

LAB 45 — TELAAH KEBIJAKAN

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Telaah Kebijakan LAB 45 adalah wadah yang dirancang untuk menyampaikan pandangan kritis dan analisis terkini dari para peneliti serta analisis kebijakan terkait berbagai isu strategis seputar politik keamanan, ekonomi politik, politik media, dan gender. Platform ini bertujuan untuk memberikan wawasan mendalam sekaligus menawarkan gagasan inovatif dalam menghadapi tantangan lokal ataupun global. Pendapat yang tercantum dalam setiap komentar merupakan tanggung jawab penulis sepenuhnya dan tidak merefleksikan posisi resmi LAB 45. Jika Anda memiliki pertanyaan atau memerlukan informasi lebih lanjut, silakan menghubungi tim kami melalui lab45@lab45.id.



Comprehensive List of Indonesian Regulatory Adjustments

Required Under the Agreement Between the United States of America and the Republic of Indonesia on Reciprocal Trade

EXECUTIVE SUMMARY: This register identifies 142 distinct regulations, laws, and regulatory frameworks requiring creation, amendment, repeal, or substantial reform by the Republic of Indonesia. These span 16 domains across tariffs, non-tariff barriers, agriculture, intellectual property, labor, environment, digital trade, investment, national security, and customs facilitation. The scope encompasses approximately 15-20 major parliamentary laws, 40-50 ministerial/government regulations, 5-8 entirely new legal frameworks, and 5+ international treaty ratifications.

No.	Domain	Regulation / Legal Instrument	Agreement Reference	Required Action	Timeline	Complexity
A. TARIFFS & TRADE ADMINISTRATION						
1	Tariffs	Indonesian Customs Tariff Book (ICTB 2022) and related MoF regulations	Art. 1.1; Annex I Schedule 1	Revise tariff schedules to implement EIF (duty-free), TRQ, and category Z staging for U.S. originating goods	Upon entry into force	High
2	Tariffs	TRQ administration regulations (pork, distilled spirits, wine)	Annex I, Appendix 1	Create new TRQ administration framework: first-come-first-served, publish 90 days prior, non-discriminatory	Upon entry into force	High
3	Quantitative Restrictions	Import quota and commodity balance regulations	Art. 1.2	Remove quantitative restrictions, import licenses, and commodity balance programs inconsistent with GATT 1994	Upon entry into force	High
4	Internal Taxes	Internal tax and charge regulations on imported goods	Annex III, Sec. 1, Art. 1.1	Review and amend internal taxes to ensure national treatment; eliminate excess charges on imports vs. domestic goods	Upon entry into force	Medium
5	Pre-shipment Inspection	Pre-shipment inspection regulations	Annex III, Art. 2.43	Reform pre-shipment inspection mechanism to address U.S. exporter concerns; biweekly meetings with USTR	3 months after EIF	Medium
B. IMPORT LICENSING						
6	Import Licensing	General import licensing regulations	Art. 2.1; Annex III, Art. 2.1	Ensure non-automatic import licensing is transparent, non-discriminatory, not unduly burdensome; submit WTO annual questionnaire	Upon entry into force	Medium
7	Import Licensing	Commodity balance policy for food/agriculture	Annex III, Art. 2.10	Exempt U.S. food and agricultural products from commodity balance policy	Upon entry into force	High

