

REGULATION SUMMARY – MARCH 2026

General Corporate

1. Regulation of the Minister of Law No. 5 of 2026 on Trademark Registrations

Enforcement Date: 23 February 2026

Summary:

- This Regulation now revises various administrative timelines relating to the trademark registration process that were previously in place. These revised timelines include: 1) Issuance of official trademark certificate excerpts: within one business day of receipt being taken of an application (previously, a maximum timeline of 15 business days was set); 2) Registration of trademark term extensions: within four business days of an application being declared complete (previously, a maximum timeline of two months was set); and 3) Publication of registration applications in the official trademark gazette: a maximum of 15 business days from receipt being taken of an application (this timeline was not previously specified).
- This new Regulation also revises the various types of supporting documents that must be submitted in order to complete trademark registrations, particularly for applications that are submitted by micro- and small-scale enterprises (*Usaha Mikro dan Kecil/UMK*). Furthermore, the new framework also allows for transfers of trademarks that are still undergoing the registration process, with this framework setting out five valid grounds that may serve as the basis for the submission of requests for the aforementioned transfers (e.g. inheritance or agreement).
- Trademark registration applicants who encounter any force-majeure events (e.g. riots, labor strikes or natural disasters) that prevent them from fulfilling the relevant administrative obligations within the determined deadline will be entitled to request extended deadlines in order to fulfill their obligations. Applications for deadline extensions may be filed in relation to various phases of the trademark registration process.

2. Regulation of the Minister of Law No. 6 of 2026 on Patent Applications

Enforcement Date: 23 February 2026

Summary:

- This Regulation has now expanded the scope of inventions that are classified as eligible to enjoy patent protection to include systems, methods and utilizations. Furthermore, in line with Law No. 65 of 2024 on the Third Amendment to Law No. 13 of 2016 on Patents, this Regulation has now revised various requirements and timelines associated with patent applications, including the following: 1) Certificates that confirm the status of applicants as micro- or small-scale businesses and/or research institutions have now been included on the list of required documents for patent applications; 2) Descriptions have now been formally limited to a maximum of 30 pages, with fees applying for any additional pages; and 3) Proofs of payment of application fees and excess claim fees are now a requirement for the securing of receipt dates.
- The new Regulation also introduces greater flexibility regarding the management of priority rights and the Patent Cooperation Treaty (PCT) mechanism. Furthermore, while the filing period for priority rights remains set at 12 months, an additional period of up to four months is now available upon payment of a prescribed fee. However, applications that are filed through Indonesia as the Receiving Office may be submitted with or without priority rights. Additionally, if an international Description is filed in Indonesian, then the applicant will be required to provide an English translation within two months of the relevant international filing date.
- The Regulation also introduces early substantive examinations (to be conducted prior to the publication stage) and re-examinations (to be conducted under certain circumstances) as part of the substantive examination mechanism. Meanwhile, period extensions that can be used in order to handle document deficiencies have now been limited to a single extension of a maximum of two months, while clear justifications must be provided.

3. Circular of the Minister of Investment and Downstream Industry/Head of the Investment Coordinating Board No. 1.S of 2026 on Provisions for the Issuance of Compliance Permits for Land Space Utilization Activities to Micro-Scale Enterprises

Enforcement Date: 6 February 2026 - 6 May 2026

Summary:

- Owners of micro-scale enterprises can secure Land Use Activity Compatibility (*Kesesuaian Kegiatan Pemanfaatan Ruang* – “ **KKPR**”) documents by submitting data and self-declarations directly via the Online Single Submission (OSS) system. In order to facilitate this process, applicants must provide five specific pieces of information, specifically their administrative location, full address, total land area, single point coordinates and a front-view photo of the relevant location.
- However, if a micro-scale enterprise is categorized as high risk, then the self-declaration mechanism alone is insufficient. In these cases, the relevant business actor must coordinate with the local government department responsible for spatial planning in order to secure a formal statement of compatibility with the regional spatial plan (*Rencana Tata Ruang/RTR*). It is important to note that any KKPR applications submitted by micro-scale enterprises that were already in progress prior to the issuance of this Regulation can be resubmitted in line with these new provisions.

4. Decree of the Director-General of Intellectual Property at the Ministry of Law No. HKI-02.HH.05.06 of 2026 on the List of Public and Exempt Information at the Directorate-General of Intellectual Property

Enforcement Date: 11 February 2026 - 31 December 2026

Summary:

- This Decree stipulates a list of public information and exempted information at the Directorate-General of Intellectual Property for 2026. Said information comprises: 1) Public information that covers seven directorates, including financial management guidelines,

standard operating procedures for the protocol management of events and ceremonies, and performance agreements; and 2) Exempted information that covers seven directorates and/or the secretariat, including personal personnel data, undisclosed patent application documents and unpublished patent descriptions.

- It should also be noted that the aforementioned list, as set out under the Appendix to the Decree, is supplemented by the relevant forms of available information, the applicable retention periods or archive retention schedule, and document classifications.

5. Draft Bill on Copyright

Enforcement Date: -

Summary:

- Comprising 165 articles that span 20 chapters, the Draft Bill is set to repeal and replace Indonesia's decade-long umbrella copyright framework, specifically Law No. 28 of 2014. One noteworthy provision that features under the Draft Bill is the introduction of copyright protections for works that make use of Artificial Intelligence (AI) technologies ("**AI-Based Works**"). However, as works that lack any specific human intellectual input are specifically excluded from copyright coverage, AI-Based Works must meet the following criteria at the least in order to enjoy copyright protection: 1) Works must be creatively conceived by humans; 2) Humans must also be involved in the selection, curation or refinement processes of relevant works; 3) Elements of the creative process must be well documented and provable; and 4) The final output must reflect human aesthetic preferences.
- Any digital platforms that facilitate the trade and distribution of copyrighted works ("**Digital Platforms**") are required to implement the following measures: 1) Must engage in adequate supervision and establish procedures that will prevent the sale of any products or content that infringe copyright and/or related rights; 2) Must provide mechanisms for the easy and quick detection, reporting and discontinuation of the sale or distribution of any products or content that infringe copyright; and 3) Must implement appropriate measures in order to stop the sale or distribution of any products or content that infringe copyright and/or related rights upon its discovery. Additionally, several new requirements have also been introduced for Digital Platforms, including: 1) Detection and removal of unauthorized

depictions of individuals in portraits; 2) Storage of metadata associated with anonymous works; and 3) Mandatory digital watermarking.

- The Draft Bill also introduces the National Collective Management Committee (*Komite Manajemen Kolektif* – “**KMK**”) as the centralized agency responsible for the collection and distribution of royalties to copyright holders. Said processes are to be facilitated through the use of technologies that are capable of recording real-time data on the withdrawal, collection and distribution of royalties. Furthermore, the Draft Bill also newly introduces so-called Resale Rights (*Hak Lanjut Jual*), which will permit creators of original works of fine art or photography to receive royalties from subsequent sales of original works after initial transfers of ownership.

Banking

6. Regulation of the Financial Services Authority No. 1 of 2026 on the Employment of Foreign Workers and the Organization of Knowledge Transfer Programs by Commercial Banks

Enforcement Date: 23 February 2026

Summary:

- This Amendment stipulates that for executive officers, specific competency-related positions and experts, the maximum period of engagement has now been extended to five years. Previously, terms were limited to three years with a possible one-time extension, resulting in a maximum total of four years. In addition, the term of service will now be calculated cumulatively if there is a gap of less than three years at the same bank.
- This Regulation also stipulates that any banks that employ foreign workers are required to assign Indonesian employees to overseas placements as part of their ongoing competency development and talent exchange initiatives. Said programs may be implemented through employee exchange schemes (intra-corporate transferees) or secondment arrangements, which are organized through head offices, overseas branches or subsidiaries.

Capital Market

7. Regulation of the Financial Services Authority No. 2 of 2026 on Mutual Funds in the Form of Collective Investment Contracts Whose Participation Units Are Traded Through the Stock Exchange with Underlying Assets in the Form of Gold

Enforcement Date: 23 February 2026

Summary:

- This Regulation stipulates that investment managers are required to allocate at least 95% of their net asset values to gold assets (e.g. physical gold bars and non-physical gold), while the remaining 5% (at the maximum) may be placed in money market instruments, deposits or cash. Furthermore, all gold used must meet minimum purity standards, specifically: 1) 99.9% for gold certified under the Indonesian National Standard (Standar Nasional Indonesia/SNI); and 2) 99.5% for gold that complies with the London Bullion Market Association (LBMA) Good Delivery List international standard.
- Moreover, in order to enhance market liquidity, participating dealers may buy and sell Exchange Traded Fund (“ETF”) gold units, although they will be required to submit periodic or continuous buy and sell offers through the Stock Exchange trading system and execute transactions in accordance with the commitments set out in collective investment contracts. If the creation of any units involves a sponsor, then the relevant investment manager will be required to draft a contract that specifies a minimum contribution in cash or gold in order to purchase gold as the underlying ETF asset. Said contract should also set out the period during which the sponsor commits not to resell these assets.
- The new Regulation also sets out various provisions that specifically address the Electronic Gold Receipt (“EGR”) instrument. An EGR functions as electronic proof of gold ownership and is issued by gold custodians based on underlying physical gold. This type of instrument is classified as a security that may be transferred, lent or traded for the purpose of managing Gold ETF, and is recorded and administered by the Central Securities Depository and Clearing Institution.

8. Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00030/BEI/02-2026 on the Fee and Incentive Policy for Stock Liquidity Providers

Enforcement Date: 26 February 2026

Summary:

- This Decree continues to reaffirm that transaction fee reductions and additional incentives will only be granted if the quotation obligations are fully satisfied by stock liquidity providers (“**Liquidity Providers**”) for a period of one calendar month. Meanwhile, any Liquidity Providers that fail to fulfill this obligation for a period of one month will still remain eligible for transaction fee reductions and additional incentives, while the amounts of all such incentives will be calculated proportionally based on the level of compliance with the applicable quotation obligations.
- While retaining the three incentive options that are linked to the share quotations of Liquidity Providers, this Decree has now revised Incentives Option 2 by reducing the minimum share requirement from 10 shares to just five shares. In this regard, the Decree also affirms that the value of additional incentives (in the form of reductions in transaction fee bills) has now been reduced from Rp. 20 million to just Rp. 10 million per month.
- Furthermore, the new Decree has also revised Incentives Option 3 by no longer featuring the 10-share minimum and package-based scheme. Instead, Liquidity Providers will now be allowed to choose one share from the Group 1 Incentive List (for every two shares selected from the list of Liquidity Provider securities) and/or one share from the Group 2 Incentive List (for every share that is selected from the list of Liquidity Provider securities). This Decree also affirms that a transaction fee reduction will be available for Liquidity Providers who select Incentives Option 3.

9. Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00029/BEI/02-2026 on Provisions on Parameters for Stock Liquidity Provider Securities, Stock Liquidity Provider Securities Incentives and Stock Liquidity Provider Quotation Obligations

Enforcement Date: 26 February 2026

Summary:

- This Decree establishes the various parameters and obligations that apply to share liquidity providers (“**Liquidity Providers**”), along with various related incentives, as part of efforts being made by the Indonesian Stock Exchange (*Bursa Efek Indonesia* – “**BEI**”) to adjust its market policies based on recent market monitoring. Under the Decree, shares eligible to be managed by Liquidity Providers can either be listed on the Special Monitoring Board or not. However, any shares that are not listed in this board must meet the following parameters: 1) Must fall within the lower percentiles for market activity (i.e. the bottom 95% for daily trading volume and the bottom 90% for daily trading frequency); 2) Must have a share capitalization value of more than 10%; and 3) Must have a minimum free-float level of 2.5% and must have been listed on BEI for at least six months.
- The Decree also sets various parameters that apply to incentive shares, which are shares with relatively higher levels of liquidity that are therefore eligible to enjoy certain incentives. In order to qualify for said incentives, all such shares must meet the following requirements: 1) Must not be included on the list of liquidity provider securities; 2) Must record daily trading volumes or frequencies within the top 50%; and 3) Must maintain a minimum free-float level of 2.5%.
- Furthermore, Liquidity Providers are required to engage in quotations within the Regular Market in accordance with certain specific quotation obligations that are determined by BEI. These obligations include the following: 1) Must maintain a quotation presence of at least 50% of trading hours during Session I and Session II of each trading day; 2) Must comply with maximum bid-ask spreads ranging from two to seven price fractions, dependent on the relevant share classifications, with a stricter limit of two price fractions for incentive shares; 3) Must provide minimum quotation volumes that range from 10 to 50 lots; and 4) Must meet minimum daily transaction values that range from Rp. 50 million to Rp. 1 billion per share. A transitional period will also apply, during which certain quotation parameters will be implemented fully starting from 1 September 2026, while interim requirements (e.g. maximum spread of five price fractions, minimum quotation of 15 lots) will apply during the transition period.

10. Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00037/BEI/03-2026 on the Amendment to the Rules on Auctions of Shares Through PT Bursa Efek Indonesia

Enforcement Date: 17 March 2026

Summary:

- This Decree has now changed the classification of auctions from the previously applicable “open auctions” to “limited open auctions”. In addition, this new framework explicitly stipulates that the Auction Committee has the authority to verify the identities and powers of attorney of all representatives of auction participants, and also reserves the right to either accept or reject the presence of such representatives based on the results of verification processes.
- This Decree also prohibits auction participants from recording, documenting or publishing any auction processes without the relevant Auction Leader’s permission. Furthermore, parties other than the exchange are not allowed to either share or use auction results with any third parties.
- This Decree has also revised the post-auction administrative completion period. In this regard, whereas previously, sets of Auction Minutes were required to be prepared by no later than the next trading day, this deadline has now been extended to no later than three trading days after the completion of an auction.

Employment

11. Regulation of the Minister for the Protection of Indonesian Migrant Workers/Indonesian Migrant Workers Protection Agency No. 2 of 2026 on Procedures for the Placement of Indonesian Migrant Workers by Placement Agencies

Enforcement Date: 5 March 2026

Summary:

- In contrast with the previous framework that covered migrant worker placements and which regulated placements, orientations and agreements separately, this new Regulation has now adopted a more comprehensive approach by consolidating all placement procedures under a single legal framework. Accordingly, several prior Regulations have now been repealed and replaced, including Regulation of the Indonesian Migrant Workers Protection Agency (*Badan Pelindungan Pekerja Migran Indonesia – “BP2MI”*) No. 2 of 2021 and Regulation of the BP2MI No. 7 of 2022 on Pre-Employment Processes for Prospective Indonesian Migrant Workers (“**Workers**”).
- This new framework also establishes a unified framework for the placement of migrant merchant ships’ crews and migrant fishing vessel crews under a single general procedure, including certain specific document requirements, which include possession of a Seafarer’s Book, as well as the use of Seafarers’ Employment Agreements (*Perjanjian Kerja Laut/PKL*) as a substitute for or as an alternative form of employment agreement.
- This new Regulation also emphasizes that Worker placements should be implemented in line with three stages (i.e. before, during and after employment). In addition, Worker Placement Companies (*Perusahaan Penempatan Pekerja Migran Indonesia /P3MI*) are required to monitor workers who are stationed abroad at least once during their contract periods and to submit formal reports accordingly.

Energy

12. Circular of the Head of the Nuclear Energy Regulatory Agency No. 375 of 2026 on Nuclear Energy Licensing Services for Non-Business Actors

Enforcement Date: 26 February 2026

Summary:

- This Circular affirms that nuclear energy licensing services for non-business actors must be organized in compliance with Regulation of the Government No. 28 of 2025 on the Organization of Risk-Based Business Licensing and Regulation of the Nuclear Energy Regulatory Agency (*Badan Pengawas Tenaga Nuklir* – “**BAPETEN**”) No. 5 of 2025 on Business Activity Standards and/or Product/Service Standards for the Implementation of Risk-Based Business Licensing Within the Nuclear Power Sector. In addition, the applicable tariffs and Non-Tax State Revenue (*Penerimaan Negara Bukan Pajak* – “**PNBP**”) must be set in line with Regulation of the Government No. 42 of 2022 on Types and Tariffs of PNBP Applicable at BAPETEN and Regulation of the Minister of Finance No. 137/PMK.02/2021 on Types and Tariffs of Volatile PNBP for Urgent Requirements at BAPETEN.
- Under these provisions, the scope of licensing covers Business Identification Numbers (*Nomor Induk Berusaha/NIB*), basic licensing requirements (e.g. environmental approvals), administrative requirements set by relevant authorities, and various other requirements. Meanwhile, the nuclear energy licensing services that are available encompass the following areas: 1) Utilization of ionizing sources of radiation; 2) Nuclear installations and materials; 3) Mining of nuclear minerals; and 4) Supporting sectors for nuclear power. Applications for new licenses, amendments, extensions and approvals under the BAPETEN licensing framework must be submitted through the BAPETEN Licensing and Inspection System (BaLIS).

13. Draft Regulation of the Government on Electrical Power Supply Businesses

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Regulation will further clarify certain aspects relating to both publicly and privately owned electrical power supply businesses and will also incorporate electric motorized vehicle (*Kendaraan Bermotor Listrik /KBL*) charging businesses onto the list of official businesses. Charging businesses may either take the form of electrical power recharging businesses (e.g. private electrical power installations and public, electric-vehicle, charging stations) or battery exchange businesses (i.e. public, electric-vehicle, battery-swap stations).
- This Draft Regulation is also set to introduce so-called “environmental attributes”. Broadly comprising four elements (e.g. carbon credits, renewable energy certification, green labeling and other tradeable rights), these attributes will be granted to relevant holders of business permits for supplies of electrical power who operate power plants that are powered by new and renewable forms of energy, as well as other types of power plants that implement actions aimed at mitigating the effects of climate change. Additionally, detailed environmental protections (e.g. pollution controls and waste management) have also been included on the list of mandatory aspects that will apply to electrical power supply businesses.
- While maintaining the majority of administrative sanctions that can be imposed in response to any non-compliance, the Draft Regulation is now set to expand the available sanctions through the inclusion of detailed administrative fines. Furthermore, in addition to non-compliance with business permit requirements and other types of behavior that may endanger overall safety, the Draft Regulation also affirms that individuals who construct buildings or that allow buildings to remain standing and/or that replant vegetation that has already been compensated, encroaches upon transmission clearance zones and/or endangers safety or the reliability of electrical power supplies will also be subject to the imposition of administrative fines.

