7.0 INDONESIA

Always check the latest in-country requirements on Micor

1. Establishment registration

Can take 12-24 months

- Payment is required in Indonesia to complete the Factory Registration. The amount depends on the products/ business unit. (Refer to Regulation Number 35 Year 2016 – Animal, Animal Products, Veterinary Drugs page 105).
- Payment must be made to PNBP (Penerimaan Negara Bukan Pajak) within 5 days of receiving advice from the Indonesian Government. Exporters should have finance systems set up to make this payment in time.
- Onsite reviews depend on the Cooperation Agreement between Indonesia and the suppliers country. Must be confirmed in advance with the Indonesia Ministry of Religion.

2. Halal

This process can start at the same time as the factory registration process

Timing – 2 months
Validity – 4 years

All dairy products must be Halal Certified for Entry into Indonesia.

The process for halal certification has recently moved from MUI (Indonesia Ulema Council) to BPJPH (Halal Product Assurance Organizing Agency), which sits within the Indonesian Ministry of Religious Affairs.

The process for Australian exporters to obtain halal certifications recognised in Indonesia is currently in a state of transition. By October 2024 companies must provide a BPJPH Halal Certificate prior to obtaining an import permit.

The list of Halal Certified Bodies has not yet been released at the printing of this guide. Exporters should remain in close contact with their import partner and watch for updates on this process.

Indonesia (ID) Micor | Halal certification in Australia: a quick guide

3. Shipping and shipping documents

What documents do I need?
All documents should be translated into Bahasa Indonesia.
- Transfer document link: Requirements-transferring-prescribed-goods (awe.gov.au)
- Health Certificate or Certificate as to the Condition
- Certificate of Origin
- Commercial Invoice
- Packing List
- Certificate of Analysis (see below)
- Fit for Human Consumption Letter

- Bill of Lading or Seaway Bill
- Indonesia BPJPH Halal Certificate
- Photo of factory from the start of production to the end of production
- Raw material certificate (breakdown)
- Finished product certificate

These documents are required for prescribed goods under Australian law. Unprescribed goods are not regulated by Australian law and exporters must confirm requirements with Indonesia.

4. Product registration
Registration can be done by the distributor/importer while factory registration process is being completed

Timing – 4 to 12 months, depending on food type.
Validity – 5 years

- Expectations and timings
- Administration requirements
- Other supporting documents
- Labelling

Labelling/stickering of the product must be completed prior to the product being sold.

5. Food regulations

Standard parameters
- Heavy metals and microbiological limits
- Additives

6. Import Permit Application

Certificate of Analysis required by Importer/Distributor every 6 months as part of Import Permit Application process

7. Intellectual Property

Intellectual property, trademarks and brand protection are key considerations for manufacturers when commencing exports

8. Tariff quota and HS Codes

See the Trade Agreement Comparison Guide for Indonesia tariff rates
Check DFAT Free Trade Agreement Portal To confirm HS codes and tariff rates

9. Useful links

INDONESIA COMPANY ACCOUNT AND PRODUCT REGISTRATION PROCESS

Visit this website to start the application process

Company registration

Apply for PB-UMKU (business license) in OSS   → Output: NIB

Open web ereg-rba.pom.go.id

Input company and factory data. Upload supporting docs   Ensure the KBLI is same as input in OSS

Evaluation by BPOM officer

Receive user ID and password   The username will be used to log in and use services from BPOM

Process time 10 days

Product registration

The Indonesian Government is replacing the current product registration process with a new Risk Based approach. The new system will be fully implemented in 2023.

Log-in using username and password (ereg-rba.pom.go.id)

Select the application type   e.g: product registration/ revision etc

Fill in the product data   e.g: material, nutrition value, certificate etc

Application review and submit for approval

See appendix for detailed e-submission guide

INDONESIA PROCESS GUIDE

1. Establishment registration

Expectations and timings

Dairy and manufacturing facilities for dairy exports need to be registered with the Australian Government by the Department of Agriculture, Fisheries and Forestry (DAFF). Detailed facilities process and audits take between 4 and 12 months.

- Average Registration Time – 10 months
- Dairy Exporter Facilitator Service (DAFF) – 3 to 4 months

Indonesia - Expectations & timings

Establishment registration usually takes around 6 months but may take between 12-24 months. Time required depends on completeness of documentation and the queue. Please refer to MoA Regulation 15 Year 2021 (permentan 15 tahun 2021).

The payment process is:

- DAFF Indonesia receives advice from MOA that payment is needed to complete registration.
- DAFF advises the company in Australia via email.
- Australian company makes payment direct to Non-Tax Revenue (PNBP) and advises DAFF.

Late payments are not accepted and the registration process may need to begin again.

All submissions of documentation are made by DAFF in Indonesia.

Origin country and Business Units:

Origin country must be approved by MoA

Business units must be registered to the MoA before it can export into Indonesia

Desk review and on-site review to approve the origin country and establishment

MoA must conduct the desk review 6 months after the document has been received.

