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Guidance handbook on gaining market access in Indonesia for EU dairy products

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ABBREVIATIONS

API	Angka Pengenal Importir (Importer Identification Number)
API-P	Angka Pengenal Importir Produsen (Producer Importer Identification Number)
API-U	Angka Pengenal Importir Umum (General Importer Identification Number)
BPJPH	Badan Penyelenggara Jaminan Produk Halal (Halal Product Assurance Organising Agency)
BPOM	Badan Pengawas Obat dan Makanan (Food and Drug Authority)
BPOM Regulation 8/2018	BPOM Regulation No. 8 of 2018 on Maximum Limits of Chemical Contaminants in Processed Foods
BPOM Regulation 9/2022	BPOM Regulation No. 9 of 2022 on Requirements for Heavy Metal Contamination in Processed Foods
BPOM Regulation 10/2026	BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels
BPOM Regulation 13/2019	BPOM Regulation No. 13 of 2019 on Maximum Limits of Microbial Contamination in Processed Foods
BPOM Regulation 13/2023	BPOM Regulation No. 13 of 2023 on Food Category
BPOM Regulation 15/2020	BPOM Regulation No. 15 of 2020 on Amendment to BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia
BPOM Regulation 20/2019	BPOM Regulation No. 20 of 2019 on Food Packaging
BPOM Regulation 20/2021	BPOM Regulation No. 20 of 2021 on Amendments to BPOM Regulation No. 31 of 2018 on Processed Food Labelling
BPOM Regulation 30/2017	BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia
BPOM Regulation 31/2018	BPOM Regulation No. 31 of 2018 on Labels for Processed Food
CTH	Change in Tariff Heading

EORI	Economic Operators' Registration and Identification
EU	European Union
EUICF	EU-Indonesia Cooperation Facility
EU-Indonesia CEPA	EU-Indonesia Comprehensive Economic Partnership Agreement
GMP	Good Manufacturing Practices
GR 1/2026	Government Regulation No. 1 of 2026 on Amendments to Government Regulation No. 86 of 2019 on Food Safety
GR 28/2025	Government Regulation No. 28 of 2025 on the Implementation of Risk-Based Business Licensing
GR 42/2024	Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance
HS	Harmonised System
MUI	Majelis Ulama Indonesia (Indonesian Ulama Council)
INSW	Indonesian National Single Window
KBLI	Klasifikasi Baku Lapangan Usaha Indonesia (Indonesian Standard Industrial Classification)
Kg	Kilogram
Law 21/2019	Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine
Law 33/2014	Law No. 33 of 2014 on Halal Product Assurance
MFN	Most-Favoured Nation
Minister of Agriculture 14/2017	Minister of Agriculture Regulation No. 14/PERMENTAN/PK.350/5/2017 on the Classification of Veterinary Medicinal Products
Minister of Agriculture Regulation 15/2021	Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector
Minister of Health Decree 301/2026	Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods

Minister of Health Regulation 1031/2011	Minister of Health Regulation No. 1031/MENKES/PER/V/2011 on Maximum Limits of Radioactive Contamination in Food
Minister of Trade Regulation 11/2026	Minister of Trade Regulation No. 11 of 2026 on the Second Amendment to Minister of Trade Regulation No. 18 of 2025 on Policies and Regulations on Imports of Agricultural and Livestock
Minister of Trade Regulation 16/2025	Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations
ML	Makanan Luar
MRL	Maximum Residue Limit
NIB	Nomor Induk Berusaha (Business Identification Number)
NKV	Nomor Kontrol Veteriner (Veterinary Control Number)
NRV	Nutritional Reference Value
OSS	Online Single Submission
PB-UMKU	Perizinan Berusaha untuk Menunjang Kegiatan Usaha (Business Licence for Supporting Business Activities)
Regulation (EC) No 853/2004	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Quarantine Agency Regulation 9/2024	Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals
SNI	Standar Nasional Indonesia (Indonesian National Standard)
SPS	Sanitary and Phytosanitary
WTO	World Trade Organization

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NOTE TO READERS

This *Guidance Handbook* reflects the legislation, regulatory requirements, and other relevant information **available at the time of writing**. As the *EU-Indonesia Comprehensive Economic Partnership Agreement* (CEPA) has not yet entered into force and Indonesia's regulatory framework continues to evolve, some of the information contained in this *Guidance Handbook* may subsequently change.

Readers are, therefore, encouraged to verify the applicable legal and regulatory requirements before making any commercial or compliance decisions.

1 INTRODUCTION

This *Guidance Handbook* was developed under the EU-Indonesia Cooperation Facility (EUICF), funded by the European Union (EU), in **anticipation of the implementation of the *EU-Indonesia Comprehensive Economic Partnership Agreement (CEPA)***.¹ The specific objectives of the EUICF include providing guidance to EU businesses and/or investors in relevant sectors of interest to facilitate their understanding of applicable trade measures, as well as proposing technical recommendations to the EU to address identified obstacles to the implementation of the *EU-Indonesia CEPA*.

This *Guidance Handbook* is intended to **assist EU dairy businesses and exporters seeking to access the Indonesian market**. It provides practical guidance on the regulatory and procedural steps involved in exporting dairy products from the EU to Indonesia, with a particular focus on Indonesia's import, market access, and Customs requirements. The *Guidance Handbook* also outlines the conditions for benefitting from the preferential treatment provided under the *EU-Indonesia CEPA*.

To enhance its practical value, the *Guidance Handbook* identifies **key challenges** encountered by EU dairy businesses in accessing the Indonesian market, drawing on consultations held with industry representatives, and highlights how the *EU-Indonesia CEPA* can help facilitate future market access for EU dairy products.

The *Guidance Handbook* is structured into the following sections:

Indonesia as an important market for EU dairy products	This section provides an overview of Indonesia's dairy sector, the EU's exports to Indonesia, and the key challenges faced by EU businesses in accessing the Indonesian market.
Indonesia's regulatory framework applicable to dairy products	This section sets out Indonesia's regulatory framework governing dairy products, including relevant import requirements; identifies key challenges faced by EU dairy exporters in accessing the Indonesian market, drawing on consultations conducted with EU dairy businesses; and outlines specific key steps for successfully placing dairy products on the Indonesian market.
Step 1: Preparing for the export of dairy products to Indonesia	This section provides an overview of the prerequisites that EU dairy businesses must satisfy within the EU, including compliance with relevant production standards and the obtaining of the necessary certificates, in order to meet Indonesia's import requirements and gain access to the Indonesian market.
Step 2: Complying with Indonesia's import requirements	This section details Indonesia's import requirements for dairy products, including country and dairy establishment approval, as well as the relevant import identification numbers, technical recommendations, and approvals.
Step 3: Complying with Indonesia's market access requirements for dairy products	This section details Indonesia's key market access requirements for dairy products, such as maximum chemical contaminant limits, as well as packaging, labelling, transportation, shelf-life, and certification requirements.
Step 4: Determining applicable tariff treatment and complying with Indonesia's Customs requirements	This section provides an overview of the applicable tariff treatment and the requirements for Customs clearance, including documentation and pre-notification requirements.
Relevance of the <i>EU-Indonesia CEPA</i>	This section details the relevant provisions under the <i>EU-Indonesia CEPA</i> that may facilitate market access and help mitigate the trade and regulatory challenges encountered by the EU dairy industry in Indonesia.

¹ *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 27 May 2026).

Recommendations and way forward	This section provides practical recommendations for EU businesses to navigate Indonesia's regulatory framework, address market access challenges, and strengthen EU-Indonesia trade relations.
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2 INDONESIA AS AN IMPORTANT MARKET FOR EU DAIRY PRODUCTS

2.1 OVERVIEW OF INDONESIA'S DAIRY SECTOR

The dairy sector is an **important subsector of Indonesia's food industry**, contributing to food security, economic resilience, economic development, and poverty alleviation in the country.² The sector continues to grow, driven by increasing consumer demand and expanding domestic production.

Between 2023 and 2025, dairy product consumption in Indonesia increased by 12.76% and is projected to reach 3,628,000 metric tonnes in 2026.³ More than 71% of this consumption consists of fresh and ultra-high temperature pasteurised milk, flavoured or fermented milk, and evaporated or condensed milk, as well as powdered milk, and other imported dairy ingredients, highlighting the prominence of **processed and liquid dairy products** in the Indonesian market. The remaining 29% comprises standalone powdered milk and cheese, as well as dairy ingredients used in the food services, confectionery, bakery, and pharmaceutical sectors.⁴

Table 1: Consumption of Dairy Products in Indonesia (in Metric Tonnes)

Products	2023	2024	2025	2026
Dairy				
Butter and Spreads	87,200	94,500	101,300	107,600
Cheese	159,800	190,400	222,700	254,700
Drinking Milk Products	1,367,300	1,443,300	1,527,300	1,621,800
Yogurt and Sour Milk	230,300	243,300	262,900	300,400
Sub Total	1,844,600	1,971,500	2,114,200	2,284,500
Other Dairy				
Condensed and Evaporated Milk	615,900	630,000	642,000	652,900
Cream	220,700	266,100	299,700	328,100
Sub Total	836,600	896,100	941,700	981,000

Similarly, **domestic dairy production** has increased, although growth has been concentrated in specific product categories. For instance, fresh milk production was projected to reach 722,883 metric tonnes in 2025.⁵ Approximately 70% of Indonesia's domestic dairy production is supplied by smallholder dairy farmers, organised into 63 cooperatives under the *Indonesian Dairy Cooperatives Union*,⁶ the national cooperative representing and advocating for dairy farmers across Indonesia. Other dairy farmers are represented by the *Bogor Dairy Producers Cooperative*. Indonesia does not produce whey or skimmed

² Indonesia's Coordinating Ministry for Economic Affairs, Press Release HM.4.6/175/SET.M.EKON.3/3/2022 on "Build a Strong National Dairy Industry, Government Encourages Farmer Welfare", available at <https://www.ekon.go.id/publikasi/detail/4094/build-a-strong-national-dairy-industry-government-encourages-farmer-welfare> (accessed 22 June 2026).

³ US Department of Agriculture, Report ID2025-0044 on "Dairy and Products Annual", p. 4, available at https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Dairy%20and%20Products%20Annual_Jakarta_Indonesia_ID2025-0044 (accessed 22 June 2026).

⁴ US Department of Agriculture, Report ID2025-0044 on "Dairy and Products Annual", p. 5, available at https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Dairy%20and%20Products%20Annual_Jakarta_Indonesia_ID2025-0044 (accessed 22 June 2026).

⁵ US Department of Agriculture, Report ID2025-0044 on "Dairy and Products Annual", p. 2, available at https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Dairy%20and%20Products%20Annual_Jakarta_Indonesia_ID2025-0044 (accessed 22 June 2026).

⁶ See <https://www.antaranews.com/berita/4967189/kementan-targetkan-swasembada-susu-2029-dengan-peta-jalan-susu-segar> (accessed 22 June 2026).

milk powder and domestic cheese production remains limited and consists primarily of artisanal cheeses intended for household consumption and specialised food service markets.⁷

To date, **domestic supply remains insufficient to meet Indonesia's domestic demand**. Approximately 3 billion litres, corresponding to 80% of dairy products consumed annually in Indonesia, are imported.⁸ This includes milk, which remains a key dairy product in Indonesia, and which currently relies on imports to satisfy approximately 79% of domestic demand.

This dependence on imports is further reflected in the disparity between Indonesia's exports and imports of dairy products. Data obtained from *Statistics Indonesia* indicate that dairy exports fluctuated, but ultimately decreased over the past years, recording an overall decrease of 6.17% between 2023 and 2025.⁹

Table 2: Value of Indonesia's Exports of Dairy Products (in USD)

Year	Value of Indonesia's Exports to the World of Harmonised System (HS) Code Chapter 04 Products
2023	662,276,440.76
2024	695,026,851.55
2025	621,490,839.18
2026 (January – May)	561,493,193.96

In contrast, **Indonesia's imports of dairy products** increased annually over the same period, recording a growth of 10.52%.¹⁰ The principal sources of Indonesia's dairy imports are New Zealand, Australia, the US, and several EU Member States.¹¹ The highest-value imported products from these countries include milk and cream;¹² skimmed milk powder;¹³ milk powder;¹⁴ as well as butter, skimmed milk powder, and whey powder,¹⁵ respectively.

Table 3: Value of Indonesia's Imports of Dairy Products (in USD)

Year	Value of Indonesia's Imports from the World of HS Code Chapter 04 Products
2023	1,474,328,025.00
2024	1,479,636,107.00
2025	1,629,420,004.27
2026 (January – May)	415,666,825.51

To **reduce dependence on dairy imports**, Indonesia adopted various measures aimed at strengthening domestic dairy production capacity and improving food self-sufficiency. For instance, between 2013 and 2025, Indonesia's Coordinating Ministry for Economic Affairs introduced the *Indonesian Dairy Blueprint*, which aims to increase domestic production to 60% by 2025 by, *inter alia*, improving the capacity and

⁷ US Department of Agriculture, Report ID2025-0044 on "Dairy and Products Annual", p. 5, 13, and 16, available at https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Dairy%20and%20Products%20Annual_Jakarta_Indonesia_ID2025-0044 (accessed 22 June 2026).

⁸ See <https://www.adb.org/results/door-door-dairy-yielding-fresh-opportunities-women-indonesia> (accessed 19 May 2026).

⁹ Data obtained from *Statistics Indonesia*, available at <https://www.bps.go.id/id/exim> (accessed 22 June 2026).

¹⁰ Data obtained from *Statistics Indonesia*, available at <https://www.bps.go.id/id/exim> (accessed 22 June 2026).

¹¹ Data obtained from the *International Trade Centre's Trade Map*, available at https://www.trademap.org/Country_SelProductCountry_TS.aspx?nvp=1%7c360%7c%7c%7c%7c04%7c%7c%7c2%7c1%7c1%7c2%7c1%7c2%7c1%7c%7c1 (accessed 22 June 2026).

¹² See <https://wits.worldbank.org/trade/comtrade/en/country/NZL/year/2024/tradeflow/Exports/partner/ALL/product/040210> (accessed 22 June 2026).

¹³ Australian Dairy Industry Council, *Inquiry into the role of Australian agriculture in Southeast Asian markets*, p. 4, available at <https://www.aph.gov.au/DocumentStore.ashx?id=ec7b606c-c983-4c36-8d73-2e4d976112f8&subId=757265> (accessed 22 June 2026).

¹⁴ See <https://www.idfa.org/wordpress/wp-content/uploads/2020/03/u-s-dairy-exports-top-10-partners.pdf> (accessed 22 June 2026).

¹⁵ See https://agriculture.ec.europa.eu/document/download/98438004-af5e-47ed-8f79-8066c40a16f5_en?filename=eu-dairy-extra-trade_en.pdf (accessed 22 June 2026).

income of domestic dairy farmers and increasing the national dairy cattle population.¹⁶ Additionally, Annex I of *Presidential Regulation No. 12 of 2025 on the National Medium-Term Development Plan 2025-2029* identifies increasing cow's milk production as a strategic priority for both Indonesia's Ministry of Agriculture and the private sector.¹⁷ On 7 June 2026, Indonesia's Deputy Coordinating Minister for Food Affairs, *Hanif Faisol Nurofiq*, emphasised the need to “restore” reputation of the Indonesian town of *Cisarua* in the Bogor Regency as a key dairy production centre to help reduce Indonesia's reliance on imported milk products. To this end, the Deputy Coordinating Minister for Food Affairs plans to convene a coordination meeting with relevant ministries, academics, and dairy farmers to develop measures to **strengthen the dairy sector**.¹⁸

On 24 February 2025, Indonesia's Deputy Minister of Agriculture, *Sudaryono*, had announced that the Government would **adopt import restrictions** to address the existing imbalance between imported and domestically produced dairy products. As of the date of this *Guidance Handbook*, no further official announcements regarding the implementation of these proposed restrictions have been made. The Government has also mandated that the milk processing industry prioritise domestic milk over imported alternatives.¹⁹ On 16 September 2025, Deputy Minister *Sudaryono* stated that the import quota for dairy cattle in 2025 had been reduced from 200,000 to 150,000.²⁰ Additional measures include the provision of loans to the dairy sector,²¹ the promotion of certain regencies as potential production hubs,²² and support for the importation of breeding cattle to strengthen domestic dairy farming.²³

In the context of these efforts to strengthen domestic dairy production and reduce reliance on imported dairy products, an EU company reported that, in 2025, its application for a *Technical Recommendation* from the Ministry of Agriculture, which is a prerequisite for obtaining an *Import Approval* from the Ministry of Trade, was not processed unless the company submitted a commitment to import live cattle into Indonesia. According to the company, this requirement appears to have been introduced on a *de facto basis* in connection with Indonesia's “*Free Nutritious Meals Programme*”, a government-led initiative aimed at improving nutrition among school-age children by providing free daily meals in schools, which include milk. This appears to be consistent with official reports dating back to 2024, in which the department on *Veterinary Public Health* within Indonesia's *Directorate General of Livestock and Animal Health* stated that companies importing animal products or their derivatives would be expected to commit to increasing Indonesia's cattle population in support of the programme.²⁴

2.2 EU EXPORTS TO INDONESIA

The EU produces approximately 150 million tonnes of raw milk annually, making the region the **world's second-largest dairy producer** after India. The EU is also a leading exporter of cheese and other high-value dairy products.²⁵ **Indonesia** is an important export market for EU dairy products, particularly for exports from Belgium, France, Germany, and the Netherlands. Between 2023 and 2025, the value of dairy exports from the EU into Indonesia increased by 25.5%, namely from USD 294 million to USD 369 million.²⁶

¹⁶ See https://www.agropustaka.id/wp-content/uploads/2021/06/2-agropustaka.id_Ditbitpro-PKH_Penataan-Regulasi-utk-Mendukung-Kebangkitan-Persusuan-Indonesia.pdf (accessed 22 June 2026).

¹⁷ Annex I of *Presidential Regulation No. 12 of 2025 on the National Medium-Term Development Plan 2025-2029*, available at <https://peraturan.bpk.go.id/Details/314638/perpres-no-12-tahun2025> (accessed 22 June 2026).

¹⁸ See <https://bandung.kompas.com/read/2026/06/07/223056678/wamenko-pangan-kita-tidak-ikhlas-kebutuhan-susu-sapi-hampir-80-persen-dari> (accessed 22 June 2026).

¹⁹ See <https://dairybusinessmea.com/2025/02/26/indonesia-to-restrict-milk-imports-to-boost-local-production/> (accessed 19 May 2026).

²⁰ See <https://english.news.cn/asiapacific/20250916/e405b761e3da4049864ebf4994186f67/c.html> (accessed 19 May 2026).

²¹ Indonesia's Coordinating Ministry for Economic Affairs, Press Release HM.4.6/175/SET.M.EKON.3/3/2022 on “*Build a Strong National Dairy Industry, Government Encourages Farmer Welfare*”, available at <https://www.ekon.go.id/publikasi/detail/4094/build-a-strong-national-dairy-industry-government-encourages-farmer-welfare> (accessed 22 June 2026).

²² See <https://rri.co.id/en/national/2366965/indonesia-invites-investment-in-livestock-eyes-wonosobo-as-dairy-hub> (accessed 19 May 2026).

²³ See <https://dairybusinessmea.com/2025/02/26/indonesia-to-restrict-milk-imports-to-boost-local-production/> (accessed 19 May 2026).

²⁴ See <https://bvetsubang.ditjenpkh.pertanian.go.id/berita/demi-makan-bergizi-gratis-pemerintah-paksa-pengusaha-impor-sapi> (accessed 22 June 2026).

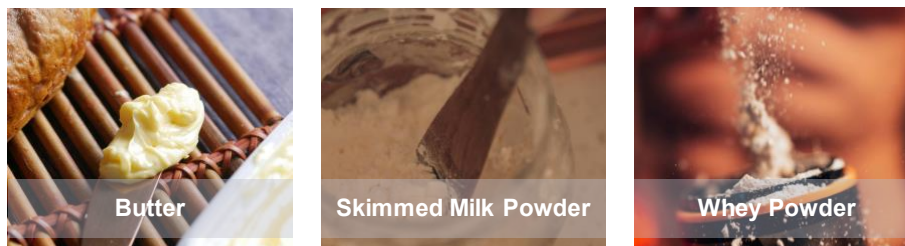
²⁵ See <https://agridata.ec.europa.eu/extensions/DataPortal/milk.html> (accessed 22 June 2026).

²⁶ Data obtained from *Statistics Indonesia*, available at <https://www.bps.go.id/id/exim> (accessed 22 June 2026).

Table 4: Value of Indonesia's Imports of Dairy Products from the EU (in USD)

Year	Value of Indonesia's Imports from the EU of HS Code Chapter 04 Products
2023	294,079,882.00
2024	293,760,912.00
2025	369,273,085.02
2026 (January – May)	74,928,214.54

The EU's **highest-value exports** to Indonesia include:



With respect to **butter**, Indonesia is the EU's seventh-largest export market, although export volumes fluctuated in recent years, declining from 4,093 metric tonnes in 2023 to 3,502 metric tonnes in 2025. For **skimmed milk powder**, Indonesia ranks as the EU's ninth-largest export market for butter, with export volumes increasing significantly from 26,974 metric tonnes in 2023 to 50,898 metric tonnes in 2025.²⁷

Whey powder appears to be a distinct case. On a cumulative basis over the 2023 to 2025 period, Indonesia was not among the EU's largest export markets for this product. However, in 2025, Indonesia ranked as the EU's third-largest export market for whey powder, after China and Malaysia, with imports reaching 74,494 metric tonnes,²⁸ indicating significant and growing market potential.

In addition to products classified under Chapter 4 of the HS, **formula products** are generally recognised by the EU as a dairy product.²⁹ However, infant formula does not rank among the EU's principal dairy exports to Indonesia. Exports of formula products from the EU to Indonesia are limited to a small number of EU Member States and have occurred only intermittently:³⁰

Table 5: Value of Indonesia's Imports of Formula Products from the EU (in USD)

Year	Value of Indonesia's Imports of Formula Products from the EU				
	Belgium	France	Germany	Greece	Netherlands
2023	N/A	653.00	N/A	N/A	223,062.00
2024	N/A	3,495.00	459.00	N/A	291,824.00
2025	2,622.19	1,051.57	N/A	N/A	N/A
2026 (January – May)	N/A	1,602.70	N/A	220.00	N/A

²⁷ See https://agriculture.ec.europa.eu/document/download/98438004-af5e-47ed-8f79-8066c40a16f5_en?filename=eu-dairy-extra-trade_en.pdf (accessed 22 June 2026).