Environment

14. Regulation of the Minister of Environment/Head of the Environmental Control Agency No. 2 of 2026 on Wastewater Quality Standards and Wastewater Treatment Technology Standards for Animal Feed and Aquaculture Feed Businesses and/or Activities

Enforcement Date: 26 February 2026

Summary:

- This Regulation mandates that any persons in charge of animal and/or aquaculture feed businesses that produce wastewater must complete wastewater treatment processes prior to releasing said wastewater into the environment. Meanwhile, any wastewater that is used for primary, supporting and/or by-product activities must be used in accordance with applicable Laws and Regulations. Wastewater treatment processes must simultaneously meet two primary requirements, specifically wastewater quality standards (i.e. specific limits on the levels of pollutants that are allowed in wastewater) and technological standards for wastewater treatment (i.e. pre-defined technological standards or series of processes established by the government for the treatment of water).
- The wastewater quality standards that must be met are determined by three factors, specifically treatment systems, types of wastewater and release activities. However, it should be noted that businesses will be exempted from mandatory compliance with these standards if they meet the following conditions: 1) Channel their waste to a collective processing facility provided by the government or third-party business entity; 2) Hand over their wastewater to a licensed transportation or processing service; and/or 3) Utilize their wastewater in direct relation to core or supporting activities, or as a side product.
- Meanwhile, the required technological wastewater treatment standards should be implemented in line with relevant activities and daily volumes (debit) in terms of wastewater produced. Businesses are also permitted to utilize technologies defined as external to the government standards, provided that they conduct technical studies and are still able to meet the final wastewater quality standards. It should also be noted that any businesses that have already secured environmental approvals or statements of commitment (*Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan*

Hidup/SPPL) must update their documentation or bring their monitoring practices into line with the new framework by 26 February 2028.

General Financial Services

15. Draft Regulation of the Financial Services Authority on the Implementation of Governance and Risk Management by Digital Financial Asset Trading Operators

Enforcement Date: -

Summary:

- This Draft Regulation specifically defines the various types of risks that must be effectively managed by each type of operator entity. Generally speaking, exchanges, custodians and dealers are required to implement processes of risk management that cover the following areas: 1) Strategic risk; 2) Operational risk; 3) Cyber risk; 4) Legal risk; 5) Compliance risk; 6) Reputational risk; and 7) Market risk. Furthermore, clearing and settlement institutions are also required to meet the additional obligation of managing liquidity risk.
- This Draft Regulation also requires all operators to implement effective, sustainable and integrated processes of cyber-security governance as part of their overall risk management frameworks. Said implementation includes the obligation to conduct periodic evaluations at least once a year, as well as to appoint a specific board of directors' member who will assume responsibility for the oversight of cybersecurity governance.
- Upon the enactment of this Draft Regulation, several provisions featured under Regulation of the Financial Services Authority (*Otoritas Jasa Keuangan – “OJK”*) No. 27 of 2024 on the Implementation of Digital Financial Asset Trading, including Crypto Assets, as amended by Regulation of the OJK No. 23 of 2025, will be revoked, including provisions that specifically address governance, risk management and business planning requirements for digital financial asset operators.

Infrastructure and Construction Services

16. Circular of the Directorate General of Construction No. 47/SE/DK/2026 on Procedures for the Preparation of Cost Estimates for Construction Works Within the Public Works Sector

Enforcement Date: 13 February 2026

Summary:

- This Circular revises various provisions that specifically address Unit Price Analysis (*Analisis Harga Satuan Pekerjaan – “AHSP”*), as were originally featured under the framework of Circular of the Directorate General of Construction Development No. 182/SE/DK/2025 (“**Circular 182/2025**”), which has now been revoked. In comparison, the number of AHSP work types that apply within the highways sector has now been reduced from 11 to 10, with “expressways and toll roads” having been removed from the main list. Meanwhile, other types of AHSP remain unchanged (e.g. drainage, asphalt pavement and bridge rehabilitation).
- Furthermore, the number of divisions or main building work types for AHSP within the *Cipta Karya* sector has now been reduced from 12 to 11, with “design types for apartment buildings” having been removed from the division list. However, procurement packages that have already been announced through the General Procurement Plan Information System (*Sistem Informasi Rencana Umum Pengadaan /SIRUP*) in line with AHSP, as set out under Circular 182/2025, may continue to be processed until a deadline of 12 March 2026.

Land & Property

17. Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 3 of 2026 on Land Valuations

Enforcement Date: 25 May 2026

Summary:

- This Regulation stipulates that assessments of the values of land plots or land zones (“**Land Valuations**”) should be performed by authorized parties with technical competence in the areas of Land Valuations and mapping (“**Land Appraisers**”), including registered appraisers and mapping consultant surveyors who are working for business entities and who have completed Land Valuation training organized the Ministry of Agrarian Affairs and Spatial Planning. In this regard, the aforementioned Land Valuations should be completed in relation to land parcels or groups of land parcels (zones) that are located on agricultural and/or non-agricultural lands in cultivation areas with non-forestry designations (excluding any existing buildings and/or vegetation).
- Land Valuations broadly encompass the drafting and updating of land value maps (“**Maps**”). This new framework affirms that Maps comprise the following forms: 1) Land value zone (*Zona Nilai Tanah* – “**ZNT**”) Maps; 2) Individual land parcel value (*Nilai Bidang Tanah* – “**NBT**”) Maps; and 3) Other types of Maps that set out information on land values. Maps will generally remain valid for five-year periods and may be utilized for several purposes, including the following: 1) As the basis for determinations of Non-Tax State Revenue (*Penerimaan Negara Bukan Pajak /PNBP*) tariffs for land and spatial planning services; 2) As sources of data and information for the preparation of spatial plans; and 3) As sources of data and information for calculations of estimated land acquisition costs during the planning stage.
- Any parties (e.g. individuals, legal entities and community organizations, as well as various other types of business entities and institutions) that object to any stipulated values based on Land Valuation processes are entitled to submit complaints to the Heads of relevant Land Offices. All such land value complaints will be processed in line with the following phases: 1) Assessment of submitted complaint; 2) Initial case conference (*gelar awal*); 3)

Follow-up with the relevant Regional Land Office; 4) Examination of proposed action for the handling of the complaint; and 5) Issuance of a complaint resolution recommendation.

18. Circular of the Minister of Investment and Downstreaming/Head of the Investment Coordinating Board No. 6 of 2025 on Provisions for the Extension of Spatial Utilization Activity Conformity Confirmations and Spatial Utilization Activity Conformity Approvals Issued Without Assessments Pursuant to Article 181 of Regulation of the Government No. 5 of 2021 on the Implementation of Risk-Based Business Licensing Through Non-Electronic Means

Enforcement Date: 17 December 2025

Summary:

- This Circular stipulates that an extension for a Spatial Utilization Activity Suitability Confirmation (*Konfirmasi Kesesuaian Kegiatan Pemanfaatan Ruang* – “**KKPR**”) may be applied for if the relevant business actor has not yet acquired the entire approved land area but has secured at least 30% of the total land area. In addition, all such applications must be submitted before the relevant KKPR expire. The required supporting documents for this process include: 1) Application letter; 2) KKPR document; and 3) Proof of land ownership or control (e.g. land certificates).
- Any KKPR that has been approved for extension will be issued a new reference number and will remain valid for two years from the date upon which such an extension decision is issued. However, it should be noted that no changes will be permitted to the activity type or technical substance of any previously issued KKPR.

19. Circular of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No.B/LR.03.01/48/I/2026 on the Strengthening of Agrarian Reform

Enforcement Date: 13 January 2026

Summary:

- In addition to affirming that asset management that is conducted under the framework of Agrarian Reform will be followed up with access management that involves various relevant stakeholders, this Circular now affirms that the granting of land rights to Agrarian Reform subjects will be implemented through a mechanism for the granting of time-limited rights over the Right-to-Manage (*Hak Pengelolaan/HPL*) on behalf of the state via the Land Bank Agency. During its implementation, the aforesaid Land Bank Agency will coordinate with the Agrarian Reform Task Force and engage in comprehensive community outreach efforts.

Manufacturing & Industry

20. Regulation of Minister of Industry No. 2 of 2026 on Procedures for the Preparation and Approval of Detailed Environmental Management Plans and Environmental Monitoring Plans for Proposed Business and/or Activities Within Industrial Estates

Enforcement Date: 4 April 2026

Summary:

- This new Regulation introduces a risk-based framework that addresses the preparation and approval of Detailed Environmental Management and Environmental Monitoring Plans (*Rencana Pengelolaan dan Pemantauan Lingkungan Hidup Rinci – “Detailed RKL – RPL”*). Requirements under this framework vary depending on the levels of risk that are associated with proposed business activities (specifically, low and medium-low risk, and medium-high and high-risk activities). Once a Detailed RKL – RPL has been approved through the Online Single Submission (OSS) system, then the relevant business actor will be issued a Business Actor Environmental Management Commitment Statement (*Pernyataan Kesanggupan Pengelolaan Lingkungan Hidup Pelaku Usaha/PKPLH PU*).
- Under this new framework, any business actors operating within industrial zones who secured certain types of environmental documents (e.g. Environmental Impact Assessment [*Analisis Mengenai Dampak Lingkungan – “AMDAL”*]) prior to the Regulation’s enactment

will be subject to a mandatory review mechanism. In this regard, said documents must be submitted to the industrial estate management company for review. The review process will be completed using a matrix designed to assess their alignment with the relevant business activities and the industrial-zone AMDAL framework (*AMDAL kawasan*).

- The implementation of any Detailed RKL - RPL must be reported for the January - June period (by 1 August of the same year) and for the July - December period (by 1 February of the following year). This new Regulation also clarifies the mandatory minimum reported content, including business identity, descriptions and locations of activities, main and supporting operations, and environmental management and monitoring measures.