If additional documents required, the embassy must submit these within 3 months

MoA must conduct on-site review 6 months after desk review result received

Import evaluation risk must be finalised 12 months after submission of on-site review result

Note: Onsite review may be required depending on cooperation agreement with Indonesia and must be confirmed in advance with Indonesia Ministry of Agriculture.

2. Halal

Halal certification started on a voluntary basis for food and beverage products and will become mandatory on 17 October 2024 for both domestic and imported products. From that time products will be labelled as either halal or non-halal.

The BPJPH (badan penyelenggara Jaminan Produk halal – Halal Product Assurance Implementing Board) is the halal application authority and works with many parties in the process. It sits under the Ministry of Religious Affairs and has taken over the role formerly held by the non governmental agency MUI.

Regulations

Law No. 33 Year 2014 on Halal Product Assurance
Law No. 11 Year 2020 on Job Creation (Omnibus Law) - this law contains some revisions to the above Halal law. The revisions are mostly to reduce the time taken in the halal certification process.

Please refer to Micor for the latest halal updates.

Expectations and timings

- Timings – 2 months

This process can be undertaken concurrently with factory registration process.

Certification process

1. Food producer or manufacturer applies to the relevant certifying organisation.

2. Manufacturing site is inspected and assessed.

3. Halal accreditation or certification is awarded for specific time period.

Once the halal certificate is received the halal label should be attached to the packaging and the product registered with BPOM.

Halal certification is valid for four years. Application for renewal should be started at least 3 months prior to expiry.

BPJPH must be informed if there are any changes to the product.

Certifying bodies

The Halal certificate(s) must be issued by the Indonesian Halal Authority, or be issued by a foreign halal authority.

Islamic organisations approved by DAFF for certification of red Halal meat and red meat products for export can certify dairy products.

The Department requires a copy of halal certificate(s) and checks:

- it is a new listing application
- there is a change of name and/or address of a listed establishment
- the product is described as halal in the Request for Permit.

Further information

More information about Halal and Haram foods can be found at:

- Halal certification in Australia: a quick guide – Parliament of Australia (aph.gov.au)
- the Department of Agriculture and Water Resources—Australian Government Authorised Halal Program
- Meat and Livestock Australia—Australian Halal meat products guide and Australian Halal fact sheet (focused on meat products), and
- Halal Australia (a certifying body)—provides general information

3. Shipping and shipping documents

Documentation

Standard shipping documents to be supplied to the importer/distributor for goods clearance in Indonesia.

- Transfer document

Sample dairy transfer documents/certificates

- Health Certificate or Certificate as to the Condition
- Certificate of Origin
- Commercial Invoice
- Packing List
- Certificate of Analysis
- Fit for Human Consumption Letter
- Bill of Lading or Seaway Bill

Milk and milk products not prescribed under Australia's export rules

Milk and milk products which do not meet the criteria under the Export Control (Milk and Milk Products) Rules 2021 are classified by Australia as non-prescribed goods.

Information on exporting non-prescribed goods from Australia is available on the Department's website.

Generic health certificates for milk and milk products

For milk and milk products for human consumption (including milk and milk products classified as a prescribed good by an importing country), use the ZD035 health certificate.

Indonesia (ID) | Micor (agriculture.gov.au)

4. Product registration

Expectations and timings

The product registration process is completed by your nominated distributor or importer in Indonesia. Product registrations cannot be undertaken by companies in Australia.

- Timings – 4 to 12 months, depending on food type.
- Product Registration Validity - 5 years

Registration can be completed by the distributor/importer while the factory registration process is being completed. (See appendix for product registration application details)

It is the responsibility of the distributor/importer to follow up with Peraturan Badan Pengawas Obat dan Makanan (BPOM) to understand when the process is likely to be completed.

Administrative requirements - Import processed food/beverage

Product registration in BPOM (Distribution permit)

Registration process for imported products in Indonesia is to be completed online by an importer/distributor

Fees for product registration

PNPB fee refers to Peraturan Pemerintah Republik Indonesia no 32 of 2017 - Jenis dan Tarif atas Jenis Penerimaan Negara Bukan Pajak yang Berlaku Pada Badan Pengawas Obat dan Makanan.

- PNPB new product registration category 01.0 (dairy products) : Rp. 750,000 per item (less than AUD $100.00 at the time of publication).

- PNPB renewal product registration category 01.0 (dairy products) : Rp. 600,000 per item

- Surat Keterangan Impor (SKI) or Import Notification Letter : Rp. 100,000 per item

Import licence for food requirement and the process can be accessed in this link (English version).

User manual online registration (https://e-reg.pom.go.id) new product by importer is in this link.

