

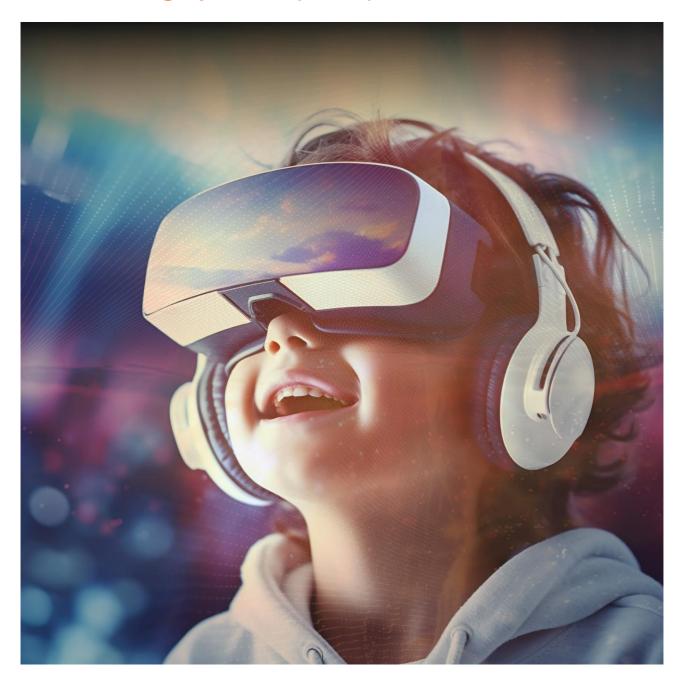


Indonesia Client Update

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TECHNOLOGY, MEDIA & TELECOMMUNICATIONS

From Law to Action: Introducing the Indonesia Game Rating System (IGRS)



Indonesia's gaming industry is entering into a new phase of regulation and active enforcement. At the Indonesia Game Developer Exchange 2025 in Bali, the Minister of Communication and Digital Affairs ("MOCD") officially launched the Indonesia Game Rating System ("IGRS") on 11 October 2025.

While the IGRS may appear new, Indonesia has had a national game-rating framework since 2016. The earlier rules under MOCD Regulation No. 11 of 2016 have now been comprehensively replaced by MOCD Regulation No. 2 of 2024 on Game Classification ("Game Classification Regulation"), which we have discussed in detail here.

At the launch, the Ministry emphasised that the IGRS is not a standalone initiative. It forms part of a broader policy agenda built on three key instruments:

- 1. The Game Classification Regulation;
- 2. Presidential Regulation No. 19 of 2024 on the Acceleration of the National Game Industry; and
- 3. Government Regulation No. 17 of 2025 on Child Protection in Electronic Systems, analysed separately here.

Together, these measures mark a turning point. Indonesia is moving from laying the regulatory foundation to enforcing compliance. For publishers and developers, this means shifting from understanding the rules to embedding them in everyday operations. This transition into the enforcement phase introduces several practical requirements and risk considerations. The next sections summarise the key compliance milestones and provide an overview of potential compliance risks.

Key Compliance Milestone: January 2026

The most critical takeaway from the IGRS launch is timing. The Ministry confirmed that January 2026 marks the end of the two-year transition period under the Game Classification Regulation and the start of full enforcement.

From that point onward, every game publisher, whether local or foreign, whose titles are marketed or accessible in Indonesia must comply with the Game Classification Regulation. In practice, this means that publishers must:

- 1. Complete the self-classification process through the official IGRS portal (igrs.id); and
- 2. Undergo a conformity review on the IGRS website, during which IGRS reviewers will assess and validate the self-classification submitted; and
- 3. Upon approval, obtain an approval certificate directly from the IGRS website.

Given this timeline, the final quarter of 2025 should be treated as the last preparation window. Publishers should prioritise completing any outstanding self-classification and conformity-review processes before year-end to avoid disruption to Indonesian users.

Because classification results must be clearly displayed on all distributed games, compliance teams, local partners, and legal counsel should now coordinate on timelines, responsibilities, and documentation requirements.

Understanding Compliance Risk: Suspension and Market Access

Under the Game Classification Regulation, compliance is not merely a procedural step. Rather, it determines whether a game can remain accessible in Indonesia.

The Ministry may impose a range of administrative sanctions for non-compliant games, including written warnings, temporary suspensions, and even permanent restrictions on access within Indonesia.

These risks apply both to games that have not been classified and those that are incorrectly classified. If a game's rating does not accurately reflect its content, particularly in relation to violence, gambling, or nudity, the Ministry may order immediate corrective action. Access to the game may be suspended until compliance is restored, including through requests to temporarily disable the game or through direct technical restrictions on user access.

For international publishers, the implication is clear: a game without a valid IGRS rating cannot be legally distributed or made accessible to users in Indonesia.

Key Takeaways

The IGRS launch marks a new phase in Indonesia's digital-regulation landscape, with stronger emphasis on child protection, consumer protection, and increased accountability across the gaming sector. The regulatory focus has shifted from awareness to day-to-day operational compliance.

Publishers and developers should view the classification framework as more than a procedural obligation. It is intended to create a structured, transparent, and responsible ecosystem for game distribution. Early compliance not only minimises the risk of service disruption, but also helps build credibility with regulators, consumers, and local partners. With the compliance deadline under the Game Classification Regulation approaching, now is the right time for publishers to take proactive steps to avoid any interruption to user access in Indonesia.

With full enforcement beginning in January 2026, publishers should:

- 1. Identify all titles accessible in Indonesia;
- 2. Complete self-classification on the IGRS portal;
- 3. Prepare supporting materials for conformity review;
- 4. Finalise rating displays across game platforms; and
- Integrate classification processes into release cycles, updates, and new-title planning.

Taking these steps now will place publishers in a strong position heading into full enforcement in January 2026.

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