Monetary & Payment System

21. Regulation of the Bank Indonesia Board of Governors No. 3 of 2026 on the Third Amendment to Regulation of the Bank Indonesia Board of Governors No. 17 of 2023 on the Implementation of the Bank Indonesia-Fast Payment System

Enforcement Date: 31 March 2026

Summary:

- This Third Amendment stipulates that parties eligible to participate in the Bank Indonesia-Fast Payment (“**BI-FAST**”) system now include: 1) Bank Indonesia; 2) Payment System Service Providers (e.g. commercial banks); and/or 3) Other parties, as approved or designated by the system operator. In addition, any participants that engage in both conventional activities and sharia business activities through sharia business units are required to maintain separate BI-FAST processing for each of these activities.
- The Third Amendment also introduces an additional type of inter-participant fund transfer service, specifically the Financial Institution Credit Transfer (“**FICT**”) service. This service is specifically designated for use during the final settlement of transactions that are processed by participants who are acting as Payment System Infrastructure Providers

(*Penyelenggara Infrastruktur Sistem Pembayaran /PIP*), in line with the provision that all such PIP participants may only participate in the FICT service.

Natural Resources

22. Regulation of the Minister of Agriculture No. 3 of 2026 on the Amendment to Regulation of the Minister of Agriculture No. 15 of 2025 on the Implementing Regulation to Regulation of the President No. 6 of 2025 on the Governance of Subsidized Fertilizers

Enforcement Date: 26 February 2026

Summary:

- This new Amendment replaces the previous concept of cost of goods sold (*Harga Pokok Penjualan/HPP*) with the concept of commercial value (*Nilai Komersial*). Commercial value is the result of calculations that reflect the market price of subsidized fertilizers in specific packaging at handover points. As a consequence, fertilizer subsidy amounts are now determined based on the difference between the relevant commercial value and the applicable highest retail price. (*Harga Eceran Tertinggi/HET*).
- This new framework also introduces a provision that specifically addresses procurements of raw materials that are used for fertilizer production, which may include natural gas, as well as non-gas materials that meet certain specifications relating to the fertilizer production process. State-owned fertilizer companies may receive subsidy payments for procurements of said raw materials prior to the actual realization of procurements. These payments are intended to support annual procurement requirements and must be disbursed by no later than the first quarter of the relevant fiscal year, subject to the results of prior reviews conducted by the Audit Board of Indonesia (*Badan Pengawasan Keuangan dan Pembangunan/BPKP*).

23. Regulation of the Minister of Agriculture No. 4 of 2026 on the Production, Certification and Supervision of the Distribution of Horticultural Seeds

Enforcement Date: 27 February 2026

Summary:

- This Regulation has now revised the regulatory framework that governs the production of horticultural seeds. In particular, a number of adjustments that relate to vegetative propagation classifications have been introduced. In this regard, the “Trees and Perennial Plants” and “Shrubs” categories, which were previously regulated separately, have now been consolidated under a new “Conventional Vegetative Propagation” classification. In addition, vegetative propagation that is undertaken through in vitro culture is no longer limited to certain commodities (e.g. bananas and pineapples). Instead, a more flexible approach has now been adopted through which subcultural limits will be determined based on the specific characteristics of each commodity.
- This new Regulation has also introduced a number of differentiated compliance obligations that apply to producers based on their business scales. In this regard, the requirement to secure Quality Management System Certificates, which previously applied to all corporate producers, now only applies to corporate producers that have been classified as large-scale businesses. Furthermore, the new Regulation expressly stipulates that all distributors of horticultural seeds are required to secure Competency Certificates. However, it should be noted that the requirement to secure Seed Distributor Registration Certificates no longer applies.
- In terms of compliance oversight, Regulation 4/2026 has now strengthened the applicable monitoring mechanism through the introduction of surveillance audits that must be conducted by a Quality Management System Certification Body on an annual basis at the least. In addition, producers or government institutions that have already secured Quality Management System Certificates will be permitted to conduct seed certification on an independent basis, subject to stricter periodic reporting obligations. Said reporting obligations involve the submission of monthly reports that address seed certification activities.

24. Regulation of the Minister of Agriculture No. 5 of 2026 on the Second Amendment to Regulation of the Minister of Agriculture No. 38 of 2019 on Releases of Crop Varieties

Enforcement Date: 27 February 2026

Summary:

- The Second Amendment has now revised the applicable framework so that releases of candidate genetically modified crop varieties will now be conducted by the Head of the Agency for Agricultural Assembly and Modernization (*Kepala Badan Perakitan dan Modernisasi Pertanian*) at the Minister of Agriculture.

25. Regulation of Minister of Finance No. 10 of 2026 on the Management of Palm-Oil Plantation Profit-Sharing Funds

Enforcement Date: 6 March 2026

Summary:

- This new Regulation has now revised the disbursement mechanism for palm-oil plantation profit-sharing funds (*Dana Bagi Hasil – “DBH”*) by replacing the previous two-stage distribution system (i.e. 50% in May and 50% in October) with a five-stage distribution structure. Under this Regulation, DBH will be distributed in line with the following stages: 20%, 15%, 20%, 15% and 30%, which will commence as early as January of the relevant fiscal year, with subsequent disbursements occurring at specified intervals thereafter.
- This Regulation also refines the DBH utilization framework while maintaining infrastructure development and maintenance as the primary objectives. In contrast with the previous fixed allocation rule (i.e. 80% for infrastructure and 20% for other activities), this Regulation introduces a performance-based model that has been linked to regional road condition indicators, allowing regions with 90% or more of their roads in good condition to allocate up to 40% of their DBH funds to other activities.
- The new Regulation also introduces greater flexibility regarding the utilization and disbursement of DBH after the occurrence of disasters or force-majeure events. In such

circumstances, regional governments may revise their fund utilization proportions and amounts based on regional requirements and also reallocate funds in order to support responses to disasters or emergency situations. The new framework also allows for more relaxed disbursements, including expedited or lump-sum disbursements and the possibility of disbursements being completed without the usual administrative requirements having to be fulfilled.

26. Regulation of the Minister of Marine Affairs and Fisheries No. 6 of 2026 on the Second Amendment to Regulation of the Minister of Marine Affairs and Fisheries No. 33 of 2023 on the Implementing Regulation to Regulation of the Government No. 26 of 2023 on the Management of Marine Sedimentation Results

Enforcement Date: 6 March 2026

Summary:

- The Second Amendment has now simplified the criteria that apply in relation to planning document assessments of projected environmental impacts of sedimentation. In this regard, impact analyses should now focus on two main aspects, specifically physical, environmental impacts and socio-economic impacts. This replaces the previously applicable provision, which covered a much broader set of technical parameters (e.g. seabed topography or aquatic landscape characteristics, as well as changes in spatial function).
- In terms of licensing, the Second Amendment now specifically requires all relevant business actors, once they have secured Sea Sand Utilization Permits, to fulfill various risk-based business licensing requirements in line with Indonesia Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia /KBLI*) Code 08104, which covers the marine and fisheries sector. Previously, this requirement was regulated in a more general and administrative manner.

27. Regulation of the National Food Agency No. 2 of 2026 on the Administration of Government Rice Reserves

Enforcement Date: 11 March 2026

Summary:

- In comparison with Regulation of the National Food Agency (*Badan Pangan Nasional* – “**Bapanas**”) No. 12 of 2022 (“**Regulation 12/2022**”) on the Administration of Government Rice Reserves (*Cadangan Beras Pemerintah* – “**CBP**”), this new Regulation has expanded CBP planning, as conducted by Bapanas, so that it now includes year-end stock targets, which represent final CBP administration volumes on an annual basis. Moreover, the Regulation clarifies that procurements of CBP that are undertaken through purchases of paddy and/or rice include harvested paddy at the farmer level (unmilled dry paddy), processed dry paddy at the farmer and/or milling level (milled dry paddy), and medium and/or premium rice of appropriate quality standards.
- Moreover, the Regulation also clarifies that CBP management may now cover stocks of milled dry paddy, medium rice and premium rice based on stock proportions that are managed by the BULOG Public Corporation. Said management should take into account distribution assignments, harvest patterns, rice price fluctuations and/or intertemporal and interregional stock distribution. Furthermore, CBP management may be conducted through dynamic stock rotation mechanisms in accordance with operational requirements and/or through specific technologies that are used in order to maintain quality and extend product shelf life.
- This Regulation also specifies various storage time limits, which did not previously feature under Regulation 12/2022, specifically a minimum of four months for rice and a minimum of 12 months for milled dry paddy, as calculated from the dates upon which CBP is stored in warehouses. Moreover, the submission requirements for applications for CBP releases have also been tightened through the addition of formal requirements in the form of supporting documents that evidence force-majeure events.