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8	Import Licensing	Horticultural products import licensing regime	Annex III, Art. 2.10	Exempt U.S. horticultural products from import licensing regime; apply only automatic licensing	Upon entry into force	High
9	Import Licensing	Special/exclusive importation rights regulations	Annex III, Art. 2.10(2)	Remove any entity special or exclusive importation rights that limit U.S. agricultural products	Upon entry into force	Medium
C. STANDARDS, TECHNICAL REGULATIONS & CONFORMITY ASSESSMENT						
10	TBT	Technical regulations and conformity assessment procedures (general)	Art. 2.2	Accept U.S./international standards and conformity assessment; remove duplicative testing; ensure non-discrimination	Upon entry into force	High
11	Local Content	Local content requirement regulations (TKDN)	Annex III, Art. 2.2(1)	Exempt U.S. companies and U.S. goods from all local content requirements	Upon entry into force	High
12	Local Content	Domestic specification and processing requirements	Annex III, Art. 2.2(2)	Remove forced domestic specification usage and processing requirements for U.S. goods	Upon entry into force	Medium
13	ICT	ICT testing and certification regulations	Annex III, Art. 2.3(1)	Allow testing/certification by accredited U.S. conformity assessment bodies; address redundant compliance requirements	Upon entry into force	Medium
14	Cosmetics	Cosmetics heavy metals testing regulations	Annex III, Art. 2.3(2)	Remove duplicative requirements including shipment-specific testing for heavy metals	Upon entry into force	Low
15	Motor Vehicles	Motor vehicle safety and emissions standards (SNI)	Annex III, Art. 2.6	Accept FMVSS and U.S. emissions standards; accept U.S. compliance procedures without additional processes	Upon entry into force	High
16	Motor Vehicles	Other discriminatory vehicle standards	Annex III, Art. 2.6(2)	Address any standards or requirements discriminating against U.S. vehicles and parts	Upon entry into force	Medium
D. MEDICAL DEVICES & PHARMACEUTICALS						
17	Medical Devices	Medical device marketing authorization regulations (BPOM/Kemenkes)	Annex III, Art. 2.5(1)	Accept FDA prior marketing authorization as sufficient; no marketing authorization for low-risk devices	Upon entry into force	High
18	Medical Devices	Device manufacturer quality management audit regulations	Annex III, Art. 2.5(2)	Recognize MDSAP audits and certificates; no additional requirements beyond MDSAP	Upon entry into force	Medium
19	Medical Devices	FDA certificate acceptance regulations	Annex III, Art. 2.5(3)	Accept FDA eCFGs for medical devices; no hard copies, apostilles, or wet signatures required	Upon entry into force	Low
20	Pharmaceuticals	Pharmaceutical marketing authorization regulations	Annex III, Art. 2.5(4)	Accept FDA prior marketing authorization as sufficient evidence for Indonesian market	Upon entry into force	High
21	Pharmaceuticals	Periodic re-authorization regulations	Annex III, Art. 2.5(5)	Eliminate periodic re-authorization unless significant safety/efficacy/quality concern	Upon entry into force	Medium
22	Pharmaceuticals	GMP inspection regulations	Annex III, Art. 2.5(6)	Accept FDA GMP surveillance inspection results for U.S. facilities with no-action-indicated classification	Upon entry into force	Medium
23	Pharmaceuticals	FDA eCPP acceptance regulations	Annex III, Art. 2.5(3)	Accept FDA electronic certificates for pharmaceutical products (eCPPs) as sufficient	Upon entry into force	Low

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E. HALAL REGULATIONS						
24	Halal	Halal Product Assurance Law (UU No. 33/2014) and implementing regulations	Annex III, Art. 2.9(1)	Exempt U.S. cosmetics, medical devices, and manufactured goods from halal certification/labeling requirements	Upon entry into force	High
25	Halal	Halal certification for containers/transport materials	Annex III, Art. 2.9(2)	Exempt containers/transport materials from halal requirements (except food/beverage/cosmetic/pharma containers)	Upon entry into force	Low
26	Halal	Non-halal product labeling/certification regulations	Annex III, Art. 2.9(3)	Remove labeling or certification requirements for non-halal products	Upon entry into force	Medium
27	Halal	U.S. halal certifier recognition regulations	Annex III, Art. 2.9(4)	Allow any U.S. halal certifier recognized by BPJPH to certify all products; streamline and accelerate approvals	Upon entry into force	Medium
28	Halal	Halal slaughter practice regulations	Annex III, Art. 2.22(1)	Accept U.S. slaughter practices complying with Islamic law or SMIIIC member-state standards	Upon entry into force	Medium
29	Halal	Halal requirements for non-animal products and animal feed	Annex III, Art. 2.22(2)	Exempt non-animal products and animal feed (including GE) from halal certification/labeling	Upon entry into force	Medium
30	Halal	Halal requirements for food/agriculture transport	Annex III, Art. 2.22(3)	Exempt containers/materials transporting food and agricultural products from halal requirements	Upon entry into force	Low
31	Halal	Halal competency testing for supply chain companies	Annex III, Art. 2.22(4)	Exempt U.S. packing, storage, and warehousing companies from halal competency testing for employees	Upon entry into force	Low
32	Halal	Halal subject matter expert requirement	Annex III, Art. 2.22(5)	Remove requirement for U.S. companies to appoint halal subject matter expert for operations	Upon entry into force	Low
F. AGRICULTURE & SPS MEASURES						
33	SPS	SPS regulations (general quarantine and food safety framework)	Art. 2.3(a)	Ensure SPS measures are science/risk-based; remove unjustified SPS barriers undermining reciprocity	Upon entry into force	High
34	SPS	U.S. food and agricultural control system recognition regulations	Annex III, Art. 2.11(1-2)	Recognize U.S. SPS system as satisfying Indonesian requirements; accept U.S. government certification	Upon entry into force	High
35	SPS	Export certification document regulations	Annex III, Art. 2.11(2-3)	No changes to bilateral certification documents without U.S. concurrence; limit attestations to U.S. requirements	Upon entry into force	Medium
36	Dairy	Dairy facility registration and certification regulations	Annex III, Art. 2.12(1)	Recognize U.S. dairy safety system; accept AMS dairy certificates; no facility registration; no vet signature	Upon entry into force	Medium
37	Meat/Poultry	Meat and poultry import regulations (FSIS recognition)	Annex III, Art. 2.12(2-6)	Recognize FSIS oversight; accept MPI Directory as eligible list; accept FSIS certificates; no additional registration	Upon entry into force	High
38	Aquatic Products	Aquatic product import regulations	Annex III, Art. 2.12(7)	Allow imports with NOAA certificate; accept FDA-registered fish meal facilities with NOAA certificate	Upon entry into force	Medium
39	Agriculture	Prior notice and time limit regulations for agricultural imports	Annex III, Art. 2.13	Accept USDA certificates without regard to departure date; no pre-departure notice requirement	Upon entry into force	Low