Requirement for new product registration – BPOM

I. Administrative requirements – Import (retail) processed food/beverage (Refer to BPOM no 27- 2017 Pendaftaran Pangan Olahan page 43-44)

Data/Documents	Manual	Online	Notes
Company Number or Nomor Induk Berusaha (NIB)	✓	✓	Undertaken by importers / distributors
Distribution facility audit report (BPOM conducts Distributor Facility)	✓	✓	Undertaken by BPOM with importer / distributor
Food safety certificate: GMP, HACCP, ISO 22000, PMR or any similar certification accredited from the country of origin (Manufacturer in Australia)	✓	✓	Competed by the manufacturer. Certificate can be in English / Indonesian
Company Deed of Incorporation / Akte Notaris Pendirian Perusahaan distributor	–	✓	Importer / distributor
Letter of appointment from the overseas company (origin)	✓	✓	From manufacturer to the distributor / importer Refer to point 1.2.1 part B (clause 11)
Health certificate or certificate of free sale	✓	✓	The name and address in these certificates must the same as the company / manufacturer in overseas The certificates must state the product's name that will be registered in BPOM
Power of attorney to process the registration	✓	✓	From Manufacturer to importer / distributor

Type of service column spans Manual / Online above.

Other supporting documents (if needed)

No	Documents
1	Brand certificate (if label states logo ® or ™)
2	SNI (Standard National Indonesia) certificate if the product states SNI on the label
3	Organic certificate (if product claims to be organic)
4	Statement of GMO for products that contain potato, soybean, corn, tomato and sugar cane
5	Statement of food radiation (if applicable)
6	Halal certificate (if the label states halal product)
7	Other supporting documents

Indonesia labelling requirements

All Imported products must be registered with the Indonesian Government by a registered Indonesian Company. Once the products are registered BPOM will issue a registration number.

- For Imported Foods, it is an ML Number.

- For Domestic products, it is an MD Number.

ML registration is owned by the distributor/importer who is importing the product.

The labelling/stickering of the product must be completed prior to the product being sold.

Indonesian Importers or Distributors place stickers on items in Bahasa (Indonesian language) after the goods have cleared customs.

Labels require:

- Product name

- List of ingredients used

- Net weight or net content

- Name and address of the producing or importing party

- Halal certification for those required

- Production date and code

- Expiration day, month, and year

- Distribution permit number for processed food (ML Number)

- Origin of certain food ingredients

- Language other than Bahasa Indonesia, Arabic numbers, or Latin letters is permitted if there is no equivalent

  Exporters should check requirements with importers/distributors for any changes to the regulation.

5. Food regulations

Standard parameters BPOM

Heavy metals, microbiological limits

Standard parameters are stated under Peraturan Badan Pengawas Obat dan Makanan Nomor 34 Tahun 2019 – Kategori Pangan

Milk Powder – Non-infant

Milk powder can be categorised in 01.5.1 (milk powder and cream powder (plain))

Cheese

01.6.1 Cheese without ripening
01.6.2 Cheese with ripening.

WPC-80

Whey powder – 01.8.2 whey and its products, except whey cheese. These include whey powder, demineralized whey powder, and permeate whey powder.

Chemical

Refer to Peraturan Badan Pengawas Obat dan Makanan Nomor 8 Tahun 2018 tentang Batas Maksimum Cemaran Kimia dalam Pangan Olahan.

Metal

Refer to Peraturan Badan Pengawas Obat dan Makanan Nomor 9 Tahun 2022 tentang Persyaratan Cemaran Logam Berat Dalam Pangan Olahan

Microbes

Refers to Peraturan Badan Pengawas Obat dan Makanan Nomor 13, 2019 – Batas Maksimal Cemaran Mikroba dalam Pangan Olahan

Additives

The max usage of food additives refers to BPOM doc number 36, 2013 Batas Maksimum Penggunaan Bahan Tambahan Pangan Pengawet

List of additives that are allowed by BPOM:

1. Sorbic acid and its salts
2. Benzoic acid and its salts
3. Ethyl para-hydroxybenzoate
4. Methyl para-hydroxybenzoate
5. Sulphites
6. Nisin
7. Nitrites

8. Nitrates

9. Propionic acid and its salts

10. Lysozyme hydrochloride

Updated food additive regulation BPOM no 11, 2019 – Bahan Tambahan Pangan

According to chapter II, clause 3, there are 27 types of BTP or food additives, as follows:

1. Antifoaming agent
2. Anticaking agent
3. Antioxidant
4. Carbonating agent
5. Emulsifying salt
6. Packaging gas
7. Humectant
8. Glazing agent
9. Sweetener, including natural and artificial sweeteners
10. Carriers
11. Gelling agent
12. Foaming agent
13. Acidity regulator
14. Preservatives
15. Raising agent
16. Emulsified
17. Thickener
18. Firming agent
19. Flavour enhancer
20. Bulking agent
21. Stabiliser
22. Colour retention agent
23. Flavouring
24. Flour treatment agent
25. Colourant, including natural and synthetic food colour
26. Propellant
27. Sequestrant

Refer to regulation on flavouring agents in BPOM no 13, 2020 – Bahan Tambahan Pangan Perisa

Prohibited Materials in Processed Foods

Refer to page 7 to 15: BPOM no 7, 2018 – Bahan Baku yang Dilarang Dalam Pangan Olahan.

