



Client Alert

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Goods that may be Stored under the Warehouse Receipt System

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The Warehouse Receipt System (*Sistem Resi Gudang* - “SRG”) is a trade and financing instrument regulated under Law No. 9 of 2006 and its implementing regulations. Under the prevailing Indonesian regulatory framework, any party that stores goods in a warehouse is entitled to obtain a warehouse receipt (*resi gudang*).

The SRG enables commodity owners, including farmers, fishermen, and other business actors, to store goods in accredited warehouses and obtain warehouse receipts issued by the warehouse operator as evidence of ownership. These receipts may be traded, transferred, or used as collateral to secure financing from financial institutions, thereby providing an alternative source of funding.

As commercial practices develop, the rules on which goods can be stored under the SRG and their requirements are regularly updated. Previously, these matters were regulated under Regulation of the Minister of Trade No. 33 of 2020 (“RM 33/2020”), which has been amended several times, most recently through Regulation of Minister of Trade No. 1 of 2025 regarding the Third Amendment to RM 33/2020 (“RM 1/2025”).

In May 2026, the Ministry of Trade of the Republic Indonesia (the “MOT”) issued Regulation of the Minister of Trade No. 14 of 2026 regarding Goods and Requirements for Goods that may be Stored under the SRG (“RM 14/2026”), which entered into force on 18 May 2026.

The following are several new provisions regulated under RM 14/2026:

1. Stages for the Issuance of Warehouse Receipts

Under RM 1/2025, warehouse receipts were issued by the warehouse operator following the delivery of goods by the owner to the warehouse.

RM 14/2026 introduces a more structured process consisting of the following stages:

- a. delivery of goods by the owner to the warehouse operator;

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- b. quality testing carried out by a Conformity Assessment Body (*Lembaga Penilaian Kesesuaian*);
- c. insurance of the goods by the warehouse operator;
- d. verification, registration of the warehouse receipt, and issuance of a security code by the Warehouse Receipt Registration Center (*Pusat Registrasi Gudang*); and
- e. issuance of the warehouse receipt by the warehouse operator.

Conformity Assessment Body

RM 14/2026 formally recognizes the Conformity Assessment Body as the entity responsible for assessing the quality and conformity of goods based on applicable standards. While such functions had previously been carried out in practice, the earlier framework did not expressly define this role within a clear institutional structure.

Warehouse Receipt Registration Center

The Warehouse Receipt Registration Center is a legal entity approved by Commodity Futures Trading Regulatory Agency (*Badan Pengawas Perdagangan Berjangka Komoditi - "Bappebti"*) to administer warehouse receipts and their derivatives. Its responsibilities include record keeping, safekeeping, book entry transfers of ownership, registration of security interests, reporting, and the provision of information systems and networks.

2. Details Requirements for Goods

RM 1/2025 set out general criteria for goods eligible for storage, specifically a minimum storage period of 3 (three) months, compliance with specified quality standards, and the fulfilment of minimum quantity thresholds, without providing detailed guidance on how such requirements should be satisfied.

RM 14/2026 now elaborates on these requirements by introducing more specific parameters, considering the nature and characteristics of the goods, packaging and storage facilities and technology affecting storage life, compliance with national standards and or standards applicable in export destination countries, as well as economic value considerations in determining minimum quantity thresholds.

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3. Expansion of Eligible Goods

Under RM 1/2025, 27 (twenty seven) types of goods were eligible for storage. RM 14/2026 expands this number to 30 (thirty) types of goods. The eligible goods include, among others, unhusked rice, rice, corn, coffee, cocoa, pepper, smoked fish, dried skipjack tuna, and cloves.

The list of eligible goods may be further amended by a decree of the MOT, considering recommendations from regional governments, ministries or non-ministerial agencies, and or commodity associations supported by relevant studies.

Conclusion

RM 14/2026 enhances the SRG framework by introducing clearer procedures for the issuance of warehouse receipts, providing more detailed requirements for eligible goods, and expanding the range of commodities covered. These developments strengthen the role of warehouse receipts as a financing instrument and improve their reliability for business actors and financial institutions.

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 goods that may be stored under the SRG or related matters.

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

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