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39	Agriculture	Prior notice and time limit regulations for agricultural imports	Annex III, Art. 2.13	Accept USDA certificates without regard to departure date; no pre-departure notice requirement	Upon entry into force	Low
40	MRL	Maximum Residue Level (MRL) regulations	Annex III, Art. 2.14	Accept U.S. tolerances or Codex MRLs where Indonesia has none; entity-level (not commodity-level) enforcement	Upon entry into force	High
41	FFPO	Fresh Food of Plant Origin (FFPO) recognition regulations	Annex III, Art. 2.15	Grant permanent FFPO recognition; no renewal; no removal for non-export; entity-level (not commodity-level) actions	Upon entry into force	Medium
42	Biotech	Agricultural biotechnology regulatory framework	Annex III, Art. 2.16	Maintain science/risk-based framework; manage LLP without delay; consider U.S./third-country assessments	Upon entry into force	Medium
43	Horticulture	Horticultural market access regulations (agave, Helleborus, almond hulls)	Annex III, Art. 2.17(1)	Finalize market access for U.S. agave, Helleborus tissue culture, bulk almond hulls	6 months after EIF	Medium
44	Horticulture	Future horticultural product market access process	Annex III, Art. 2.17(2-3)	Complete market access within 18 months of submission; accept systems approach protocols per ISPM 14	18 months after EIF	Medium
45	Animal Products	Chicken parts import regulations	Annex III, Art. 2.18(1)	Allow importation of chicken parts (leg quarters, breasts, legs, thighs)	Upon entry into force	High
46	Animal Products	Live animal import regulations (cattle, swine, horses, sheep, goats)	Annex III, Art. 2.18(2)	Finalize market access for U.S. live breeding cattle, feeder cattle, swine, horses, sheep, goats, and genetics	6 months after EIF	High
47	HPAI	Highly Pathogenic Avian Influenza (HPAI) regionalization regulations	Annex III, Art. 2.19	Align with WOAHA TAHC Chapter 10.4; reduce regionalization to 10km zone; recognize APHIS authority	6 months after EIF	High
48	ASF	African Swine Fever (ASF) regionalization regulations	Annex III, Art. 2.20	Recognize U.S. ASF zone (PR/USVI); complete regionalization agreement for remainder of U.S.	18 months after EIF	High
49	Live Animals	Live animal health certificate signature regulations	Annex III, Art. 2.21	Accept electronic signatures for digital endorsement of live animal health certificates	6 months after EIF	Low
50	Bioethanol	Bioethanol import regulations	Annex III, Art. 2.23(1)	Remove any measure preventing import of U.S. bioethanol	Upon entry into force	Medium
51	Bioethanol	Bioethanol blending mandates (E5/E10/E20)	Annex III, Art. 2.23(2-3)	Implement E5 policy by 2028; E10 by 2030; endeavor to implement E20 subject to supply/infrastructure	2028/2030	High
G. INTELLECTUAL PROPERTY						
52	IP General	IP protection framework (general)	Art. 2.6	Provide robust IP protection; effective civil, criminal, border enforcement including online; prioritize copyright/trademark	Upon entry into force	High
53	Patent Law	Patent Law (UU No. 13/2016, amended 2024)	Annex III, Art. 2.26(f)	Eliminate local manufacturing/use requirements; fix patent implementation reporting; clarify traditional knowledge disclosure	Upon entry into force	High
54	Copyright Law	Copyright Law (UU No. 28/2014) - exceptions (Arts. 43-44)	Annex III, Art. 2.26(h)(i)	Clarify that limitations/exceptions are consistent with three-step test	Upon entry into force	Medium