According to clause 3., processed or imported food in Indonesia is prohibited from using:

• Raw material that can alter and or cause harm

• Raw material that contain drugs, psychotropics, nicotine, protected plants, and/or protected animals.

For substance questions go to the live chat BPOM

For flavouring agent regulations

Updated food additive regulations

6. Import Permit Application

Certificate of analysis

The Indonesian Government no longer accepts in house COA's issued by the manufacturer for Import Permit Applications. All COA's need to be published from an accredited laboratory.

COA'S are required by your Importer/Distributor every 6 months as part of the Import Permit Application process.

PERKA BPOM Nomor 27 Tahun 2017_Pendaftaran Pangan Olahan-1620622264.pdf

Reference in Document – Hasil Uji Produk Akhir – final product test results (Detail of the COA (page 84 on the regulation doc)

a. Analysis and the result should be published from an accredited laboratory from both Indonesia or overseas or government laboratories

b. The certificate must be original and valid in accordance with what is stated in the test results or at least 1 (one) year from the issued date

c. The certificate must clearly state:

   1. The name of the registered food

   2. The name and address of the manufacturer in the certificate should match with the data on the BPOM registration

   3. The test parameters, test result and units are accordance with requirements

d. Test results include:

   1. Microbial contamination

   2. Heavy metal contamination (Arsenic, Mercury, Lead, Cadmium, and Tin)

   3. Quantitative food additives, for food that uses BTP which has Numerical Maximum Limit/ADI requirements

   4. Quality parameters according to the characteristics in the food category food

   5. All parameters in SNI (Standard Nasional Indonesia/ Indonesia National Standard), for mandatory SNI products

6. Nutrients according to Nutritional Value Information (for foods that state nutritional value information on the label)

7. Nutrient/non-nutritional substances according to product's claims (for foods that state any claim on the label)

8. Alcohol (for food containing or use alcohol)

9. Caffeine for foods that use/add anhydrous caffeine)

10. Chloramphenicol (for honey)

11. Melamine (for infant formula/ milk)

12. Total aflatoxin and aflatoxin B1 for processed products (corn, peanuts, and spices), Aflatoxin M1 for milk

13. Ocratoxin A (OTA) (for cereal-based products and coffee products)

14. Patulin (for apple products and their processed products)

15. Benzo(a)pyrene (for flavoring smoke and foods that are processed smoke)

16. Drained weight (for solid food that has liquid medium), can be done in internal laboratory

7. Intellectual property

Intellectual property, trademarks and brand protection are key considerations for manufacturers when commencing exports.

Please see this link from the Australian Government for IP considerations for Indonesia.

Companies should protect these rights through the registration of their brands and trademarks either at a country level as a starting point, or via the global brand registration system, the Madrid System (The World Intellectual Property Organization - WIPO).

Intellectual property such as key ingredient information or production processes should be protected via confidentiality agreements or non-disclosure agreements.

As an example, please see link below for an article on IKEA.

Sweden's IKEA loses right to use its own name in Indonesia | Reuters

8. Tariff quota and HS codes

The ASEAN-Australia-New Zealand Free Trade Agreement (AANZFTA) and Indonesia Australia Comprehensive Economic Partnership Agreement (IA-CEPA) provide significant market access advantages for Australian dairy exporters. Under these agreements all Australian dairy products, except liquid milk, now enter Indonesia duty free.

USEFUL LINKS

Animal and animal product import and export provision

Austrade: New service helps dairy processors get export ready

Dairy | Micor (agriculture.gov.au)

Dairy Indonesia (ID) | Micor (agriculture.gov.au)

DAFF: Charging guidelines 2022

DAFF: Export facilitator service

DAFF: Meat Notice 2009/08

DAFF: Requirements for transferring prescribed goods between export registered establishments

DFAT Free Trade Agreement Portal

Export Control (Milk and Milk Products) Rules 2021

Exporting non-prescribed goods from Australia

Halal Certification Australia

Halal certification in Australia: a quick guide

Indonesia (ID) | Micor (agriculture.gov.au)

IP protection in Indonesia

List of approved foreign halal certification bodies

List of recognised Islamic bodies for halal certification of red meat

List of Halal Certification Bodies

Modernising agricultural trade

What is Kosher and Halal slaughter in Australia?

INDONESIA COMPANY ACCOUNT AND PRODUCT REGISTRATION PROCESS

The product registration system is in process of being updated with the new Risk Based Approach (RBA) system being phased in, in 2023. **2022 product registration, New product registration link**