28. Decree of the Director-General of Sustainable Forest Management No. 13 of 2026 on the Evaluation of Access Rights to the Forest Product Administration Information System and the Non-Tax State Revenue Information System for Land Rights Holders

Enforcement Date: 19 February 2026

Summary:

- This Decree stipulates that access rights evaluations will be undertaken in relation to Land Rights Holders (*Pemegang Hak Atas Tanah/PHAT*) who have already registered through the Forest Product Administration Information System (*Sistem Informasi Penatausahaan Hasil Hutan/SIPUHH*) and the Non-Tax State Revenue Information System (*Sistem Informasi Penerimaan Negara Bukan Pajak /SIPNBP*), as well as PHAT who are newly applying for access rights to these two systems.
- This evaluation process covers three main criteria aimed at ensuring overall legality and sustainability, specifically: 1) Land status certainty, in order to verify that land rights documents are in compliance with the various requirements set under the Agrarian and Spatial Planning/National Land Agency framework; 2) Suitability of timber utilization location, in order to ensure that logging areas are in line with relevant land rights documents; and 3) Potential environmental impact, in order to assess whether any environmental impacts may arise as a result of timber utilization activities.
- In addition, the Decree sets out three evaluation indicators, specifically: 1) Land status certainty (e.g. identification of different types of land tenure documents); 2) Suitability of timber utilization locations (e.g. conducting of spatial analyses of proposed locations); and 3) Potential environmental impacts (e.g. assessments of potential environmental impacts).

Non-Banking Financial Services

29. Draft Regulation of the Board of Commissioners of the Financial Services Authority on Fit-and-Proper Testing for Primary Parties of Financing Institutions, Venture Capital Companies, Microfinance Institutions and Other Types of Financial Service Institutions

Enforcement Date: -

Summary:

- If this Draft Regulation is ultimately enacted, then it will replace Circular of the Financial Services Authority No. 22/SEOJK.06/2024 on Fit-and-Proper Testing for Primary Parties of Financing Institutions, Venture-Capital Companies, Microfinance Institutions and Other Types of Financial Service Institutions (*Lembaga Pembiayaan, Perusahaan Modal Ventura, Lembaga Keuangan Mikro, dan Lembaga Jasa Keuangan Lainnya – “PVML”*). One of the new key changes set to be introduced is an expanded definition of PVML to include the Public Housing Savings Management Agency (*Badan Pengelola Tabungan Perumahan Rakyat/BP Tapera*).
- Under the administrative requirements that will apply to Controlling Shareholders (*Pemegang Saham Pengendali /PSP*) that take the form of legal entities, the Draft Regulation requires statement letters to be submitted by relevant beneficial owners. Said letters should provide a detailed explanation of the relationship between a beneficial owner and the company that will be acquired, as well as a statement of commitment confirming that the beneficial owner will not engage in any nominee arrangements or share ownership under borrowed names.

30. Draft Regulation of the Board of Commissioners of the Financial Services Authority on the Assessments of the Soundness Levels of Financing Companies and Sharia Financing Companies

Enforcement Date: -

Summary:

- This Draft Regulation retains the four-factor framework for assessments of company soundness levels while simplifying assessments of governance (without requiring ratings across five categories). This new framework also introduces a number of refinements to the applicable core-capital components and imposes a cap on supplementary capital, which has been set at a maximum of 100% of core capital, subject to certain criteria.
- The Draft Regulation also retains the core principles that underpin capital assessments (e.g. capital adequacy and capital management), including applicable deductions from core capital and a 50% cap on subordinated loans (*qardh*). The new framework also offers greater clarity regarding capital structure and components in an effort to enhance consistency and transparency during the assessment process.
- From a reporting perspective, the obligation to submit assessment results to the OJK remains in place but is now set to be complemented by a number of alternative mechanisms that will come into play in the event of any system disruptions or force-majeure events (e.g. submissions will have to be completed via email or physical storage media). The applicable offline submission location is also set to be revised, while business actors should ensure the operational readiness of their various systems and the adequacy of their internal compliance procedures.

Pharmacies, Health Industry, and Foods & Drugs Standards

31. Regulation of the National Agency of Drug and Food Control No. 3 of 2026 on the Amendment to Regulation of the National Agency of Drug and Food Control No. 13 of 2019 on the Maximum Microbial Contamination Limit for Processed Foods

Enforcement Date: 26 February 2026

Summary:

- This Regulation has revised various microbiological criteria for processed foods, which are further outlined under the Appendix to this Regulation. Furthermore, this Regulation stipulates that flavored powdered drinks that contain milk or milk products, creamer or chocolate and for which Business Licenses to Support Business Activities (*Perizinan*

Berusaha untuk Menunjang Kegiatan Usaha /PB UMKU) have already been secured or are in the process of being secured, must be brought in line with this new framework by 26 February 2027.

32. Regulation of the National Agency of Drug and Food Control No. 4 of 2026 on the Implementation of Pharmacovigilance

Enforcement Date: 26 February 2026

Summary:

- In comparison with the now-revoked framework of Regulation of the National Agency of Drug and Food Control No. 15 of 2022 (“**Regulation 15/2022**”), which previously set out various procedures and requirements regarding the implementation of pharmacovigilance in relation to drugs and biological products, this new framework has now expanded pharmacovigilance activities to include natural medicines, health supplements, cosmetics and quasi-drugs. Furthermore, while Regulation 15/2022 mandated that pharmaceutical producers should implement pharmacovigilance, the new Regulation has now revised the parties subject to this requirement, i.e. holders of marketing authorizations.

- The new framework of Regulation has also further revised the following details that specifically relate to reporting categories and their specific deadlines: 1) Adverse Events Following Immunization (*Kejadian Ikutan Pasca Imunisasi – “KIPI”*): the new Regulation has set a strict 24-hour deadline for the reporting of any KIPI that ultimately results in death. Meanwhile, other serious KIPI must be reported within 15 days; 2) Adverse Effects (*Kejadian Tidak Diinginkan/KTD*) and Adverse Drug Reactions (*Efek Samping Obat/ESO*): while Regulation 15/2022 required cumulative reports to be submitted on a six-monthly basis, this new Regulation has now narrowed the reporting window to just 90 days; and 3) Zero (*nihil*) reporting: this new framework introduces a requirement to submit zero reports by 10th January of the following year if no safety-related reports are received during a given year.
- Ultimately, this new Regulation now explicitly requires all distributors, importers and exporters to engage in data exchanges relating to safety information with holders of marketing authorizations. Said data exchanges must be based on cooperation agreements.

33. Regulation of the National Nutrition Agency No. 1 of 2026 on Food Residues, Waste and Domestic Wastewater from the Free Nutritious Meal Program

Enforcement Date: 17 March 2026

Summary:

- This new framework stipulates that the Nutrition Fulfillment Service Unit (*Satuan Pelayanan Pemenuhan Gizi – “SPPG”*) will assume responsibility for the handling of food waste, as well as for the management of domestic waste and wastewater. Furthermore, all such processes may be implemented in collaboration with local governments and/or third parties.
- Food waste should be handled in line with the following stages: 1) Prevention of waste through the SPPG (e.g. from the planning to serving stages) and target groups (through education); 2) Collection of data on food waste; and 3) Food recovery efforts. Any leftover food that is considered safe and suitable for consumption can be distributed to local communities or through food banks, while electronic reporting of all such efforts should be completed through the Stop Boros Pangan platform.

- This Regulation also stipulates that waste management must be undertaken in line with principles of circular economy through the following stages: 1) Planning; 2) Implementation (e.g. reduction and handling); 3) Monitoring; and 4) Reporting. Furthermore, all waste should always be separated into organic waste (for composting/maggots), inorganic waste, residual waste and hazardous waste (*Bahan berbahaya dan beracun /B3*). Meanwhile, domestic wastewater must be managed internally or delegated to a third party, while routine monitoring should be completed on a three-monthly basis.

34. Circular of the Head of the Halal Product Assurance Organizing Agency No. 2 of 2026 on the Mechanism for Determining Product Categories During the Registration of Foreign Halal Certification for Products Not Yet Listed under Provisions on Types of Products Required to Be Halal-Certified and Materials Exempted from the Halal Certification Requirement

Enforcement Date: 20 February 2026

Summary:

- This Circular concerns all importers or authorized representatives of business actors operating within Indonesia who apply for the registration of Foreign Halal Certificates (*Sertifikat Halal Luar Negeri/SHLN*) for product categories that have not yet been regulated under Indonesian provisions that set out mandatory halal product types or exempted materials.
- During the registration process, applicants must ensure that all products that are submitted for registration correspond to the specified product category details that have been established. However, if a given product has not yet been featured on the detailed product category list, then the relevant business actor will be required to submit additional supporting documents as the basis for a determination of the product's classification.
- The supporting types of documents that must be submitted include a statement letter issued by the manufacturer or importer setting out a detailed explanation of the relevant product category, the composition of the product's ingredients and/or the product's production process. In addition, applicants must also submit technical documents such as a Material Safety Data Sheet (MSDS), Certificate of Analysis (COA) and/or other documents that set out supporting information on the composition of ingredients.

35. Circular of the Head of the National Agency of Drug and Food Control No. 2 of 2026 on Provisions for the Production, Importation, Registration and Distribution of Dinitrogen Monoxide (N₂O) Food Additives

Enforcement Date: 27 February 2026

Summary:

- This Circular requires distribution permits to be secured for all dinitrogen monoxide (N₂O) products that are used as food additives (*Bahan Tambahan Pangan – “BTP”*) prior to their marketing. In addition, said products may only be distributed in primary packaging in maximum net weights of 10 grams per unit, although they may also be marketed in secondary or multipack packaging. All relevant product labeling must also contain certain information, including the following: 1) Product name; 2) Net weight; 3) Identity of the producer or importer; 4) Production code; 5) Expiration date; 6) The text: “BTP”; and 7) The classification, type and maximum permitted use level of the food additive in food products.
- All BTP producers, including parties that engage in repackaging activities (“**Producers**”), must secure Implementation Licenses for Good Processed Food Manufacturing Practices (*Izin Penerapan Cara Produksi Pangan Olahan yang Baik /IP-CPPOB*). Meanwhile, all importers must secure Processed Food Safety Management System (*Sistem Manajemen Keamanan Pangan Olahan/SMKPO*) certification for their distribution facilities. In addition, all BTP products must comply with specifications set out in the Indonesian Food Codex (*Kodeks Pangan Indonesia*). Other relevant business actors are also required to provide information and education to consumers affirming that BTP may only be used for food processing or food serving purposes.
- Finally, producers, distributors and importers are required to submit periodic reports every six months to the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan/BPOM*) that address all production, importation and distribution activities related to BTP products.