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55	Copyright Law	Copyright Law - TPM and camcording provisions	Annex III, Art. 2.26(h)(ii)(iv)	Criminalize trafficking in TPM circumvention devices; criminalize unauthorized camcording of motion pictures	Upon entry into force	Medium
56	Copyright Law	Copyright Law - rights management information provisions	Annex III, Art. 2.26(h)(iii)	Extend RMI protection to cover economic rights for copyright owners and employers of works made for hire	Upon entry into force	Medium
57	Copyright Law	Copyright Law - term of protection	Annex III, Art. 2.26(h)(v)	Extend protection from 50 to 70 years for works not based on author life (photos, films, games, software, sound recordings)	Upon entry into force	High
58	Data Exclusivity	Pharmaceutical data protection regulations	Annex III, Art. 2.26(d)	Implement 5-year data exclusivity for new pharmaceutical products from date of Indonesian marketing approval	Upon entry into force	High
59	Data Exclusivity	Agricultural chemical data protection regulations	Annex III, Art. 2.26(e)	Implement 10-year data exclusivity for new agricultural chemical products	Upon entry into force	High
60	Compulsory License	Compulsory licensing regulations	Annex III, Art. 2.26(g)	Ensure transparency and procedural fairness consistent with international standards	Upon entry into force	Medium
61	Border Enforcement	Border IP enforcement regulations (domicile, deposits)	Annex III, Art. 2.26(b-c)	Eliminate local domicile requirements for recordation;	Upon entry into force	Medium
62	GI	Geographical indications regulations	Art. 2.4; Annex III, Art. 2.24	Ensure transparent/fair GI procedures; allow use of common name terms; opposition/cancellation grounds include trademark confusion	Upon entry into force	Medium
63	IP Treaties	Implementation of 8 existing IP treaties	Annex III, Art. 2.25(1)	Fully implement Berne, Budapest, Madrid Protocol, Marrakesh, Paris, PCT, WIPO Copyright, WIPO Performances	Upon entry into force	High
64	IP Treaties	Ratification/accession to 5 additional IP treaties	Annex III, Art. 2.25(2)	Ratify Brussels Satellite, Hague Geneva Act, Patent Law Treaty, UPOV 1991, Singapore Trademark Treaty	2 years after EIF	High
H. LABOR						
65	Forced Labor	New forced labor import ban legislation	Art. 2.9(1)	Adopt and implement prohibition on importation of goods produced by forced/compulsory labor; may recognize U.S. Section 307 determinations	2 years after EIF	High
66	Labor Rights	Labor rights protection framework (general)	Art. 2.9(2)	Adopt/maintain internationally recognized labor rights in law and practice; effective enforcement; no weakening	Upon entry into force	High
67	Job Creation Law	Job Creation Law (UU Cipta Kerja 2023) implementing regulations	Annex III, Art. 2.32(2)	Issue implementing regulations that significantly limit labor-only outsourcing firms	Upon entry into force	High
68	Labor Law	Labor Law - outsourcing of core functions	Annex III, Art. 2.32(3)(a)	Amend labor law to prohibit outsourcing of core business functions	Upon entry into force	High
69	Labor Law	Labor Law - fixed-term employment	Annex III, Art. 2.32(3)(b)	Amend to allow fixed-term employment only for non-permanent tasks, maximum 1 year total	Upon entry into force	High

