

GENERAL CORPORATE / M&A

Recalibrating Business Activities under KBLI 2025



Indonesia has introduced a new business classification framework that may directly affect how businesses are licensed and regulated. The 2025 Indonesian Standard Business Classification ("**KBLI 2025**"), issued by the Central Bureau of Statistics (*Badan Pusat Statistik* or "**BPS**") under BPS Regulation No. 7 of 2025, came into effect on 18 December 2025. This regulation expressly revokes and replaces the 2020 Indonesian Standard Business Classification ("**KBLI 2020**") regulated under BPS Regulation No. 2 of 2020, thereby establishing a new official reference point for business activities in Indonesia.

KBLI 2025 introduces both structural and substantive changes to KBLI 2020, including the formal recognition of new and evolving business activities. These include digital platform intermediation, factoryless goods production, digital content and creative media, carbon trading and storage, and new financial services.

As a core reference across Indonesia's regulatory ecosystem, particularly for business licensing under the Online Single Submission risk-based licensing system ("**OSS-RBA**"), the update has practical implications for both existing and new businesses. The adoption of KBLI 2025 reflects BPS' efforts to align Indonesia's business classification framework with the International Standard Industrial Classification of All Economic Activities Revision 5 ("**ISIC Rev. 5**"), as recommended by the United Nations in March 2023, while ensuring continued relevance to economic, technological advancement, and business developments in Indonesia.

Structural Changes

One of the most immediate impacts of KBLI 2025 lies in its structural reconfiguration of business classifications. These changes affect not only how business activities are grouped and defined, but also how existing licences may be further mapped under the new framework.

KBLI 2025 expands the overall structure of the business classification system by increasing the number of categories from 21 to 22. This expansion is due to the splitting of Category J (Information and Communication) under KBLI 2020 into two separate categories:

- Category J (Publishing, Broadcasting, Content Production and Distribution Activities); and
- Category K (Telecommunications, Computer Programming, Consultancy, Computing Infrastructure, and Other Information Services).

As stated in the KBLI 2025 Booklet (Catalog 1302017) issued by BPS, this separation was carried out in accordance with ISIC Rev. 5 and to more accurately reflect the current landscape of content creation and digital infrastructure, which continues to evolve rapidly with technological and media developments.

In addition, KBLI 2025 introduces a comprehensive change of various business classifications to conform with ISIC Rev. 5. This process involves the refinement, relocation, division, and consolidation of a number of previously recognised classifications, as well as the introduction of new classifications. As a result, certain business activities may no longer correspond directly to their former KBLI 2020 codes.

Overall, KBLI 2025 contains 1,560 business classifications, compared to 1,789 classifications in KBLI 2020. While this streamlining is intended to improve clarity and consistency across the classification system, businesses may need to reassess how their activities are categorised.

Substantive Changes

Beyond structural reorganisation, KBLI 2025 also introduces a range of new business classifications and broadens the scope of business activities within several existing classifications in KBLI 2020. This expansion reflects the acknowledgment of new business models and emerging sectors that were either not expressly regulated or only indirectly captured under KBLI 2020. The changes are reflected not only in the introduction of new KBLI codes, but also in more detailed activity descriptions, as well as clearer inclusions and exclusions within individual classifications.

In a nutshell, here are a few examples of new KBLI codes introduced in KBLI 2025:

- **Intermediation services**

KBLI 2025 introduces a standalone intermediation classification across multiple sectors, which was previously embedded within broader categories under KBLI 2020 such as wholesale trade and/or retail trade. Among others, this includes intermediation conducted through websites, mobile applications, and other digital platforms (KBLI 47901).

- **Digital content and media**

Broadcasting and content distribution are separated, with new codes for digital TV (KBLI 60202) and streaming or video-on-demand distribution services (KBLI 60203). Online content activities (e.g., news agencies, blogs, wikis) are consolidated under subgroup 603.

- **Factoryless goods producers (FGPs)**

KBLI 2025 formally recognises FGPs within the manufacturing category. FGPs are entities that outsource manufacturing but retain control over process and intellectual properties.

- **Artificial intelligence (AI)**

AI programming shifts from KBLI 62015 to 62194. AI is also embedded in downstream activities such as unmanned vehicles manufacturing (KBLI 30113, 30302), AI-based software publishing (KBLI 58290), and automated call centre operations (KBLI 82200).

- **Carbon capture, storage, and trading**

New codes cover carbon capture (KBLI 39001), storage (KBLI 39002), and trading activities including sales of carbon credit units (KBLI 35111, 35112, and 35120), proprietary trading (KBLI 64995), operation of trading systems (KBLI 66111), and brokerage services (KBLI 66127).