Profession

36. Regulation of the Judicial Commission No. 1 of 2026 on the Second Amendment to Regulation of the Judicial Commission No. 2 of 2016 on the Selection of Supreme Court Judge Candidates

Enforcement Date: 4 March 2026

Summary:

- The Second Amendment to this framework revises the requirements that apply to the career paths of judicial candidates in terms of specific violations of the Code of Ethics and Judicial Conduct Guidelines (*Kode Etik dan Pedoman Perilaku Hakim* – “ **KEPPH**”). Previously, candidates were only required to have never been subject to any temporary suspension. However, under the updated provision, this requirement has been tightened by mandating that candidates must have never been subject to either moderate or severe sanctions in response to violations of the KEPPH, thereby placing greater emphasis on the integrity and ethical track records of prospective judges.
- In addition, the Second Amendment has now removed the requirement for Supreme Court (*Mahkamah Agung/MA*) justice candidates who have passed the administrative selection process to submit recommendation letters from three individuals attesting to their integrity and qualifications.

37. Circular of the Director-General of General Legal Administration No. AHU-AH.03-12 of 2026 on Reporting Procedures for the Performance of Sworn Translator Duties and the Imposition of Administrative Sanctions

Enforcement Date: 18 February 2026

Summary:

- In essence, this Circular requires sworn translators to submit annual reports that address the performance of their offices to the Minister of Law (“ **Minister**”) via the Director-

General of General Legal Administration (*Administrasi Hukum Umum – “AHU”*) after their appointment. Said report should be submitted within three months of the completion of each one-year term of office.

- The aforementioned reports may be submitted by downloading, completing and re-uploading the required documents, which have been provided via the official website of the Directorate-General of AHU. Said documents include the following: 1) Completed form; 2) Original annual repertory document of the relevant sworn translator; 3) Specimen signature and initials, seal or stamp of the sworn translator, as well as their office address; 4) Original statement letter confirming the continuity of the sworn translator’s professional practice; and 5) Original statement letter confirming the fulfillment of the sworn translator’s tax obligations.
- Any sworn translators who are found to have violated the reporting obligations may be subject to the imposition of administrative sanctions based on the results of supervisions that will be undertaken by the Minister. Said sanctions may take the following forms: 1) Written reprimands; 2) Temporary suspensions; and 3) Dishonorable dismissals.

38. Draft Regulation of the Government on the Regulation of the Offices of Land Deed Officials

Enforcement Date: -

Summary:

- If ultimately enacted, then the Draft Regulation will simultaneously repeal and replace Regulation of the Government No. 37 of 1998 on the Regulation of the Offices of Land Deed Officials (*Pejabat Pembuat Akta Tanah – “PPAT”*), as amended by Regulation of the Government No. 24 of 2016 (collectively referred to as “**Regulation 37/1998**”). However, any Implementing Regulations that were issued prior to the Draft Regulation will remain applicable, provided that they do not conflict with any of the provisions that now feature under the Draft Regulation. As a consequence of this, any temporary PPAT who were appointed prior to the enforcement of the Draft Regulation may continue to serve up until the end of their terms of office, while any prospective PPAT who have passed their examinations but who have not yet been appointed will now be appointed based on the

Draft Regulation. Finally, any deeds that were executed by PPAT in line with Regulation 37/1998 will remain valid and binding.

- While retaining the core provisions originally set out under the framework of Regulation 37/1998, the Draft Regulation has now revised the various requirements that must be met in order to be appointed as PPAT. Said requirements now encompass the obligation to undertake an internship at a land office and/or to work as a PPAT employee for a period of at least six months after completion of the relevant notarial education. Moreover, the Draft Regulation specifies various types of professional misconduct that may be committed by PPAT and classifies them as minor, moderate and serious violations.
- In addition, the Draft Regulation affirms the right of PPAT to form, join and associate with professional organizations. Said professional organizations may subsequently formulate codes of ethics. However, all such organizations will be required to submit any codes of ethics that they establish to the Minister for their approval and ratification, and will also be required to submit periodic reports.

Tax & Non-Tax Charges

39. Regulation of the Minister of Finance No. 8 of 2026 on the Amendment to Regulation of the Minister of Finance No. 228/PMK.03/2017 of 2017 on Detailed Types of Data and Information, as Well as Procedures for the Submission of Taxation-Related Data and Information

Enforcement Date: 27 February 2026

Summary:

- The Amendment introduces the authority of the Director-General of Taxes (*Direktur Jenderal Pajak* – “**DJP**”) to notify government agencies, institutions, associations and other parties regarding reports on the utilization of tax-related data and information. Said notifications should be delivered through formal letters that inform the relevant parties of the use of the data and information that they have submitted.
- If any previously submitted data and information are deemed insufficient, then the DJP is authorized to collect additional taxation-related data and information. Upon receiving any such request letter, the relevant government agency, institution, association or other party must provide the requested data and information in accordance with actual conditions within a maximum period of one month from the date upon which the request is received.
- This Amendment also authorizes the DJP to delegate part of its authority (e.g. the authority to collect data and information related to taxation) in the form of a mandate to officials working within the DJP (e.g. the Head of a Regional DJP Office).

40. Decree of the Director-General of Taxes No. KEP-37/PJ/2026 of 2026 on Taxation Policy on the Implementation of the Core-Tax Administration System for Submissions of Article-21 Income Tax Returns for the December 2025 Tax Period

Enforcement Date: 27 February 2026

Summary:

- This Decree states that administrative sanctions in the form of the imposition of fines for late submissions of monthly tax returns (*Surat Pemberitahuan Masa Bulanan* – “**Monthly SPT**”) for Article-21 Income Tax (*Pajak Penghasilan* – “**PPH**”) for the December 2025 tax period will now be waived, provided that the relevant returns are ultimately submitted after the statutory deadline but before the end of February 2026. This waiver is to be implemented through the non-issuance of tax collection letters (*Surat Tagihan Pajak* – “**STP**”). In this regard, if an STP has already been issued, then the relevant Head of the Regional Office of the Directorate-General of Taxes has the authority to cancel or remove the relevant sanction.
- However, despite this new administrative leniency, taxpayers will remain obliged to fulfill their tax payment obligations in accordance with applicable tax-related Laws and Regulations. In this regard, tax payments should be completed through the tax deposit mechanism, which may subsequently be followed by book-entry transfers in order to settle any outstanding tax liabilities, as reported in the relevant tax returns.

Technology, Media, and Telecommunication

41. Regulation of the Minister of Communication and Digital Affairs No. 8 of 2026 on the Indonesian Radiofrequency Spectrum Allocation Table

Enforcement Date: 24 February 2026

Summary:

- Outlined comprehensively under the Appendix to this Regulation, the government has now brought the most recent Indonesian Radiofrequency Spectrum Allocation Table (“**Allocation Table**”) into line with the 2024 edition of the Radio Regulation issued by the International Telecommunication Union. In this regard, the aforementioned Allocation Table comprises the following aspects: 1) Allocation table; 2) International footnotes; 3) Indonesian footnotes; 4) The allocation of Maritime Mobile Service radiofrequency channels for radiotelephony use at coastal radio stations in Indonesia; and 5) The allocation of Aviation Mobile Service radiofrequency channels for Indonesia.
- This Regulation affirms that the aforementioned Allocation Table will now serve as a reference during the planning of radiofrequency band usage (band plan) and radiofrequency channel usage (channeling plan), as well as during the allocation of radiofrequency bands and/or channels. The Allocation Table itself has been classified into nine radiofrequency band ranges, which span the 3 kHz - 30 kHz range (very low frequency/VLF) all the way up to the 300 GHz - 3000 GHz range.
- It should also be noted that this Regulation stipulates that radio services (*radio dinas*) are classified as either primary or secondary during planning for the use of the radiofrequency spectrum. The use of radio services at the primary level will be protected from any harmful interference that is caused by the use of the Radio Services at the secondary level. Meanwhile, the use of radio services at the secondary level must fulfill the following requirements: 1) Must not cause any harmful interference to the use of radio services at the primary level to which radiofrequency bands have been assigned or will be assigned; and 2) May not claim protection from any harmful interference caused by the use of radio services at a primary level for which radiofrequency bands have been assigned or will be assigned.

