

## Indonesia Client Update

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COMPETITION/ANTITRUST, CONSUMER & TRADE

# Indonesia Tightens Import Rules for Cooling Equipment to Support Environmental Commitments



Indonesia has introduced stricter import restrictions on air conditioning, refrigeration, and other cooling equipment as part of its efforts to reduce ozone-depleting substances. Under Ministry of Trade Regulation No. 47 of 2025 on Goods Prohibited from Import ("Regulation 47/2025"), effective 1 January 2026, businesses importing cooling systems face new prohibitions and classifications.

Regulation 47/2025 replaces the previous framework under Ministry of Trade Regulation No. 18 of 2021 ("Regulation 18/2021") and removes overlapping provisions from Ministry of Trade Regulation No. 21 of 2025 ("Regulation 21/2025"). Key changes include:

1. Separating import prohibitions from export rules for greater clarity;
2. Reclassifying cooling equipment categories; and
3. Expanding the list of substances that trigger import bans, including Hydrochlorofluorocarbon-123 ("HCFC-123"), an ozone-depleting substance already restricted in many jurisdictions, including the European Union and the United States.

These changes reflect Indonesia's commitment to climate control and carbon governance, following proposed policy initiatives from the Ministry of Environment in April 2025.

## Cooling Equipment Importation Updates Under Regulation 47/2025

Regulation 47/2025 introduces significant changes to the rules on importing cooling equipment. These changes aim to strengthen Indonesia's commitment to reducing ozone-depleting substances and provide clearer guidance for businesses.

### 1. Reclassification of cooling equipment

Previously, cooling systems using Chlorofluorocarbon ("CFC") and Hydrochlorofluorocarbon 22 ("HCFC-22") were prohibited from import under Regulation 18/2021. The new regulation goes further by creating three distinct categories of cooling equipment:

- Fire suppression systems;
- Non-fire suppression systems; and
- Cooling-based electronics.

### 2. Expanded criteria for prohibited goods

Under the old framework, only systems using CFC and HCFC-22 were banned. Regulation 47/2025 adds HCFC-123 to the list of substances that trigger import restrictions. The new criteria apply to:

- Non-fire suppression systems using CFC, HCFC-22, or HCFC-123; and
- Cooling-based electronics using these substances.

Fire suppression systems remain prohibited only if they use CFC or HCFC-22.

### 3. Complete ban on HCFC-123 imports

Previously, imports of cooling systems using HCFC-123 were allowed with an import license and surveyor report. Under Regulation 47/2025, these imports are now completely prohibited.

## Temporary Exceptions for HCFC-123 Imports

Regulation 47/2025 provides a short grace period for certain imports of cooling equipment containing HCFC-123. This exception applies only to non-fire suppression system and cooling-based electronics, whether empty or filled.

To qualify, these conditions must be met:

1. The goods were shipped before 1 January 2026, as evidenced in the bill of lading or airway bill; and
2. The goods arrive in Indonesia by 31 January 2026, as indicated in the manifest document.

After this date, imports of these goods will be fully prohibited.

## Key Takeaways

With the issuance of Regulation 47/2025, businesses importing cooling equipment containing CFCs, HCFC-22, and particularly HCFC-123 must immediately review their import plans. These substances are now subject to strict prohibitions, and the grace period for goods already in transit is very short. Only shipments made before 1 January 2026 and arriving in Indonesia by 31 January 2026 will qualify for the temporary exception. After that, imports will be fully banned.

Looking ahead, Indonesia's commitment to phasing out ozone-depleting substances means that future regulations are likely to become even stricter. Businesses should reassess their supply chains, identify products containing these substances, and explore environmentally friendly alternatives to ensure compliance and avoid disruption.

# Contacts

## COMPETITION/ANTITRUST, CONSUMER & TRADE



Farid Fauzi Nasution

PARTNER

D +62 21 2555 9998  
[farid.nasution@ahp.id](mailto:farid.nasution@ahp.id)



Budi Herdiyanto

SENIOR ASSOCIATE

D +62 21 2555 7885  
[budi.herdiyanto@ahp.id](mailto:budi.herdiyanto@ahp.id)

## Contribution Note

This Legal Update is contributed by the Contact Partners listed above, with the assistance of **Dealita Tiara Oktaviani** (Associate, Assegaf Hamzah & Partners).

Please feel free to also contact Knowledge Management at [RTApublishations@rajahtann.com](mailto:RTApublishations@rajahtann.com).

# Regional Contacts

## Cambodia

Rajah & Tann Sok & Heng Law Office

T +855 23 963 112 | +855 23 963 113

[kh.rajahtannasia.com](http://kh.rajahtannasia.com)

## China

Rajah & Tann Singapore LLP

Representative Offices

### Shanghai Representative Office

T +86 21 6120 8818

F +86 21 6120 8820

### Shenzhen Representative Office

T +86 755 8898 0230

[cn.rajahtannasia.com](http://cn.rajahtannasia.com)

## Indonesia

Assegaf Hamzah & Partners

### Jakarta Office

T +62 21 2555 7800

F +62 21 2555 7899

### Surabaya Office

T +62 31 5116 4550

F +62 31 5116 4560

[www.ahp.co.id](http://www.ahp.co.id)

## Lao PDR

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239

F +856 21 285 261

[la.rajahtannasia.com](http://la.rajahtannasia.com)

## Malaysia

Christopher & Lee Ong

T +603 2273 1919

F +603 2273 8310

[www.christopherleeong.com](http://www.christopherleeong.com)

## Myanmar

Rajah & Tann Myanmar Company Limited

T +951 9253750

[mm.rajahtannasia.com](http://mm.rajahtannasia.com)

## Philippines

Gatmaytan Yap Patacsil Gutierrez & Protacio  
(C&G Law)

T +632 8248 5250

[www.cagatlaw.com](http://www.cagatlaw.com)

## Singapore

Rajah & Tann Singapore LLP

T +65 6535 3600

[sg.rajahtannasia.com](http://sg.rajahtannasia.com)

## Thailand

Rajah & Tann (Thailand) Limited

T +66 2656 1991

F +66 2656 0833

[th.rajahtannasia.com](http://th.rajahtannasia.com)

## Vietnam

Rajah & Tann LCT Lawyers

### Ho Chi Minh City Office

T +84 28 3821 2382

F +84 28 3520 8206

### Hanoi Office

T +84 24 3267 6127 | +84 24 3267 6128

[vn.rajahtannasia.com](http://vn.rajahtannasia.com)

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