A. Application of PB-UMKU in OSS

1. Log in to OSS
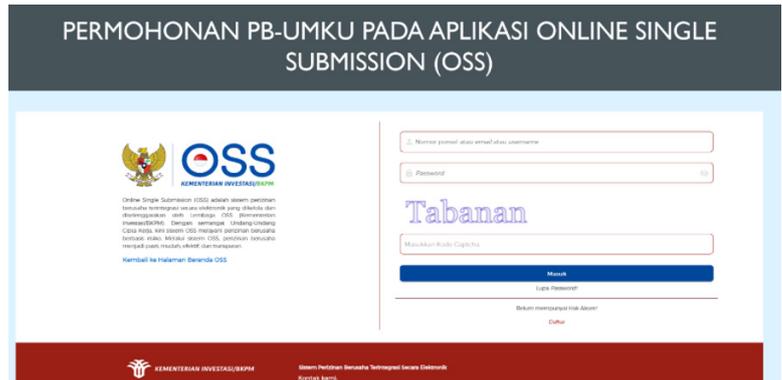
2. Choose PB UMKU then Permohonan Baru (new application)
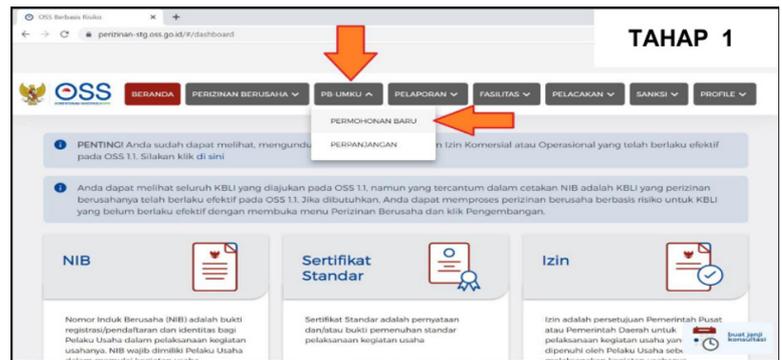
3. Choose Proses Perizinan Berusaha UMKU, based on KBLI food to be registered
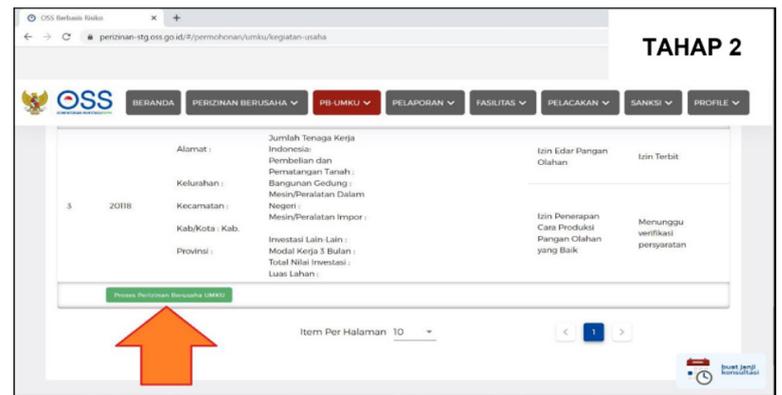
4. Choose Ajukan Perizinan Berusaha UMKU- Submit business permit UMKU
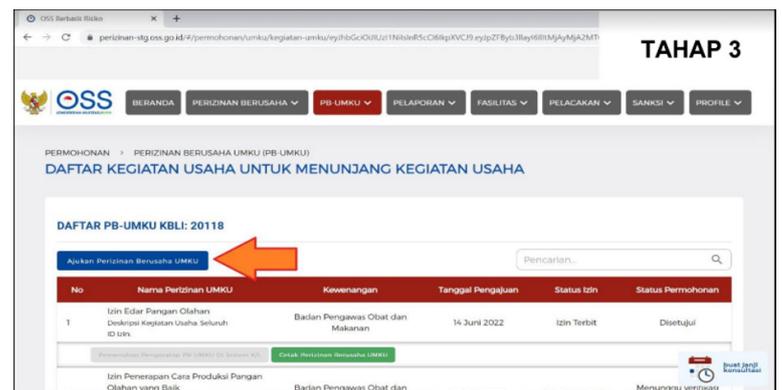
5. Select the type of PB - UMKU to be submitted. E.g: Izin Edar Pangan Olahan
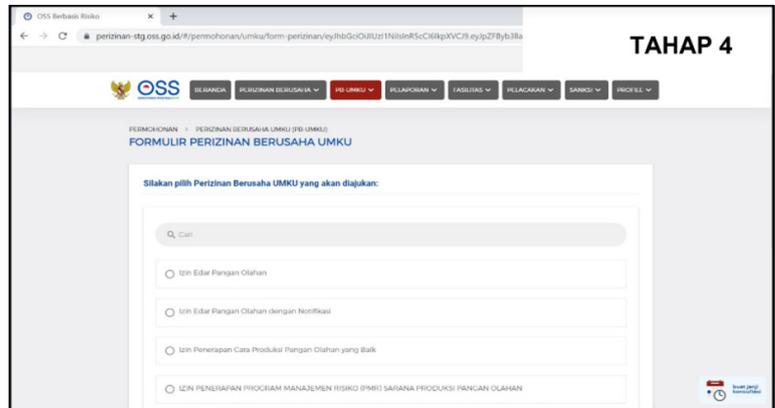
6. Select all on the description box and then click lanjut - next
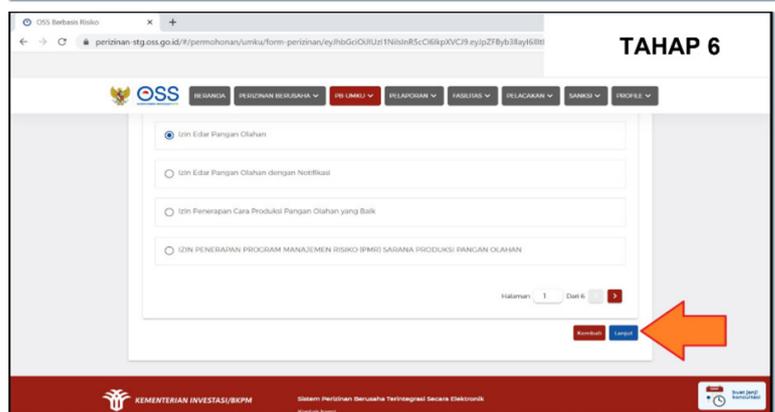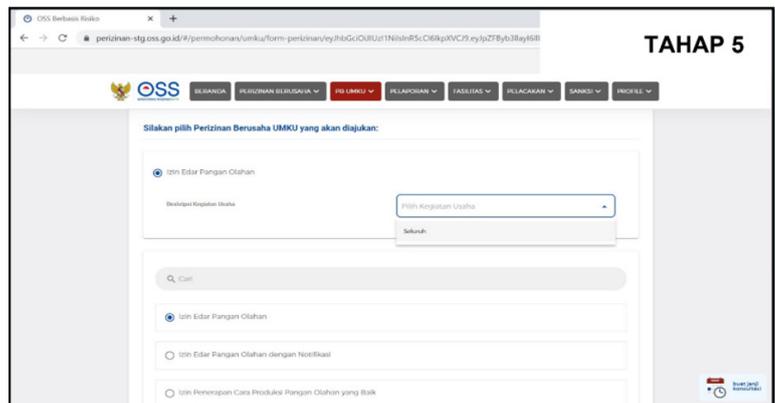
7. Select complete PB UMKU Requirements in the K/L System, then you will be redirected to the page