²⁸ See https://agriculture.ec.europa.eu/document/download/98438004-af5e-47ed-8f79-8066c40a16f5_en?filename=eu-dairy-extra-trade_en.pdf (accessed 22 June 2026).

²⁹ See https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/factsheets/factsheet-eu-indonesia-comprehensive-economic-partnership-agreement-main-benefits_en (accessed 22 June 2026).

³⁰ Data obtained from *Statistics Indonesia*, available at <https://www.bps.go.id/id/exim> (accessed 22 June 2026).

3 INDONESIA'S REGULATORY FRAMEWORK FOR DAIRY PRODUCTS

EU dairy businesses intending to access the Indonesian market must ensure compliance with the applicable **general and product-specific trade conditions and market access requirements**. While importers in Indonesia often communicate these requirements to exporters in the EU, some may also impact the production process itself. Businesses must, therefore, take these requirements into account at an early stage and incorporate them into their commercial operations. These non-tariff measures can significantly affect market access and may increase the complexity and cost of trade.

Understanding Indonesia's **regulatory framework governing dairy products** is therefore essential for EU businesses seeking to place their products on the Indonesian market. This framework comprises a combination of:

- Import requirements;
- Market access requirements; and
- Customs procedures and documentary requirements.

Depending on the type and origin of the dairy product, importers may be required to obtain **approvals from several Indonesian ministries and authorities**, including the Ministry of Agriculture, the Ministry of Trade, and Indonesia's *Food and Drug Authority (Badan Pengawas Obat dan Makanan, BPOM)*. For example, cheese intended for retail sale must be registered with BPOM before it may be imported and marketed in Indonesia, whereas milk powder imported for use as an industrial raw material is subject only to the applicable import and veterinary requirements. EU businesses should, therefore, allow sufficient time to obtain the necessary regulatory approvals when planning their entry into the Indonesian market.

The table below provides an overview of Indonesia's regulatory requirements governing the importation of dairy products, indicating the relevant regulations and the respective competent authorities responsible for their administration:

Table 6: Indonesia's regulatory framework for the imports of dairy products

Action	Requirements	Legal Basis	Relevant Authority
Import requirements	Country and establishment approval	<i>Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector (Minister of Agriculture Regulation 15/2021)</i>	Ministry of Agriculture
	<i>Business Identification Number / Import Identification Number</i>	<i>Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations, as amended by Minister of Trade Regulation No. 37 of 2025 and Minister of Trade Regulation No. 16 of 2026 (Minister of Trade Regulation 16/2025, as amended)</i>	Ministry of Investment / Indonesia Investment Coordinating Board
	<i>Technical Recommendation</i>	<i>Minister of Trade Regulation 16/2025</i>	Ministry of Agriculture
	<i>Import Approval</i>	• <i>Minister of Trade Regulation No. 11 of 2026 on the Second Amendment to Minister of Trade Regulation No. 18 of 2025 on Policies and Regulations on Imports of</i>	Ministry of Trade

Market access requirements		<i>Agricultural and Livestock (Minister of Trade Regulation 11/2026)</i> • <i>Minister of Trade Regulation 16/2025</i> • <i>Government Regulation No. 28 of 2025 on the Implementation of Risk-Based Business Licensing (GR 28/2025)</i>	
	Complementary Goods Certificate	<i>Minister of Trade Regulation 16/2025</i>	Ministry of Trade
	Animal product registration number	<i>Minister of Agriculture Regulation 15/2021</i>	Ministry of Agriculture
	Food safety requirements: • Compositional requirements for dairy products; • Veterinary drug residues; • Maximum limits for heavy metal contaminants; • Maximum limits for radioactive contaminants; • Maximum limits of chemical contamination; • Maximum limits of microbiological contaminant; and • Sanitary and phytosanitary (SPS) requirements (<i>i.e.</i>, obtaining a <i>Health</i> or <i>Sanitary Certificate</i>, submitting a <i>Prior Notice</i>, comply with the necessary quarantine procedures).	• <i>BPOM Regulation No. 13 of 2023 on Food Category (BPOM Regulation 13/2023)</i> • <i>Minister of Agriculture Regulation No. 14/PERMENTAN/PK.350/5/2017 of 2017 on the Classification of Veterinary Medicinal Products (Minister of Agriculture 14/2017)</i> • <i>BPOM Regulation No. 9 of 2022 on Requirements for Heavy Metal Contamination in Processed Foods (BPOM Regulation 9/2022)</i> • <i>Minister of Health Regulation No. 1031/MENKES/PER/V/2011 on Maximum Limits of Radioactive Contamination in Food (Minister of Health Regulation 1031/2011)</i> • <i>BPOM Regulation No. 8 of 2018 on Maximum Limit of Chemical Contaminants in Processed Foods (BPOM Regulation 8/2018)</i> • <i>BPOM Regulation No. 13 of 2019 on Maximum Limits of Microbial Contamination in Processed Foods (BPOM Regulation 13/2019)</i> • <i>Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine (Law 21/2019)</i> • <i>Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals (Quarantine Agency Regulation 9/2024)</i>	BPOM and Ministry of Agriculture
	Packaging, labelling, and product registration requirements	• <i>Minister of Agriculture Regulation 15/2021</i> • <i>BPOM Regulation No. 31 of 2018 on Labels for Processed Food (BPOM Regulation 31/2018)</i> • <i>BPOM Regulation No. 20 of 2021 on Amendments to BPOM Regulation No. 31 of 2018 on Processed Food Labelling</i> • <i>BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia (BPOM Regulation 30/2017)</i> • <i>BPOM Regulation No. 20 of 2019 on Food Packaging (BPOM Regulation 20/2019)</i>	BPOM

		Government Regulation No. 1 of 2026 on Amendments to Government Regulation No. 86 of 2019 o Food Safety (GR 1/2026)	
Shelf-life requirements		BPOM Regulation 30/2017	BPOM
Transportation requirements		Minister of Agriculture Regulation 15/2021	Ministry of Agriculture
Halal labelling and certification requirements		- Law No. 33 of 2014 on Halal Product Assurance (Law 33/2014) - Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance (GR 42/2024)	Halal Product Assurance Organising Agency (i.e., Badan Penyelenggara Jaminan Produk Halal, BPJPH).
Nutritional information and “Nutri-Level” labelling requirements		- BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels (BPOM Regulation 10/2026) - Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods (Minister of Health Decree 301/2026)	BPOM and Ministry of Health
Customs procedures and documentary requirements	Customs documentation	Law No. 10 of 1995 on Customs	National Single Window Institution within Indonesia’s Ministry of Finance
	Post Border Import Certificate	BPOM Regulation No. 15 of 2020 on Amendment to BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia (BPOM Regulation 15/2020)	BPOM

The regulatory distinction between dairy products and formula products

In terms of the regulatory framework in Indonesia, it must be distinguished between dairy products and formula products. Under *BPOM Regulation 13/2023 on Food Category*, dairy products are classified under Food Category 1 on “*Dairy products and dairy alternatives*”, while formula products are classified under Food Category 13 on “*Processed Food for Special Dietary Uses*”.³¹ Consequently, formula products are subject to a number of specific regulatory requirements that differ from those applicable to dairy products covered in this *Guidance Handbook*, particularly in relation to product composition, labelling, and food safety requirements.

The requirements for formula products are detailed in **Annex IX** of this *Guidance Handbook*. The broader import requirements for formula products are generally aligned with those applicable to dairy products and are set out in Section 4 of this *Guidance Handbook*.

3.1 KEY CHALLENGES FACED BY EU BUSINESSES

EU dairy businesses already exporting to Indonesia have encountered a number of **challenges** accessing the Indonesian market, particularly relating to **import and market access requirements**.

³¹ BPOM Regulation No. 13 of 2023 on Food Category, available at <https://jdih.pom.go.id/download/rule/1492/13/2023/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2013%20Tahun%202023%20tentang%20Kategori%20Pangan> (accessed 22 June 2026).

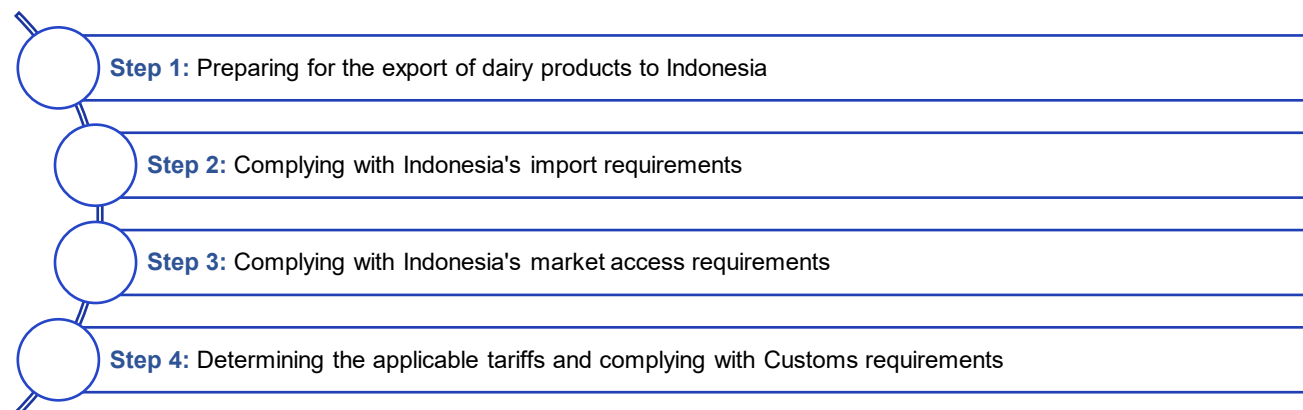
The following **recurring issues** have been flagged:

- EU businesses noted difficulties in obtaining **approvals for dairy establishments** from Indonesia's Ministry of Agriculture (see Section 5.1 of this *Guidance Handbook*). The approval process, which involves a desk-based assessment and on-site inspections, is considered slow, non-transparent, and unpredictable. EU businesses indicated that the Ministry of Agriculture conducts desk-based assessments during only three review cycles each year. In some cases, the desk-based assessment reportedly took up to three years, while the scheduling of an on-site inspection required at least an additional one to two years.
- Additional concerns include limited or no feedback following an on-site inspection in certain cases, the lack of approvals granted to new dairy establishments in recent years, requests for supplementary documents, including *Halal* certificates, despite *Halal* certification not yet being mandatory for dairy products, and the limited digitalisation of the approval process, storage devices (e.g., hard drive).
- EU businesses expressed concerns regarding the imposition of requirements that do not appear to be provided under the applicable regulatory framework in the context of obtaining a **Technical Recommendation** from the Ministry of Agriculture (see Section 5.3 of this *Guidance Handbook*). One EU company reported an instance in which its application for a *Technical Recommendation* was not processed unless it submitted a letter committing to import live cattle into Indonesia. According to the business, this requirement appears to have been introduced on a *de facto basis* in connection with Indonesia's "*Free Nutritious Meals Programme*" (see Section 2.1 of this *Guidance Handbook*).³²
- Several EU businesses identified the forthcoming mandatory **Halal certification** requirements as an emerging challenge. A key concern is that Indonesia does not currently recognise the EU as a Single Market for the purposes of recognising foreign *Halal* certification bodies (see Section 6.8 of this *Guidance Handbook*). EU businesses also noted that the process for approving *Halal* certification bodies in the EU remains slow and that certain EU Member States, such as Estonia and Finland, currently do not have any certification bodies recognised by Indonesia's Halal Product Assurance Organising Agency, the BPJPH. While Indonesian authorities have reportedly expressed openness to recognising the EU as a single region for *Halal* certification purposes, businesses understand that implementing such a change would require legislative changes and may, therefore, take considerable time to implement.
- Several EU businesses raised concerns regarding delays in Customs clearance. Businesses further highlighted that greater cooperation on the recognition of Authorised Economic Operator programmes, together with related Customs simplification, could facilitate trade by streamlining border procedures and accelerating the clearance of goods. Businesses emphasised the importance of ensuring that Customs and sanitary and phytosanitary (SPS) procedures remain transparent, predictable, and administratively manageable to minimise unnecessary trade disruptions and compliance costs for exporters.
- Several EU businesses identified the approval requirements for new **food additives** as a challenge. In particular, where a food additive is not specifically regulated or listed in Indonesia, Indonesia's Food and Drug Authority *BPOM* requires a special permit supported by certifications from authorities or recognised certification bodies in five different countries attesting to the additive's safety. Businesses reported that this process could be burdensome and lengthy, with approvals in some cases taking up to one year before the product could be registered and placed on the Indonesian market.

³² See <https://bvetsubang.ditjenpkh.pertanian.go.id/berita/demi-makan-bergizi-gratis-pemerintah-paksa-pengusaha-impor-sapi> (accessed 22 June 2026).

3.2 KEY STEPS FOR EU BUSINESSES

Given the range and complexity of the regulatory and procedural requirements applicable to imports of dairy products, as well as the challenges identified during stakeholder consultations, EU businesses should consider the **practical steps** set out below when intending to export dairy products to Indonesia.



The steps outline the regulatory and procedural requirements applicable throughout the **import process**, from preparing for export in the EU to completing Customs clearance and placing products on the Indonesian market.

Sections 4 to 7 of this *Guidance Handbook* set out these requirements in detail and identify practical challenges reported by EU businesses at different stages of the process, together with indicative timeframes and other relevant practical considerations, as well as indications of the trade facilitative elements of the *EU-Indonesia CEPA*.

4 STEP 1: PREPARING FOR THE EXPORT OF DAIRY PRODUCTS TO INDONESIA

Before exporting dairy products to Indonesia, EU businesses must ensure that they have completed certain procedures and obtained the approvals, authorisations, and certificates necessary to comply with Indonesia's **import and market access requirements** (see Sections 5 and 6 of this *Guidance Handbook*). EU businesses must, therefore, familiarise themselves with Indonesia's import regulatory framework and related procedures at an early stage when planning their market entry strategy.

4.1 APPROVAL AND AUTHORISATION OF DAIRY ESTABLISHMENTS

The dairy establishment in the EU must be approved by Indonesia's Ministry of Agriculture (see Section 5.1 of this *Guidance Handbook*). In order to obtain such approval, EU businesses must ensure that their **dairy establishments have been approved** by the competent authority of the relevant EU Member State (i.e., by an official government body in each EU Member State that is legally responsible for enforcing food safety and animal health rules) in accordance with *Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin*.³³ The requirements to obtain approval and authorisation of dairy establishments may differ according to the national laws of each EU Member State.

4.2 VETERINARY HEALTH CERTIFICATE

In order to export to Indonesia and, in particular, for the presentation of the goods to Indonesia's Quarantine Authority at Customs (see Section 7.4 of this *Guidance Handbook*), EU businesses must obtain a **Veterinary Health Certificate** for each consignment intended for export to Indonesia, which is issued by a competent authority in an EU Member State (as explained in Section 4.1) of the EU Member State where the approved establishment is located (e.g., in France, the *Directorate-General of Food*).³⁴ The Veterinary Health Certificate provides official assurance that the dairy products comply with the applicable EU animal health, public health, and food safety requirements and originate from an establishment approved or registered by, and subject to the supervision of, the competent authority of the relevant EU Member State. The *Veterinary Health Certificate* serves as official documentation for importation and Customs clearance in Indonesia.

To obtain a **Veterinary Health Certificate**, the competent authority in the EU Member State may require EU businesses to provide information on, *inter alia*, the following elements:³⁵

- The equipment, means of transport, premises, and other places under the EU businesses' control and surroundings;
- The animals and goods under EU businesses' control;

³³ Article 4 of *Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin*, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02004R0853-20260127> (accessed 22 June 2026).

³⁴ *Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC*, available at <https://eur-lex.europa.eu/eli/reg/2017/625/oj/eng> (accessed 22 June 2026).

³⁵ Article 15 of *Regulation (EU) 2017/625*, available at <https://eur-lex.europa.eu/eli/reg/2017/625/oj/eng> (accessed 22 June 2026).

- Their documents and any other relevant information;
- Their name and legal form; and
- The specific activities the EU business carry out.

4.3 COMPLIANCE WITH GOOD MANUFACTURING PRACTICES FOR PROCESSED FOOD

To obtain a distribution authorisation from Indonesia's Food and Drug Authority *BPOM* (see Section 6.2 of this *Guidance Handbook*), EU businesses must demonstrate that the production of their dairy products complies with *Good Manufacturing Practices* (GMP), which shall be evidenced by:

- A GMP certificate; or
- A *Hazard Analysis and Critical Control Points* (HACCP) certificate.

The GMP Certificate is issued by the relevant national competent authorities in the EU Member State (*e.g.*, the Health Products Regulatory Authority in Ireland), whereas a HACCP certificate may be issued by an independent certification body (*e.g.*, *Bureau Veritas*, a global testing, inspection, and certification company).

4.4 OBTAIN *HALAL* CERTIFICATION

From 17 October 2026, *Halal* certification will be extended to imported food and beverages, as well as to food and beverages produced by domestic micro, small, and medium enterprises. Such products, including dairy products, must be *Halal*-certified in order to be distributed and traded in Indonesia (see Section 6.8 of this *Guidance Handbook*). Accordingly, EU businesses seeking to export dairy products to Indonesia must obtain a *Halal* certificate either directly from Indonesia's Halal Product Assurance Organising Agency, the BPJPH, or through a *Halal* certification body in the EU that is recognised by the BPJPH through a Mutual Recognition Arrangement (MRA). To date, the following EU *Halal* certification bodies have been recognised by the BPJPH pursuant to an MRA:

Table 7: List of EU *Halal* Certification Bodies Recognised by the BPJPH Pursuant to an MRA (as of June 2026)

Name	Country	Scope of Competency
Halal Quality Control (HQC) Austria	Austria	Food and Beverages
Islamic Information Documentation and Certification (IIDC Austria)	Austria	Food and Beverages
Halal Food Council of Europe (HFCE) Belgium	Belgium	Food and Beverages
Halal Quality Control Group [HQC] Belgium	Belgium	Food and Beverages
Halal Quality Control [HQC] Group - Scandinavia	Denmark	Food, Beverages, Drugs/Pharmaceuticals, Cosmetics, and Chemical products
Global Halal Systems France	France	Food and Cosmetics

Halal Correct France	France	Food and Chemical products
Halal Quality Control Group (HQC) France	France	Food and Beverages
HFCE France	France	Food and Chemical products
International Halal Center SAS - France	France	Food and Beverages
Halal Control GmbH	Germany	Food and Chemical products
Halal Correct Germany	Germany	Food and Beverages
Halal Quality Control (HQC) Germany GmbH	Germany	Food and Chemical Products
IGMG-EHZ European Institute of Halal Certification	Germany	Food and Cosmetics
International Halal Center GmbH - Germany	Germany	Food and Cosmetics
Halal Quality Control (HQC) Group Ireland	Ireland	Food and Beverages
HFCE Ireland	Ireland	Food and Beverages
ISLAMIC FOUNDATION OF IRELAND	Ireland	Food and Chemical products
Halal Italia	Italy	Food and Beverages
Halal Quality Control (HQC) Italia	Italy	Food and Beverages
HFCE Italy	Italy	Food and Beverages
WHAD ITALIA -italian halal certification center	Italy	Food and Beverages
World Halal Authority (WHA)	Italy	Food, Beverages, Cosmetics, Chemical products, and Use Goods
World Halal Trust	Lithuania	Food and Beverages
Halal Feed and Food Inspection Authority (HFFIA)	The Netherlands	Food, Beverages, Drugs/Pharmaceuticals, Cosmetics, and Biological products
Halal Quality Control Netherlands	The Netherlands	Food and Beverages
Total Quality Halal Correct Certification (TQHCC)	The Netherlands	Food and Beverages
Halal Quality Control Poland	Poland	Food and Beverages
Polish Institute of Halal (PIH) (Polski Instytut Halal)	Poland	Food, Beverages, Drugs/Pharmaceuticals, and Slaughtering services
HALAL CONSULTING, S.L.	Spain	Food and Beverages
Halal Food & Quality	Spain	Food, Beverages, Drugs, Pharmaceuticals, Biological products, and Chemical products
Halal Quality Control Europe, S.L.	Spain	Food and Beverages
HFCE Halal Certification Espana, S.L	Spain	Food and Beverages
Instituto Halal (Estandar Global de Certificación Halal, S.L.)	Spain	Food, Beverages, Cosmetics, Chemical products, and Slaughtering services

A *Halal* certificate issued by any of the above certification bodies must still be **registered with the BPJPH** through the *SiHALAL* system before the relevant products may be imported, distributed, or traded in Indonesia.³⁶ Applications for the registration of foreign *Halal* certificates must be submitted separately for each product category (see Section 6.8.3 of this *Guidance Handbook*).³⁷

³⁶ Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 22 June 2026).

³⁷ Annex I to Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration, p. 5, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 29 June 2026).

5 STEP 2: COMPLYING WITH INDONESIA'S IMPORT REQUIREMENTS

Indonesia imposes a range of **regulatory requirements on the importation** and distribution of dairy products. As an initial requirement, dairy products may only be imported into Indonesia if both the exporting country and the dairy establishment have been approved by Indonesia's Ministry of Agriculture.

Once such approval has been obtained, the necessary import identification numbers, recommendations, and approvals must be obtained by an importer established in Indonesia. EU businesses may fulfil this requirement either by:

- Establishing a **legal entity** in Indonesia in the form of a *Foreign Investment Limited Liability Company* to import and distribute their own products, in accordance with the applicable laws and regulations;³⁸ or
- Appointing an **Indonesian importer or distributor** to obtain the required licences and approvals and to undertake the importation and distribution of the products in Indonesia.

5.1 COUNTRY AND ESTABLISHMENT APPROVAL

In accordance with Indonesia's *Minister of Agriculture Regulation 15/2021*,³⁹ animal products imported into Indonesia must originate from countries and specific production facilities (*i.e.*, establishments) that have been evaluated and **approved** by the *Directorate General of Livestock and Animal Health Services* within Indonesia's Ministry of Agriculture.

In general terms, the approval process involves an assessment of both the animal health status of the country of origin from which the dairy products are exported and the food safety controls implemented by the establishment seeking to export dairy products to Indonesia.

