 5) Monitoring of work results; and so forth.
- Registrations under the SKKK will be revoked once these competencies have been formalized as a new set of Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia/SKKNi*) for the same scope-of-competence unit.

**67. Decree of the Director-General of the General Judicial Body of the Supreme Court No. 199/DJU/SK.DL1.10/I/2026 of 2026 on Updated Guidelines for the Implementation of Services and the Provision of Facilities and Infrastructure for Persons with Disabilities at High Courts and District Courts**

Enforcement Date: 28 January 2026

Summary:

- This Decree revokes the previous framework of Decree of the Director-General of the General Judicial Body No. 1692/DJU/SK/PS.00/12/2020 of

2020 on Guidelines for the Implementation of Services for Persons with Disabilities at High Courts and District Courts (“**Decree 1692/2020**”). In comparison with Decree 1692/2020, this new Decree places a stronger emphasis on privacy and psychological protection by explicitly recognizing various additional rights for persons with disabilities, including the following: 1) The right to enjoy confidentiality, which should allow individuals to request that information relating to their disability be kept confidential, except in situations where it is required for trial purposes; 2) The right to enjoy trauma prevention, thereby ensuring that they are not required to confront any parties who may trigger psychological distress; and 3) The right to express discomfort, thereby allowing them to raise concerns during the service process.

- Furthermore, while Decree 1692/2020 emphasized “Personal Assessments” as the primary mechanism for determinations of individual needs, this new Decree introduces an earlier procedural step known as “Initial Identification”. This process is conducted via One-Stop Integrated Service (*Pelayanan Terpadu Satu Pintu/PTSP*) officers in order to identify relevant types of disability, assess any potential barriers and determine specific accessibility and reasonable levels of required accommodation. The results of this identification process should be formally documented and attached to the relevant case file.
- In addition, the Decree uses the broader term “Language Guide/Interpreter” (*Penjuru Bahasa*), which may include electronic or technological systems, whereas Decree 1692/2020 previously only referred to human interpreters.

**68. Letter of the Deputy Attorney General for General Crimes No. B-99/E/Ejp/01/2026 on Technical Guidelines for the Acceptance of Suspects and Evidence, Detention or Continued Detention and Transfers of Cases to Court During the Transition Period**

Enforcement Date: 13 January 2026

Summary:

- This new set of technical guidelines will now govern the handling of general criminal cases during the transition period for the enforcement of Law No. 1 of 2023 on the Criminal Code (*Kitab Undang-Undang Hukum Pidana - “KUHP”*), Law No. 20 of 2025 on the Criminal Procedure Code (*Kitab Undang-Undang Hukum Acara Pidana - “KUHP”*) and Law No. 1 of 2026 on Penal Adjustment. The technical guidelines emphasize the restructuring of the Stage II process as the point of transfer of judicial and physical authority over a case from the investigator to the public prosecutor, which requires the prior submission and examination of evidence before the handover of any suspect. This arrangement is complemented by various detention policy parameters that are based on the classification set out under Article 70 of the KUHP, including the principle of synchronization with prior actions taken by investigators.

- In addition, the technical guidelines establish strict timelines in order to ensure legal certainty and expedite the prosecution process, specifically three days for the preparation of opinion reports (determination of whether to proceed with prosecution), seven days for the drafting of indictments and 14 days for the submission of cases to the district court. In the event that a pretrial motion is filed in relation to a detention, then the relevant case must be submitted to the court within seven days of the relevant date of detention. Public prosecutors are also granted authority to conduct supplementary examinations for a maximum period of 14 days, including the use of coercive measures, examinations of additional evidence and the application of special mechanisms such as plea bargaining and crown witnesses.
- Furthermore, the technical guidelines encourage the optimization of out-of-court case resolutions through processes of restorative justice (maximum of 45 days), settlements through peace fines (maximum of 30 days) and deferred prosecution agreements for corporations (maximum of six months), as well as the termination of prosecutions due to the payment of maximum fines pursuant to Article 132, Paragraph (1) of the KUHP.