

TECHNOLOGY, MEDIA & TELECOMMUNICATIONS

Indonesia Extends PP Tunas Self-Assessment Deadline As Implementation Framework Continues to Evolve



Key Takeaways

Electronic system operators (“**ESOs**”) now have until 31 December 2026 to submit their self-risk assessments to the Ministry of Communication and Digital Affairs (“**MOCD**”), as required under PP Tunas (Government Regulation No. 17 of 2025).¹ While the extension gives ESOs additional preparation time, it does not change the underlying child-protection obligations.

- The extension does not suspend compliance obligations, and ESOs remain responsible for assessing the risk profiles of their PSFs (products, services and features) and implementing the applicable child-protection measures.
- Failure to submit the result of the self-assessment may lead the MOCD to conduct its own assessment and determine the relevant risk classification.
- ESOs should use the additional time to strengthen compliance, including validating self-risk assessments against the latest framework and reviewing age assurance, child account management, parental controls and content governance measures.

Approx. 6 min read

More than a year after the issuance of PP Tunas, Indonesia continues to expand its online child-protection regime through new implementing regulations and enhanced regulatory oversight. As discussed in our previous client update on PP Tunas ([click here to read](#)), the regulation introduced a comprehensive framework requiring ESOs to implement child-protection measures, assess the risk profile of their PSFs, and adopt age-appropriate safeguards for child users.

Since PP Tunas was enacted on 27 March 2025, the MOCD has issued several implementing regulations and adopted a more proactive approach to implementation and enforcement. Taken together, these developments signal that the MOCD expects ESOs to have complied with PP Tunas.

This update examines the extension of the self-risk assessment submission deadline to 31 December 2026, key implementing regulations issued under PP Tunas, and recent regulatory and enforcement developments relevant to ESOs.

Accelerated Implementation of PP Tunas

Under PP Tunas, the transitional period is stated to be a maximum of two years from its enactment, ending on 27 March 2027. In practice, many stakeholders expected that active implementation and enforcement would not begin until the end of that period.

Contrary to these expectations, the MOCD's subsequent actions suggest that implementation has proceeded on a more accelerated timetable.

During a press conference held on 6 March 2026,² the MOCD announced that the implementation phase of PP Tunas would commence on 28 March 2026, beginning with the deactivation of accounts held by children under 16

¹ Peraturan Pemerintah No. 17 Tahun 2025 tentang Tata Kelola Penyelenggaraan Sistem Elektronik dalam Perlindungan Anak

² <https://www.komdigi.go.id/berita/siaran-pers/detail/permen-komdigi-terbit-pemerintah-mulai-implementasi-perlindungan-anak-di-platform-digital>.

on high-risk PSFs. According to the MOCD, compliance efforts should have been underway since PP Tunas was enacted on 27 March 2025 and, accordingly, enforcement measures would begin from 28 March 2026.

Extended Deadline for Self-Risk Assessment Submission

Since PP Tunas was enacted, the MOCD has progressively developed implementing regulations of PP Tunas, including the following key regulations and decrees.

Instrument	Key Purpose
MOCD Regulation No. 9 of 2026	Introduces the self-risk assessment framework and methodology for determining whether a PSF is intended for, or likely to be accessed by, children, as well as elaborating the age verification requirements.
MOCD Decree No. 140 of 2026	Designates YouTube, Threads, Facebook, Instagram, X, TikTok, Bigo Live and Roblox as high-risk PSFs and imposes additional child-protection obligations on those platforms.
MOCD Decree No. 142 of 2026	Provides technical guidance, assessment indicators, templates and verification procedures for the self-risk assessment process.
MOCD Decree No. 219 of 2026	Updates the self-risk assessment template and refines certain elements of the assessment methodology.

Under PP Tunas, one of the most important obligations is for ESOs to assess and classify the risk profile of their PSFs and submit the assessment results to the MOCD for verification. The resulting classification determines the child-protection measures and compliance obligations applicable to the relevant PSF.

Under MOCD Regulation No. 9 of 2026, ESOs were originally required to submit their self-risk assessments by 6 June 2026. However, according to a MOCD press release issued on 14 September 2026,³ the submission deadline has been extended to 31 December 2026.

While the extension provides ESOs with additional time to complete their assessments and compliance preparations, the MOCD has emphasised that it does not suspend or modify the underlying obligations under PP Tunas. The MOCD has further indicated that where an ESO fails to submit an assessment by the deadline, the MOCD may conduct its own assessment and determine the applicable risk classification of the relevant PSF. As a result, ESOs may become subject to regulatory requirements based on the MOCD's classification rather than their own assessment.

Recent Enforcement Developments and What ESOs Should Do Next

Recent announcements from the MOCD suggest that implementation and oversight efforts under PP Tunas continue to accelerate notwithstanding the extension of the self-risk assessment deadline.

In its six-month review of PP Tunas since March 2026, the MOCD reported that approximately 28 million children had benefited from child-protection measures implemented by ESOs.⁴ The MOCD further reported that, as of 6

³ <https://www.komdigi.go.id/berita/siaran-pers/detail/evaluasi-6-bulan-pp-tunas-28-juta-anak-terlindungi-kepatuhan-platform-meningkat>.

⁴ <https://www.komdigi.go.id/berita/siaran-pers/detail/evaluasi-6-bulan-pp-tunas-28-juta-anak-terlindungi-kepatuhan-platform-meningkat>.

September 2026, 252 PSFs operated by 94 ESOs had completed the self-assessment process, while 60 PSFs had completed the MOCD's verification process. The MOCD also reiterated that ESOs remain responsible for completing their self-assessment obligations by 31 December 2026.

On the same date, the MOCD announced that it is developing an administrative fine framework for violations of PP Tunas.⁵ According to the draft regulation shared by the MOCD, large-scale and global ESOs may be subject to fines of up to 6% of global revenue.

The MOCD has continued to develop the PP Tunas framework, accelerate implementation efforts and signal a more active enforcement posture. Although the self-risk assessment deadline has been extended, ESOs should not view the extension as a relaxation of their compliance obligations. Instead, the additional time should be used to strengthen compliance preparations, including by:

- Reviewing PP Tunas and its implementing regulations to understand the requirements applicable to their PSFs;
- Conducting and validating their self-risk assessments using the latest MOCD assessment framework; and
- Identifying and implementing appropriate child-protection and risk mitigation measures, including any enhancements to age assurance, child account management, parental controls, and content governance processes, as relevant.

Taking these steps now will help ESOs submit well-supported self-risk assessments, prepare for the MOCD's verification process, and reduce the risk of the MOCD independently determining the risk classification of their PSFs.

If you have any queries on the above, please reach out to our team set out on this page.

For regional Technology, Media & Telecommunications matters, please see Rajah & Tann Asia's [Technology, Media & Telecommunications](#) Practice for more information.

⁵ <https://www.komdigi.go.id/berita/siaran-pers/detail/kemkomdigi-rumuskan-denda-6-persen-pendapatan-global-bagi-platform-pelanggar-pp-tunas>.

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