As part of this process, the animal health status of the country of origin must be determined based on official reports of the *World Organisation for Animal Health* (WOAH) and in accordance with WOAH principles. Depending on the disease concerned, these requirements may be assessed at the country, zone, compartment, or farm level:⁴⁰

- Foot and Mouth Disease-free status (at the country, zone or compartment level, with or without vaccination);
- Brucellosis- and Tuberculosis-free status (at the country level or within a disease-free zone or farm);
- Rift Valley Fever-free status (at the country level or within a disease-free zone); and

³⁸ Law No. 40 of 2007 on Limited Liability Company, available at <https://peraturan.bpk.go.id/Details/39965> (accessed 22 June 2026) and Law No. 25 of 2007 on Investment, available at <https://peraturan.bpk.go.id/Details/39903/uu-no-25-tahun-2007> (accessed 22 June 2026), as amended by Law No. 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation Law, available at <https://peraturan.bpk.go.id/Details/246523/uu-no-6-tahun-2023> (accessed 22 June 2026).

³⁹ Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector, available at <https://peraturan.bpk.go.id/Details/224954/permentan-no-15-tahun-2021> (accessed 22 June 2026).

⁴⁰ Annex to Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector, available at <https://peraturan.bpk.go.id/Details/224954/permentan-no-15-tahun-2021> (accessed 30 June 2026).

- For sheep and goat milk products, have a Peste des Petits Ruminants-Free status (at the country level or within a disease-free zone).

EU businesses seeking to export dairy products to Indonesia must obtain approval for the relevant establishment by submitting an **application** through the competent authority in the country of origin (*i.e.*, the relevant competent authority in the EU Member State where the establishment is located), which will then forward it to Indonesia's Ministry of Agriculture. In practice, the submission is often coordinated through the Agricultural Counsellor or another designated representative at the relevant EU Member State's Embassy in Indonesia, depending on the administrative arrangements of the Member State concerned.

The application must be accompanied by the following documents:

- **Cover Letter** from the representative of the EU business/exporter in the country of origin to Indonesia;
- **Country of Origin Questionnaire**, which must be completed by the competent authority of the country of origin; and
- **Business Establishment Questionnaire**, which must be completed by a technical person in charge of the establishment.

The *Country of Origin Questionnaire* must be completed with, *inter alia*, the following information:⁴¹

- Name of country;
- Administrative organisation, including name, address, and contact details of the authority responsible for animal health and veterinary public health;
- Provide a map showing, *inter alia*, administrative regions, states or district and sites of approved border for inspection posts (*i.e.*, airports, seaports, and land crossings);
- Livestock industry and trade, which includes information on, *inter alia*, livestock population by species during the past three years, production of milk by species during the past three years, and number of milk and milk products exported during the past three years;
- Structure of the country's livestock industry, including information on, *inter alia*, the animal health programmes for the livestock industry;
- Farm registration, which includes information on the system used to register livestock establishments and recording of farm registrations;
- List of relevant legislation, which includes laws related to livestock and dairy products, animal health, and veterinary public health (*e.g.*, laws on the production, processing, storage, and transport of retail milk and milk products);
- Information of the control systems maintained by the competent authority in the country, including, *inter alia*, information of the organisation and structure of veterinary systems and recruitment and training procedures of officials; and
- Animal health situation in the country, which includes information on, *inter alia*, routine of animal health controls, such as monitoring and surveillance programmes, and information on the rules applicable for vaccination against animal diseases.

⁴¹ See https://ditjenpkh.pertanian.go.id/storage/master/file/Uh2xZxqH_2_Kuesioner_Negara_Susu.pdf (accessed 22 June 2026).

If a country has already been approved by the Ministry of Agriculture, the new application for the establishment approval is assessed solely at the establishment level.

The *Business Establishment Questionnaire*⁴² must be accompanied by supporting information and documents related to the food safety assurance system, notably:

- List of the sources of raw materials used in the processing of the dairy product;
- List of countries to which the establishment has exported their dairy products, including export volumes and copies of *Veterinary Health Certificates*;
- Layout of the dairy establishment;
- Number of veterinarians employed by the establishment;
- Annual water examination result;
- Layout map indicating the location of mouse traps;
- Picture, quantity, and size details of the facilities in the establishment, such as toilets, locker, changing rooms, and disposable towel and hand disinfectant;
- Flowchart of the production process of the dairy product;
- *Food Safety Certificate* from the country of origin;
- Detailed information on the control process, and Critical Control Point and/or Operational Prerequisite Program;
- The establishment's pest control programme; and
- Contact person of the establishment.

The documents may be submitted either in Bahasa Indonesia or in English language.

Following the submission of the application, Indonesia's Ministry of Agriculture conducts the following assessments for the establishment approval:

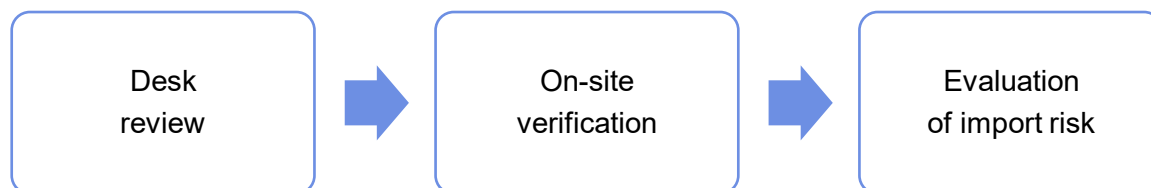
- Document review (**desk review**) of the submitted questionnaires and documents. The desk review is conducted by a document assessment team consisting of representatives from the *Directorate General of Livestock and Animal Health Services*, the *Agricultural Quarantine Agency*, and the *Expert Commission of Animal Health, Veterinary Public Health, and Animal Quarantine*. The team is required to complete its review within **six months** after the application was first received. For establishment approval, Indonesia's Ministry of Agriculture is required to carry out the desk review within six months of receiving the application and confirmation of payment of the applicable fee. The fee for the approval establishments is IDR 15,650,000 (EUR 758) per application.⁴³
- If the submitted documents are found to be complete, accurate, and compliant with the applicable requirements, the approval process will proceed to the **on-site verification** of the food safety assurance system at the establishment. The results of the on-site verification will

⁴² See https://ditjenpkh.pertanian.go.id/storage/master/file/HX1ksq6a_3_kuesioner_unit_usaha_Milk_and_milk_products.pdf (accessed 22 June 2026).

⁴³ Annex to Government Regulation No. 28 of 2023 on Types and Tariffs for Types of Non-Tax State Revenue Applicable to the Ministry of Agriculture, available at <https://peraturan.bpk.go.id/Details/249828/pp-no-28-tahun-2023> (accessed 22 June 2026).

be communicated by the *Directorate General of Livestock and Animal Health* and the *Expert Commission on Animal Health, Veterinary Public Health, and Animal Quarantine* to the competent authority of the country of origin; and

- An **import risk assessment** is conducted by the document review team and the on-site verification assessment team to determine whether the country and establishment satisfy Indonesia's animal health and food safety standards for import. The import risk assessment is based on the results of the **on-site verification**. The assessment must be conducted no later than 12 months after the *Directorate General of Livestock and Animal Health Services* receives the on-site review result from the field verification evaluation team.



In practice, the country and establishment **approval process often takes significantly longer than the statutory timelines**. EU businesses have reported that obtaining approval may take several years due to the lengthy desk reviews and delays in scheduling on-site inspections. According to stakeholders, Indonesia's Ministry of Agriculture conducts document assessments only during three review cycles each year, which may contribute to delays in the approval process. In some cases, the desk review has reportedly taken up to three years to complete, while the scheduling of an on-site inspection has required an additional one to two years. Additionally, there appears to be a lack of approvals granted to new dairy establishments in recent years. Applicants should also note that Indonesia's Ministry of Agriculture requires prompt payment of the application fee (*i.e.*, within 5 days) following the desk review (see Section 3.1 of this *Guidance Handbook*).

Once the establishment has been approved, the establishment must ensure compliance with the following requirements when exporting to Indonesia:

- Be under the supervision of, and registered as an exporting business unit by, the veterinary authority of the country of origin;
- Not accept animals and/or process animal products originating from countries affected by contagious animal diseases. This requirement should be read together with the country-of-origin disease status requirements described above;
- Apply a food safety assurance system in accordance with international standards, as evidenced by a food safety assurance system certificate issued by an internationally recognised competent authority;
- Not source raw materials from countries or business units that have not been approved by Indonesia's Minister of Agriculture.

Indonesia's *Veterinary Public Health* is tasked to conduct a review of the establishments at least every six months or at any time if non-compliance is suspected. This includes checking documents, such as veterinary and *Halal* certificates, inspecting packaging and labelling (*e.g.* product name, producer, production and expiry dates, product type), and reviewing storage and transport conditions to ensure hygiene, proper temperature control, and separation of *halal* and non-*halal* products.⁴⁴ In practice, EU

⁴⁴ Annex to Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector, available at <https://peraturan.bpk.go.id/Details/224954/permentan-no-15-tahun-2021> (accessed 22 June 2026).

businesses noted that Indonesia's Ministry of Agriculture generally carries out document reviews on a quarterly basis (*i.e.*, every three months).

Currently, Indonesia's Ministry of Agriculture does not publicly make available a list of countries and establishments approved to export dairy products to Indonesia. Only establishments producing meat products are publicly listed.⁴⁵

The practical challenges associated with the country and establishment approval, particularly the lengthy process and limited transparency, are specifically addressed in the *EU-Indonesia CEPA*. In particular, **Article 6.8** of the CEPA on "*Procedure for Listing of Establishment or Facilities*" seeks to enhance the transparency, predictability, and efficiency of approval procedures by establishing a 60-day timeframe for the processing of listing requests, requiring the importing Party to: 1) Provide reasons for any refusal; 2) Permit approval without a prior on-site inspection in certain circumstances; and 3) Require approved establishments to be publicly listed (see Section 8.3 of this *Guidance Handbook*).

The box below summarises key information relating to country and establishment approval:

Country and Establishment Approval

- **Relevant Ministry/Government Agency:** Ministry of Agriculture
- **Validity of the Country and Establishment Approval:** There is no fixed validity period for the approval. Once the country and establishment have been approved and registered, the approval remains effective unless suspended, revoked, withdrawn, or otherwise subject to review
- **Renewal:** Not necessary since the country and establishment approval is valid indefinitely unless suspended, revoked, withdrawn, or otherwise subject to review
- **Processing time of the Country and Establishment Approval:** 21 months
- **Practical considerations:** Country and establishment approval is generally regarded as the most burdensome and time-consuming regulatory requirement for exporting dairy products to Indonesia. In practice, the desk review has reportedly taken up to three years to complete, while the scheduling of an on-site inspection has required an additional one to two years. Where a dairy establishment in the exporting country has not previously been approved by Indonesia's Ministry of Agriculture, procuring establishment approval may result in significant additional delays prior to market access. In addition, the lack of transparency regarding the business units or establishments that have been approved may make it more difficult for exporters to identify eligible suppliers and source raw materials
- **Relevance of the *EU-Indonesia CEPA*:** Article 6.8 of the Agreement on "*Procedure for Listing Establishment of Facilities*" seeks to enhance the transparency, predictability, and efficiency of approval procedures by establishing a 60-day timeframe for the processing of listing requests, requiring the importing Party to, *inter alia*, provide reasons for any refusal and requiring approved establishments to be publicly listed (see Section 8.1 of this *Guidance Handbook*)

⁴⁵ Only establishments producing meat products are publicly listed. See <https://ditjenpkh.pertanian.go.id/informasi/daftar-unit-usaha-asal-pemasukan-produk-hewan-yang-telah-disetujui> (accessed 22 June 2026).

5.2 BUSINESS IDENTIFICATION NUMBER / IMPORT IDENTIFICATION NUMBER

To import goods into Indonesia, EU businesses in Indonesia or their appointed Indonesian importer (referred to as the importer) must first obtain a *Business Identification Number* (i.e., *Nomor Induk Berusaha*, NIB), which also serves as the *Importer Identification Number* (i.e., *Angka Pengenal Importir*, API).

The NIB is a 13-digit number that serves as proof of a business' official identification for conducting business activities.⁴⁶ It serves as proof of a business's legal registration and automatically confers importer status. The possession of an API is a prerequisite for obtaining an *Import Approval* from Indonesia's Ministry of Trade (see Section 5.4 of this *Guidance Handbook*).

A business may hold only one type of API. Depending on the nature of the business activities, the **applicable API** may be either:

- A *General Importer Identification Number* (i.e., *API Umum*, API-U), granted to business entities that import certain goods for the purpose of trading, selling, or transferring such goods; or
- A *Producer Import Identification Number* (i.e., *API Produsen*, API-P), granted to business entities that import certain goods for their own use as capital goods, raw materials, auxiliary materials, and/or materials to support the production process.

To obtain a NIB, importers must submit the required **information** through Indonesia's *Online Single Submission* (OSS) system, including, *inter alia*:

- The appropriate business sector classification under the *Indonesian Standard Industrial Classification* (i.e., *Klasifikasi Baku Lapangan Usaha Indonesia*, **KBLI**). For example, KBLI 1050 applies to dairy manufacturing activities, while KBLI 46326 applies to the wholesale trade of milk and dairy products;⁴⁷
- Location of the company; and
- Company information, including the amount of its business capital.

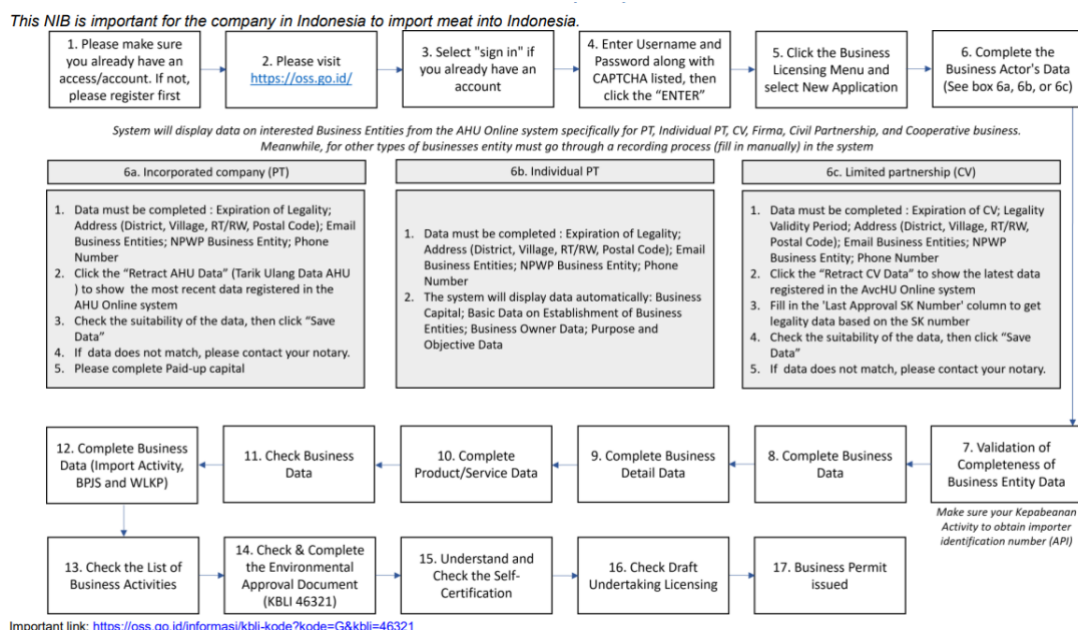
The official guide to obtaining a NIB through the OSS system, including the information to be submitted, is provided in **Annex III** of this *Guidance Handbook*.⁴⁸

⁴⁶ Article 1(14) of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

⁴⁷ See https://web-api.bps.go.id/download.php?f=cn+CjLkNNXsrkA58jeC+RjFaZW1KbklURGIocFJFTVdZY1dudVVGc2ZQb3BjdVVqcUNiOWVIYVNSQjh3b0FlcFBFbGJhVTI2eUY3ejF2VDNGaE1nQklvNXEvZy9Ldk9vWUxRVzRDdCt4RU9NMU8wNTJibGxQeDZyVG45b0J6amYwMWZKcnBjbFRpL1RlaGh1cmErOTlndmtJeTBSTStqYzVDQm5aYzZmZejJYTEQwKys0V09aNGM2K1dsYmdCdEdwWUy5emJ0TXpJaFFyS3BMSDdFaEQwZzFGOVkvK0FSQVpZNUUxQnNDTIIEOEIPbEQ2djcxYm1lSnp5OVlrajZDdDQ2Rm5obTQzU3FJZjJNanZleXk3Mm4zejBrYnBDK2tZYU5lVkdnpT0=&_gl=1*ln20up*_ga*NTkzMjQ1MjI2LjE3NzcwMTM1MzY.*_ga_XXTTVXWHDB*czE3NzcwNzNzNzkkbzlkZzAkdDE3NzcwNzNzNzkkajYwJGwwJGgw (accessed 22 June 2026).

⁴⁸ OSS, *Guide to NIB Registration*, available at <https://oss.go.id/en/panduan/676a8758cde449ca8bf75911> (accessed 22 June 2026).

Image 1: Obtaining an NIB through the OSS System⁴⁹



The box below summarises key information relating to the Business Identification Number and Importer Identification Number:

Business Identification Number (NIB) and Importer Identification Number (API)

- **Relevant Ministry/Government Agency:** Ministry of Investment/Indonesia Investment Coordinating Board
- **Validity of the NIB:** Indefinitely, or for as long as the business remains actively operational in Indonesia
- **Renewal:** Not necessary since the NIB is valid indefinitely
- **Processing time of the NIB:** 1 to 2 working days

5.3 TECHNICAL RECOMMENDATION

In accordance with Indonesia's *Minister of Trade Regulation 16/2025*, importers of dairy products must obtain a **Technical Recommendation** from Indonesia's Ministry of Agriculture as part of the process for securing an *Import Approval* from Indonesia's Ministry of Trade.⁵⁰

Importers seeking a *Technical Recommendation* must submit an **application** through the OSS system to the Head of the *Centre for Plant Variety Protection and Agricultural Licensing* of Indonesia's Ministry of Agriculture.⁵¹ The application must be accompanied by the following documents:

⁴⁹ EU-ASIA Cooperation on SPS, *Guideline on requirements for the importation of meat and meat products into Indonesia EU Asia Cooperation on (Phyto-) Sanitary (SPS) and Food Safety Regulation*, available at <https://www.eu-asia-sps.com/images/guides/Indonesia/Indonesia - Guide - Importing Meat and Processed Meat.pdf>, p. 20 (accessed 22 June 2026).

⁵⁰ See <https://kabarbisnis.com/read/28127263/kemendag-ogah-beri-izin-impor-susu-tanpa-rekometek-kementan> (accessed 22 June 2026).

⁵¹ See https://bpmsph.ditjenpkh.pertanian.go.id/storage/master/file/YEQRYqIF_PERMENTAN-15-2021-SS_Kesmavet.pdf (accessed 22 June 2026).

- *Application Letter* (see Annex IV of this *Guidance Handbook*);
- NIB / API;
- Stamped *Statement Letter* confirming control/ownership of the storage facility, accompanied by supporting documentary evidence;
- *Veterinary Control Number* (i.e., *Nomor Kontrol Veteriner*, NKV) and assessment results for the storage facility located in Indonesia. An NKV is an official certificate evidencing that a business unit producing or storing animal products complies with the applicable hygiene, sanitation, and food safety standards;
- *Halal* certificate. Mandatory *Halal* certification requirements for dairy products will take effect on 17 October 2026 (see Section 6.8 of this *Guidance Handbook*);
- *Certificate of Analysis* (i.e., an official document confirming that a food or beverage product has met specific quality, safety, and regulatory standards)⁵² issued by an accredited laboratory in the country of origin;
- *Certificate of Origin* from the previous importation or a stamped statement letter if importing for the first time;
- *Veterinary Certificate* of the dairy product issued by the competent authority of the country of origin from the previous importation, or a stamped statement letter if importing for the first time;
- Stamped *Statement Letter* declaring that the applicant is not currently subject to legal issues related to the recommendation and/or import permit of the dairy product; and
- Stamped *Statement Letter* declaring that the submitted documents are true and valid.

Applications are assessed jointly by Indonesia's *Centre for Plant Variety Protection and Agricultural Licensing* and Indonesia's Technical Team of the *Directorate General of Livestock and Animal Health Services*, both bodies are established under Indonesia's Ministry of Agriculture.

In practice, EU businesses have reported already being requested to provide *Halal* certificates as part of the application process, despite *Halal* certification not yet being mandatory in Indonesia. However, in some cases, Indonesia's Ministry of Agriculture has reportedly accepted a letter confirming the business's commitment to comply with the *Halal* certification requirement once it becomes applicable. In addition, one EU business reported that, in 2025, its application for a *Technical Recommendation* was made conditional upon the submission of a letter of commitment to import live cattle into Indonesia. Such a requirement does not appear to be provided for under the applicable legal framework (see Section 2.1 of this *Guidance Handbook*).

A *Technical Recommendation* is **valid for six months** from the date of issuance and cannot be renewed. Importers must apply for an *Import Approval* within three months from the date of issuance of the *Technical Recommendation*. If no application to the Ministry of Trade is submitted within this period, the *Technical Recommendation* will lapse and will become invalid. Each *Technical Recommendation* may only be used for a single application for an *Import Approval*.

EU businesses must ensure that the *Technical Recommendation* number is clearly stated in the ***Veterinary Health Certificate*** accompanying the product in each shipment.

Each *Technical Recommendation* contains at least the following information:

⁵² See <https://www.ecisolutions.com/blog/manufacturing/deacom-erp-software/what-is-a-certificate-of-analysis/> (accessed 22 June 2026).

- Recommendation number;
- Recommendation validity period;
- Name, tax identity number, and address of the business;
- Address of the storage facility;
- Number and application date;
- Country of origin;
- Name and number of the establishment;
- HS code and product description, including each HS code's amount in kilogram (kg);
- Technical requirement from the *Veterinary Public Health*;
- Port of entry; and
- The product's intended use.

The box below summarises key details relating to the *Technical Recommendation*:

Technical Recommendation
• Relevant Ministry/Government Agency: Ministry of Agriculture • Validity of the <i>Technical Recommendation</i>: 6 months after the date of issuance • Renewal: No renewal, so importers would need to re-apply • Processing time of the <i>Technical Recommendation</i>: Not specified • Practical considerations: EU businesses have reported being requested to provide <i>Halal</i> certificates as part of the application process, despite <i>Halal</i> certification not yet being mandatory in Indonesia. One EU business also reported that, in 2025, its application for a <i>Technical Recommendation</i> was made conditional upon the submission of a letter of commitment to import live cattle into Indonesia

5.4 IMPORT APPROVAL

In accordance with Indonesia's *Minister of Trade Regulation 11/2026*, which governs the imports of animal products,⁵³ importers of dairy products must obtain an **Import Approval** from the Ministry of Trade.⁵⁴

Following the issuance of the *Technical Recommendation*, importers may apply for an *Import Approval* through the *Indonesian National Single Window* (INSW) and submit the relevant documents, namely:

⁵⁴ Article 1(20) of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

- NIB / API;
- Identify and data of the importer;⁵⁵ and
- Taxpayer status in Indonesia.⁵⁶

The *Import Approval* is typically processed by Indonesia's Ministry of Trade within five days.⁵⁷ The *Import Approval* remains valid for six months from the date of issuance.

