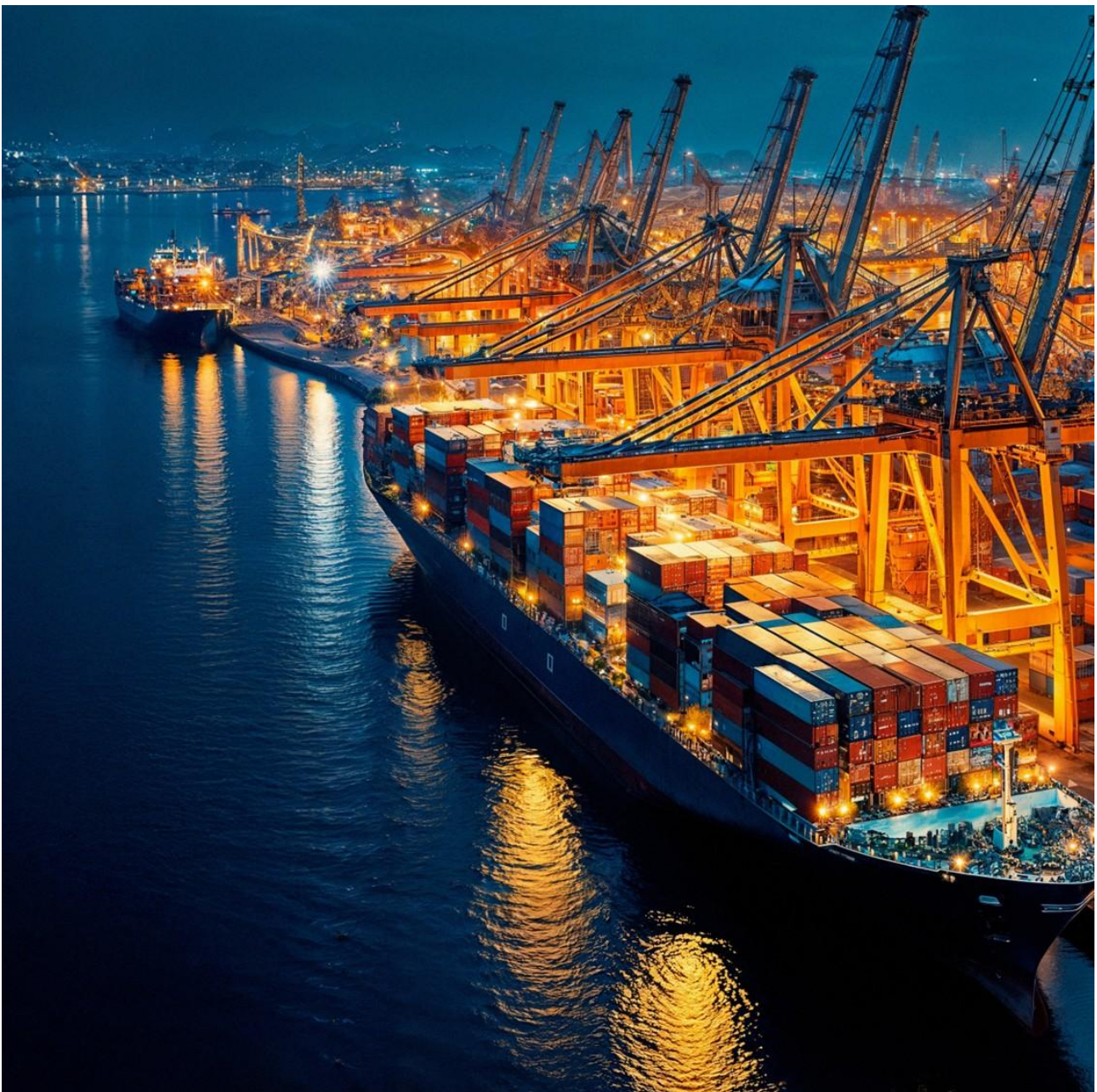


COMPETITION / ANTITRUST, CONSUMER & TRADE

Indonesia Revises Export Framework: Key Changes to Procedure and Export Bans



On 17 March 2026, Indonesia issued two Ministry of Trade regulations introducing significant changes to its export regulatory framework. Both regulations came into effect on 1 April 2026, and form part of the government's ongoing efforts to streamline export licensing, which refers to the regulatory framework requiring exporters to obtain prior authorisation for certain goods in the form of an Export Permit (*Perizinan Ekspor* or "**PE**"), Registered Exporter status (*Eksportir Terdaftar* or "**ET**"), and/or a Surveyor Report (*Laporan Surveyor* or "**LS**"), to address as well as to digitalise and expand the automation of export permit issuance, and promote regulatory harmonisation of regulations in selected sectors.

These updates are introduced through two Ministry of Trade regulations: Ministry of Trade Regulation No. 5 of 2026 ("**Regulation 5/2026**"), which amends Ministry of Trade Regulation No. 23 of 2023 on Export Policy and Regulation, and Ministry of Trade Regulation No. 6 of 2026 ("**Regulation 6/2026**"), which amends Ministry of Trade Regulation No. 22 of 2023 on Goods Prohibited to Export.

Regulation 5/2026 introduces adjustments affecting both the general export policy and the technical export policies applicable to certain industries, including tin, oil and gas, coal, minerals, and agricultural products. Key changes focus on simplifying export administration, including through the automation of PE issuance for certain commodities.

In parallel, Regulation 6/2026 amends the list of goods prohibited to export, reflecting updated governmental controls on restricted commodities.

Set out below are several of the key regulatory changes with practical implications for businesses engaged in export activities.

General Updates on Export Policy

- **Reporting obligations**

Goods that require only a LS for export are now exempt from reporting requirements. Exporters of such goods are also no longer subject to export service suspension sanctions for failure to submit export reports.