42. Regulation of the Minister of Communication and Digital Affairs No. 9 of 2026 on the Implementing Regulation to Regulation of the Government No. 17 of 2025 on the Governance and Organization of Electronic Systems in Relation to Child Protection

Enforcement Date: 6 March 2026

Summary:

- Following the enforcement of Regulation of the Government No. 17 of 2025, this new implementing framework sets out further details of the minimum age information that must be disclosed by organizers of electronic systems (*Penyelenggara Sistem Elektronik – “PSE”*) in order to protect children under 18 years of age who use or access electronic systems (“**Children**”) from the utilization or accessing of certain online products, services and features that are provided by PSE (collectively referred to as “**Online Services**”). In this regard, PSE should implement age verification mechanisms through the use of certain technologies (either independently or in collaboration with third-party providers).
- This Regulation also further details the self-assessments that must be completed by PSE and that address the potential risks faced by Children who utilize their Online Services (e.g. interactions with unknown individuals, exposure to inappropriate content and threats to the security of Children’s personal data). Said risks will be classified as either low-risk or high-risk. These self-assessments must be submitted to the Director-General of Digital Space Supervision by 6 June 2026.
- Any networking services and social-media platforms that are organized and provided by PSE will automatically be classified as Online Services with high-risk profiles (unless submitted self-assessments and risk profiles that are subsequently stipulated by the Minister state otherwise). As a result, this new framework will require all PSE that meet the general criteria that apply to the aforementioned platforms to deactivate the accounts of all Child users under 16 years of age.

43. Regulation of the Minister of Public Works No. 5 of 2026 on the Implementation of Electronic-Based Government Systems

Enforcement Date: 10 March 2026

Summary:

- This Regulation introduces the Data and Information Unit (*Unit Data dan Informasi* – “**Datin Unit**”) as an organizational-level work unit that is responsible for the management of data and information technology. The Datin Unit is expected to collaborate with Pusdatin, particularly regarding the utilization of Electronic-Based Government System (*Sistem Pemerintahan Berbasis Elektronik* – “**SPBE**”) infrastructure, which includes computing centers. Accordingly, all Organizational Units, Work Units and Technical Implementation Units (*Unit Pelaksana Teknis* – “**UPT**”) are required to coordinate with the Datin Unit and the Center for Data and Information Technology (*Pusat Data dan Teknologi Informasi* – “**Pusdatin**”) regarding the use of such infrastructure.
- This new Regulation has retained the stipulation that Special Applications (*Aplikasi Khusus*) may be designed, developed and/or built by Organizational Units, Work Units or Pusdatin. However, in practice, Work Units or UPT are required to coordinate with the Datin Unit, which will subsequently follow up through an evaluation process before securing joint approval in coordination with Pusdatin.
- One of the key updates introduced under this new framework is the explicit requirement for all SPBE services, including both administrative services (e.g. human resources and archiving services) and public services (e.g. legal documentation and information services), to be planned and developed through the involvement of artificial intelligence (AI) technologies, as well as other types of advanced technologies.

44. Circular of the Central Indonesian Broadcasting Commission No. 1 of 2026 on the Utilization of Artificial Intelligence in Programs Broadcast Through Broadcasting Institutions

Enforcement Date: 23 February 2026

Summary:

- This Circular attempts to address the growing use of Artificial Intelligence (“AI”) in relation to broadcasting activities (e.g. program planning, audio-visual processing, virtual presenters and audience analytics) by setting out a compliance reference for use by broadcasting institutions. This reference should hopefully ensure that any AI technologies that are utilized do not undermine the overall accuracy of information and are capable of ensuring balanced reporting, transparency and public trust. This new framework should also guarantee that these new technologies are utilized in line with the country’s broadcasting Laws and Guidelines on Broadcasting Ethics and Broadcast Program Standards (*Pedoman Perilaku Penyiaran dan Standar Program Siaran - “P3SPS”*).
- This Circular requires all broadcasting institutions that utilize AI technologies during their programming to clearly disclose the use of AI-generated sound or images to the general public (particularly when such use may influence perceptions of facts or reality). Meanwhile, all AI-assisted broadcasting activities must remain under human supervision or control in order to ensure professional accountability. Furthermore, all AI-generated content must be produced in good faith and must avoid the use of any prohibited elements (e.g. pornography, obscenity, lies, defamation, sadism and/or discrimination), while continuing to comply with applicable broadcasting regulations and P3SPS standards.
- This Circular prohibits broadcasting institutions from imitating, manipulating or fabricating the faces, voices, statements or identities of any real individuals without first securing valid consent. The production of any AI-generated content that violates human rights, privacy rights or personal dignity is also prohibited. Any non-compliance with this new framework may ultimately result in the imposition of administrative sanctions (e.g. written reprimands, administrative fines and temporary suspensions of broadcasting activities), which will be imposed by the Central Indonesian Broadcasting Commission.

45. Joint Decree of the Minister of Home Affairs; Minister of Religious Affairs; Minister of Primary and Secondary Education; Minister of Higher Education, Science and Technology; Minister of Communication and Digital Affairs; Minister of Population and Family Development/Head of the National Population and Family Planning Agency; and Minister of Women’s

Empowerment and Child Protection No. 400.1-492, 211, 2/KB/2026, 1/M/KB/2026, 117, 4/SKB/F1/2026, 2 of 2026 on Guidelines for the Use of and Learning Through Digital Technology and Artificial Intelligence During Formal, Non-Formal and Informal Education

Enforcement Date: 12 March 2026

Summary:

- This Decree outlines a set of guidelines that specifically address the utilization of and learning through digital technology and artificial intelligence (“**AI**”) during formal, non-formal and informal education pathways (“**Guidelines**”). The Guidelines take into account the specific characteristics, features and academic autonomy of each educational pathway. Meanwhile, relevant educational institutions are being encouraged to: 1) Assess the readiness of their human resources, infrastructure and governance for utilization purposes; 2) Implement the Guidelines in relation to the utilization of and learning through digital technology and AI; 3) Uphold child protection measures; and so on.
- Under the Appendix to the Decree, the aforementioned Guidelines comprise: 1) Approaches, principles and general limitations, which range from human-centered approaches to the readiness of learners; 2) Child protection and the role of families in assisting the utilization of digital technology and AI, including the strengthening of family resilience and capacities, as well as religious guidance that covers the use of digital technology and AI; 3) The role of relevant ministries/agencies in implementing the Guidelines; 4) Guidelines for early childhood education; 5) Guidelines for primary and secondary education; and so forth.

46. Decree of the Minister of Communication and Digital Affairs No. 67 of 2026 on Technical Standards for Land Mobile Radio Telecommunications Equipment

Enforcement Date: 18 May 2026

Summary:

- This Decree stipulates various technical standards that apply to Land Mobile Radio (“**LMR**”) equipment that is manufactured, assembled, imported, traded and used within Indonesia. Based on their operational functions, LMR devices are classified into the following three

categories: 1) Conventional Radio, which operates using simplex or duplex communication systems; 2) Trunking Radio, which operates through systems that automatically allocate frequency channels; and 3) Private Mobile Radio, which is generally used for short-range, voice communications services under a class license framework.

- LMR devices are further classified into three types: 1) Fixed equipment, specifically permanently installed LMR devices at particular locations that are powered by AC sources of electrical power; 2) Vehicular equipment, specifically LMR devices that are used in vehicles and powered by vehicles' main batteries; and 3) Portable equipment, specifically LMR devices that are designed for mobile use and powered primarily by batteries.
- This Decree also requires all LMR devices to comply with various technical requirements (e.g. requirements relating to electrical safety and electromagnetic compatibility, as well as various radio performance parameters). From an electrical safety perspective, all devices must be capable of protecting users from various risks (e.g. overvoltage) in accordance with applicable Indonesian National Standards (*Standar Nasional Indonesia* – “**SNI**”), including SNI IEC 60950-1 and SNI IEC 62368-1.

Trade

47. Regulation of the Minister of Industry No. 3 of 2026 on Procedures for the Issuance of Technical Considerations for the Granting of Import-Duty Exemption Facilities

Enforcement Date: 4 April 2026

Summary:

- Importers of machinery that will be used for industrial construction or development purposes (“**Machinery**”), industrial goods and materials (“**Industrial Goods**”), as well as goods that will be used for scientific research and development purposes (“**Research Goods**”), may secure import-duty exemption facilities (“**Facilities**”). Said Facilities will be provided if the above-listed items meet any of the following conditions: 1) Are not yet being produced domestically; 2) Do not meet the required specifications; or 3) Are not available in sufficient quantities to meet industrial requirements.
- In order to enjoy Facilities, technical considerations (“**Considerations**”) will have to be secured if the conditions outlined in points (2) and (3) above are met. In this regard, relevant importers will have to submit their applications electronically to the Director-General of Industrial Development through the National Industrial Information System (*Sistem Informasi Industri Nasional* – “**SIINas**”), along with required company data and supporting documents. Considerations will remain valid for two years for Machinery and Industrial Goods, and for one year for Research Goods.
- Importers that have secured Considerations will be required to submit import realization reports every six months through SIINas. Any failure to submit said reports may result in the imposition of administrative sanctions, including a prohibition on the submission of applications for Considerations during the following period.

48. Decree of the Minister of Trade No. 334 of 2026 on the Amendment to Regulation of the Minister of Trade No. 2397 of 2025 on Export Incentives to Meet Domestic Market Obligations for Public Cooking Oil

Enforcement Date: 19 February 2026

Summary:

- This Amendment has now stipulated that Perum BULOG and/or State-Owned Food Enterprises (*Badan Usaha Milik Negara [BUMN] Pangan*) have been designated as Line Distributors 1. In addition, the regional multiplier factor (*angka factor pengali regional*), which determines the export incentives relating to the fulfillment of the domestic market obligation for public cooking oil, has been revised, as specifically detailed under the Appendix to this Amendment.