If dairy products are shipped before the expiry of the *Import Approval* but are expected to arrive in Indonesia after the *Import Approval* has expired, the importer may apply to Indonesia's Ministry of Trade for an extension by submitting the following documents:

- The *Import Approval* issued by the Ministry of Trade;
- A ***Statement of Absolute Responsibility*** from the importer explaining that:
 - The goods had been loaded onto the means of transport before the expiry of the *Import Approval*; and
 - The reasons for the delay in the arrival of the goods; and
- The ***Bill of Lading*** or ***Air Waybill***, evidencing that the goods had been loaded onto the means of transport.⁵⁸

The *Import Approval* contains the following information:⁵⁹

- *Import Approval* number and date of issuance;
- NIB and identity of the importer;
- Tariff classification/HS code;
- Serial number of the good;
- Type/description of the good;
- The quantity of the good and unit of measurement;
- Country of origin; and
- Validity period of the *Import Approval*.

Indonesia's Commodity Balance

⁵⁵ Article 13 of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

⁵⁶ Article 9 of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

⁵⁷ Article 12(2) of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

⁵⁸ Annex I of *Minister of Trade Regulation No. 11 of 2026 on Policies and Regulations Governing the Importation of Agricultural and Livestock Product*, available at <https://jdih.kemendag.go.id/peraturan/peraturan-menteri-perdagangan-republik-indonesia-nomor-11-tahun-2026-tentang-perubahan-kedua-atas-peraturan-menteri-perdagangan-nomor-18-tahun-2025-tentang-kebijakan-dan-pengaturan-impor-barang-pertanian-dan-peternakan> (accessed 22 June 2026).

⁵⁹ Article 14 of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 22 June 2026).

Pursuant to *Presidential Regulation No. 61 of 2024 on Commodity Balance*, as amended by *Presidential Regulation No. 7 of 2025*,⁶⁰ Indonesia maintains a “**Commodity Balance**”,⁶¹ which is a centralised national mechanism used by the Government of Indonesia to manage and control the importation of strategic commodities based on domestic supply and demand. The *Commodity Balance* is prepared annually through a reconciliation of national production and consumption data, typically completed by December of each year, and serves as the basis for determining import allocations and approvals.⁶² Agricultural products currently subject to the *Commodity Balance* are rice, sugar, meat (e.g., beef), shallots, garlic, chilli, and soybeans.⁶³

Dairy products are **currently excluded** from the **Commodity Balance**. However, if they were to become subject to the regime in the future, the Government could determine import allocations based on domestic supply and demand, thereby affecting both the quantity and timing of dairy imports. Importers could also be required to obtain an import allocation under the *Commodity Balance* mechanism before applying for an *Import Approval* from Indonesia's Ministry of Trade.⁶⁴

In such a case, importers would be required to provide the following additional information:

- An import plan detailing the volume, relevant HS code, and technical information of the good;
- Import realisation of the previous year;
- Production plan (i.e., projection of the amount of goods that the company intends to manufacture during the relevant period);
- Domestic sales in Indonesia; and
- Production capacity.

This information must be submitted through the *National Commodity Balance System* (i.e., **Sistem Nasional Neraca Komoditas**) online platform, a sub-system of the *INSW*.⁶⁵

In practice, obtaining an *Import Approval* is generally regarded as a straightforward process. EU businesses have reported that, once a *Technical Recommendation* has been obtained, the issuance of an *Import Approval* is largely automated and can be monitored through the relevant online system.

The **EU-Indonesia CEPA** guarantees a number of procedural safeguards in relation to import licensing procedures. In particular, **Article 2.12** of the Agreement on “*Import Licensing Procedures*” requires import licensing procedures to be administered in a fair, non-discriminatory, and transparent manner, including through the publication of the relevant licensing requirements and procedures. These disciplines are intended to provide greater transparency for businesses seeking import approvals (see Section 8.2 of this *Guidance Handbook*).

The box below summarises key information relating to the *Import Approval*:

⁶⁰ *Presidential Regulation No. 7 of 2025 on Amendment to Presidential Regulation No. 61 of 2024 on Commodity Balance*, available at <https://peraturan.bpk.go.id/Details/314634/perpres-no-7-tahun-2025> (accessed 22 June 2026).

⁶¹ Article 9 of *Minister of Trade Regulation No. 11 of 2026 on the Second Amendment to Minister of Trade Regulation No. 18 of 2025 on Policies and Regulations on Imports of Agricultural and Livestock Goods*, available at <https://jdih.kemendag.go.id/peraturan/peraturan-menteri-perdagangan-republik-indonesia-nomor-11-tahun-2026-tentang-perubahan-kedua-atas-peraturan-menteri-perdagangan-nomor-18-tahun-2025-tentang-kebijakan-dan-pengaturan-impor-barang-pertanian-dan-peternakan> (accessed 22 June 2026).

⁶² See [https://www.fratinivergano.eu/static/upload/1/1/21.09_12_TP_Issue_16-2021_\(for_circulation\).pdf](https://www.fratinivergano.eu/static/upload/1/1/21.09_12_TP_Issue_16-2021_(for_circulation).pdf) and https://c95e5d29-0df6-4d6f-8801-1d6926c32107.usrfiles.com/ugd/c95e5d_7735b11428c94102a3ff186b55058b2a.pdf (accessed 22 June 2026).

⁶³ See <https://www.transcon-indonesia.com/id/blog/kebijakan-neraca-komoditas-beri-kemudahan-transparansi-dan-akselerasi-perizinan-ekspor-dan-impor> (accessed 22 June 2026).

⁶⁴ *Presidential Regulation No. 61 of 2024 on Commodity Balance*, available at <https://peraturan.bpk.go.id/Details/286317/perpres-no-61-tahun-2024> (accessed 27 May 2026), as amended by *Presidential Regulation No. 7 of 2025 on Amendment to Presidential Regulation No. 61 of 2024*, available at <https://peraturan.bpk.go.id/Details/314634/perpres-no-7-tahun-2025> (accessed 22 June 2026).

⁶⁵ See https://c95e5d29-0df6-4d6f-8801-1d6926c32107.usrfiles.com/ugd/c95e5d_7735b11428c94102a3ff186b55058b2a.pdf (accessed 22 June 2026).

Import Approval

- **Relevant Ministry/Government Agency:** Ministry of Trade
- **Validity of the *Import Approval*:** 6 months after the date of issuance
- **Renewal:** No renewal, importers need to re-apply
- **Processing time of the *Import Approval*:** 5 days
- **Practical considerations:** While dairy products are not currently subject to the *Commodity Balance*, EU businesses should monitor relevant regulatory and policy developments. In recent years, Indonesia has increasingly linked dairy imports to broader policy objectives aimed at strengthening domestic dairy production, including local milk absorption programmes, commitments to import dairy cattle, and initiatives to increase the use of domestically produced fresh milk (see Section 2.1 of this *Guidance Handbook*). As a result, importers may face additional policy-driven conditions in practice, even in the absence of formal *Commodity Balance* requirements⁶⁶
- **Relevance of the *EU-Indonesia CEPA*:** Article 2.12 of the Agreement on “*Import Licensing Procedures*” requires import licencing procedures to be administered in a fair, non-discriminatory, and transparent manner, including through the publication of the relevant licencing requirements and procedures. These disciplines are intended to provide greater transparency for businesses seeking import approvals (see Section 8.2 of this *Guidance Handbook*)

5.5 COMPLEMENTARY GOODS CERTIFICATE

API-P holders importing dairy products as complementary goods (*i.e.*, goods imported to complement, support, complete, or be used together with the importer’s main industrial products or production activities) must obtain a **Complementary Goods Certificate** from Indonesia’s Ministry of Trade.

As stipulated in *Minister of Trade Regulation 16/2025*,⁶⁷ imports of complementary goods are allowed only where the dairy products are used in the importer’s own business activities, particularly for industrial or operational purposes, in the following sectors:⁶⁸

⁶⁶ See <https://bvetsubang.ditjenpkh.pertanian.go.id/berita/demi-makan-bergizi-gratis-pemerintah-paksa-pengusaha-impor-sapi> (accessed 22 June 2026).

⁶⁷ Annex II of *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 1 June 2026).

⁶⁸ Annex to *Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations*, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 25 May 2026).



Applications for a *Complementary Goods Certificate* must be submitted through the *INSW*. In order to obtain the certificate, importers must:

- Hold a valid industrial business permit from Indonesia's Ministry of Industry; or
- Hold a business licence based on the level of risk associated with the business activities.⁶⁹ For imports of dairy products, which are classified as a "*high-risk*" business activity, this includes an NIB and an *Import Approval*.

Businesses must then:

- Provide proof of a relationship with an overseas company (*i.e.*, evidence demonstrating that the importer and exporter are related Parties, such as through ownership, corporate affiliation, or the existence of a commercial relationship); and
- Submit an import plan for one calendar year setting out the proposed imports for a one-year period, including the type of goods, quantity, country of origin, and destination port.⁷⁰

The box below summarises key information relating to the *Complementary Goods Certificate*:

Complementary Goods Certificate	
•	Relevant Ministry/Government Agency: Ministry of Trade
•	Validity of the <i>Complementary Goods Certificate</i>: 1 year
•	Renewal: No renewal, importers will need to re-apply
•	Processing time of the <i>Complementary Goods Certificate</i>: Not specified under <i>Minister of Trade Regulation 16/2025</i> ⁷¹

⁶⁹ Government Regulation No. 28 of 2025 on the Implementation of Risk-Based Business Licensing, available at <https://peraturan.bpk.go.id/Details/319773/pp-no-28-tahun-2025> (accessed 1 June 2026).

⁷⁰ Annex II B to Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 25 May 2026).

⁷¹ Article 55 of Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations, available at <https://peraturan.bpk.go.id/Details/323106/permendag-no-16-tahun-2025> (accessed 3 June 2026).

6 STEP 3: COMPLYING WITH INDONESIA'S MARKET ACCESS REQUIREMENTS FOR DAIRY PRODUCTS

In addition to the applicable import requirements, EU businesses must ensure that their dairy products comply with Indonesia's **product-specific regulatory and market requirements**, including those relating to, *inter alia*, product registration, food safety, labelling, and *Halal* certification.

6.1 PRODUCT REGISTRATION REQUIREMENT

Pursuant to *Minister of Agriculture Regulation 15/2021*, imported animal products must be registered with Indonesia's Ministry of Agriculture. Upon registration, the Ministry will issue an *Animal Product Registration Number*, which must be displayed on the packaging of the dairy product.⁷²

To apply for the registration, importers must submit the following documents:⁷³

- *Application Letter*;
- NIB;
- Proof of identity, which may consist of the *Identity Card*, passport of the company director, or authorisation from the company director;
- *Taxpayer Identification Number*;
- Company profile;
- *Deed of Establishment* of the company and its latest amendment;
- *Recommendation Letter* for the importation of animal products; and
- *Statement Letter* confirming that the submitted documents are true and accurate;
- Proof that the dairy product comply with the safety and quality requirements for animal products in the country of origin, as evidenced by:
 - An *Animal Product Health Certificate*;
 - A copy of the *Certificate of Origin*;
 - A copy of the *Certificate of Analysis*; and
- Copy of the *Halal* Certificate. Dairy products must be certified as *Halal* by 17 October 2026 (see Section 6.8 of this *Guidance Handbook*).

⁷² Annex to *Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector*, available at https://bpmsph.ditjenpkh.pertanian.go.id/storage/master/file/YEQRYglF_PERMENTAN-15-2021-SS_Kesmavet.pdf (accessed 22 June 2026).

⁷³ Annex to *Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector*, available at https://bpmsph.ditjenpkh.pertanian.go.id/storage/master/file/YEQRYglF_PERMENTAN-15-2021-SS_Kesmavet.pdf (accessed 22 June 2026).

The application must indicate the **Veterinary Control Number** (*i.e.*, *Nomor Kontrol Veteriner*, **NKV**), which must be obtained by the importer from the relevant regional *Veterinary Authority* (*i.e.*, the regional livestock and animal health office) in Indonesia. The NKV is a veterinary hygiene and sanitation certification required for facilities that handle products of animal origin located in Indonesia. The requirement applies to facilities used by the importer or distributor for the storage, handling, processing, or distribution of imported animal products, including cold storage facilities, warehouses, and processing facilities. The certificate confirms that the relevant facilities comply with the veterinary public health requirements imposed by the Ministry of Agriculture.

NKV certificates are classified into three levels:

- Level 1: Indicating excellent compliance;
- Level 2: Indicating good compliance; and
- Level 3: Indicating adequate compliance.

The box below summarises key information relating to the *Animal Product Registration Number*:

Animal Product Registration Number	
•	Relevant Ministry/Government Agency: Ministry of Agriculture
•	Validity of the <i>Animal Product Registration Number</i>: Five years from the date of issuance
•	Renewal: No renewal, importers will need to re-apply
•	Processing time of the <i>Animal Product Registration Number</i>: Not specified
•	Practical consideration: It appears that, in certain circumstances, a <i>Certificate of Free Sale</i> may be accepted as an alternative to an <i>Animal Product Health Certificate</i> as evidence that the dairy product complies with the safety and quality requirements for animal products in the country of origin and that the establishment manufacturing the products is subject to regular inspections by the competent authorities

6.2 PRODUCT REGISTRATION NUMBER

Under *BPOM Regulation 30/2017*,⁷⁴ as most recently amended by *BPOM Regulation 15/2020*,⁷⁵ processed food products, including dairy products sold in retail packaging, must obtain a **Business Licence for Supporting Business Activities** (*i.e.*, *Perizinan Berusaha untuk Menunjang Kegiatan Usaha*, PB-UMKU) issued by the Head of BPOM.⁷⁶ The PB-UMKU is also a prerequisite for obtaining a BPOM product registration number (*i.e.*, *Makanan Luar* (ML) Number), which authorises the product to be distributed in Indonesia.

⁷⁴ Article 2 of *BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia*, available at <https://peraturan.bpk.go.id/Details/220393/peraturan-bpom-no-30-tahun-2017> (accessed 22 June 2026).

⁷⁵ *BPOM Regulation No. 15 of 2020 on Amendment to BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia*, available at <https://peraturan.bpk.go.id/Details/181779/peraturan-bpom-no-15-tahun-2020> (accessed 22 June 2026).

⁷⁶ Articles 3 and 5 of *BPOM Regulation No. 23 of 2023 on Processed Food Registration*, available at https://standarpangan.pom.go.id/oldspo/dokumen/peraturan/lain-lain/Peraturan_Badan_Pengawas_Obat_dan_Makanan_Nomor_23_Tahun_2023_tentang_Registrasi_Pangan_Olahan.pdf (accessed 22 June 2026).

To obtain the PB-UMKU licence, importers must:⁷⁷

- Hold an *Import Approval* from the Ministry of Trade (see Section 5.4 of this *Guidance Handbook*);
- Hold a *Letter of Appointment* in the form of an agreement letter from the company in the country of origin; and
- Implement the Food Safety Management System.

Applications for the PB-UMKU must be submitted through BPOM's website.⁷⁸

When applying for a PB-UMKU, manufacturers of processed dairy products must ensure that they have complied with GMP requirements in the country of origin. Compliance must be evidenced by:⁷⁹

- A *GMP Certificate* issued by the relevant competent authority in the EU Member State;
- A *Hazard Analysis and Critical Control Points Certificate* from accredited certification bodies;
- Equivalent certificates to the *GMP Certificate* or a *Hazard Analysis and Critical Control Points* certificate issued by an authorised or accredited institution; and/or
- Audit results from the local government in Indonesia (*i.e.*, sub-national authorities at provincial and/or district/city level).

Where necessary to verify compliance with GMP requirements, BPOM may conduct on-site inspections.

The PB-UMKU is valid for five years.

Once the PB-UMKU licence has been issued, importers may register their products through BPOM's electronic registration system, which is integrated with Indonesia's OSS system. Following BPOM's evaluation of the application, the product will be assigned an **ML Number**, which authorises the product to be marketed and distributed in Indonesia. The *ML number* must be displayed on the product packaging.

The following information and supporting documents must be submitted to **register** the dairy product:

- Information on the product's ingredient list;
- Product label artwork (*i.e.*, proposed packaging and label design);
- Health Certificate; and
- Manufacturing information and quality of documentation (*e.g.*, GMP certificate).

BPOM processes the product registration within approximately 14 days to 8 weeks, and once approved, BPOM issues the relevant *ML number*. In practice, EU businesses reported that the process from the submission of an application to the issuance of an ML number typically takes approximately six months.

⁷⁷ Article 9 of *BPOM Regulation No. 23 of 2023 on Processed Food Registration*, available at https://standarpangan.pom.go.id/oldspo/dokumen/peraturan/lain-lain/Peraturan_Badan_Pengawas_Obat_dan_Makanan_Nomor_23_Tahun_2023_tentang_Registrasi_Pangan_Olahan.pdf (accessed 22 June 2026).

⁷⁸ See <https://e-reg.pom.go.id> (accessed 22 June 2026).

⁷⁹ Article 12 of *BPOM Regulation No. 23 of 2023 on Processed Food Registration*, available at https://standarpangan.pom.go.id/oldspo/dokumen/peraturan/lain-lain/Peraturan_Badan_Pengawas_Obat_dan_Makanan_Nomor_23_Tahun_2023_tentang_Registrasi_Pangan_Olahan.pdf (accessed 22 June 2026).

For products bearing nutritional, health, or other marketing claims, the process may take up to twelve months (see Section 6.4 of this *Guidance Handbook*).

The box below summarises key information relating to the Business Licence for Supporting Business Activities (PB-UMKU):

Business Licence for Supporting Business Activities (PB-UMKU)

- **Relevant Ministry/Government Agency:** BPOM
- **Validity of the PB-UMKU:** Five years after the date of issuance
- **Processing time of the PB-UMKU:** 1 to 7 days
- **Renewal of the PB-UMKU:** Renewal of PB-UMKU must be done through the BPOM website by selecting the “*renewal registration (registrasi ulang)*” option on the website. The application can only be filed no earlier than 6 months and no later than 10 calendar days before the expiry of the PB-UMKU licence
- **Processing time of the *ML number*:** Approximately 14 days to 8 weeks
- **Practical considerations:** EU businesses reported that the process from the submission of an application to the issuance of an *ML number* typically takes approximately six months. For products bearing nutritional, health, or other marketing claims, the process may take up to twelve months (see Section 6.4 of this *Guidance Handbook*)

6.3 FOOD SAFETY REQUIREMENTS

EU businesses must ensure that their dairy products comply with the applicable food safety requirements administered by Indonesia’s Food and Drug Authority *BPOM*, Indonesia’s Ministry of Health, and Indonesia’s Ministry of Agriculture.

6.3.1 COMPOSITIONAL REQUIREMENTS FOR DAIRY PRODUCTS

BPOM Regulation 13/2023 details the compositional requirements applicable to processed dairy products marketed in Indonesia.⁸⁰ These include, *inter alia*, full cream milk, cream analogues, and ripened cheese.

For example, full cream milk must contain:

- Milk fat content: not less than 3%;
- Total milk solids non-fat: not less than 7.8%; and
- Protein content: not less than 2.7%.

⁸⁰ *BPOM Regulation No. 13 of 2023 on Food Category*, available at <https://jdih.pom.go.id/download/rule/1492/13/2023/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2013%20Tahun%202023%20tentang%20Kategori%20Pangan> (accessed 22 June 2026).

The Regulation also prescribes compositional requirements for ripened cheese, including cheese in brine. Cheese in brine is defined as a semi-hard to soft ripened cheese, white to yellowish in colour, with a compact texture and no rind, which is matured and/or stored in brine until ready for consumption.

The full list of compositional requirements is provided in **Annex V** to this *Guidance Handbook*.

6.3.2 VETERINARY DRUG RESIDUES

Indonesia's *Minister of Agriculture Regulation 14/2017* regulates the definition, classification, and use of veterinary medicinal products based on their risk level.⁸¹ Annex III to the Regulation lists the **veterinary drugs** that are prohibited for use in livestock intended for human consumption:

Table 8: List of Veterinary Medicinal Products Prohibited for Use in Livestock Whose Products Are Intended for Human Consumption

Veterinary Medicinal Product Description	
Group of Veterinary Medicinal Products Prohibited for Use as Feed Additives in Feed for Production Livestock	Antibiotics
Group of Certain Hormonal Veterinary Medicinal Products Prohibited for Production Livestock	Synthetic Hormones
Group of Certain Veterinary Medicinal Products That are Prohibited	a. Prohibited from Being Mixed into Feed as Feed Additives 1. Argentum Proteinat (Colloidal Silver) 2. Lysergic Acid Diethylamide (LSD) 3. Dimetridazole 4. Dipyrone 5. Phenylbutazone 6. Colorants: Gentian Violet, Rhodamine, Methyl Yellow, Methyl Red, Malachite Green, Auramine, Metanil Yellow, Methyl Violet, Ponceau 3R 7. Beta-1 Adrenergic Agonist Group 8. Beta-2 Adrenergic Agonist Group 9. Pesticide Group, Except Cyromazine 10. Iprnidazole 11. Carbadox 12. Carbon Tetrachloride 13. Roxarsone 14. Thalidomide

⁸¹ *Minister of Agriculture Regulation No. 14/PERMENTAN/PK.350/5/2017 of 2017 on the Classification of Veterinary Medicinal Products*, available at <https://peraturan.bpk.go.id/Details/160953/permentan-no-14permentanpk35052017-tahun-2017> (accessed 22 June 2026).