- **Digital financial and crypto assets**

KBLI 2025 distinguishes blockchain development from crypto trading, adding classifications for proprietary trading (KBLI 64994), operation of exchanges (KBLI 66113), and brokerage services (KBLI 66123).

- **Bullion banking**

New codes are applied for bullion banking (KBLI 64996, 64997), which is defined as accepting precious metal deposits and issuing loans backed by metals, separating it from trading and custodial services.

- **E-cigarette and e-liquid manufacturing**

A dedicated classification is introduced for e-cigarette and e-liquid manufacturing (KBLI 20298), with separate wholesale trade codes (KBLI 46335, 46799), clarifying the distinction between manufacturing and distribution.

The notable changes introduced in KBLI 2025, compared to KBLI 2020, are outlined by category and summarised in a [table](#) at the end of this document.

Transitional Period & Grandfathered Impact

Given the breadth of changes introduced under KBLI 2025, the transitional arrangements and treatment of existing licences are particularly relevant for businesses assessing their compliance position.

Article 5 of KBLI 2025 requires all users to adjust their existing KBLI classifications within a six-month transitional period, ending in June 2026. During this period, government systems, including OSS-RBA, will gradually integrate and adopt the KBLI 2025 framework. To facilitate the transition, BPS has issued a KBLI 2020 and KBLI 2025 conversion table.

Importantly, the implementation of KBLI 2025 does not automatically revoke or invalidate licences that were validly issued under KBLI 2020. The Ministry of Investment and Downstream Industry (*Kementerian Investasi dan Hilirisasi Industri/Badan Koordinasi Penanaman Modal* or "**BKPM**") has further clarified that OSS-RBA will automatically adjust and update the risk-based licensing to reflect the new KBLI classifications as determined by BPS. This position was also confirmed during our consultation with BKPM.

Therefore, where a business continues to conduct activities that remain covered by its existing licences, no immediate adjustment is required solely as a result of the enactment of KBLI 2025. As has been publicly confirmed by BKPM, adjustments will generally only be required where a business:

- Applies for the renewal of an existing licence; and/or
- Changes or expands its business activities, including applying for a new licence.

This position has been publicly confirmed by BKPM, providing a degree of regulatory continuity for existing operations during the transition period. Nevertheless, based on our consultations with the Ministry of Law and several public notaries, companies are advised to adjust their stated purposes and objectives under the articles of association once KBLI 2025 is operationalised within the Directorate General of General Legal Administration Online System (*Direktorat Jenderal Administrasi Hukum Umum Online* or "**AHU Online**").

As of the date of this client update, KBLI 2025 has not yet been operationalised within the OSS-RBA, AHU Online, or other relevant government systems, all of which are currently undergoing system updates. Accordingly, based on consultations with BKPM, the Ministry of Law, and public notaries, new company establishments and related licensing filings must continue to refer to KBLI 2020 in deeds of establishment and licensing documents until KBLI 2025 is formally implemented across the relevant government systems.

Key Takeaways

KBLI 2025 represents a substantial update to Indonesia's business classification framework, reflecting shifts in economic activities and emerging business models. While the overall number of classifications has been reduced, KBLI 2025 introduces more precise activity definitions, reclassifies certain business models, and provides more detailed treatment of specific sectors. These changes may affect how businesses describe, classify, and license their activities going forward.

Although businesses have until June 2026 to adjust their classifications with KBLI 2025, existing licenses remain valid and do not require immediate amendment, unless triggered by a licence renewal, a change in business activities, or a new licence application. Companies should, however, be prepared to update their purposes and objectives under their articles of association once KBLI 2025 becomes operational within the AHU Online system.

From a practical perspective, companies should consider taking the following actions:

- Review their current KBLI classifications against the updated definitions under KBLI 2025;
- Assess whether their business activities remain in line with their registered classifications; and
- Ensure that their articles of association and corporate documents remain consistent with their operational activities and the updated KBLI framework, particularly in anticipation of future licensing or expansion.