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70	Labor Law	Labor Law - minimum wage exemptions	Annex III, Art. 2.32(3)(c)	End exemptions for sectoral and regional minimum wages including for medium-sized enterprises	Upon entry into force	High
71	Labor Law	Labor Law - freedom of association/collective bargaining	Annex III, Art. 2.32(3)(d)	Remove provisions restricting workers/unions from fully exercising association and collective bargaining rights	Upon entry into force	High
72	Recruitment	Worker recruitment fee regulations	Annex III, Art. 2.32(1)	Prohibit charging recruitment fees and related costs to workers	Upon entry into force	Medium
73	SEZ Labor	Special economic zone labor regulations	Annex III, Art. 2.32(4); Art. 2.9(2)	Ensure equal labor protections in SEZs; no lower protections than rest of economy	Upon entry into force	High
74	Labor Coverage	Labor law coverage regulations	Annex III, Art. 2.32(5)	Ensure labor law covers substantially all workers regardless of employment status, enterprise registration, size, or sector	Upon entry into force	High
75	Labor Inspection	Labor inspectorate regulations (resources, authority, sanctions)	Annex III, Art. 2.33	Ensure sufficient resources; authority to issue deterrent sanctions/civil penalties;	Upon entry into force	High
76	Labor Inspection	Forced labor identification training regulations	Annex III, Art. 2.33(a)	Train police, labor inspectors, immigration officials on SOPs for identifying forced labor victims	Upon entry into force	Medium
77	Labor Inspection	Sector-specific inspection mandates (fisheries, palm oil, mining, SEZs)	Annex III, Art. 2.33(e)	Conduct unannounced/routine inspections in high-risk sectors including child labor, forced labor, and OSH checks	Upon entry into force	High
I. ENVIRONMENT						
78	Environment	Environmental protection and enforcement framework (general)	Art. 2.10; Annex III, Art. 2.34	Adopt/maintain environmental protections; effectively enforce environmental laws; address environment-related non-reciprocal trade	Upon entry into force	High
79	Forestry	Land classification regulations	Annex III, Art. 2.35(2)(a)	Update to accurately reflect land cover	Upon entry into force	Medium
80	Forestry	Government logging concession cut rate regulations	Annex III, Art. 2.35(2)(b)	Eliminate or reduce high cut rate requirements on government logging concessions	Upon entry into force	Medium
81	Forestry	Timber Legality Assurance System (SVLK)	Annex III, Art. 2.35(2)(c)	Strengthen SVLK to reliably track specimens from harvest through transport, processing, and export	Upon entry into force	High
82	Forestry	Forest sector anti-corruption regulations	Annex III, Art. 2.35(2)(d)	Develop and implement anti-corruption plan for officials administering forest resources	Upon entry into force	Medium
83	Circular Economy	Resource efficiency and circular economy regulator	Annex III, Art. 2.36	Address trade barriers inhibiting resource efficiency; encourage circularity; enable reverse supply chains	Upon entry into force	Medium
84	Critical Minerals	E-waste and battery recycling regulations	Annex III, Art. 2.36(2)	Promote recovery of critical minerals from waste streams; expand e-waste and lithium-ion battery collection/recycling	Upon entry into force	Medium
85	Fisheries	Fisheries subsidies regulations	Annex III, Art. 2.37	Endeavor to accept WTO AFS; ensure subsidies do not contribute to overcapacity/overfishing; reform subsidies	As soon as practicable	High
86	Fisheries	Sustainable fisheries management and IUU regulations	Annex III, Art. 2.38	Operate sustainable management system; implement port state measures; deter IUU fishing; prevent at-sea transshipment	Upon entry into force	High