- b. Prohibited for Oral, Parenteral, and Topical Use
1. Amphetamine
 2. Dihydrostreptomycin (DHS)
 3. Chloramphenicol
 4. Nitrofurantoin
 5. Phenylbutazone
 6. Beta-1 Adrenergic Agonist Group
 7. Beta-2 Adrenergic Agonist Group
 8. Carbadox
 9. Carbon Tetrachloride
 10. Olaquinox
 11. Roxarsone
 12. Thalidomide
 13. Antibiotics Mixed with Vitamins, Minerals, Amino Acids, and Natural Veterinary Medicines
 14. Natural Veterinary Medicines Mixed with Synthetic Veterinary Medicines

The **Indonesian National Standard (i.e., Standar Nasional Indonesia, SNI) No. 9223:2023** establishes the Maximum Residue Limits (MRLs) for veterinary drug residues in food products of animal origin, including for dairy products. The MRLs are expressed in mg/kg and represent the maximum permissible concentration of veterinary drug residues in such products. The applicable MRLs are as follows:⁸²

Table 9: Maximum Residue Limits

Type of Veterinary Drug Residue	Drug Type	Beef/Cattle and Buffalo				
Amoxicillin	Antibacterial	0.01	0.01	0.01	0.01	0.05
Ampicillin	Antibacterial	ND	ND	ND	ND	0.01
Amprolium	Antibacterial	0.5	1.0	1.0	ND	7.0
Apramycin	Antibacterial	0.2	0.8	0.8	0.2	0.1
Oxolinic Acid	Antibacterial	0.1	0.15	0.15	0.5	ND

6.3.3 MAXIMUM LIMITS FOR HEAVY METAL CONTAMINANTS

BPOM Regulation 9/2022 establishes maximum limits for **heavy metal contaminants** in processed food. For dairy products, the applicable limits are as follows:

⁸² See <https://www.facebook.com/brmp.kaltimara/posts/-batas-maksimum-residu-obat-hewan-dalam-pangan-asal-hewan-sni-92232023keamanan-p/1313955577433901/> (accessed 22 June 2026).

- Arsenic: 0,10 mg/kg;
- Lead: 0,02 mg/kg;
- Mercury: 0,02 mg/kg; and
- Cadmium: 0,05 mg/kg.

For dairy products, compliance with these limits is assessed based on the product in its ready-to-consume form.⁸³

6.3.4 MAXIMUM LIMITS FOR RADIOACTIVE CONTAMINANTS

Minister of Health Regulation 1030/2011 establishes maximum permissible limits of radioactive contaminants in food products.

For dairy products, the applicable limits are as follows:⁸⁴

Type of processed food	Maximum Limit (Bq/kg)	
	I-131 (Iodine-131)	CS-137 (Caesium-137)
Milk and Dairy Products	100	150

6.3.5 MAXIMUM LIMITS OF CHEMICAL CONTAMINATION

BPOM Regulation 8/2018 details the types and maximum limits of chemical contaminants in processed food. For dairy products, the maximum limits of chemical contamination are as follows:⁸⁵

- **Aflatoxin M1**: 0,5 ppb or µg/kg;
- **Dioxins for processed milk, including butter fat**: maximum 2,5 pg/gram of fat.

6.3.6 MAXIMUM LIMITS OF MICROBIOLOGICAL CONTAMINANTS

BPOM Regulation 13/2019 sets out the microbiological criteria applicable to processed foods, including dairy products.

For instance, where five samples of pasteurised milk are tested:

- ALT (Total Aerobic Microbial Count) must not exceed 10⁴ colonies/ml in more than one of the samples;
- *Enterobacteriaceae* must not exceed 1 APM/ml in more than two of the samples; and
- *Salmonella* must not be detected in any of the samples (negative in 25 ml).

⁸³ *BPOM Regulation No. 9 of 2022 on Requirements for Heavy Metal Contamination in Processed Food*, available at <https://peraturan.bpk.go.id/Details/223968/peraturan-bpom-no-9-tahun-2022> (accessed 22 June 2026).

⁸⁴ *Minister of Health Regulation No. 1031/MENKES/PER/V/2011 on Maximum Limits of Radioactive Contamination in Food*, available at <https://manajemenrumahsakit.net/wp-content/uploads/2012/08/PMK-No.-1031-ttg-Batas-Maksimum-Cemaran-Radioaktif-Dalam-Pangan-thn-2011.pdf> (accessed 22 June 2026).

⁸⁵ *BPOM Regulation No. 8 of 2018 on Maximum Limit of Chemical Contaminants in Processed Foods*, available at <https://peraturan.bpk.go.id/Details/183202/peraturan-bpom-no-8-tahun-2018> (accessed 22 June 2026).

The microbiological criteria applicable to dairy products are set out in **Annex VI** to this *Guidance Handbook*.⁸⁶

6.3.7 FOOD ADDITIVES

BPOM Regulation 11/2019 governs the classes and categories of food additives, applicable maximum limits, approval requirements and procedures, as well as restrictions on the use of **food additives**.⁸⁷

The Regulation recognises **27 classes of food additives**, each of which may only be used in the food categories specified in Annex I. Annex II further sets out the maximum permitted levels for each approved food additive.

Table 10: Classes of Food Additives

Antifoaming Agent	Carrier	Flavour Enhancer
Anticaking Agent	Gelling Agent	Bulking Agent
Antioxidant	Foaming Agent	Stabiliser
Carbonating Agent	Acidity Regulator	Colour Retention Agent
Emulsifying Salt	Preservative	Flavouring
Packaging Gas	Raising Agent	Flour Treatment Agent
Humectant	Emulsifier	Colour, Including Natural Food Colours and Synthetic Food Colours
Glazing Agent	Thickener	Propellant
Sweetener, Including Natural Sweeteners and Artificial Sweeteners	Firming Agent	Sequestrant

Food additives listed in *BPOM Regulation 11/2019* may be used individually or in combination, provided that their use:

- Is supported by a *Quantitative Analysis Certificate* issued by a laboratory appointed by the Head of BPOM and/or a laboratory that has obtained accreditation from the *National Accreditation Committee*; and
- Is not intended to conceal the use of ingredients that fail to comply with the applicable requirements, practices that are inconsistent with good food production practices, and/or food deterioration.

For categories of food additives that cannot be analytically quantified, compliance must be determined based on the amount of food additives added to the food products.⁸⁸

Food additives that are **not recognised** under *BPOM Regulation 11/2019* may only be used upon obtaining prior **written approval** from the Head of BPOM.

To obtain such approval, an applicant must submit an *Application Letter* to the Head of BPOM, accompanied by general information regarding the food additive (e.g., trade name, product type, packaging type, and name of manufacturer/company). The Head of BPOM is required to issue a decision to approve

⁸⁶ *BPOM Regulation No. 13 of 2019 on Maximum Limits of Microbial Contamination in Processed Foods*, available at <https://peraturan.bpk.go.id/Details/345957/peraturan-bpom-no-13-tahun-2019> (accessed 22 June 2026).

⁸⁷ *BPOM Regulation No. 11 of 2019 on Food Additives*, available at <https://jdih.pom.go.id/view/slide/848/11/2019/07811dc6c422334ce36a09ff5cd6fe71> (accessed 22 June 2026).

⁸⁸ Articles 10, 11, and 21 of *BPOM Regulation No. 11 of 2019 on Food Additives*, available at <https://jdih.pom.go.id/view/slide/848/11/2019/07811dc6c422334ce36a09ff5cd6fe71> (accessed 22 June 2026).

the proposed use of the food additives within 85 working days.⁸⁹ In practice, EU businesses have reported practical challenges regarding the approval process for food additives. In particular, applicants have been requested to provide safety confirmations or certifications issued by up to five foreign authorities or certification bodies. In addition, businesses have reported that the approval process for these additives may take up to one year, which is significantly longer than the statutory processing period (see Section 6.3.7 of this *Guidance Handbook*).

Image 2: Application Letter for the Use of Food Additives

SURAT PERMOHONAN PENGGUNAAN BTP

Nama perusahaan/importir :
Alamat perusahaan/importir :
Nomor surat perusahaan/importir :
Perihal :
Lampiran :

Kepada Yth.
Kepala Badan Pengawas Obat dan Makanan
c.q. Direktur Standardisasi Pangan Olahan

Sesuai dengan ketentuan Pasal 16* Peraturan Badan Pengawas Obat dan Makanan Nomor 11 Tahun 2019 tentang Bahan Tambahan Pangan, dengan ini kami mengajukan permohonan untuk menggunakan BTP sebagai berikut:

a. Jenis BTP dan INS** :
b. Fungsi :
c. Jenis pangan :
d. Kategori pangan :

Demikian surat ini kami sampaikan, atas perhatian dan kerjasama Bapak/Ibu, kami ucapkan terima kasih.

TTD dan Cap Perusahaan :
Nama Pemohon :
Contact Person :
Telp./Fax/E-mail :

* Pilih salah satu: BTP secara penambahan langsung atau BTP Ikutan (*Carry over*)
** *International Numbering System*

The box below summarises the key information relating to the application process for the approval of food additives:

Application Letter for the Approval of Food Additives

- **Relevant Ministry/Government Agency:** BPOM
- **Validity of the food additives approval:** Indefinite
- **Processing time of the *Application Letter for the Use of Food Additives*:** 85 days
- **Renewal:** Not necessary since the approval is valid indefinitely
- **Practical considerations:** EU businesses reported that, in applications for the approval of food additives, applicants may be requested to provide safety confirmations or certifications issued by up to five foreign authorities or certification bodies, and that the approval process may take up to one year

⁸⁹ Article 16 of *BPOM Regulation No. 11 of 2019 on Food Additives*, available at <https://jdih.pom.go.id/view/slide/848/11/2019/07811dc6c422334ce36a09ff5cd6fe71> (accessed 22 June 2026).

6.3.8 SPS PROCEDURES

Under *Law 21/2019* and its implementing regulations,⁹⁰ as well as the *Quarantine Agency Regulation 9/2024*,⁹¹ imported dairy products are subject to SPS procedures. Importers must ensure that each consignment is accompanied by the required health documentation and undergoes inspection upon arrival.

6.3.8.1 OBTAINING A HEALTH OR SANITARY CERTIFICATE

As a prerequisite for importing animal products into Indonesia, EU businesses must obtain a *Health Certificate* or *Sanitary Certificate* issued by the competent veterinary or food safety authority in the country of origin, confirming that the dairy products are safe, disease-free, and produced in an establishment that has been approved by the competent authority in the country of origin (see Section 4.2 of this *Guidance Handbook*).

6.3.8.2 SUBMITTING A PRIOR NOTICE

Before, or at the time when the consignment departs for Indonesia, EU businesses exporting animal products, including dairy products, must **submit a Prior Notice** electronically to the *Technical Implementation Unit* of the *Indonesian Quarantine Agency*. To do so, EU businesses must first register as users on the following website: <https://notice.karantinaindonesia.go.id>. The *Prior Notice* must be signed by the EU exporter.

The prescribed form of the *Prior Notice* is set out below:

⁹⁰ *Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine*, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹¹ *Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals*, available at <https://docs.paralegal.id/PERATURAN-LPNK/PBARANTIN/2024/PBARANTIN-9-2024.pdf> (accessed 22 June 2026).

Image 3: Form of the *Prior Notice* available on the *KarantinaIndonesia* website

PRIOR NOTICE/PEMBERITAHUAN AWAL					
Reference Number H.20240829.HES6KF					
COUNTRY OF ORIGIN : CHINA					
COUNTRY OF EXPORT : INDONESIA					
Description of Exporter/ Representative*	Name	MOCHAMAD RIDWAN	Company name	PT UNTUNG TERUS	
	Address	GANG ABAH IMBAR, RW 10, CIBUBUR, CIRACAS, EAST JAKARTA, SPECIAL CAPITAL REGION OF JAKARTA, JAVA, 13720, INDONESIA			
	Phone/Fax. Number	+6287882997448			
	Email	mochamadridwan008@gmail.com			
Description of Importer/ Representative*	Name	SURJANA	Company name	PT CITRA LESTARI JAYA	
	Address	RUKO PERMATA JAYA 1 NO 4 KAV 4, MUARA BARU, JAKARTA, INDONESIA			
	Phone/Fax. Number	021902900			
	Email	surjana@mail.com			
DESCRIPTION OF COMMODITY/CONSIGNMENT:					
☐ Non GMO ☒ GMO: the CoA's reference no & date					
No	Common Name/ Scientific Name	HS Code	Quantity/ Packaging	Certificate of Analysis/Health Certificate's Reference Number and issued date *)	Testing Laboratory/ NFSCA Body*)
1	-	0102	100 2	CN 98080 (2024-08-27)	ID-17287
EXPORT PURPOSE		Raw			
DEGREE OF PROCESSING		☐ Fresh ☐ Minimal processed ☒ Full processed ☐ Other			
HEALTH/SANITARY/PHYTOSANITARY CERTIFICATE*					
No	Reference Number	Place of Issue		Date of Issue	
1	CN 87989	China		2024-08-27	
Means of conveyance		SEA	Voyage/Flight number		MV OCEAN STAR
Port of loading		CNAIN	Date of loading		2024-08-29
Place of destination		JAKARTA	Date of estimated arrival		2024-09-20
Additional Information: CoA ref number : CN98083					
Container's Identification Number*: OOCLL89897;					
Other (specify):					
Place: China Date: 2024-08-27  Applicant (MOCHAMAD RIDWAN)					

6.3.8.3 SPS INSPECTIONS

Upon arrival in Indonesia, imported dairy products must undergo SPS inspection, which may include documentary verification, physical inspection, and sampling/testing, depending on the risk level of the product.⁹² SPS procedures are conducted before the submission of the import Customs declaration.⁹³

The person responsible for the means of transport must notify the Indonesian Quarantine Officer of the importation of the goods.⁹⁴ The Quarantine Officer will then inspect the following documents:

- Transport manifest/cargo list documents; and

⁹² Article 33 of *Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine*, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹³ Article 28 of *Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine*, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹⁴ Article 29 of *Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine*, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

- The contents of the transport cargo.⁹⁵

The inspection of goods consists of:⁹⁶

- An administrative inspection and document verification. The documents may be in printed or electronic form;⁹⁷ and
- Health inspection, food safety testing, feed safety testing, food quality testing, and/or feed quality testing. A health inspection is conducted clinically, physically, visually, and/or in laboratories to detect animal pests and diseases.⁹⁸

Each quarantine action undertaken in respect of imported animal products must be documented by the issuance of a **quarantine document** by the Indonesian Quarantine Officer.⁹⁹ The document may be issued in either physical or electronic form.¹⁰⁰

The goods will be released by the Quarantine Officer if, following the inspection of the goods, they are found to comply with the applicable animal health and food safety requirements and do not pose a risk of transmitting animal diseases, such as foot-and-mouth disease. The Quarantine Officer will then issue a release certificate for importation.¹⁰¹

The relevant quarantine documents that are listed under Annex I to *Quarantine Agency Regulation 9/2024* are as follows:

Table 11: List of Quarantine Documents

No.	Quarantine Document	Description
1	<i>Application for Quarantine Measures and Supervision and/or Control, and Minutes of Handover of Carrier Media at Entry, Exit and/or Transit Points</i>	Made by the Quarantine Officer and the owner/importer to be submitted to the Head of Local Quarantine Unit
2	<i>Prior Notice</i>	Made by the importer
3	<i>Arrival Report of Conveyance</i>	Made by transport operator/person in charge of conveyance to be submitted to the Quarantine Officer
4	<i>Cargo Manifest Mutation Report of Conveyance</i>	Made by transport operator/ person in charge of conveyance to be submitted to the Quarantine Officer
5	<i>Results of Analysis of Application for Quarantine Measures</i>	
6	<i>Official Assignment Letter</i>	Made by the Head of the UPT to be sent to the Quarantine Officer
7	<i>Minutes of Sampling</i>	Made and signed by the Sampling officer and owner/importer (if present)

⁹⁵ Article 30 of Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹⁶ Articles 37 and 38 of Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹⁷ Article 38 of Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹⁸ Article 39 of Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

⁹⁹ Article 2 of Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals, available at <https://docs.paralegal.id/PERATURAN-LPNK/PBARANTIN/2024/PBARANTIN-9-2024.pdf> (accessed 22 June 2026).

¹⁰⁰ Article 6 of Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals, available at <https://docs.paralegal.id/PERATURAN-LPNK/PBARANTIN/2024/PBARANTIN-9-2024.pdf> (accessed 22 June 2026).

¹⁰¹ Article 55 of Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine, available at <https://peraturan.bpk.go.id/Details/123687/uu-no-21-tahun-2019> (accessed 22 June 2026).

8	<i>Order to Enter Quarantine Installation or Other Location</i>	Made and signed by the Quarantine Officer at origin
9	<i>Report on Administrative Inspection and Document Conformity</i>	Made and signed by the Quarantine Officer
10	<i>Report on Health Inspection</i>	Made and signed by the Quarantine Officer
11	<i>Report on Isolation and Observation Results</i>	Made and signed by the Quarantine Officer
12	<i>Treatment Certificate</i>	Made and signed by the Quarantine Officer
13	<i>Report on Treatment Results</i>	Made and signed by the Quarantine Officer
14	<i>Detention Order</i>	Made and signed by the Quarantine Officer
15	<i>Minutes of Detention</i>	Made and signed by the Quarantine Officer
16	<i>Report on Detention Results</i>	Made and signed by the Quarantine Officer
17	<i>Rejection Letter</i>	Made and signed by the Quarantine Officer and delivered to the owner
18	<i>Minutes of Rejection</i>	Made and signed by the Quarantine Officer and delivered to the owner
19	<i>Report on Rejection Results</i>	Made and signed by the Quarantine Officer
20	<i>Notification of Non-Compliance</i>	Notice of Non-Conformity of Requirements
21	<i>Destruction Order</i>	Issued by Head of Local Quarantine Unit
22	<i>Minutes of Destruction</i>	Made and signed by the Quarantine Officer and delivered to the owner
23	<i>Report on Destruction Results</i>	Made and signed by the Quarantine Officer
24	<i>Release Certificate</i>	Made and signed by the Quarantine Officer and delivered to the owner
25	<i>Quarantine Certificate</i>	Made and signed by the Quarantine Officer and delivered to the owner
26	<i>Certificate of Inspection Results</i>	
27	<i>Animal Health Certificate</i>	Made and signed by the Quarantine Officer and delivered to the owner
28	<i>Sanitary Certificate of Animal Product</i>	Made and signed by the Quarantine Officer and delivered to the owner

6.4 LABELLING AND MARKETING REQUIREMENTS

Imported dairy products must comply with the relevant **labelling and marketing** requirements.

6.4.1 LABELLING REQUIREMENTS

Minister of Agriculture Regulation 15/2021,¹⁰² and *BPOM Regulation 31/2018*,¹⁰³ as most recently amended by *BPOM Regulation No. 6 of 2024*,¹⁰⁴ detail the **labelling requirements** for processed food products, including dairy products.

Dairy products must be labelled in Bahasa Indonesia language, containing at least the following information:

¹⁰² *Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector*, available at <https://peraturan.bpk.go.id/Details/224954/permentan-no-15-tahun-2021> (accessed 22 June 2026).

¹⁰³ *BPOM Regulation No. 31 of 2018 on Labels for Processed Food*, available at <https://peraturan.bpk.go.id/Details/219910/peraturan-bpom-no-31-tahun-2018> (accessed 22 June 2026).

¹⁰⁴ *BPOM Regulation No. 6 of 2024 on Second Amendment to BPOM Regulation No. 31 of 2018 on Processed Food Labels*, available at <https://peraturan.bpk.go.id/Details/284512/peraturan-bpom-no-6-tahun-2024> (accessed 22 June 2026).

- Country of destination (*i.e.*, Indonesia);
- Name and address of the business unit;
- Business unit's establishment number;
- Production date and production code/batch code;
- Amount, types, and specification of the animal product;
- *Halal* mark for required animal products, in accordance with the legislation;
- Lot number (batch) and expiry date;
- Product name;
- List of ingredients used;
- Net weight or net content;
- Name and address of the importer;
- Expiry information;
- Distribution permit/ market authorisation number from BPOM; and
- Origin of certain food ingredients.

BPOM Regulation 31/2018 sets out the general requirements relating to the language, placement, durability, accuracy, and consistency of food labels. Under the regulation, labels for dairy products must:

- Be written in Bahasa Indonesia. A foreign term may be used where no equivalent Indonesian term exists, or where no appropriate Indonesian term can be created;
- Be placed in a visible and readable part of the packaging;
- Not easily detached, faded, or become damaged;
- Not be misleading;
- Contain images only where the product actually contains the depicted ingredient; and
- Be consistent with the label approved during the product registration or licensing process.

6.4.1.1 LABELLING OF MILK PRODUCTS

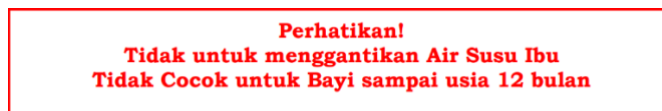
BPOM Regulation 31/2018 imposes **additional labelling requirements** for powdered **milk products, ultra-high temperature milk, and sterilised milk**. The labels of these products must include the following written statements:¹⁰⁵

¹⁰⁵ Article 53 of *BPOM Regulation No. 31 of 2018 on Labels for Processed Food*, available at <https://peraturan.bpk.go.id/Details/219910/peraturan-bpom-no-31-tahun-2018> (accessed 22 June 2026).

- “*Attention!*”;
- “*Not intended to replace breast milk*”; and
- “*Not suitable for infants up to 12 months of age*”;

These warning statements must be printed in red text within a red rectangular box on a white background, in the prescribed format indicated below:

Image 4: Label for Milk Products



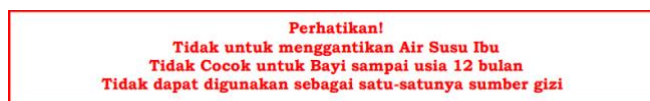
6.4.1.2 LABELLING OF CONDENSED MILK PRODUCTS

Additional labelling requirements apply to **condensed milk products**. The labels of these products must include the following written statements:¹⁰⁶

- “*Attention!*”;
- “*Not intended to replace breast milk*”;
- “*Not suitable for infants up to 12 months of age*”; and
- “*Cannot be used as the sole source of nutrition*”.

The warning statements must be displayed in red text within a red rectangular box on a white background, in the following format:

Image 5: Label for Condensed Milk Products



6.4.2 MARKETING CLAIMS

BPOM and the *National Food Agency* (i.e., *Badan Pangan Nasional*, a government body responsible for food policy and food governance in Indonesia) regulate the use of certain **marketing claims** commonly used for dairy products. For example:

- The claim “*natural*” may only be used for processed food that is either not mixed with other substances and remains unprocessed, or which has undergone only physical processing that does not alter its properties or contents;
- The claim “*pure*” or “*100%*” may only be used for processed food that has not been added to or mixed with other ingredients;

¹⁰⁶ Article 54 of BPOM Regulation No. 31 of 2018 on Labels for Processed Food, available at <https://peraturan.bpk.go.id/Details/219910/peraturan-bpom-no-31-tahun-2018> (accessed 22 June 2026).