ereg-rba.pom.go.id application
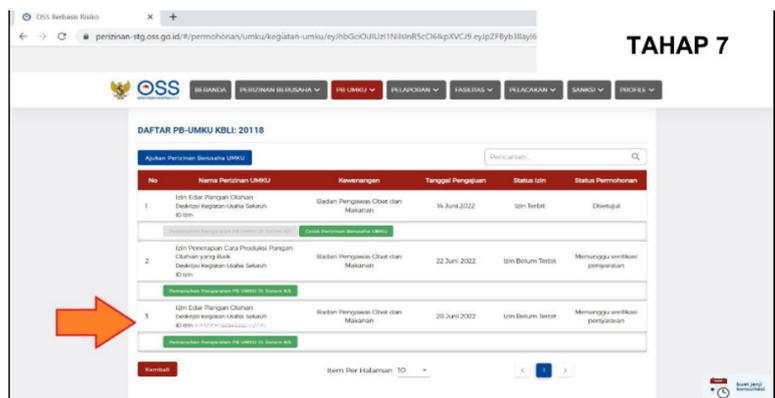
B. Company's Account Ereg-RBA Registration

1. Choose Registerasi Akun
   (account registration)
   > baru (new)

2. Input company's NIB
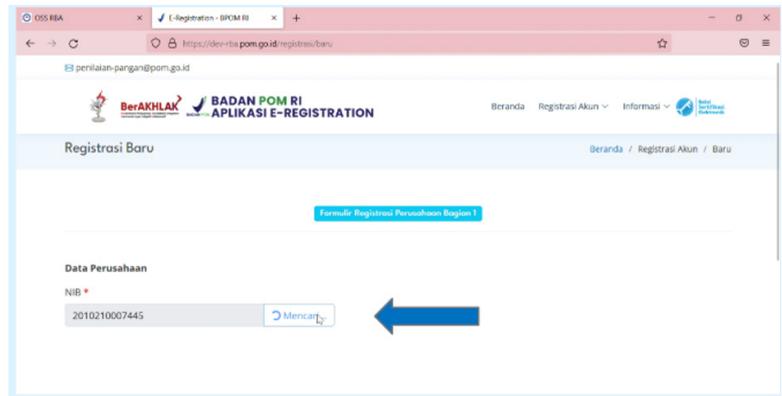
3. The integrated system will fill the data according to the data submitted on OSS