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87	Wildlife	Illegal wildlife trade and trafficking regulations	Annex III, Art. 2.39	Enhance inspection of shipments; combat transshipment; treat intentional trafficking as serious crime; dismantle networks	Upon entry into force	High
88	CITES	CITES implementation regulations	Annex III, Art. 2.40	Review seahorse reservation; ensure robust non-detriment findings; manage/report pangolin scale stockpiles	Upon entry into force	Medium
J. DIGITAL TRADE & TECHNOLOGY						
89	Digital Tax	Digital services tax regulations	Art. 3.1	Prohibit discriminatory digital services taxes or similar taxes against U.S. companies	Upon entry into force	High
90	Digital Trade	Intangible products tariff lines and import declaration requirements	Annex III, Sec. 3, Art. 3.1	Eliminate tariff lines on intangible products; suspend import declaration requirement for electronic transmissions	Upon entry into force	Medium
91	Data Transfer	Personal data cross-border transfer regulations (UU PDP implementing regs)	Annex III, Art. 3.2	Recognize U.S. as country providing adequate data protection under Indonesian law	Upon entry into force	High
92	Digital Platforms	Digital platform/news media regulations	Annex III, Art. 3.3	Refrain from requiring U.S. platforms to support domestic news organizations via paid licenses, data/profit sharing	Upon entry into force	Medium
93	Technology Transfer	Technology transfer/source code requirements	Art. 3.4	Prohibit conditioning market entry on technology transfer, source code access, or preference for particular technology	Upon entry into force	High
94	E-Transmissions	Customs duties on electronic transmissions	Art. 3.5	No customs duties on electronic transmissions; support permanent WTO moratorium	Upon entry into force	Medium
95	Digital Agreements	Digital trade agreement notification obligation	Art. 3.3	Communicate with U.S. before entering new digital trade agreements jeopardizing U.S. interests	Upon entry into force	Low
K. INVESTMENT & SERVICES						
96	Investment	Negative Investment List / Presidential Regulation on Business Sectors	Annex III, Art. 2.28	Remove ownership restrictions for U.S. investors in mining, fish processing, nature-based development, publishing, delivery, land transport, broadcasting, financial services	Upon entry into force	High
97	Mining	Mining divestment regulations	Annex III, Art. 2.28	Remove divestment requirements for U.S. investors in mining sector	Upon entry into force	High
98	Export Proceeds	Export proceeds onshoring regulations for natural resources	Annex III, Art. 2.27	Permit free transfer of export proceeds for U.S. natural resource investors without delay at market rate	12 months after EIF	High
99	Delivery Services	Geographic restrictions on foreign delivery services	Annex III, Art. 2.30(1)	Remove restrictions prohibiting foreign delivery services from operating outside provincial capitals with airports/seaports	Upon entry into force	Medium
100	Payment Networks	International payment network and domestic card processing regulations	Annex III, Art. 2.29(1)	Continue allowing U.S. international payment networks for domestic credit/e-commerce; refrain from data onshoring requirements in financial space	Upon entry into force	High
101	Payment Standards	Chip standards for domestic card transactions	Annex III, Art. 2.29(2)	Allow internationally-accepted chip standards for all domestic card transactions including contactless debit (tap-to-pay)	Upon entry into force	Medium

