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New Amendment to Import Regulation

In October 2025, the Minister of Trade of the Republic of Indonesia (the "**Minister**") issued Regulation of the Minister No. 37 of 2025 regarding the Amendment to the Regulation of the Minister No. 16 of 2025 regarding the Import Policy and Regulation ("**RM 37/2025**"), which came into effect on 5 November 2025.

As its title suggests, RM 37/2025 is an amendment to the Regulation of the Minister No. 16 of 2025 regarding the Import Policy and Regulation ("**RM 16/2025**"), and therefore RM 37/2025 introduces several changes and additions to the provisions under RM 16/2025. The following are several key provisions of RM 37/2025:

1. **Amendment to the Business Identification Number (*Nomor Induk Berusaha – "NIB"*) that Functions as an Importer Identification Number (*Angka Pengenal Importir – "API"*)**

RM 16/2025 and RM 37/2025 both stipulate that an amendment to an NIB that functions as an API may only be made from an NIB that functions as a General API (*API Umum – "API-U"*) to an NIB that functions as a Producer API (*API Produsen – "API-P"*).

However, previously RM 16/2025 only provided that such amendment may be made in the event that:

- a. The importer does not have a valid Import Approval and/or Surveyor Report; or
- b. The importer that has a valid Import Approval and/or Surveyor Report is not in the process of realizing its import.

RM 37/2025 now adds to these provisions. Accordingly, the amendment of an NIB that functions as API-U to an NIB that functions as API-P may only be made in the event that:

- i. The importer does not have a valid Registered Importer (*Importir Terdaftar*), Producer Importer (*Importir Produsen*), Import Approval (collectively referred to as the "**Import Licenses**"), Certificate (*Surat Keterangan*), and/or Surveyor Report; or
- ii. The importer has valid Import Licenses, Certificate (*Surat Keterangan*), and/or Surveyor Report, and is not in the process of realizing its import.



2. Revocation of NIB that functions as API

Previously, RM 16/2025 did not regulate the revocation of an NIB that functions as an API. RM 37/2025 now introduces such provision, under which an API may be revoked in the event that:

- a. The importer does not have valid Import Licenses, Certificate (*Surat Keterangan*), and/or Surveyor Report; or
- b. The importer has valid Import Licenses, Certificate (*Surat Keterangan*), and/or Surveyor Report, and is not in the process of realizing its import.

With respect to goods that have already been imported, the following provisions apply:

- i. Goods imported by an importer holding an NIB that functions as API-U prior to the revocation may be traded or transferred; and
- ii. Goods imported by an importer holding an NIB that functions as API-P prior to the revocation may not be traded or transferred either before or after the revocation.

3. Addition of Data Elements and/or Information in the Surveyor Report

RM 16/2025 and RM 37/2025 maintain the same general provisions relating to the Surveyor Report, including verification and technical tracing that may only be conducted by surveyors appointed by the Minister, the locations where such verification and technical tracing may be conducted, and other related requirements.

However, previously RM 16/2025 required that a Surveyor Report must contain at least the following data elements and/or information:

- a. Number and issuance date of the Surveyor Report;
- b. Tariff post/harmonized system;
- c. Quantity and unit of goods; and
- d. Port of destination, except for Surveyor Reports issued in a Free Trade Zone and Free Port (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas* – “KPBPB”), a Special Economic Zone (*Kawasan Ekonomi Khusus* – “KEK”), or a Bonded Zone (*Tempat Penimbunan Berikat* – “TPB”).



Now, in addition to the above, RM 37/2025 introduces additional data elements and/or information that must be included in the Surveyor Report, namely:

- i. The loading port located in KPBPB, for verification and technical tracing conducted within the KPBPB area; and
- ii. The name and address of the KEK or TPB, for verification and technical tracing conducted within the KEK or TPB area.

This Client Alert is intended to provide a brief overview only on several provision and may not cover all provisions under the RM 37/2025, thus, cannot be deemed as a legal advice. Please do not hesitate to contact us if you need a more detailed discussion, advice, and/or have specific questions.

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