- **Cancellation of export certificate application**

Under the previous regulatory framework, there was no formal avenue to cancel an export certificate (*surat keterangan*) application, despite business circumstances that may require exporters to withdraw their applications. This regulatory gap often created practical constraints for exporters whose applications were no longer required or had become commercially unviable.

To address this gap, the government has introduced a new workflow within the system to accommodate such cancellations. Exporters may now cancel an application for the issuance of an export certificate submitted to satisfy export licensing requirements. Cancellation requests must be submitted through the Indonesian National Single Window ("**INSW**") system, together with the reasons for cancellation, and must be made before the application is declared complete and formally accepted. This development reflects the government's efforts to provide greater clarity and certainty in the issuance and cancellation of export certificates.

- **Elimination of export obligation and sanctions**

Exporters holding an ET with a validity period (e.g., ET Coal) are no longer required to carry out export activities during the validity period and will not be subject to warning sanctions if no exports are made within one year.

- **Re-export provisions**

Re-exported goods are exempt from export licensing requirements, provided that any of the following conditions are met:

- The imported goods remain within the customs zone or in a location treated as equivalent to a temporary storage facility;
- The goods are re-exported from a bonded facility without undergoing processing, and the quantity does not exceed the amount stated in the entry documents; or
- The goods were originally imported on a temporary basis and are intended for re-export.

Export Licensing Updates for Certain Sectors

The following summarises the key changes under Regulation No. 5/2026 affecting the relevant sectors:

Sector	Key Changes
Tin	<ul style="list-style-type: none"> • Removal of the ET Industrial Tin requirement as a prerequisite for exporting certain tin products. • Consolidation of export licensing for refined tin produced through smelter facility cooperation into the general ET Refined Tin Ingots regime, eliminating the previously separate ET Refined Tin Ingots – Smelter Facility Cooperation category. • Adjustment to export eligibility criteria under PE Industrial Tin: <ol style="list-style-type: none"> Tin solder specification: <ul style="list-style-type: none"> ○ Simplification of specifications for exportable tin solder, which now only requires a Stannum (Sn) content of $\leq 99.7\%$. ○ Removal of technical requirements relating to iron (Fe) content, dimensions, weight, and packaging of tin solder. Adjustment of eligibility criteria for tin solder and other tin products, allowing the use of imported raw materials supported by an import declaration.
Oil and Gas	<ul style="list-style-type: none"> • The requirement to hold an ET Oil and Gas has been removed for exports of oil and gas products, except for exports of natural gas transmitted directly through fixed pipelines, which remain subject to an ET requirement.
Coal	<ul style="list-style-type: none"> • The requirement to submit a coal sale and purchase cooperation agreement has been removed for holders of a Special Production Operation Mining Licence for Transportation and Sales (<i>IUP Operasi Produksi Khusus untuk Pengangkutan dan Penjualan</i>) or a Coal

Sector	Key Changes
	Transportation and Sales Licence (<i>Izin Pengangkutan dan Penjualan Batubara</i>) when applying for an ET Coal.
Minerals	<ul style="list-style-type: none"> • Holders of an Industrial Business Licence (<i>Izin Usaha Industri</i> or IUI) or a risk-based industrial business licence are no longer eligible to apply for a PE for ilmenite concentrate and rutile concentrate.
Agriculture	<p>Kratom</p> <ul style="list-style-type: none"> • The validity period of ET Kratom has been limited to three years, replacing the previously unspecified period. • For ET Kratom application, International certifications (ISO 9001:2015 and ISO 22000:2018) have been added as non-mandatory requirements to encourage compliance with international standards. <p>Swiftlet nest</p> <ul style="list-style-type: none"> • For ET Swiftlet Nest application, the nomenclature of one of the required documents—the sanitation certificate for animal products—has been updated from "KH 12" to "KH 2", in line with regulations issued by the Indonesian Quarantine Agency. <p>Rice</p> <ul style="list-style-type: none"> • HS Code ex 1006.30.99, previously prohibited from export is now permitted to export as regulated under the export policy framework pursuant to Regulation 5/2026, subject to obtaining a PE.

Transitional Provisions Affecting Existing Certain Export Licences

Regulation 5/2026 sets out transitional provisions governing the validity, replacement, and adjustment of certain existing export licences. A summary of the key transitional arrangements is set out in the table below:

Commodities	Existing licence status	Deadline for new licence application	Immediate action required
Industrial Tin	Will remain valid until 30 April 2026: <ul style="list-style-type: none"> • ET Industrial Tin • PE Industrial Tin 	Before 30 April 2026	Apply for a new PE Industrial Tin
Refined Tin Ingots	Will remain valid until 30 April 2026: <ul style="list-style-type: none"> • ET Refined Tin Ingots – Smelter Facility Cooperation • PE Refined Tin Ingots – Smelter Facility Cooperation 	Before 30 April 2026	Apply for a new ET Refined Tin Ingots (replacing the previous ET Refined Tin Ingots – Smelter Facility Cooperation)

Commodities	Existing licence status	Deadline for new licence application	Immediate action required
Oil and Gas	Will remain valid until the end of the following month: <ul style="list-style-type: none"> ET Oil and Gas (used for exporting gas transmitted directly through fixed pipelines) 	No later than 14 working days after Regulation 5/2026 comes into force.	Apply for a new ET Gas (replacing the previous ET Oil and Gas)
Coal	Will remain valid until its expiry date: <ul style="list-style-type: none"> ET Coal 	After the prior ET Coal has expired or remains unused.	None. However, exporters intending to apply for a new ET under Regulation 5/2026 must ensure that they: <ul style="list-style-type: none"> do not hold a Surveyor Report, nor have a pending application for Export Verification or Technical Traceability; and/or are not conducting coal export activities under an ET issued prior to the entry into force of Regulation 5/2026.
Kratom	Will remain valid until 1 July 2026: <ul style="list-style-type: none"> ET Kratom Producers ET Non-Kratom Producers 	Before 1 July 2026	Apply for a new ET Kratom Producers and ET Non-Kratom Producer