Key Changes by Category

Category	Description	Changes
A	Agriculture, Forestry, and Fisheries	<p>This category is refined to improve clarity and emphasise sustainability.</p> <ul style="list-style-type: none"> • Non-timber forest products are grouped under one comprehensive category. • Wildlife and plant breeding are separated to reflect different business characteristics. • Fisheries are simplified by classifying based on water type (marine or freshwater) rather than fish species. • Carbon absorption and storage activities in forestry and aquatic cultivation are now included, aligning with global environmental agendas.
B	Mining and Quarrying	<p>This category is adjusted to reflect stronger downstream policy and the management of strategic resources.</p> <ul style="list-style-type: none"> • Coal beneficiation has its own code, clarifying the mining value chain. • Precious and non-ferrous metal mining is restructured, and industrial/chemical minerals are expanded. • Rare earth mining has its own code, recognising its importance for technology, renewable energy, and electric vehicles.
C	Manufacturing	<p>This category is changed to reflect shifts in production methods.</p> <ul style="list-style-type: none"> • Factoryless Goods Producers (FGP), which own product designs but outsource manufacturing, are classified according to their products rather than as traders. • New commodities are recognised, including liquid biofuels, solar panels and inverters, energy storage systems, medical devices (such as ventilators and breathing aids), and unmanned or space vehicles.
D	Electricity, Gas, Steam/Hot Water, and Cold Air Supply	<p>This category is updated mainly in the energy sector.</p> <ul style="list-style-type: none"> • Electricity generation is classified based on renewable versus non-renewable sources, with emission considerations. • Hydrogen production and distribution are reclassified, with new codes for brokers and agents in electricity and gas. • Carbon unit trading is included, marking the development of Indonesia's carbon economy.
E	Water Supply, Wastewater Management, Waste Handling, and Remediation	<p>This category is simplified and mainly updated in the environmental management sector.</p> <ul style="list-style-type: none"> • Wastewater collection, treatment, and disposal are restructured for clearer process classification. • New codes cover carbon dioxide capture and storage, radioactive waste treatment, waste-to-energy activities, and plastic recovery.

Category	Description	Changes
F	Construction	<p>This category is adjusted to clarify the boundaries between conventional and prefabricated construction to avoid overlap.</p> <ul style="list-style-type: none"> • Civil building scopes are simplified and consolidated. • Interior and exterior decoration are merged into construction finishing. • A new code is introduced for construction intermediation services.
G	Wholesale and Retail Trade	<p>This category is simplified and adjusted to reflect digital business practices.</p> <ul style="list-style-type: none"> • Wholesale and retail trade are distinguished, while vehicle repair is moved to "other services." • Digital platform trade is classified as retail trade intermediation. • Distinctions based on mail-order or online sales are removed.
H	Transportation and Storage	<p>This category is restructured for greater consolidation.</p> <ul style="list-style-type: none"> • Land transport is grouped by service type and distance. • Space transport is separated from air transport. • New codes recognise intermediaries in passenger and freight transport, including postal and courier intermediation.
I	Accommodation and Food Services	<p>This category is restructured to reflect diverse consumption and tourism patterns.</p> <ul style="list-style-type: none"> • Accommodation is classified more specifically, including intermediaries such as Online Travel Agents (OTAs). • Food and beverage services are grouped by building type rather than business type, reflecting real-world conditions. • A new code is introduced for intermediation services in food and beverage provision.
J	Publishing, Broadcasting, and Content Production/ Distribution	<p>This category is revised to capture changes in the media and creative content ecosystem.</p> <ul style="list-style-type: none"> • The emphasis is on content creation, packaging, and distribution in digital and conventional formats. • Recognised activities include podcast production, game publishing, and on-demand streaming. • Broadcasting is categorised by technology rather than ownership, aligning with digitalisation. • Social media and news agencies are moved into this category, reinforcing KBLI 2025's role in capturing the modern content industry.
K	Telecommunications, Computer Programming, Consultancy, Computing Infrastructure, and Other Information Services	<p>This category is changed to accommodate digital infrastructure and services.</p> <ul style="list-style-type: none"> • Cable, wireless, and satellite telecommunications are unified under one group to emphasise their role as core infrastructure. • Value-added services (internet, data, IPTV) are now directly attached to telecommunications, no longer treated as supporting activities. • Web portals and digital platforms are removed, with intermediation classified by sector.