- The claim “*fresh*” may not be used on labels for food made from intermediate processed food or other processed food products;¹⁰⁷
- The claim “*Source of Dietary Fibre*” may be used only if the dietary fibre content is at least 10% of the Nutritional Reference Value (NRV), namely 3 g per 100 g. The nutrition information on the label must include total energy, total carbohydrates, total fat, and protein;
- The claim “*High Protein*” may only be used if the protein content is at least 35% of the NRV, namely 21 g per 100 g. The nutrition information on the label must include total energy, total carbohydrates, total fat, and protein; and
- The claim “*No Added Preservatives*” may only be used if no type of preservative has been used in the food product. The claim must be supported by a statement confirming that no preservatives of any kind have been added.¹⁰⁸

BPOM also prohibits **misleading statements and claims** on food labels. In particular, food labels must not contain statements, descriptions, text, images, logos, claims, and/or visualisations that are false, misleading, or deceptive, including:¹⁰⁹

- Claims that nutrient content is superior to other products or that disparage other products;
- Claims that the product can improve health;
- Claims that the product can increase intelligence;
- Claims of superiority where the advantage does not entirely come from the product itself but partly from another product consumed together with it;
- Claims that the product alone can fulfil all nutritional needs;
- Inclusion of the name, logo, or identity of laboratories or institutions conducting food analysis/testing;
- References to “*latest*”, “*modern*”, “*advanced technology*”, or similar time-sensitive superiority claims;
- Statements/visualisations depicting condensed milk and similar products as a standalone milk beverage or sole nutritional source;
- Statements/visualisations showing only children under 5 years old on condensed milk products and analogues;
- Superlative claims (e.g., the best milk in Indonesia); and
- Claims such as “*the only*”, “*just*”, “*only*”, or equivalent terms unless supported by verifiable evidence.

¹⁰⁷ BPOM Regulation No. 20 of 2021 on Amendments to BPOM Regulation No. 31 of 2018 on Processed Food Labelling, available at <https://peraturan.bpk.go.id/Details/181758/peraturan-bpom-no-20-tahun-2021> (accessed 22 June 2026); and see <https://rumahsiripo.pom.go.id/peraturan/label/contoh-label-pangan-olahan/ketentuan> (accessed 22 June 2026).

¹⁰⁸ See <https://badanpangan.go.id/tabelrhk> (accessed 1 June 2026).

¹⁰⁹ BPOM Regulation No. 20 of 2021 on Amendments to BPOM Regulation No. 31 of 2018 on Processed Food Labelling, available at <https://peraturan.bpk.go.id/Details/181758/peraturan-bpom-no-20-tahun-2021> (accessed 3 June 2026); and see <https://rumahsiripo.pom.go.id/peraturan/label/contoh-label-pangan-olahan/ketentuan> (accessed 22 June 2026).

6.5 SHELF-LIFE

Under *BPOM Regulation 30/2017*, imported dairy products must have a remaining shelf life of at least **two-thirds of their total shelf life** at the time of importation into Indonesia.¹¹⁰

6.6 PACKAGING REQUIREMENTS

Under *Minister of Agriculture Regulation 15/2021*, food products, including dairy products, must be packaged and labelled in the country of origin and use **food-grade packaging** made from special non-toxic material and safe for food products of animal origin.

GR 1/2026 requires food packaging materials to be **safe for human health**. In particular, packaging materials that come into direct contact with food must comply with applicable migration limits and may only contain approved food contact substances.¹¹¹

The food contact substances approved for use in food packaging are regulated under *BPOM Regulation 20/2019*. The Regulation prohibits certain food contact substances, including the use of *alkanet* as a colouring agent and *Bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ether (BFDGE)* as an adhesive.¹¹² The Regulation also permits the use of specified substances, including *Dimethyl decarbonate* and Glycerol ester mixtures of ricinoleic acid.¹¹³ A list of permitted food contact substances is provided in **Annex VII** to this *Guidance Handbook*.

Annex III to *BPOM Regulation 20/2019* identifies the food contact materials that may be used in food **packaging**, including plastics, multilayer plastics, rubber, paper and paperboard, closures and seals, glass, and cans.

6.7 TRANSPORTATION REQUIREMENTS

Minister of Agriculture Regulation 15/2021 sets out **transportation requirements** for the import of dairy products into Indonesia. In particular, dairy products must:¹¹⁴

- Be transported directly from the country of origin to Indonesia;
- Be transported only after the completion of the applicable quarantine measures applied in the country of origin prior to loading onto the transport vessel;
- Transported through transit in accordance with the *Quarantine Agency Regulation 9/2024*;
- Be transported in containers that are separate from those used for non-*Halal*-certified animal products, where the products are *Halal*-certified; and
- Be subject to SPS inspection upon arrival in Indonesia.

¹¹⁰ Article 4 of *BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia*, available at <https://peraturan.bpk.go.id/Details/220393/peraturan-bpom-no-30-tahun-2017> (accessed 27 May 2026).

¹¹¹ Article 24 of *Government Regulation No. 1 of 2026 on Amendment to Government Regulation No. 86 of 2019 on Food Safety*, available at <https://peraturan.bpk.go.id/Details/348700/pp-no-1-tahun-2026> (accessed 22 June 2026).

¹¹² Annex I of *BPOM Regulation No. 20 of 2019 on Food Packaging*, available at <https://bikinpabrik.id/wp-content/uploads/2019/08/PBPOM-Nomor-20-Tahun-2019-tentang-Kemasan-Pangan.pdf> (accessed 22 June 2026).

¹¹³ Annex II of *BPOM Regulation No. 20 of 2019 on Food Packaging*, available at <https://bikinpabrik.id/wp-content/uploads/2019/08/PBPOM-Nomor-20-Tahun-2019-tentang-Kemasan-Pangan.pdf> (accessed 22 June 2026).

¹¹⁴ Annex to *Minister of Agriculture Regulation 15/2021 on Business Activity Standards and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector*, available at <https://peraturan.bpk.go.id/Details/224954/permentan-no-15-tahun-2021> (accessed 22 June 2026).

6.8 HALAL CERTIFICATION AND LABELLING REQUIREMENTS

Law 33/2014,¹¹⁵ as implemented by GR 42/2024,¹¹⁶ requires all products specified in the *Minister of Religious Affairs Decree No. 748 of 2021 on Types of Products Required to be Halal Certified*,¹¹⁷ whether imported into Indonesia or produced in Indonesia for the Indonesian market, to be **certified and labelled as Halal** before they may be distributed or traded in Indonesia. The products covered by the Decree include milk and its analogues, such as yogurt and sterilised milk.

The following products are **exempt** from the mandatory *Halal* certification and labelling requirements:

- Products that are inherently *Halal* (e.g., materials originating from unprocessed natural plant or mineral sources, pose no risk of containing prohibited substances, and are neither hazardous nor in contact with prohibited substances), as listed under *Minister of Religious Affairs Decree No. 1360 of 2021 on Materials Exempted from the Mandatory Halal Certification Requirement*,¹¹⁸ and
- Products categorised as *Haram* (i.e., “forbidden” under Islamic law), such as pork and alcohol. These products may be distributed and traded in Indonesia only if they bear a Non-*Halal* Statement expressly indicating that they do not meet *Halal* standards (see Section 6.8 of this *Guidance Handbook*).

6.8.1 HALAL CERTIFICATION REQUIREMENTS

Mandatory *Halal* certification is being introduced in phases, with different product categories becoming subject to the requirement until 2034. Covered products include food and beverages, cosmetics, medicines, and chemical products. In the case of **imported food and beverages**, as well as food and beverages produced by domestic micro, small, and medium enterprises, compliance with the mandatory *Halal* certification will be required from **17 October 2026**.¹¹⁹

To obtain *Halal* certification for dairy products, EU businesses must apply with either of the following:



Indonesia's *Halal* Product Assurance Agency (i.e., *Badan Penyelenggara Jaminan Produk Halal*, BPJPH)



Foreign *Halal* certification bodies recognised by the BPJPH pursuant to MRAs

¹¹⁵ Law No. 33 of 2014 on *Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/38709/uu-no-33-tahun-2014> (accessed 22 June 2026).

¹¹⁶ Government Regulation No. 42 of 2024 on Implementation of *Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

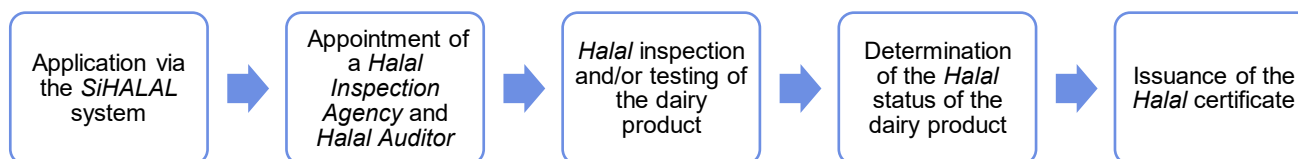
¹¹⁷ Minister of Religious Affairs Decree No. 748 of 2021 on Types of Products Required to be Halal Certified, available at <https://halalmui.org/wp-content/uploads/2026/05/Keputusan-Menteri-Agama-RI-No-748-Tahun-2021-Tentang-Jenis-Produk-yang-Wajib-Bersertifikat-Halal.pdf> (accessed 22 June 2026).

¹¹⁸ Minister of Religious Affairs Decree No. 1360 of 2021 on Materials Exempted from the Mandatory *Halal* Certification Requirement, available at https://halalmui.org/wp-content/uploads/2023/06/Keputusan-Menteri-Agama-RI-No-1360-Bahan-yang-Dikecualikan-dari-Kewajiban-Sertifikasi-Halal_compressed.pdf (accessed 22 June 2026).

¹¹⁹ Article 160 of Government Regulation No. 42 of 2024 on Implementation of *Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

6.8.2 CERTIFICATION BY THE BPJPH

The following are the steps for EU businesses to obtain a *Halal* certificate from the BPJPH:



1) Application via the *SiHALAL* system

EU businesses must submit an application through the *SiHALAL* system,¹²⁰ either through their Indonesian office or the importer in Indonesia. The application must be accompanied by:¹²¹

- The business actor's data;
- The dairy product's name and category;
- The list of dairy products and ingredients used; and
- The dairy product's processing details.

Upon receipt of the application, the BPJPH will examine the completeness of the submitted documents within a maximum period of one day from the date of receipt.¹²²

2) Appointment of a *Halal Inspection Agency* and a *Halal* auditor

Once the application documents are deemed complete, the BPJPH will appoint a *Halal Inspection Agency*, which must assign a *Halal* auditor to examine the documents and inspect and/or test the product's *Halal* status within a maximum period of two days from the issuance of the appointment by the BPJPH.¹²³

3) *Halal* inspection and/or testing of the dairy product

Once the application documents are deemed complete, the *Halal Inspection Agency* must submit the inspection and/or testing costs to the BPJPH. The BPJPH will then issue an invoice to the EU business through the *SiHALAL* system, which must be paid within a maximum period of five days from the date of issuance. Failure to do so will result in the rejection of the *Halal* certificate.¹²⁴

Upon confirmation of payment, the *Halal* auditor must conduct an on-site inspection of the EU business's production facility within 15 days.¹²⁵ If the inspection indicates that any ingredients are of doubtful *Halal* status, the product may be subject to laboratory testing.¹²⁶

¹²⁰ See <https://ptsp.halal.go.id/> (accessed 19 May 2026).

¹²¹ Article 67 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²² Article 75 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²³ Articles 76, 77, and 78(1) of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²⁴ Article 79 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²⁵ Article 80(1) of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²⁶ Article 83 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

4) Determination of the *Halal* status of the dairy product

The results of the *Halal* inspection and/or testing must be submitted to the *Indonesian Ulama Council* (i.e., *Majelis Ulama Indonesia*, MUI), the *Provincial MUI*, the *Regency/City MUI*, or the *Aceh Ulama Consultative Council*. The submission includes:¹²⁷

- The name and category of the dairy product;
- The dairy product and materials used;
- The *Halal Product Process* of the dairy product, namely the series of activities undertaken by the EU business to ensure the *Halal* integrity of the product, including the sourcing of materials, processing, storage, packaging, distribution, sale, and serving of the product;
- The analysis results and/or specifications of the materials;
- The inspection report; and
- The recommendations accompanied by technical and sharia (i.e., Islamic law) considerations.

The *MUI*, *Provincial MUI*, *Regency/City MUI*, or the *Aceh Ulama Consultative Council* must determine the *Halal* status of the dairy product in a *Halal fatwa* deliberation session within a maximum period of three days from the date of receipt of the inspection and/or testing result from the *Halal Inspection Agency*.¹²⁸

5) Issuance of the *Halal* certificate

Upon the receipt of the decision on the product's *Halal* status, the BPJPH must issue the *Halal* certificate for the dairy product within one day.

Based on the experience of EU businesses, obtaining a *Halal* certificate directly from the BPJPH may take up to three months from the date of application to the issuance of the certificate (see Section 3.1 of this *Guidance Handbook*).

The box below summarises key information relating to the *Halal* certification:

***Halal* Certification**

- **Relevant Ministry/Government Agency:** BPJPH
- **Validity of the *Halal* certificate:** The *Halal* certificate remains valid indefinitely, provided that there are no changes to the product's composition
- **Renewal:** Not necessary, provided that there are no changes to the product's composition
- **Processing time of the *Halal* Certificate:** Approximately 27 days, excluding any extension of time requested by the *Halal* Certification Body, which may extend the process by a maximum of 15 additional days

¹²⁷ Article 85 of *Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹²⁸ Article 86 of *Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

6.8.3 CERTIFICATION BY RECOGNISED FOREIGN *HALAL* CERTIFICATION BODIES

As an alternative to obtaining a *Halal* certificate directly from the BPJPH, EU businesses may obtain *Halal* certification for their dairy products from any of the **EU-based *Halal* certification bodies** recognised by the BPJPH on the basis of MRAs (see Section 4.4).¹²⁹

Pursuant to *Government Regulation No. 42 of 2024 on Implementation in the Field of Halal Product Assurance*, foreign *Halal* certificates can be recognised in Indonesia if an MRA has been concluded between a foreign *halal* certification body and the BPJPH.¹³⁰ Importantly, the BPJPH does not currently recognise the EU as a single unified system for *Halal* certification. Instead, recognition is granted to individual *Halal* certification bodies and not at EU level. If the EU were to be recognised as a single market for purposes of *Halal* certification, the BPJPH could rely on a centralised EU-level accreditation system under which a competent EU authority would designate and supervise *Halal* certification bodies. Certification issued by any body accredited under this EU-level system could then be accepted by the BPJPH without the need for separate bilateral recognition of individual certification bodies.

Where the relevant dairy product has been certified by a BPJPH-recognised foreign *Halal* certification body, EU businesses must **register the *Halal* certificate** with the BPJPH through the *SiHALAL* system, either through their Indonesian representative office or through their Indonesian counterpart (*i.e.*, the importer).¹³¹ Applications for the registration of foreign *Halal* certificates must be submitted separately for each product category.¹³²

For the purpose of registering a foreign *Halal* certificate, the following documents must be submitted:¹³³

- An *Application Letter* for the foreign *Halal* certificate registration;
- An *Appointment Letter* in the form of an agreement issued by the EU business, containing a clause authorising the importer and/or the EU business's official representative in Indonesia to act on its behalf for the purposes of foreign *Halal* certificate registration;
- The NIB of the importer and/or the EU business's official representative in Indonesia;
- Copies of the foreign *Halal* certificate for the dairy products entering the Indonesian Custom territory;
- The list of goods to be imported to Indonesia, including HS codes;
- Warehousing data, consisting of the name of the warehouse, the address of the storage warehouse, and the ownership status of the warehouse (*i.e.*, owned or leased); and
- A *Declaration Letter* confirming that all submitted documents are correct and valid.

¹²⁹ See <https://bpjph.halal.go.id/data/hln/> (accessed 22 June 2026).

¹³⁰ *Government Regulation No. 42 of 2024 on Implementation in the Field of Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹³¹ *Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration*, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 22 June 2026).

¹³² Annex I to *Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration*, p. 5, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 22 June 2026).

¹³³ Annex I to *Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration*, p. 5, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 22 June 2026).

The registration of a foreign *Halal* certificate must be renewed by the importer and/or the EU business's authorised representative in Indonesia by submitting a **renewal** application no earlier than 60 days before, and no later than, the expiry of its validity period.

If the renewed foreign *Halal* certificate is not yet available at the time of submission, the applicant may submit a letter issued by the foreign *Halal* certification body, confirming that the renewal process is ongoing, provided that the letter is issued before the certificate expires. The renewed foreign *Halal* certificate must then be submitted 5 days after the expiry of the foreign *Halal* certificate registration number.¹³⁴

Any change to the information relating to the importer, the EU business's authorised representative in Indonesia, the foreign *Halal* certification body, or the EU business's production facility, requires the submission of a new application to the BPJPH.

Issues relating to *Halal* certification and the recognition of foreign *Halal* certification bodies may be addressed through the institutional dialogue mechanisms established under the **EU-Indonesia CEPA**. For example, **Chapter 21** of the CEPA on "*bilateral dialogue mechanism*" may facilitate discussions between the EU and Indonesia on enhancing cooperation in this area, including the possible recognition of the EU as a single *Halal* certification area or the development of a more streamlined framework for the recognition of EU-based *Halal* certification bodies (see Section 8.4 of this *Guidance Handbook*).

The box below summarises key information relating to the registration of a foreign *Halal* certificate:

Registration of a Foreign *Halal* Certificate

- **Relevant Ministry/Government Agency:** BPJPH
- **Validity of the foreign *Halal* certificate:** The validity period of the foreign *Halal* certificate corresponds to the validity period of the certificate issued by the foreign *Halal* certification body the country of origin
- **Renewal:** A renewal application must be submitted no earlier than 60 days before, and no later than, the expiry of the foreign *Halal* certificate's validity period
- **Processing time of the registration of the foreign *Halal* Certificate:** 13 working days
- **Relevance of the **EU-Indonesia CEPA**:** Chapter 21 of the CEPA on "*Bilateral Dialogue Mechanism*" may facilitate discussions between the EU and Indonesia on enhancing cooperation in *Halal* certification (see Section 8.4 of this *Guidance Handbook*)

¹³⁴ Annex I to Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign *Halal* Certificate Registration, p. 5, available at https://cmsbl.halal.go.id/uploads/Decree_Kepkaban_221_2025_Implementation_Procedure_of_Foreign_Halal_Certificate_Registration_b95097144.pdf (accessed 22 June 2026).

6.8.4 HALAL LABELLING

Law 33/2014 and GR 42/2024 require that, upon the issuance of the *Halal* certificate, the relevant product be labelled as *Halal*.¹³⁵ The same *Halal* label applies regardless of whether the dairy product is certified by BPJPH or by a BPJPH-recognised foreign *Halal* certification body.

The *Halal* label must contain, at a minimum, a logo in the form of an image, text, or a combination of both, as well as the *Halal* certificate or registration number.¹³⁶ The label must be affixed to the product packaging, a specific part of the product, and/or a designated area on the product in a “clearly visible and legible” manner, and in a way that ensures it is not “easily removed, detached, or damaged”.¹³⁷ The official *Halal* logo that must be used on relevant products marketed in Indonesia is set out below:

Image 6: Indonesia’s *Halal* Logo



The requirement to affix a *Halal* label does not apply to dairy products that are:

- Packaged in containers that are too small to accommodate all required information;
- Sold and packaged directly in the presence of the consumer in small quantities;
- Sold in bulk, which are not sold in retail packaging (e.g., bulk cheese blocks supplied to hotels/restaurants for further processing); or
- Sold in limited quantities for special purposes, such as food intended for specific medical conditions based on a doctor’s prescription.

In such cases, compliance with the *Halal* labelling requirement must be demonstrated by the relevant *Halal* certificate held by the business.¹³⁸

6.8.5 NON-HALAL LABELLING

Food and beverages, including dairy products, that are non-*Halal* (e.g., yogurt containing gelatine derived from porcine sources, such as skin, bones, and hooves), are exempt from the mandatory *Halal* labelling requirement. However, such products must bear a **Non-Halal Statement** that is “clearly visible and legible” and cannot be easily removed, detached, or damaged.¹³⁹

¹³⁵ Article 21(a) of Law No. 33 of 2014 on Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/38709/uu-no-33-tahun-2014> (accessed 19 May 2026); Article 51(a) of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹³⁶ Article 107 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹³⁷ Article 109 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹³⁸ Article 109 of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹³⁹ Article 26 of Law No. 33 of 2014 on Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/38709/uu-no-33-tahun-2014> (accessed 19 May 2026); Article 110(1) and (2) of Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

The specific form of, and procedures for, affixing the *Non-Halal* Statement are to be determined by the Head of the BPJPH in coordination with the relevant ministries and/or government agencies.¹⁴⁰ As of June 2026, the relevant BPJPH Regulation remains in draft form and has not yet been finalised.¹⁴¹ Accordingly, while the requirement to bear a *Non-Halal* Statement is already established, the detailed implementation requirements are still being defined.

Under the current draft BPJPH regulation, the *Non-Halal* Statement would need to be affixed on the packaging and/or a specific part or designated area of the dairy product, with each method subject to different formats and procedures:¹⁴²

Table 12: Format and Procedures for Affixing Non-Halal Statements

Packaging	Specific Part or Designated Area of the Dairy Product
- The <i>Non-Halal</i> Statement must be placed proportionally on both the primary and the secondary packaging; - The <i>Non-Halal</i> Statement must be placed in a prominent location that is clearly visible and easily readable; - Background elements, such as images, colours, and/or other design features must not obscure the size, shape, or colour of the <i>Non-Halal</i> Statement; - Where the packaging background is red, the text and colour of the <i>Non-Halal</i> Statement may be adjusted, provided sufficient contrast is maintained to ensure readability; and - The <i>Non-Halal</i> Statement must not be easily removed, detached, or damaged.	- The <i>Non-Halal</i> Statement must be placed proportionally on a specific part and/or designated area of the product; - The <i>Non-Halal</i> Statement must be placed in a prominent location that is clearly visible and easily readable; - Background elements, such as images, colours, and/or other design features must not obscure the size, shape, or colour of the <i>Non-Halal</i> Statement; - Where the packaging's background is red, the text and background colour of the <i>Non-Halal</i> Statement may use other colours with sufficient contrast to ensure readability; and - The <i>Non-Halal</i> Statement must not be easily removed, detached, or damaged.

