



Ministry of Trade Revamps Import Regulation Through Ministry of Trade Regulation No. 16 of 2025

The Ministry of Trade has issued a new regulation Ministry of Trade Regulation (“**MoTR**”) No. 16 of 2025 on Import Policies and Regulations (“**MoTR 16/2025**”) which aims to restructure, simplify, and deregulate Indonesia’s import system. With the enactment of MoTR 16/2025, previous MoTR on import policies and regulation (i.e. MoTR No. 36 of 2023 as lastly amended by MoTR No. 8 of 2024 or “**MoTR 36/2023**”) is revoked. As an effort to deregulate import policies, the Ministry of Trade is aiming to issue 8 other cluster regulations in the nearby future, as follows¹:

1. MoTR No. 17 of 2025 on Import Policy and Provisions on Textiles and Textile Products;
2. MoTR No. 18 of 2025 on Import Policy and Provisions on Agricultural and Livestock Products;
3. MoTR No. 19 of 2025 on Import Policy and Provisions on Salt and Fisheries Commodities;
4. MoTR No. 20 of 2025 on Import Policy and Provisions on Chemicals, Hazardous Substances and Mining Materials;
5. MoTR No. 21 of 2025 on Import Policy and Provisions on Electronics and Telematics;
6. MoTR No. 22 of 2025 on Import Policy and Provisions on Specific Types of Industrial Goods;
7. MoTR No. 23 of 2025 on Import Policy and Provisions on Consumer Goods;
8. MoTR No. 24 of 2025 on Import Policy and Provisions on Used Goods and Non-Hazardous, Non-Toxic Waste.

API Conversion

As previously regulated under MoTR 36/2023, importers are required to have a Business Identification Number (*Nomor Induk Berusaha* or “**NIB**”) which will act as an Importer Identification Number (*Angka Pengenal Importir* or “**API**”). In this regard, importers may select either General API (*API Umum* or “**API-U**”), which is issued to business entities that import goods for resale or transfer, or Producer API (*API Produsen* or “**API-P**”) which is issued to entities that import goods for internal use as capital goods, raw materials, supporting materials and/or for production purposes.

Similar to the previous provision under Article 2 Paragraph (6) of MoTR 36/2023, Article 8 Paragraph (1) of MoTR 16/2025 also retained the provision that allows NIB that functions as an API-U to be converted into an API-P. The difference however lies with the requirements for such conversion, which is regulated under Article 8 Paragraph (2) of MoTR 16/2025 as below:

¹ <https://www.tempo.co/ekonomi/sembilan-peraturan-menteri-perdagangan-tentang-import-1865034>

1. The importer does not have a have a valid import business license in the form of an Import Approval and/or Surveyor's Report; or
2. The importer holds a valid import business license but is not currently engaging in any imports.

Timelines for Administrative Verification for Import Business License

Regarding applications for new, revised, or renewed import business license, Article 7, 13, and 16 of MoTR 36/2023 does not specify a timeline for the new verification process. It only sets a five working day deadline for the Ministry of Trade ("**MOT**") to issue an approval or rejection once the application is deemed complete or incomplete.

Under Article 12, 19, and 22 of MoTR 16/2025 however, specified the timeline for the MoT officials to verify the administrative documents for new, revised, or renewed import business licenses applications, which must be completed within 15 working days after the application was received.

Revocation of Several Import Approvals

MoTR 16/2025 revoked and renders several types of Import Approvals granted under API-U or API-P to be invalid, below are the affected commodities:

1. Import Approval for Forestry Products;
2. Plastic Raw Materials;
3. Subsidized Fertilizer;
4. Fuels and Fuel Mixtures;
5. Other types of Fuel and Fuel Mixtures.

The above Import Approval whose issuance process is still ongoing, will be electronically rejected through the INATRADE system.

Expansion on the Sanctions Framework

For certain violations, MoTR 16/2025 introduced a more structured administrative sanctioning for several violations under Article 75, as follows:

1. Inconsistencies in the documents relating to requirement and data or information reflected in the application of import business license, the amendment of import business license, or the extension of import business license, statement letter or amendment of statement letter;

Conclusion

The enactment of MoTR 16/2025 marks a significant step in the Indonesian government's effort to streamline and modernize its import regulatory system. By revoking the previous regulation and introducing a more structured approach, such as defined verification timelines, clearer API conversion requirements, and a broadened sanctions framework.

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