   Fill in the data of penanggung jawab/ PIC
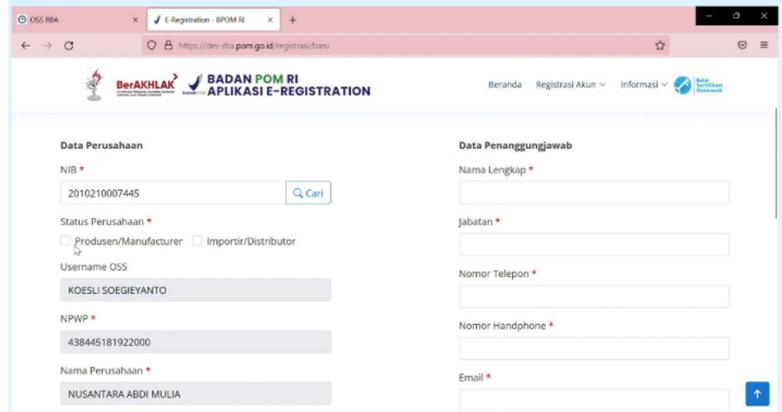
4. Input email and username that will be used
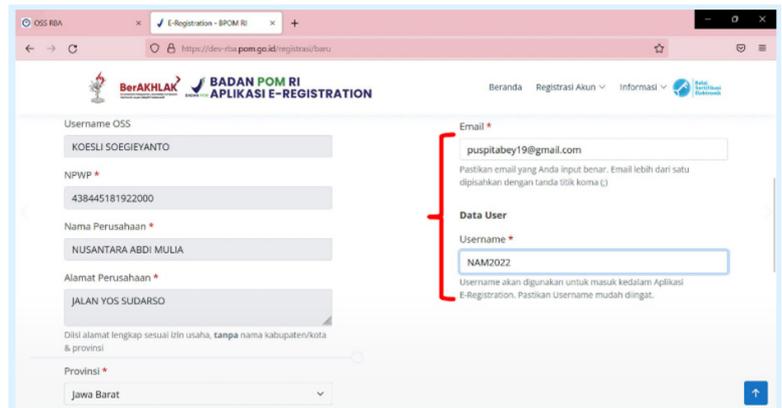
5. Input information about the factory
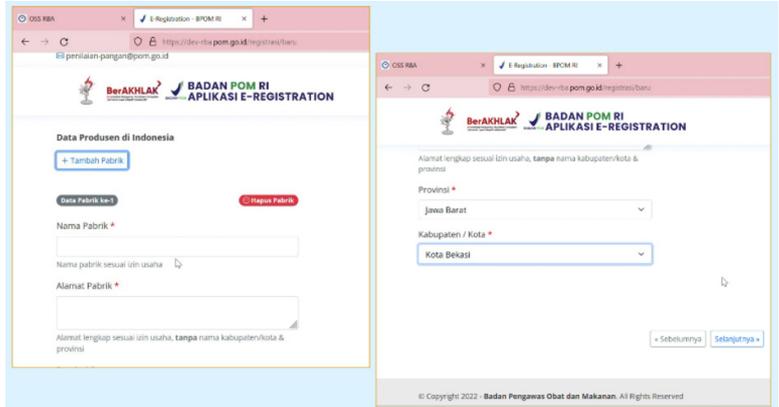
6. Input information related to KBLI and CPPOB permits that are in accordance with the category of food products to be registered
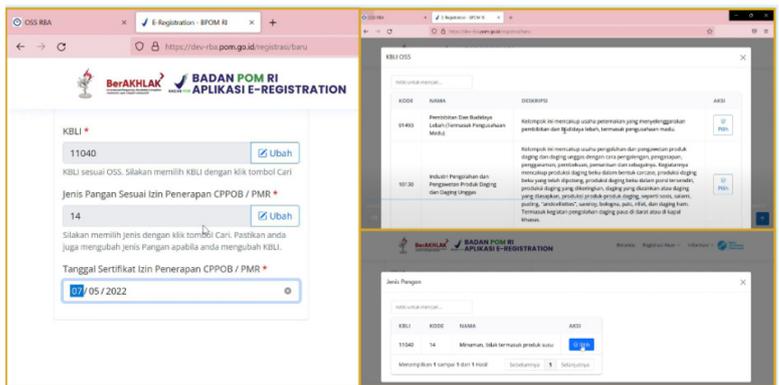
7. Upload supporting documents according to requirements
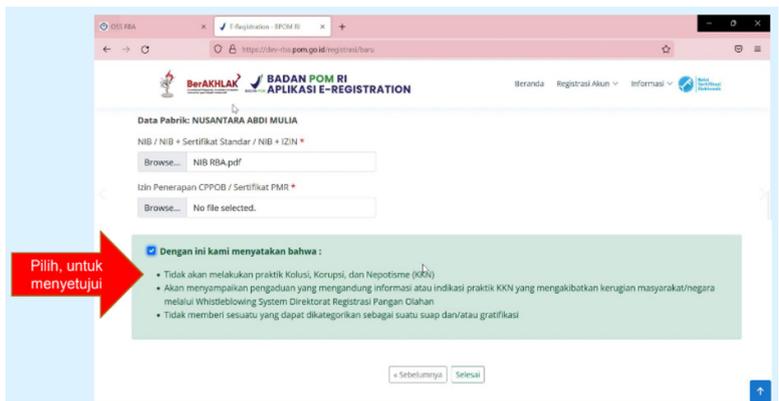
8. Confirmation of data delivery & approval
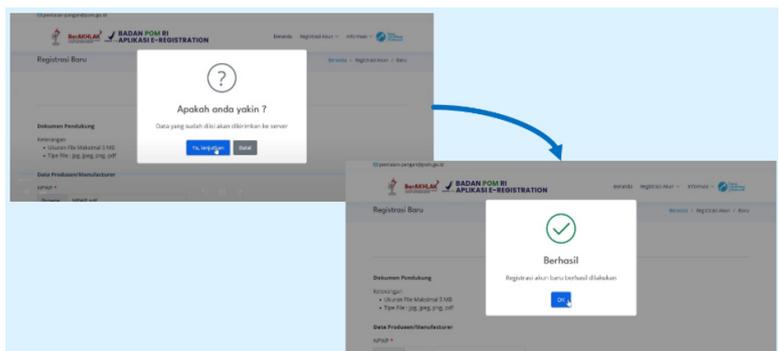
C. Registration Process - Processed Food Products (Ereg-RBA)
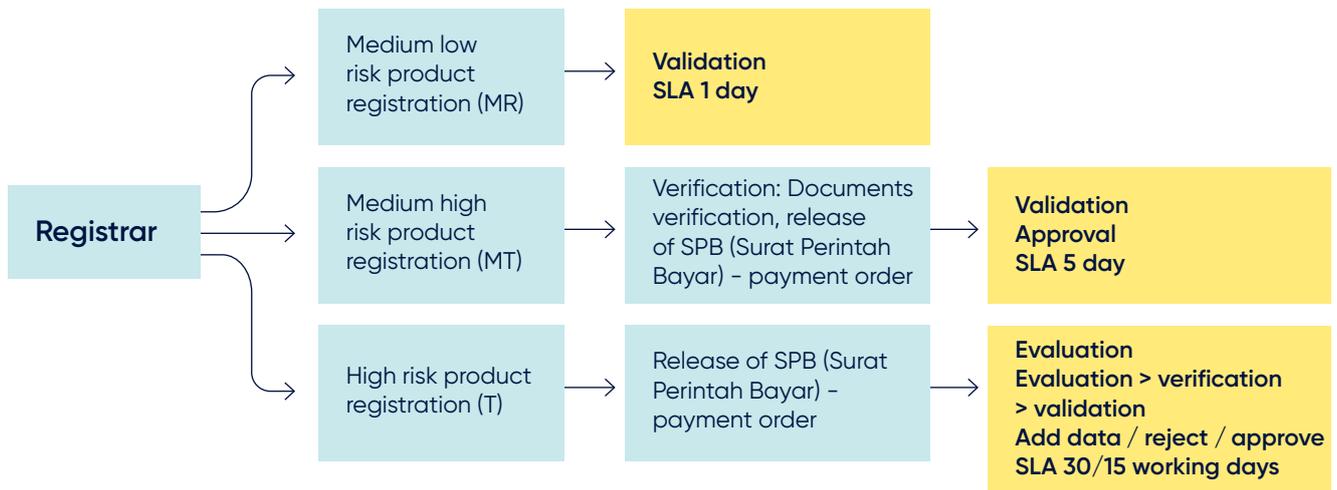
C. Registration Process - Processed Food Products (Ereg-RBA)