Automation of PE Issuance for Fishery and Rice Commodities

To streamline export administration processes, particularly for fishery commodities and rice, the Government has enhanced coordination among relevant agencies through an integrated electronic system. This system integrates the Indonesia National Trade Repository ("**INATRADE**") platform with INSW. The INATRADE platform is administered by Ministry of Trade, to which the Ministry of Marine Affairs and Fisheries and the Ministry of Agriculture issue supporting documents, while INSW is operated by the central government as a single gateway for business processes. Under this enhanced framework, supporting export documentation issued through the relevant ministries' portals is automatically transmitted to the INATRADE and INSW systems, enabling the automatic issuance of PE without requiring businesses to submit separate applications.

This digital automated process replaces the previous manual verification and validation mechanisms applied separately by each institution and expedites PE issuance for CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) and non-CITES fishery commodities, as well for rice exports. This reform reflects the Government's commitment to enhancing efficiency, certainty, and ease of export administration.

Addition of Export Regulations for Certain Animal Species

Regulation No. 5/2026 also introduces new export controls aimed at supporting species conservation by regulating the export of certain animal species.

In particular, additional HS Codes have been introduced to subject the following species to export controls:

- **Threatened sea cucumber species:** Under HS Code ex 0308.11.10; ex 0308.11.20; ex 0308.12.00; ex 0308.19.20; ex 0308.19.30; and ex 0106.20.00; and
- **Sahul crocodile (*Crocodylus halli*):** Under HS Code ex 0106.20.00.

In addition, the Irian freshwater crocodile (*Crocodylus novaeguineae*), classified under HS Code ex 0106.20.00, has been reclassified from non-CITES to CITES, resulting in stricter export controls for this species.

Updates to the List of Goods Prohibited to Export

Regulation 6/2026 amends the annex to Ministry of Trade Regulation No. 22 of 2023 on Goods Prohibited from Export, which categorises prohibited goods across seven sectors: forestry, agriculture, subsidised fertiliser, mining, cultural heritage, metal scrap and waste, and marine sediment products. The key amendments are summarised below:

- **Rice**
The previous prohibition on non-organic rice produced through non-organic farming systems with a breakage level exceeding 25% (excluding broken rice) has been lifted. As a result, rice products falling within this category are no longer subject to an export ban.
- **Tin Solder**
Regulation 6/2026 simplifies the additional description of tin solder prohibited from export, replacing the previously detailed technical specifications. At the same time, product description details have been added under the following HS Codes to ensure coverage of all tin solder products:
 - a. ex 8007.00.20 for solder tape with a thickness > 0.2 mm;
 - b. ex 8007.00.30 for solder powder; and
 - c. ex 8007.00.99 for solder ball, solder half ball, solder tape with a thickness < 0.2 mm, and solder paste.

Key Takeaways

Regulation 5/2026 represents a significant recalibration of Indonesia's export regulatory framework, including the simplification of export licensing requirements, the expansion of automation through the INATRADE-INSW system, and the revision of compliance obligations across multiple sectors. Exporters should review their existing export structures to ensure alignment with the updated requirements, particularly with respect to product classifications, export permits, and reporting obligations.

The transitional provisions under Regulation 5/2026 impose specific deadlines for the replacement or adjustment of existing export licences. Non-compliance with these timelines may affect the validity of ongoing export activities and lead to operational disruption.

In parallel, Regulation 6/2026 revises the list of goods prohibited from export. Exporters of rice and tin solder products should reassess applicable HS Code classifications and product descriptions to confirm continued compliance under the revised framework.

More broadly, businesses should remain attentive to the evolving export compliance landscape to mitigate regulatory risks, avoid delays or suspension of export activities, and ensure continuity of operations.

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