The following food and beverages, including dairy products, are **exempt** from the above *Non-Halal* Statement requirement:

- Food and beverages with packaging that is too small to accommodate the *Non-Halal* Statement;
- Products classified as non-retail products; and
- Products whose trade names contain the term “*pig*”.¹⁴³

Where the packaging is too small, the *Non-Halal* Statement must be affixed on a hang tag, brochure, display panel, shrink wrap, or other labelling media. In the case of non-retail dairy products, supporting documentation must be provided stating that the product is derived from prohibited materials and/or that its production process does not comply with *Halal* standards.¹⁴⁴

¹⁴⁰ Article 110(3) of *Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance*, available at <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024> (accessed 22 June 2026).

¹⁴¹ *Draft BPJPH Regulation on Format and Procedures for the Affixing of Non-Halal Statements*, available at https://members.wto.org/crnattachments/2026/TBT/IDN/26_00888_00_x.pdf (accessed 22 June 2026).

¹⁴² Article 23 of *Draft BPJPH Regulation on Format and Procedures for the Affixing of Non-Halal Statements*, available at https://members.wto.org/crnattachments/2026/TBT/IDN/26_00888_00_x.pdf (accessed 22 June 2026).

¹⁴³ Article 27 of the *Draft BPJPH Regulation on Format and Procedures for the Affixing of Non-Halal Statements*, available at https://members.wto.org/crnattachments/2026/TBT/IDN/26_00888_00_x.pdf (accessed 22 June 2026).

¹⁴⁴ Articles 27 and 28 of the *Draft BPJPH Regulation on Format and Procedures for the Affixing of Non-Halal Statements*, available at https://members.wto.org/crnattachments/2026/TBT/IDN/26_00888_00_x.pdf (accessed 22 June 2026).

6.9 NUTRITIONAL LABELLING

Processed foods, including dairy products, are subject to **nutritional labelling** requirements under:

- *BPOM Regulation 10/2026 on Nutritional Information on Processed Food Labels*, which requires the display of a Nutritional Information Panel and a “Nutri-Level” label and permits the use of a “Healthier Choice” logo on **packaged processed foods** distributed in Indonesia; and
- *Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods*, which requires the Nutri-Level label to be displayed on **ready-to-serve processed foods** directly offered for sale to consumers (e.g., in restaurants and cafes).

Both regulations require the display of a **Nutri-Level** label, but apply to different categories of processed foods. Under *BPOM Regulation 10/2026*, the grading is based on the sugar, salt, and total fat content of the product, whereas, under *Minister of Health Decree 301/2026*, the grading is based on the sugar, salt, and saturated fat content. As saturated fat is only a subset of total fat, products with the same total fat content but different saturated fat levels may receive different **Nutri-Level grades** under the two regulations.

The regulations also prescribe **different timelines** for the mandatory implementation of the *Nutri-Level* labelling requirements:

- Under *BPOM Regulation 10/2026*, the mandatory labelling requirements will apply from 17 October 2028; and
- Under *Minister of Health Decree 301/2026*, the mandatory requirements will take effect only two years after the Government establishes maximum limits for sugar, salt, and fat content under separate legislation, which, as of June 2026, has not yet been enacted.

Notably, the distinction on the basis of distribution channels may give rise to implementation challenges, as products that are distributed through both retail and food service channels (e.g., bottled ready-to-drink beverages, such as iced tea, coffee, or fruit juice sold in supermarkets and also offered by cafes or restaurants) could receive different *Nutri-Level* grades.

The box below summarises key information relating to the nutritional labelling requirements:

Nutritional Labelling

- **Relevant Ministry/Government Agency:** Ministry of Health and BPOM
- **Relevance of the EU-Indonesia CEPA:** Chapter 21 of the CEPA on “Bilateral Dialogue Mechanism” and Article 20.4 on “Enquiries” may provide a platform for the EU and Indonesia to discuss Indonesia’s *Nutri-Level* front-of-pack nutrition labelling schemes. Such discussions could help avoid uncertainty and confusion regarding the implementation of the respective regulatory regimes, particularly where products are distributed through both retail and food service channels (e.g., bottled ready-to-drink beverages, such as iced tea, coffee, or fruit juice sold in supermarkets and also offered by cafes or restaurants) could receive different *Nutri-Level* grades

6.9.1 REQUIREMENTS FOR PACKAGED PROCESSED FOODS

BPOM Regulation 10/2026 establishes the **nutrition information requirements and labelling standards** applicable to packaged processed foods distributed in Indonesia. The Regulation governs the provision of nutrition information on food packaging, including the mandatory declaration of nutritional information (e.g. energy, fat, protein, carbohydrates, sugar, and sodium), and introduces the *Nutri-Level* front-of-pack nutrition label for specified categories of processed beverages.

Under *BPOM Regulation 10/2026*, processed food, including dairy products, must include **nutrition information** on the product label. The different formats for including the nutrition information are set out in Annex I to the Regulation.

At a minimum, the nutrition information must include:¹⁴⁵

- The serving size;
- The number of servings per package, which is detailed in Annex II to *BPOM Regulation 10/2026* for dairy products. For instance, the prescribed serving size for plain liquid milk is 100 to 250 ml;
- The types of nutrients and non-nutrient substances;
- The amounts of nutrients and non-nutrient substances;
- The percentage of the Recommended Dietary Allowance; and
- A footnote stating that the Percentage Daily Value (%DV) is based on a 2,150-kcal reference diet and that individual energy needs may vary. The footnote must be placed at the bottom of the panel, in italics, as the final item in the table.

BPOM Regulation 10/2026 allows processed food products, including dairy products, to display the **Healthier Choice** logo, provided that they comply with the nutrient profile criteria prescribed for the relevant category of processed food. The applicable nutrient profile criteria for each product category, including for ready-to-drink beverages, are set out in Annex IV to *BPOM Regulation 10/2026*.

For instance, plain milk, plain milk beverages, and beverages containing plain milk are eligible to display the *Healthier Choice* logo only if they contain no more than 0.5 g of sugars (excluding lactose) per 100 ml and do not contain added sweeteners, whether added directly or introduced through carry-over.

Image 7: The “Healthier Choice” Logo under BPOM Regulation 10/2026



¹⁴⁵ Articles 2, 3, and 5 of *BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

BPOM Regulation 10/2026 also requires specified categories of processed beverages to display the **Nutri-Level** front-of-pack nutrition label. These categories include ready-to-drink beverages, powdered beverages, and liquid and solid beverage concentrates, including dairy products such as flavoured milk and powdered milk drinks. The *Nutri-Level* indicates the relative nutritional profile of a product by assigning it to one of four grades from A to D, represented by a colour-coded label, based on its sugar, sodium, and total fat content.¹⁴⁶ The *Nutri-Level* front-of-pack nutrition label will take effect 24 months after the promulgation of the Regulation, namely on 17 June 2028.¹⁴⁷

The detailed requirements for the *Nutri-Level* front-of-pack nutrition label applicable to ready-to-drink beverages, powdered beverages, and liquid and solid beverage concentrates are set out in Annex V to *BPOM Regulation 10/2026*. For ready-to-drink beverages, the applicable nutrient thresholds for sugar, sodium, and total fat per 100 ml are as follows:

Table 14: Categories under the “Nutri-Level” Labelling Scheme

Nutrient	A	B	C	D
Sugar (g)	≤ 0.5	> 0.5 – ≤ 6.0	> 6.0 – ≤ 12.5	> 12.5
Salt (mg)	≤ 5.0	> 5.0 – ≤ 120.0	> 120.0 – ≤ 500.0	> 500.0
Total fat (g)	≤ 0.5	> 0.5 – ≤ 3.0	> 3.0 – ≤ 17.0	> 17.0

The display of the *Nutri-Level* logo must comply with the following requirements:

- Level A products must not contain any food additives used as sweeteners, whether natural or artificial, either through direct addition or by carry-over;
- Level B products may contain natural sweeteners only;
- Levels C and D products may contain natural and/or artificial sweeteners;
- Sugars refers to all monosaccharides and disaccharides, excluding lactose;
- The total fat criterion does not apply to:
 - Plain liquid milk (full-fat, partially skimmed, and skimmed milk), with or without added vitamins and minerals, provided no other food ingredients are added; and
 - Plain powdered milk (full-cream milk powder, instant full-cream milk powder, partially skimmed milk powder, and skimmed milk powder).

Image 8: The “Nutri-Level” Label under BPOM Regulation 10/2026



¹⁴⁶ Article 27 and 29 of *BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

¹⁴⁷ Articles 27 and 32 of *BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

6.9.2 REQUIREMENTS FOR READY-TO-SERVE PROCESSED FOODS

Pursuant to *Minister of Health Decree 301/2026*,¹⁴⁸ large-scale enterprises operating in Indonesia that market beverages in retail stores for direct consumption, such as bubble tea and milk tea, will be required to print and display the *Nutri-Level* label indicating the content of sugar, salt, and saturated fat.¹⁴⁹ This requirement will take effect two years after the Government has established the maximum limits for sugar, salt, and fat content under separate legislation, which has not yet been enacted.

Image 9: The “*Nutri-Level*” Label under *Minister of Health Decree 301/2026*



The specifications for the *Nutri-Level* label are set out below:¹⁵⁰

Table 14: Specifications for the “*Nutri-Level*” Label

Specification	Details
Font for “ <i>NUTRI-LEVEL</i> ” text	Arial Black
Font for percentage content of sugar, salt, and fat	Arial Bold
Dark Green Level A	CMYK 100C 25M 100Y 0K
Light Green Level B	CMYK 55C 0M 100Y 0K
Yellow Level C	CMYK 0C 30M 90Y 0K
Red Level D	CMYK 20C 100M 100Y 10K
Black	CMYK 0C 0M 0Y 100K
White	CMYK 0C 0M 0Y 0K

The *Nutri-Level* label contains four levels, with “A” representing the lowest level and “D” the highest level of sugar, salt, and saturated fat content:¹⁵¹

Table 15: Categories under the “*Nutri-Level*” Labelling Scheme

Nutrient	A	B	C	D
Sugar (g)	≤ 1 (no added sweeteners)	> 1–5	> 5–10	> 10
Salt (mg)	≤ 5	> 5–≤ 120	> 120–≤ 500	> 500
Saturated fat (g)	≤ 0.7	> 0.7–1.2	> 1.2–2.8	> 2.8

¹⁴⁸ *Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods*, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 22 June 2026).

¹⁴⁹ Dictums 1 and 2 of *Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods*, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 22 June 2026).

¹⁵⁰ Annex to *Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods*, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 22 June 2026).

¹⁵¹ Dictum 5 of *Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods*, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 22 June 2026).

The *Nutri-Level* label must be displayed on various forms of information media, such as menus, retail packaging, brochures, banners, leaflets, and menu listings on commercial electronic applications:¹⁵²

Image 10: Examples of Various Information Media with the “*Nutri-Level*” Label¹⁵³



The nutri-level labelling scheme will become mandatory two years after the Government has established the maximum limits for sugar, salt, and fat content under separate legislation.¹⁵⁴ As such legislation has not yet been enacted, participation in the scheme remains **voluntary**. Under the current voluntary scheme, any beverage sold through retail outlets for direct consumption that exceeds the maximum threshold for Category “C” is automatically classified as Category “D”.

¹⁵² Dictum 4 of Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 22 June 2026).

¹⁵³ Annex to Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 25 May 2026).

¹⁵⁴ Dictum 10 of Minister of Health Decree No. HK.01.07/MENKES/301/2026, available at <https://jdih.kemkes.go.id/documents/keputusan-menteri-kesehatan-nomor-hk0107menkes3012026> (accessed 25 May 2026).

7 STEP 4: DETERMINING THE APPLICABLE TARIFF AND COMPLYING WITH CUSTOMS REQUIREMENTS

Once the *EU-Indonesia CEPA* enters into force, EU businesses should determine whether the relevant product(s) intended for export are eligible for **preferential treatment**.

EU businesses must also comply with all applicable **Customs procedures and documentary requirements** before their products can be cleared for entry into Indonesia. This includes ensuring that all required import documentation, licences, approvals, and supporting certificates are complete, accurate, and consistent with the Customs declaration submitted by the importer. Inaccurate, incomplete, or inconsistent documentation may result in delays, penalties, or other disruptions to the importation process.

7.1 DETERMINING THE APPLICABLE TARIFF TREATMENT

Trade in goods between countries is typically subject to **tariffs**. Members of the *World Trade Organization* (WTO) are bound by the tariff commitments set out in their respective WTO Schedules of Commitments, which specify the maximum tariff rates that a WTO Member may impose on goods imported from other WTO Members. Such tariffs are referred to as Most-Favoured Nation tariffs.¹⁵⁵ Tariffs may, however, be reduced or eliminated pursuant to **preferential trade agreements**, such as the *EU-Indonesia CEPA*.

EU businesses may export goods to Indonesia under:

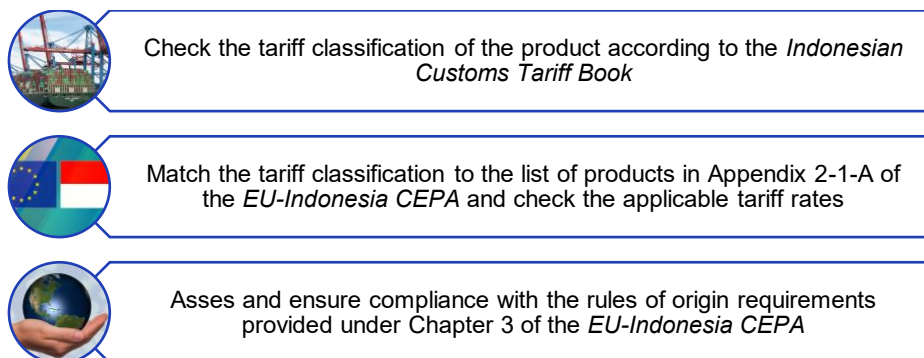


Once the *EU-Indonesia CEPA* enters into force, EU dairy businesses seeking access to the Indonesian market should determine whether their products are eligible for preferential tariff treatment under the Agreement. Under the Agreement, tariffs on a range of dairy products will either be **eliminated** immediately upon entry into force or progressively phased out over a period of up to five years. Access to such preferential tariff treatment is, however, subject to compliance with the applicable rules of origin under the Agreement.

To determine whether their products qualify for preferential tariff treatment under the *EU-Indonesia CEPA*, EU exporters should undertake the following steps:¹⁵⁶

¹⁵⁵ See [https://www.wto.org/english/thewto_e/whatis_e/tif_e/fact2_e.htm#:~:text=Most%2Dfavoured%2Dnation%20\(MFN\)%3A%20treating%20other%20people%20equally](https://www.wto.org/english/thewto_e/whatis_e/tif_e/fact2_e.htm#:~:text=Most%2Dfavoured%2Dnation%20(MFN)%3A%20treating%20other%20people%20equally) (accessed 22 June 2026).

¹⁵⁶ See <https://www.beacukai.go.id/btki-dan-tarif> and <https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/15b8b355-fb6a-45c2-8d1f-7c0335119724/details?open=true> (accessed 22 June 2026).



Once the *EU-Indonesia CEPA* has entered into force, EU businesses could consult the EU's *Access2Markets* website to determine whether their dairy products qualify for preferential tariff treatment under the Agreement.¹⁵⁷

Pending the entry into force of the *EU-Indonesia CEPA*, exports of EU dairy products to Indonesia will remain subject to Indonesia's Most-Favoured-Nation (MFN) applied tariff rates. Currently, dairy products are subject to a **5%** applied tariff rate (while the bound tariff rates range from 40% to 210%, depending on the product).¹⁵⁸

7.2 PREFERENTIAL TARIFFS UNDER THE EU-INDONESIA CEPA

The *EU-Indonesia CEPA*, concluded on 23 September 2025, is currently awaiting signature and implementation by both Parties. Under the Agreement, both sides committed to **eliminating tariffs on more than 98.5% of tariff lines**, covering close to 100% of the bilateral trade value, with approximately 80% liberalised upon the Agreement's entry into force.

Indonesia's tariff commitments under the *EU-Indonesia CEPA* are set out in **Appendix 2-A-1**. Indonesia will **eliminate import tariffs** on a wide range of EU dairy products, including milk, buttermilk, whey, butter, curd, yogurt, and cheese. Each tariff line is assigned a **staging category**, which determines whether the applicable Customs duty will be eliminated immediately upon the Agreement's entry into force or phased out over a specified period.

The tariff elimination staging categories are summarised below.

Table 15: Staging Categories and Tariff Elimination Commitments under the *EU-Indonesia CEPA*

Staging Category	Tariff Elimination Commitment
Category A	Tariffs will be reduced to 0% on the date of the entry into force of the Agreement
Category B3	Tariffs will be eliminated in four equal annual stages beginning upon entry into force of the Agreement and will be reduced to 0% on 1 January of Year 3.
Category B5	Tariffs will be eliminated in six equal annual stages beginning upon entry into force of the Agreement and will be reduced to 0% on 1 January of Year 5.

The table below sets out Indonesia's tariff commitments for dairy products under the Agreement:

Table 16: Indonesia's tariff commitments for dairy products under the *EU-Indonesia CEPA*

HS Code	Product Name	Base Tariff Rate	Staging Category
04.01	Milk and cream, not concentrated nor containing added sugar or other sweetening matter		

¹⁵⁷ Access2Markets, available at <https://trade.ec.europa.eu/access-to-markets/en/home> (accessed 29 June 2026).

¹⁵⁸ See <https://ttd.wto.org/en/profiles/indonesia> and <https://ttd.wto.org/en/member=C360&year=2025> (accessed 22 June 2026).

04011010	In liquid form	5%	B5
04011090	Other	5%	B5
04012010	In liquid form	5%	B5
04012090	Other	5%	B5
04014010	Milk in liquid form	5%	B3
04014020	Milk in frozen form	5%	B3
04014090	Other	5%	B3
04015010	In liquid form	5%	B3
04015090	Other	5%	B3
04.02	Milk and cream, concentrated or containing added sugar or other sweetening matter		
04021041	In containers of a net weight of 20 kg or more	5%	A
04021042	In containers of a net weight of 2 kg or less	5%	A
04021049	Other	5%	A
04021091	In containers of a net weight of 20 kg or more	5%	A
04021092	In containers of a net weight of 2 kg or less	5%	A
04021099	Other	5%	A
04022120	In containers of a net weight of 20 kg or more	5%	A
04022130	In containers of a net weight of 2 kg or less	5%	A
04022190	Other	5%	A
04022920	In containers of a net weight of 20 kg or more	5%	A
04022930	In containers of a net weight of 2 kg or less	5%	A
04022990	Other	5%	A
04029100	Not containing added sugar or other sweetening matter	5%	A
04029900	Other	10%	A
04.03	Yogurt; buttermilk, curdled milk and cream, kephir and other fermented or acidified milk and cream, whether or not concentrated or containing added sugar or other sweetening matter or flavoured or containing added fruit, nuts, or cocoa		
04032011	Flavoured or containing added fruits (including pulp and jams), nuts or cocoa	10%	A
04032019	Other	10%	A
04032091	Flavoured or containing added fruits (including pulp and jams), nuts or cocoa	10%	A
04032099	Other	10%	A
04039010	Buttermilk	5%	A
04039090	Other	5%	A
04.04	Whey, whether or not concentrated or containing added sugar or other sweetening matter; products consisting of natural milk constituents, whether or not containing added sugar or other sweetening matter, not elsewhere specified or included.		
04041011	Whey, fit for human consumption	5%	A
04041019	Other	5%	A

04041091	Whey, fit for human consumption	5%	A
04041099	Other	5%	A
04049000	Other	5%	A
04.05	Butter and other fats and oils derived from milk; dairy spreads		
04051000	Butter	5%	A
04052000	Dairy spreads	5%	A
04059010	Anhydrous butterfat	5%	A
04059020	Butteroil	5%	A
04059030	Ghee	5%	A
04059090	Other	5%	A
04.06	Cheese and curd		
04061010	Fresh (unripened or uncured) cheese, including whey cheese	5%	A
04061020	Curd	5%	A
04062010	In packages of a gross weight exceeding 20 kg	5%	A
04062090	Other	5%	A
04063000	Processed cheese, not grated or powdered	5%	A
04064000	Blue-veined cheese and other cheese containing veins produced by <i>Penicillium roqueforti</i>	5%	A
04069000	Other cheese	5%	A

7.3 RULES OF ORIGIN UNDER THE EU-INDONESIA CEPA

In order to qualify for preferential tariff treatment under the *EU-Indonesia CEPA*, dairy products must satisfy the applicable **rules of origin** set out in Chapter 3 of the *EU-Indonesia CEPA* on “*Rules of Origin and Origin Procedures*”.¹⁵⁹ Therefore, once the applicable tariff treatment has been identified, EU businesses must assess whether their products meet the relevant origin requirements.

The EU and Indonesia have agreed upon rules of origin designed to ensure that only products that are wholly obtained or that have undergone substantial processing within the territory of either Party are eligible to benefit from the Agreement’s preferential tariff treatment. These rules are intended to ensure that the benefits of the Agreement accrue exclusively to products originating in the EU or Indonesia, rather than to products originating in third countries and merely transhipped via a CEPA Party.¹⁶⁰

To benefit from the Agreement, products must be deemed to “**originate**” from the Party, in this case, the EU. Products are considered originating if they:

¹⁵⁹ Article 3.19 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁶⁰ See https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/key-elements-eu-indonesia-trade-agreement-and-investment-protection-agreement_en (accessed 22 June 2026).

Have been wholly obtained in that Party A criterion which mainly applies to products occurring naturally and to goods made entirely from them, such as minerals and agricultural products	Have been produced in that Party exclusively from originating materials A criterion which applies to products produced exclusively materials that have already acquired originating status by being wholly obtained or satisfying the applicable product-specific rules	Have been produced in that Party incorporating non-originating materials that satisfy the applicable product-specific rules in Annex 3-B Depending on the classification, products are subject to specific rules regarding working or processing operations that confer them originating status
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For dairy products classified under Chapter 4 of the **HS** on “*Dairy produce; birds’ eggs; natural honey; edible products of animal origin, not elsewhere specified or included*”, covering HS headings 04.01 to 04.10, originating status is conferred only where the materials of Chapter 4 used in the production are **wholly obtained**. Accordingly, dairy products will be considered originating in an EU Member State if they are produced from milk obtained from animals raised in the EU.