Category	Description	Changes
		<ul style="list-style-type: none"> New codes for resale and telecommunications intermediation distinguish infrastructure providers from retail operators.
L	Financial and Insurance Activities	<p>This category is restructured from an entity-based to an activity-based system.</p> <ul style="list-style-type: none"> Financing companies are divided into activities such as leasing and factoring. Proprietary trading is placed in its own group. New codes cover carbon unit trading, brokerage, and crypto-asset activities. These changes allow clearer identification of economic functions.
M	Real Estate Activities	<p>This category is specified according to purpose and function.</p> <ul style="list-style-type: none"> Residential and non-residential activities are separated, with distinctions for development and leasing. Management of special economic zones and industrial estates is included. New codes address warehouse rental and self-storage services.
N	Professional, Scientific, and Technical Activities	<p>This category is simplified and its boundaries clarified.</p> <ul style="list-style-type: none"> Various design activities are consolidated into one subgroup, while retaining their distinct scopes. Public relations is separated from management consultancy, recognising its strategic role. Humanities research is grouped into a dedicated category. Technical testing and analysis are restructured by service function (certification, inspection, verification, testing).
O	Administrative and Support Service Activities	<p>This category is simplified and expanded.</p> <ul style="list-style-type: none"> The phrase "without option rights" is removed from rental activities to simplify naming without changing substance. New groups introduced for intermediation in leasing and other support services. Labour placement is reorganised to distinguish domestic, household, and seafarer placements.
P	Public Administration, Defense, and Mandatory Social Security	<p>This category is adjusted only in minor ways to strengthen functional clarity.</p> <ul style="list-style-type: none"> A new group is added for government administration of environmental services, reflecting the state's growing role in environmental management. Minor editorial adjustments are made to titles and descriptions for consistency and clarity.
Q	Education	<p>This category is restructured to clarify levels and service types.</p> <ul style="list-style-type: none"> Preschool and primary education are separated into distinct groups.

Category	Description	Changes
		<ul style="list-style-type: none"> Secondary education is redefined to include post-secondary non-tertiary programs. New subgroups cover driving schools, vocational training (government, private, corporate), and professional certification. These changes allow more precise classification of education and training activities in human resource development.
R	Human Health and Social Work Activities	<p>This category is revised for a more functional structure.</p> <ul style="list-style-type: none"> Terminology is updated to be more human-centered and aligned with current social policy. New codes cover intermediation services for health and residential care. Clarified scope for elderly housing, orphanages, and religious fundraising avoids overlap.
S	Arts, Sports, and Recreation	<p>This category is reorganised for clarity.</p> <ul style="list-style-type: none"> Artistic creation, performing arts, and supporting activities are separated. Libraries, museums, cultural heritage, and natural conservation areas receive clearer distinctions. Tourist attractions are consolidated into one group. Sports professions are clarified, distinguishing independent athletes from referees and judges.
T	Other Service Activities	<p>This category is restructured for clarity and to separate pure service activities from goods trading.</p> <ul style="list-style-type: none"> Vehicle repair and maintenance are relocated from the trade sector to this category, reflecting their service nature. Repair of computer and communication equipment, along with various personal services are restructured.
U	Activities of Households as Employers and Production of Goods and Services for Own Use	<p>This category changes only terminology.</p> <ul style="list-style-type: none"> The term "domestic personnel" is replaced with "household workers," aligning with labour norms and policies. The scope of activities remains the same.
V	Activities of International Organizations and Other Extra-International Bodies	<p>No substantive changes are made to this category. Only recoding occurs, while the scope remains consistent with international standards. The structure is retained as in KBLI 2020.</p>

Contacts

GENERAL CORPORATE / M&A



Eko Ahmad Ismail Basyuni

PARTNER

D +62 21 2555 7802
eko.basyuni@ahp.id



Mita Kartohadiprodjo

PARTNER

D +62 21 2555 9972
mita.kartohadiprodjo@ahp.id

Contribution Note

This Legal Update is contributed by the Contact Partners listed above, with the assistance of **Agnes Sebastian** (Associate, Assegaf Hamzah & Partners) and **Aliifah Nazeeya** (Associate, Assegaf Hamzah & Partners).

Please feel free to also contact Knowledge Management at RTApublications@rajahtann.com.

Regional Contacts

Cambodia

Rajah & Tann Sok & Heng Law Office

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

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

Lao PDR

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239
F +856 21 285 261
la.rajahtannasia.com

Malaysia

Christopher & Lee Ong

T +603 2273 1919
F +603 2273 8310
www.christopherleeong.com

Myanmar

Rajah & Tann Myanmar Company Limited

T +951 9253750
mm.rajahtannasia.com

Philippines

Gatmaytan Yap Patacsil Gutierrez & Protacio

(C&G Law)

T +632 8248 5250
www.cagatlaw.com

Singapore

Rajah & Tann Singapore LLP

T +65 6535 3600
sg.rajahtannasia.com

Thailand

Rajah & Tann (Thailand) Limited

T +66 2656 1991
F +66 2656 0833
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

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