



# Client Alert

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## Raw and/or Auxiliary Materials Supply Hub

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## Raw and/or Auxiliary Materials Supply Hub

Under Indonesian import regulations, any company engaging in import activities must hold a Business Identification Number (*Nomor Induk Berusaha* - “NIB”) that functions as an Importer Identification Number (*Angka Pengenal Importir* - “API”). The API is categorized into:

- a. General API (*API Umum* - “API-U”), designated for companies engaged in wholesale trading activities, which may import goods solely for trading purposes; and
- b. Producer API (*API Produsen* - “API-P”), designated for industrial or manufacturing companies, which may import goods exclusively for use in their own production processes, and such goods cannot be traded or transferred.

In practice, this framework has created challenges for Small and Medium Industries (*Industri Kecil dan Menengah* - “IKM”). Many IKM lack the capability to independently import raw and/or auxiliary materials. At the same time, their access to such materials in the domestic market is limited, as API-U holders typically are not allowed to import raw and/or auxiliary materials, while API-P holders are prohibited from reselling or transferring them.

To address this issue, in March 2026, the Ministry of Industry of the Republic of Indonesia (the “MOI”) issued the Regulation of the Minister of Industry of the Republic of Indonesia No. 5 of 2026 regarding the Raw and/or Auxiliary Materials Supply Hub (“RM 5/2026”), effective as of 26 March 2026. This regulation introduces a new framework allowing certain wholesale trading companies to import raw and/or auxiliary materials for limited distribution purposes.

### 1. New Framework

Pursuant to RM 5/2026, companies holding an API-U are permitted to import and distribute raw and/or auxiliary materials, provided that they first obtain an official designation from the MOI as a Raw and/or Auxiliary Materials Supply Hub (*Pusat Penyedia Bahan Baku dan/atau Bahan Penolong* - “PPBBP”), and that such materials are distributed solely to IKM businesses.

## RELATED PEOPLE



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## 2. Eligibility Criteria

To be designated as a PPBBBP, a company must meet certain criteria including:

- a. hold a valid NIB that functions as an API-U; and
- b. own or control storage facilities for each commodity, with a minimum area of 500 m<sup>2</sup> in a single location.

## 3. Application Procedure

Applications for designation of PPBBBP must be submitted electronically to the Director General of Small, Medium, and Miscellaneous Industries (the “**Director General**”) through the National Industrial Information System (*Sistem Informasi Industri Nasional* - “**SIINas**”), for each relevant commodity group.

Once the application is complete, the MOI reviews it within 5 (five) business days (including possible site verification). Should the application be approved, a recommendation is issued within 1 (one) business day, followed by a Ministerial Decree formalizing the designation.

## 4. Application Requirements

The application submitted through SIINas consists of:

### a. Data Entry

The applicant must complete the data entry through SIINas by providing information on the company and the partnering IKM businesses, including their respective names, addresses, NIB, and relevant KBLI classifications, as well as the proposed commodity group.

### b. Supporting Documents

The applicant must upload supporting documents, including the deed of establishment, proof of ownership or control of storage facilities, evidence of cooperation with IKM businesses, and a company profile.

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## 5. Ministerial Designation

### a. Validity Period and Revocation

The designation as a PPBBBP shall remain valid as long as the company's business activities are carried out in compliance with the data and supporting documents submitted via SIINas at the time of application.

The designation may be revoked for various reasons, including if the company no longer has valid ownership or control over its storage facilities and/or if the cooperating IKM businesses fail to meet the applicable requirements.

### b. Amendments

A list of IKM can be amended through an application in SIINas in the event of there is:

- i. changes in the IKM's licensed business activities; and/or
- ii. changes in the number of cooperating IKM entities.

In all cases, the PPBBBP must maintain cooperation with at least 5 (five) IKM businesses.

This Client Alert is provided for general informational purposes only and does not constitute legal advice. Please contact us should you require further information or assistance regarding PPBBBP or related matters.

For further information regarding the above Client Alert and future updates, please contact our counselors at:

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