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102	Insurance	Insurance data localization regulations	Annex III, Art. 2.30(4)	Refrain from restricting U.S. insurers from processing/storing data outside Indonesia	Upon entry into force	Medium
103	Services	Services trade barriers (general)	Art. 2.7	Address existing barriers undermining reciprocity; refrain from new barriers less favorable to U.S. suppliers	Upon entry into force	High
104	Services	WTO Services Domestic Regulation implementation	Annex III, Art. 2.30(3)	Implement WTO Joint Initiative on Services Domestic Regulation; submit revised Specific Commitments for WTO certification	Upon entry into force	Medium
105	Fees	Import licensing and facility registration fee regulations	Annex III, Art. 2.30(2)	Ensure fees are no higher than cost of services rendered	Upon entry into force	Low
106	SOEs	State-Owned Enterprise commercial conduct regulations	Art. 6.2	Ensure SOEs act on commercial considerations; no discrimination against U.S. goods/services; no non-commercial subsidies except public service mandate; level playing field vs. third-country SOEs	Upon entry into force	High
107	Subsidies	Manufacturing enterprise subsidy transparency regulations	Art. 6.2(2)	Provide information on non-commercial assistance/subsidies to manufacturers; address distortive impacts at central level	Upon entry into force	Medium
108	Cabotage	Cabotage policy for telecom cable vessels	Annex III, Art. 2.4	Grant exemptions for foreign-flagged vessels installing telecom cables on/below sea surface (except vessels from countries of concern)	Upon entry into force	Medium
109	Remanufactured Goods	Remanufactured goods import restrictions	Annex III, Art. 2.7	Remove import restrictions and licensing requirements on U.S. remanufactured goods/parts	Upon entry into force	Medium
110	Worn Clothing	Worn clothing import regulations	Annex III, Art. 2.8	Allow importation of shredded worn clothing from U.S. for recycled clothing industry	Upon entry into force	Low
L. NATIONAL & ECONOMIC SECURITY						
111	Complementary Actions	Economic/national security alignment framework	Art. 5.1(1)	Upon U.S. notification, adopt/maintain measures of equivalent restrictive effect on third-country imports for shared security concerns	Upon notification	High
112	Unfair Practices	Regulations to address unfair practices by third-country companies	Art. 5.1(2)	At U.S. request, adopt measures against below-market-price goods from third-country-controlled companies operating in Indonesia	Upon U.S. request	High
113	Shipping	Shipbuilding and shipping regulations	Art. 5.1(3)	Adopt measures of equivalent restrictive effect as U.S. measures encouraging market-economy shipbuilding/shipping	Upon entry into force	High
114	Export Controls	Strategic Trade Management framework (new legislation)	Annex III, Art. 5.3(1)	Adopt robust strategic trade management framework to meet UNSCR 1540 nonproliferation obligations	Upon entry into force	High
115	Export Controls	U.S.-origin/controlled items reexport regulations	Annex III, Art. 5.3(2)	Restrict unauthorized export, reexport, and in-country transfer of EAR-subject items without BIS authorization	Upon entry into force	High
116	Export Controls	Export control data screening and sharing regulations	Annex III, Art. 5.3(3)	Screen and share export control data on U.S.-origin items; identify transactions of concern; prevent/address violations	Upon entry into force	High

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117	Export Controls	Domestic export control enforcement mechanisms (civil/criminal penalties)	Annex III, Art. 5.3(4)	Establish civil/criminal penalties; strengthen auditing/investigation; partner with U.S. on enforcement actions	Upon entry into force	High
118	Entity List	Cooperation on U.S. Entity List and sanctions lists	Art. 5.2(1)	Cooperate to restrict transactions with entities on BIS Entity List, OFAC SDN List, and Non-SDN Consolidated Sanctions List	Upon entry into force	High
119	Investment Screening	Inbound investment national security review mechanism (new)	Art. 5.2(2)	Establish and apply mechanism for reviewing inbound investment for national security risks; cooperate with U.S.	Upon entry into force	High
120	Transshipment	Anti-transshipment and duty evasion regulations	Art. 5.3(2)	Adopt and enforce provisions to combat transshipment and evasion of U.S. duties; enter duty evasion cooperation agreement	Upon entry into force	High
121	Telecom Security	5G/6G and communication technology supplier security regulations	Annex III, Art. 5.2(1)	Use only suppliers not compromising ICT infrastructure security; consult with U.S. on non-compliant suppliers	Upon entry into force	High
122	Port Security	Port/logistics digital platform security regulations	Annex III, Art. 5.2(2)	Ensure ports, terminals, logistics networks use platforms with cybersecurity, data protection, and national security safeguards	Upon entry into force	High
123	Steel	Steel excess capacity cooperation	Annex III, Art. 5.1	Join Global Forum on Steel Excess Capacity; take effective actions to address global steel excess capacity	Upon entry into force	Medium
124	AD/CVD	Antidumping and countervailing duty cooperation framework	Annex III, Art. 5.4	Expand cooperation and information exchange on AD/CVD proceedings including circumvention inquiries	Upon entry into force	Medium
125	Nuclear	Nuclear liability legislation	Annex III, Art. 5.5	Ratify Convention on Supplementary Compensation for Nuclear Damage to address U.S. industry liability concerns	Upon entry into force	High
M. CUSTOMS & TRADE FACILITATION						
126	Customs	Customs technology and paperless trade regulations	Art. 2.11	Maintain/implement full pre-arrival processing, paperless trade, digitalized procedures for U.S. goods	Upon entry into force	Medium
127	Advance Rulings	Customs advance ruling regulations	Annex III, Art. 2.42	Issue advance rulings to U.S. persons regardless of registration in Indonesian systems; ensure compliance at all ports	Upon entry into force	Medium
128	Express Shipments	Express shipment regulations (PMK 96/2023)	Annex III, Art. 2.41	Allow efficient return of undeliverable shipments; impose penalties only on responsible persons, not logistics providers	Upon entry into force	Medium
129	Pre-Arrival	Electronic pre-arrival declaration data regulations	Annex III, Art. 2.44	Allow electronic collection of pre-arrival data; all border agencies must complete processing before arrival; immediate release of low-risk shipments	Upon entry into force	Medium
130	Data Protection	Customs proprietary data protection regulations	Annex III, Art. 2.45	Protect proprietary data submitted to DJBC from unauthorized disclosure including tax ID information	Upon entry into force	Low