1. Log in to Ereg website
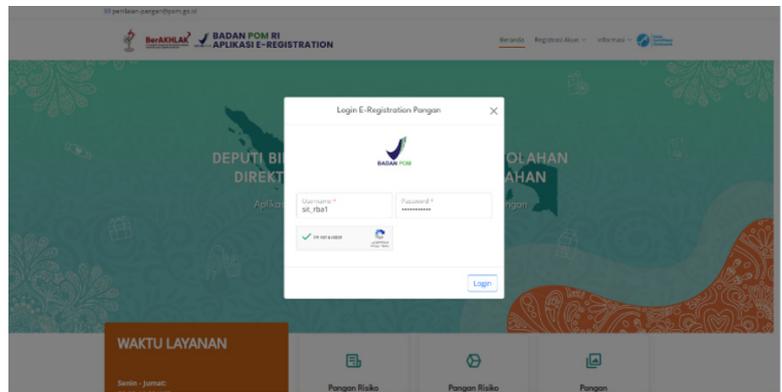
2. Select the appropriate application type

3. Fill in the product data to be registered

4. Fill in material that used in product composition as well as material concentration

5. Fill in basic characteristics products according to selected food category

6. Fill in analysis result of heavy metals and pathogen micro

7. Fill in nutrition value of the product

8. Fill in nutritional value

9. Application review

Requirements for Account Registration

A. Account registration

Below are documents required for account registration – import products

a. NPWP (tax file number)

b. Nomor Induk Berusaha (NIB) RBA version - Business Identification Number

c. Sertifikat Sistem Management Keamanan Pangan Olahan (SMKPO) - Processed Food Safety Management System Certificate

d. Letter of Appointment (LoA)

e. Food safety certificates (GMP/ HACCP/ ISO 22000/ government audit)

Reference: BPOM socialization RBA documents and video https://youtu.be/x0HxC9eEF6M

KBLI- dairy industry: https://oss.go.id/informasi/kbli-kode?kode=C&kbli=105