49. Draft Regulation of the Government on Safeguard, Antidumping and Countervailing Measures

Enforcement Date: -

Summary:

- This new Draft Regulation is set to expand Indonesia's safeguard measures through the introduction of a whole new category of industrial safeguards and by allowing bilateral or regional measures to be implemented through international trade agreements. The new framework also sets clear conditions that must be met prior to the imposition of any safeguards, including import surges, serious damage to domestic industries and a causal link between the two.
- The Draft Regulation also further introduces a formal new shipper review mechanism that will apply in both antidumping and countervailing cases. This will allow exporters or producers who are not involved in original investigations to request their own individual duty rates. In this regard, applicants must meet certain specific criteria, including non-engagement in any exports during the original investigation period, not having any affiliation with previously investigated exporters and commencing exports after the

relevant duty has been imposed. If these requirements are met, then the investigating authority may recommend an individual duty rate; otherwise, the general duty rate will apply.

- The Draft Regulation is also set to adjust the duration of safeguard, antidumping and countervailing measures in comparison with the current regulatory framework. While the maximum period will largely remain the same, a minimum duration of three years will now be introduced for antidumping and countervailing duties. Meanwhile, a defined extension framework will be established for safeguard measures and will permit a total duration of up to 10 years.

Transportation and Logistic Services

50. Decree of the Director-General of Sea Transportation No. KP-DJPL 107 of 2026 on Guidelines for the Implementation of Education and Training for Operators of Marine Aids to Navigation

Enforcement Date: 3 March 2026

Summary:

- This Decree stipulates that operators of Marine Aids to Navigation (“**AtoN**”) may only be trained by education and training institutions that have secured Certificates of Approval for AtoN Training Courses, as issued by the Director-General of Sea Transportation. Prior to initiating any training programs, organizing institutions must submit training implementation plans to the Director of Navigation at least two weeks prior to the commencement of the relevant programs. Said plans must include the following information: 1) Training schedule; 2) Training venue; 3) List of participants; 4) Proposed list of instructors; and 5) Blended learning method.
- This Decree further mandates that prospective training participants must meet the following requirements: 1) Must secure a recommendation letter from the relevant business entity or institution; 2) Must have achieved at least a senior high school or

vocational high school education (or equivalent qualification); and 3) Must be under 40 years of age. Training programs should be conducted over 50 instructional hours, which are the equivalent of five days of effective training and one day of examination.

- Organizing institutions are required to submit reports on the implementation of their training programs within two weeks of their completion. Any failure to submit these reports will result in institutions being prohibited from proposing any plans for subsequent training programs.

Miscellaneous

51. Regulation of the Minister of Youth and Sports No. 4 of 2026 on the Amendment to Regulation of the Minister of Youth and Sports No. 10 of 2023 on Procedures for the Granting of Recommendations for Indonesian Citizenship Applications for Foreign Athletes and Foreign Sporting Personnel

Enforcement Date: 4 March 2026

Summary:

- This new Regulation has retained the existing deadline for the issuance of recommendations by the Minister, which is set at 60 business days from the date upon which an application is deemed complete. This new framework also reaffirms that the Legal Unit is responsible for the preparation of relevant administrative processes within a maximum of 14 business days after completion of a verification. However, one key change lies in the introduction of a new provision that will allow the Minister to delegate authority for the signing of recommendations to the Secretary of the Ministry.

52. Regulation of the Meteorology, Climatology and Geophysics Agency No. 1 of 2026 on Procedures for the Securing of Weather Modification Operator Registration Certification

Enforcement Date: 19 February 2026

Summary:

- This Regulation requires all legal entities operating within Indonesia that intend to engage in weather modification activities to secure official registration certificates (“**Certificates**”). In order to obtain said Certificates, applicants must submit the following documents: 1) Application letter for the issuance of a Certificate; 2) Statement of document authenticity; 3) Copy of the company’s deed of establishment; 4) Copy of the company’s decree of approval, as issued by the ministry responsible for legal affairs; 5) Copy of the legal entity’s Business Identification Number (*Nomor Induk Berusaha/NIB*); and 6) Statement specifying the type of vehicle that will be used in order to deliver the seeding material and the type of seeding material that is intended to be used.
- Certificates will remain valid for periods of five years and may be renewed. Renewal applications must be submitted at least 30 days prior to a given Certificate expiring. In addition, operators are required to request updated Certificates in the event that any changes are made to the company’s identity or modifications are made to the specifications of the relevant delivery vehicle or the seeding material used.
- It should be noted that the Meteorology, Climatology and Geophysics Agency (*Badan Meteorologi, Klimatologi, dan Geofisika/BMKG*) has the authority to initiate different types of legal action in relation to an issued Certificate in three circumstances: 1) Suspension, if an operator is inactive for three consecutive years; 2) Cancellation, if discrepancies are discovered in any submitted documents; and 3) Revocation, if an operator is proven to have committed violations that have caused harm to the environment or public safety. In the case of a revocation, the relevant legal entity will be prohibited from applying for a new Certificate for a period of two years.

53. Decree of the Director-General of the General Judicial Body of the Supreme Court No. 127/DJU/SK.HM1.1/III/2026 on the Updated Standardization of Court Websites Within the General Courts Environment

Enforcement Date: 16 March 2026

Summary:

- This Decree stipulates that all courts are required to use an official government domain (i.e. go.id) and are prohibited from using any free Internet services such as Blogspot or Wordpress in order to ensure that security and credibility are maintained. In addition, all such websites must implement the HTTPS protocol, ensure that regular backups are undertaken and separate their website servers, either physically or virtually, from internal application servers (e.g. SIPP) in order to minimize any risk of disruption.
- The Decree stipulates that all homepages must display key service menus (e.g. court schedules and e-Court information). Furthermore, public information should be classified into the following three categories: 1) Periodic information (e.g. profiles and case fees); 2) Immediate information (e.g. security disruptions); and 3) Information that is available at all times (e.g. case information).
- In order to maintain overall quality, monitoring should be conducted on a regular basis (i.e. ranging from daily to monthly), along with periodic evaluations (i.e. quarterly, semi-annual and annual basis). In this regard, a given website will be considered high-quality if it is able to demonstrate that it can meet certain technical indicators (e.g. minimum uptime of 99% and a homepage access speed of no longer than three seconds).

54. Draft Bill on Private International Law

Enforcement Date: -

Summary:

- The Draft Bill on Private International Law ("**Draft Bill**"), which has been included as a part of the 2026 Priority National Legislation Program, aims to establish a comprehensive and integrated framework that will address various cross-border legal matters. Said matters are currently regulated under the *Algemene Bepalingen van Wetgeving* ("**AB**") and the *Reglement op de Burgerlijke Rechtsvordering* ("**Rv**"). In comparison with the AB, the Draft Bill revises the rules on personal status, expands the scope of immovable property Regulations to include registered and intangible assets, and also emphasizes party autonomy for legal acts regarding the choice of law.

- The Draft Bill is also set to introduce a flexible framework for determinations of the international jurisdiction of Indonesian courts (“**Courts**”) in relation to civil disputes that involve foreign elements. This new framework will allow jurisdiction in situations where there is a sufficient connection to Indonesia, such as a defendant’s country of residence, a place of business or the location of a given dispute. At the same time, the Draft Bill also allows Courts to decline jurisdiction in certain circumstances.
- The Draft Bill also introduces a formal mechanism for the recognition and enforcement of foreign court decisions in Indonesia. This comes against a background of the longstanding practice set out under Article 436 of the Rv, which states that foreign court decisions may not be directly enforced, thereby requiring the filing of new lawsuits. Finally, the Draft Bill will also recognize certain types of foreign judgments, without them necessarily being enforceable.

55. Draft Regulation of the Government in Lieu of Law on the Eradication of Economic Crimes and National Economic Recovery

Enforcement Date: -

Summary:

- If ultimately enforced, this Draft Regulation will put strict definitions of economic crimes in place (i.e. criminal acts that damage stability, hinder growth or cause losses to the national economy on a macro scale) and classifies these economic crimes under the following categories: 1) Crimes that already feature under existing frameworks (e.g. customs-and-excise, mining, trade and financial sector-related crimes); and 2) Other crimes that meet certain criteria (e.g. organized crimes that take place within the natural resources sector, systemic manipulation within the capital market and financial sector, as well as hoarding and/or sabotage relating to the distribution of nationally strategic commodities in ways that trigger crises).
- The Draft Regulation also mandates the establishment of a new Task Force for the Handling of Economic Crimes (“**Task Force**”) by the Attorney General, which will handle the aforementioned cases involving economic crimes. This Task Force is authorized to carry out

five core functions, including: 1) Conducting of preliminary investigations, investigations, prosecutions and enforced verdicts; 2) Implementation of law enforcement intelligence functions in order to prevent and track diversions of assets deriving from criminal acts; and 3) Taking over of investigations from other investigative agencies (if crimes that are being handled qualify as a threat to the state economy). The Draft Regulation also exempts the Task Force from provisions relating to banking confidentiality and other types of financial transaction confidentiality if the new body requests data and information from financial service providers.

- The Attorney General, based on a recommendation made by the Task Force, is authorized to terminate a given investigation or prosecution through the imposition of a peace fine (*denda damai*) upon the relevant corporate suspect or defendant. Furthermore, the Task Force is entitled to propose the implementation of a Deferred Prosecution Agreement (DPA) if the criminal prosecution of a corporation has the potential to threaten the livelihoods of workers, trigger mass layoffs or disrupt the livelihoods of significant numbers of citizens. Ultimately, the Task Force is authorized to block and confiscate assets in urgent circumstances in order to prevent diversions of funds suspected of originating from economic crimes.