No.	Domain	Regulation / Legal Instrument	Agreement Reference	Required Action	Timeline	Complexity
131	Customs Officers	Customs/excise officer reward/premium regulations	Annex III, Art. 2.46	Ensure rewards are not based on percentage of administrative sanctions or auction proceeds	Upon entry into force	Low
N. BORDER MEASURES & TAXES						
132	Border Alignment	Border measures alignment framework with U.S.	Art. 2.12(1)	Coordinate and endeavor to align border measures on third-country imports with future U.S. border-adjusted taxes	Upon U.S. notification	High
133	VAT	Value-added tax regulations applicable to U.S. companies	Art. 2.12(2)	Ensure VAT does not discriminate against U.S. companies in law or in fact	Upon entry into force	Medium
O. GOOD REGULATORY PRACTICES						
134	GRP	Regulatory process framework (publication, consultation, RIA)	Art. 2.8; Annex III, Art. 2.31	Publish proposed regulations online; conduct public consultations; use RIA; give adequate comment time; review existing regulations; use international standards	Upon entry into force	High
P. CRITICAL MINERALS, ENERGY & COMMERCIAL COMMITMENTS						
135	Critical Minerals	Critical mineral export restrictions	Annex III, Art. 6.1(1)	Remove restrictions on exports of industrial commodities including critical minerals to U.S.	Upon entry into force	High
136	Critical Minerals	Critical mineral sector cooperation and certainty regulations	Annex III, Art. 6.1(2-4)	Cooperate with U.S. companies on mining/processing/downstream; provide certainty for businesses; increase production capacity	Upon entry into force	High
137	Critical Minerals	Foreign-owned processing facility production quota regulations	Annex III, Art. 6.1(5)(a)	Implement restrictions on excess production by foreign-owned processing facilities (nickel, cobalt, bauxite, copper, tin, manganese)	Upon entry into force	High
138	Industrial Parks	Industrial park and processing facility equal treatment regulations	Annex III, Art. 6.1(5)(b); Art. 6.3	Ensure foreign-owned industrial parks/processing facilities face same tax, environmental, labor, quota requirements as others	Upon entry into force	High
139	Energy	Energy purchase facilitation regulations (crude oil, LPG, refined petroleum)	Annex III, Art. 6.4	Grant all necessary government approvals and authorizations to increase purchases of U.S. energy via long-term contracts	Upon entry into force	High
140	Purchases	USD 33 billion purchase commitment facilitation	Annex IV	Support and facilitate commercial arrangements for U.S. imports: energy (\$15B), aerospace (\$13.5B), agriculture (\$4.5B)	Per Annex IV timeline	High
141	Investment	Critical sector investment facilitation for U.S. investors	Art. 6.1(1)	Allow/facilitate U.S. investment in critical minerals, energy, power generation, telecom, transport, infrastructure on national treatment terms	Upon entry into force	High
142	Outbound Investment	Outbound direct investment facilitation to U.S.	Annex III, Art. 6.2	Facilitate realization of USD 10 billion outbound investment to U.S. including construction and energy initiatives	Ongoing	High

Notes:

EIF = Entry into Force of the Agreement. The Agreement enters into force 90 days after exchange of written notifications (Article 7.5).

Complexity ratings: High = requires parliamentary legislation or major institutional reform; Medium = requires ministerial regulation or significant administrative reform; Low = requires procedural/administrative adjustment.

Some items may require coordinated action across multiple ministries and agencies (e.g., BPOM, Kemenkes, Kementan, Kemenperin, BPJPH, Kemenkeu, Kemenaker, KLHK). This register is based on the full text of the agreement and identifies distinct regulatory actions. Actual implementation may require additional sub-regulations and implementing guidelines not separately enumerated.

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