Processed dairy products classified under other **HS Chapters** may, however, be subject to different product-specific rules of origin. For example:

HS Code	Product-specific rules of origin
Heading 18.06 on “<i>Chocolate and other food preparations containing cocoa</i>”. Product examples include chocolate bars.	Change in Tariff Heading (CTH) provided that the total weight of non-originating materials of headings 17.01 (cane or beet sugar and chemically pure sucrose, in solid form) and 17.02 (other sugars, including chemically pure lactose, maltose, glucose and fructose, in solid form; sugar syrups not containing added flavouring or colouring matter; artificial honey, whether or not mixed with natural honey; caramel) used does not exceed 40% of the weight of the product.
Heading 19.01 on “<i>Malt extract; food preparations of flour, groats, meal, starch or malt extract, not containing cocoa or containing less than 40 % by weight of cocoa calculated on a totally defatted basis, not elsewhere specified or included; food preparations of goods of headings 04.01 to 04.04, not containing cocoa or containing less than 5 % by weight of cocoa calculated on a totally defatted basis, not elsewhere specified or included</i>”. Product examples include infant formula.	CTH, provided that: • Non-originating materials of headings 11.01 to 11.08 used are milled, malted or otherwise processed from materials of other chapters in the territory of a Party; however, non-originating materials of headings 11.01 to 11.08 (i.e., wheat, cereals, flour, and starches) which do not respect that condition may be used provided that their total weight does not exceed 20% of the weight of the product; • All the materials of Chapter 4 used are wholly obtained; and • The total weight of non-originating materials of headings 17.01 and 17.02 used does not exceed 20% of the weight of the product.

To claim preferential tariff treatment under the *EU-Indonesia CEPA*, the exporter must issue a **Statement on Origin** certifying that the product complies with the applicable rules of origin.¹⁶¹ The *Statement on Origin* must be made in one or more languages, provided that at least one version is in English. It must be

¹⁶¹ Article 3.19 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

included on an invoice or any other commercial document describing the originating product in sufficient detail to enable its identification.¹⁶²

Indonesian importers claiming preferential tariff treatment for products imported from the EU must keep the *Statement on Origin*, or a copy of it, for at least three years from the date of the preferential tariff claim, unless Indonesian law requires a longer period.¹⁶³

Annex 3-C of the *EU-Indonesia CEPA* provides a **model *Statement on Origin***, including the languages in which the statement may be completed.

Image 11: Model Statement on Origin

ANNEX 3-C

TEXT OF THE STATEMENT ON ORIGIN

The statement on origin must be drawn up in accordance with the respective footnotes. The footnotes do not have to be reproduced.

Bulgarian version
Croatian version
Czech version
Danish version
Dutch version

English version
(Period: from _____ to _____ ⁽³⁾)

The exporter of the products covered by this document (Exporter Reference No ... ⁽⁴⁾) declares that, except where otherwise clearly indicated, these products are of ... ⁽⁵⁾ preferential origin.

..... ⁽⁶⁾
(Place and date)

.....
(Printed name and signature ⁽⁷⁾ of the exporter)

³ When the statement on origin is completed for multiple shipments of identical originating products within the meaning of Article 18 (Statement on Origin), indicate the period for which the statement on origin will apply. The period shall not exceed twelve months. All importations of the product must occur within the period indicated. Where a period is not applicable, the field can be left blank.

⁴ Indicate the reference number through which the exporter is identified. For the EU exporter, this will be the number assigned in accordance with the laws and regulations of the Union. For the Indonesia exporter, this will be the number assigned in accordance with the laws and regulations of Indonesia. Where the exporter has not been assigned a number in accordance with Laws and Regulations of the Parties, this field may be left blank.

⁵ Indicate the origin of the product: Indonesia or the European Union or EU.

⁶ Place and date may be omitted if the information is contained on the document itself.

⁷ If the exporter has been assigned a number, he is not required to sign the statement on origin

¹⁶² Article 3.18 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁶³ Article 3.22 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

7.4 CUSTOMS DOCUMENTATION

For Customs clearance of dairy products upon importation into Indonesia, importers must submit the following documents:¹⁶⁴

- *Proforma Invoice*;
- *Import Declaration*. The *Import Declaration* contains comprehensive information on goods classification, Customs value, as well as the calculation of import duties and import taxes;
- *Commercial Invoice*;
- *Certificate of Origin* to claim for preferential treatment;
- *Bill of Landing* or *Airway Bill*;
- *Packing List*;
- *Insurance Certificate*; and
- SPS related documents specific for dairy products, namely the *Veterinary Health Certificate*.

These documents are to be submitted via the **Indonesia National Single Window (INSW)**, an integrated platform that connects the government agencies involved in import and export procedures.¹⁶⁵ The *INSW* facilitates the electronic submission and processing of trade-related documents, including import and export licences, Customs documents, and import or export realisation reports.¹⁶⁶ Importers can also use the *INSW* to track their import status, including information on the process of document verification, approval of licences, and Customs release.¹⁶⁷

Submissions of import documents typically occur prior to cargo arrival. In some cases, Indonesia's Customs authorities may require importers to upload flash drive backups for manual verification.¹⁶⁸

Upon arrival, goods are subject to Customs inspections, which may include documentary verification and the physical inspection of goods. The physical inspection of goods may be conducted by opening the goods' packaging and/or using scanning equipment.¹⁶⁹

Several provisions in the *EU-Indonesia CEPA* aim to expedite Customs clearance and to improve the efficiency of Customs processes, including through cooperation on Authorised Economic Operator (AEO) programmes, as provided under Article 4.11 of the Agreement (see Section 8.3 of this *Guidance Handbook*).

¹⁶⁴ Law No. 10 of 1995 on Customs, available at <https://peraturan.bpk.go.id/Details/46201/uu-no-10-tahun-1995> (accessed 1 June 2026), as amended by Law No. 17 of 2006 on Amendments to Law No. 10 of 1995 on Customs, available at <https://peraturan.bpk.go.id/Details/40189/uu-no-17-tahun-2006> (accessed 22 June 2026).

¹⁶⁵ Presidential Regulation No. 44 of 2018 on Indonesia National Single Window, available at <https://peraturan.bpk.go.id/Details/82674/perpres-no-44-tahun-2018> (accessed 22 June 2026).

¹⁶⁶ See https://www.unescap.org/sites/default/files/10_INSW-ESCAP.pdf (accessed 22 June 2026).

¹⁶⁷ See <https://tfadatabase.org/en/members/indonesia/article-10-4-3?> (accessed 22 June 2026).

¹⁶⁸ See <https://www.trade.gov/country-commercial-guides/indonesia-import-requirements-and-documentation> (accessed 22 June 2026).

¹⁶⁹ See <https://www.beacukai.go.id/pemeriksaan-pabean> (accessed 22 June 2026).

7.5 POST BORDER IMPORT CERTIFICATE

Under *BPOM Regulation 15/2020*, importers of processed food products, including dairy products, must obtain a **Post Border Import Certificate** from BPOM no later than seven days from the date on which the goods are released from Customs.¹⁷⁰ The Certificate is valid only for one time importation.¹⁷¹

Applications for a *Post Border Import Certificate* must be submitted electronically through the official e-BPOM¹⁷² system or the INSW system¹⁷³ and must be accompanied by the following documents:¹⁷⁴

- *Distribution Approval* from BPOM (i.e., in the form of the ML number);
- *Certificate of Analysis* or *Product Certificate* for the use of the *SNI Mark* for products subject to mandatory SNI requirements. For dairy products, the use of SNI is not mandatory;¹⁷⁵ and
- Commercial Invoice for the imported goods;
- The *Application Letter* signed by the company's director or an authorised representative of the director, bearing a stamp duty;¹⁷⁶
- The original *Statement Letter of Responsibility* bearing a stamp duty;
- An NIB;
- An *Import Authorisation Letter* in the form of a notarial deed, where the applicant is a business entity that has been authorised by another company to carry out the importation; and
- The list of HS Codes for the commodities to be imported.

Applicants must also clearly specify the warehouse where the products will be stored.

Within six hours of the submission of the application and all documents required by BPOM, and upon payment of the applicable fee (i.e., between IDR 50,000 (EUR 2.42) to IDR 100,000 (EUR 4.85)), BPOM must evaluate the application to determine whether the *Post Border Import Certificate* should be issued.¹⁷⁷ If the application is complete and in order, BPOM will issue the *Post Border Import Certificate* within six hours.

The box below summarises key information relating to the *Post-Border Import Certificate*:

Post-Border Import Certificate
• Relevant Ministry/Government Agency: BPOM

¹⁷⁰ Article 3 of *BPOM Regulation No. 15 of 2020 on Amendment to BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia*, available at <https://peraturan.bpk.go.id/Details/181779/peraturan-bpom-no-15-tahun-2020> (accessed 22 June 2026).

¹⁷¹ See <https://ditwasotsk.pom.go.id/post/ski-border-dan-post-border-1> (accessed 22 June 2026).

¹⁷² See <https://e-bpom.pom.go.id> (accessed 22 June 2026).

¹⁷³ See <https://insw.go.id/> (accessed 22 June 2026).

¹⁷⁴ Article 16 of *BPOM Regulation No. 28 of 2023 on Amendments to BPOM Regulation No. 27 of 2022 on the Supervision of the Importation of Drugs and Food into the Territory of Indonesia*, available at <https://jdih.pom.go.id/download/flip/1535/28/2023> (accessed 22 June 2026).

¹⁷⁵ See http://pustan.kemenperin.go.id/List_SNI_Wajib (accessed 22 June 2026).

¹⁷⁶ Article 9 of *BPOM Regulation No. 28 of 2023 on Amendments to BPOM Regulation No. 27 of 2022 on the Supervision of the Importation of Drugs and Food into the Territory of Indonesia*, available at <https://jdih.pom.go.id/download/flip/1535/28/2023> (accessed 22 June 2026).

¹⁷⁷ Article 28 of *BPOM Regulation No. 27 of 2022 on the Supervision of the Importation of Drugs and Food into the Territory of Indonesia*, available at <https://peraturan.bpk.go.id/Details/285059/perka-bpom-no-27-tahun-2022> (accessed 22 June 2026).

- **Validity of the *Post Border Import Certificate*:** Valid for one time importation only
- **Processing time of the *Post Border Import Certificate*:** 6 hours

8 RELEVANCE OF THE EU-INDONESIA COMPREHENSIVE ECONOMIC PARTNERSHIP AGREEMENT

The *EU-Indonesia CEPA* contains a range of provisions that, upon the Agreement's entry into force and application, may help address several of the trade and regulatory challenges currently faced by the EU dairy industry in accessing the Indonesian market. In particular, various commitments are intended to promote a more **transparent, predictable, and facilitative trading environment** for businesses operating between the EU and Indonesia, including those in the dairy sector.

Of particular relevance to EU dairy exporters, the CEPA also provides for procedures governing the approval and listing of **foreign establishments eligible to export** to the other Party's market. These disciplines may help improve the transparency, predictability, and timeliness of the country and establishment approval process administered by Indonesia's Ministry of Agriculture. Furthermore, the Agreement establishes mechanisms for regulatory cooperation, consultation, and information exchange through which market access issues affecting businesses may be raised and discussed between the European Commission and Indonesian authorities.

The extent to which these anticipated benefits materialise will depend on **how the *EU-Indonesia CEPA* is implemented** in domestic law, how consistently it is applied by the relevant authorities, how consistently it is applied by the relevant authorities, and the level of ongoing engagement and cooperation between the EU and Indonesia.

8.1 FACILITATING THE APPROVAL PROCESS FOR DAIRY ESTABLISHMENTS

Article 6.8 of the *EU-Indonesia CEPA* on "*Procedure for Listing of Establishments or Facilities*" concerns the procedure for approving and listing foreign establishments, such as dairy processing facilities, that wish to export products to the other Party's market. This provision is particularly relevant for EU businesses in light of concerns regarding lengthy, non-transparent, and unpredictable establishment approval process administered by the Ministry of Agriculture, which in some cases may take more than five years to complete (see Section 5.1 of this *Guidance Handbook*).

The provision requires the importing Party, to approve the listing of establishments or facilities located in the exporting Party without prior inspection, subject to the fulfilment of certain conditions, notably that:

- The exporting Party has requested an approval for the establishment or facility;
- The establishment or facility has been approved by the competent authority of the exporting Party; and
- The exporting Party has provided any relevant information and appropriate guarantees requested by the importing Party.

Unless additional information is required, the importing Party must take the necessary legislative or administrative measures to allow imports within **60 calendar days** of receiving the request for approval. If the importing Party rejects the request, it must inform the exporting Party without delay of the elements and justification on which the decision is based. The importing Party is also required to make its lists of approved establishments or facilities publicly available.

- Article 6.8 of the *EU-Indonesia CEPA* establishes clear procedural requirements and timelines for the approval of foreign establishments and enhances transparency surrounding approval decisions
- Once the *EU-Indonesia CEPA* has entered into force and is applied by the Parties, this provision could help address some of the procedural factors contributing to delays in the establishment approval process administered by the Ministry of Agriculture. More specifically, the requirement to approve establishments without prior inspection in certain circumstances may reduce delays associated with the scheduling and conduct of on-site inspections, while the introduction of a 60-calendar-day timeframe for processing approval requests may provide greater certainty regarding the timing of approval decisions
- The requirement for the importing Party to publish lists of approved establishments may also improve visibility regarding approval outcomes

8.2 ENHANCING REGULATORY TRANSPARENCY

Chapters 2, 4, 6, and 7 of the *EU-Indonesia CEPA* on “*National Treatment and Market Access for Goods*”, “*Customs and Trade Facilitation*”, “*Sanitary and Phytosanitary Measures*” and “*Technical Barriers to Trade*”, respectively, contain provisions intended to promote **greater regulatory transparency** between the EU and Indonesia. These commitments may help address concerns raised by EU dairy businesses regarding the transparency, predictability, and administration of import requirements in Indonesia.

Article 2.12 on “*Import Licensing Procedures*” requires import licensing procedures to be administered in a fair, equitable, non-discriminatory, and transparent manner.¹⁷⁸ The provision further incorporates key disciplines under the *WTO Agreement on Import Licensing Procedures* and requires the Parties to publish, including on the Internet, all relevant rules, information, conditions, and administrative requirements relating to import licence applications.¹⁷⁹

The EU and Indonesia must **notify** each other of new import licensing procedures or changes to existing procedures, provide information on such procedures upon request, and establish contact points from which interested persons may obtain further information regarding import licensing requirements.¹⁸⁰ Article 2.12 also requires authorities, upon request, to provide written **explanations for the denial of import licence applications** and provides applicants with the opportunity to seek administrative or judicial review of licensing decisions.¹⁸¹

Article 4.12 on “*Publication and Availability of Information*” requires Customs regulations and procedures, such as administrative notices, importation, exportation, transit procedures, and rules of origin, to be made publicly available and in an accessible manner.¹⁸²

¹⁷⁸ Article 2.12(1) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁷⁹ Article 2.12(5) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸⁰ Article 2.12(5) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸¹ Article 2.12(6) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸² Article 4.12 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

Article 6.6 on “*Import Conditions, Import Procedures and Trade Facilitation*” contains various commitments aimed at enhancing transparency, predictability, and efficiency in the administration of SPS-related import requirements. The provision requires the Parties to ensure that their SPS measures are not applied in a manner that would constitute an arbitrary or unjustifiable discrimination against the other Party.¹⁸³

Article 6.10 on “*Transparency and Exchange of Information*” contains commitments by the Parties to exchange information on matters related to the development and application of SPS measures that may affect trade between the Parties.¹⁸⁴ These commitments may address concerns by EU dairy businesses regarding the lack of transparency and unpredictability of Indonesia’s SPS-related requirements, such as on country and establishment approval. In particular, these provisions may help to prevent the imposition of arbitrary or additional administrative requirements not provided under the applicable laws and regulations.¹⁸⁵ For instance, requiring the importation of cattle as a prerequisite for obtaining a *Technical Recommendation* from the Ministry of Agriculture, where such a requirement is not established under the applicable rules; and

Article 7.7 on “*Transparency*” contains various commitments aimed at enhancing transparency of TBT-related measures. The provision requires the EU and Indonesia to notify proposed technical regulations and conformity assessment procedures to the WTO and provide the other Party with at least 60 days to submit comments, except in urgent circumstances involving safety, health, environmental protection, or national security. This commitment may help address concerns regarding the transparency and predictability of technical regulations and conformity assessment procedures by requiring the EU and Indonesia to provide opportunities for comments before adoption.¹⁸⁶

- Certain provisions under the *EU-Indonesia CEPA* may provide a basis for enhanced transparency of Indonesia’s import and market access requirements for dairy products, including commitments related to the publication of regulations, access to regulatory information, and the administration of import procedures
- For instance, the transparency obligations, including requirements to publish import licensing requirements, notify procedural changes, could improve access to information on the requirements and procedures for obtaining the necessary licences, including *Import Approvals* and *Technical Recommendations*, while ensuring that businesses are informed of new or amended requirements in a timely manner
- Once the *EU-Indonesia CEPA* has entered into force and is officially implemented, these provisions are intended to enhance regulatory transparency and predictability for EU businesses by improving access to relevant regulatory requirements, reducing challenges arising from fragmented regulatory frameworks and language barriers, as well as regarding the application of administrative requirements that are not clearly reflected in the applicable regulation (e.g., additional requirements, such as to import cattle as a pre-requisite to obtain a *Technical Recommendation* from the Ministry of Agriculture, as discussed under Section 5.3 of this *Guidance Handbook*)

¹⁸³ Article 6.6(1) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸⁴ Article 6.10(c) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸⁵ Article 6.6(2)(b) and (8) of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

¹⁸⁶ Article 7.7 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 22 June 2026).

8.3 SIMPLIFIED CUSTOMS PROCEDURES

Chapter 4 of the *EU-Indonesia CEPA* on “*Customs and Trade Facilitation*” contains a number of provisions that may help address concerns raised by EU businesses regarding delays in Customs clearance and the administrative burden associated with import procedures. In particular, these provisions aim to facilitate trade by improving the efficiency, transparency, and predictability of Customs processes, including through the use of authorised economic operator programmes.

Article 4.5 on “*Customs Provisions and Procedures*” provides the commitment of the EU and Indonesia to improve the transparency, efficiency, integrity, and accountability of Customs procedures through the simplification of Customs requirements and formalities, as well as Customs data and documentation.

Article 4.7 on “*Simplified Customs Procedures*” contains commitments to establish a simplified, transparent, and efficient Customs procedures to reduce costs and increase predictability for economic operators, including for small and medium-sized enterprises.

Article 4.11 on “*Authorised Operators*” requires the EU and Indonesia to provide additional trade facilitation measures related to imports conducted by authorised operators, including a low rate of physical inspections and examinations, rapid release time, as well as a single Customs declaration for all imports in a given period.

Article 4.20 on “*Relations with Business Community*” requires regular consultations between Customs administrations in the EU and Indonesia with the business community on Customs and trade facilitation measures, and requires that Customs procedures remain responsive to the needs of traders.

- Certain provisions under Chapter 4 of the *EU-Indonesia CEPA* may provide a basis for enhanced cooperation between the EU and Indonesia on Customs and trade facilitation matters, including the simplification of Customs procedures and the reduction of delays in Customs clearance
- Once the *EU-Indonesia CEPA* has entered into force and is implemented by the Parties, these provisions are intended to contribute to more efficient and predictable Customs procedures for EU businesses by reducing administrative burdens, enhancing procedural transparency, and facilitating the movement of goods between the EU and Indonesia

8.4 COOPERATION AND DISCUSSIONS

Chapters 2, 6, 19, and 20 of the *EU-Indonesia CEPA* on “*National Treatment and Market Access for Goods*”, “*Sanitary and Phytosanitary Measures*”, “*Good Regulatory Practices*”, and “*Transparency*” respectively, contain provisions aimed at enhancing regulatory cooperation, promoting dialogue, and facilitating the exchange of information between the Parties on existing and emerging regulatory issues. These commitments may provide avenues through which concerns affecting EU businesses, such as those relating to Indonesia’s *Halal* certification requirements (see Section 6.8 of this *Guidance Handbook*), may be raised and discussed between the Parties.

Article 24.4 of the *EU-Indonesia CEPA* on “*Specialised committees*” foresees the establishment of specialised Committees, including committees on Trade in Goods, Customs, and SPS. Among other

functions, these committees are tasked with discussing and addressing barriers to trade in goods, including those arising from the application of non-tariff measures.¹⁸⁷

Article 6.6 on “*Import Conditions, Import Procedures and Trade Facilitation*” requires the importing Party to consider requests from the exporting Party to review existing import conditions, thereby creating a mechanism for the assessment and potential refinement of trade-related regulatory measures.

Article 6.11 on “*Technical Consultations*” requires Parties to engage in technical consultations where a Party raises significant concerns regarding measures affecting human, animal, or plant life or health.

Article 19.7 on “*Public Consultations*” establishes the requirement for the Parties to conduct public consultations when preparing for a major regulatory measure. In particular, Parties are required to publish either draft regulatory measures or consultation documents that provide sufficient detail of the draft regulation to allow stakeholders to assess whether and how their interests may be affected, and to consider such comments where they are relevant to the consultation.

Article 20.4 on “*Enquiries*” requires each Party to establish or maintain appropriate mechanisms to respond to enquiries regarding its domestic laws and regulations.

Chapter 21 on “*Bilateral Dialogue Mechanism*” establishes a bilateral dialogue mechanism through which the Parties could enhance cooperation and dialogue on matters of interest in their trade relations, including through the exchange of information on existing or proposed measures that may affect bilateral trade or investment, and through follow up discussions to address concerns regarding measures that may unduly restrict bilateral trade or investment and to seek mutually acceptable outcomes.

- Certain provisions of the *EU-Indonesia CEPA* could, once the Agreement has entered into force and is applied by the Parties, provide a basis for enhanced discussions and consultations between the EU and Indonesia on trade-regulatory matters, such as concerns raised by EU businesses regarding Indonesia’s new *Nutri-Level* front-of-pack nutrition labelling schemes, the forthcoming mandatory *Halal* certification requirements and Indonesia’s non-recognition of the EU as a Single Market for the purposes of recognising foreign *Halal* certification bodies

¹⁸⁷ Article 2.16 and Article 24.4 of the *EU-Indonesia Comprehensive Economic Partnership Agreement*, available at https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements/text-agreements_en (accessed 27 June 2026).

9 RECOMMENDATIONS AND WAY FORWARD

In light of the findings presented in this *Guidance Handbook*, and recognising both the opportunities and regulatory challenges associated with exporting dairy products to Indonesia, the following **recommendations** are proposed for EU businesses seeking to access and further expand their presence in the Indonesian market:

- **Engagement with relevant Indonesian authorities:** EU businesses should use this *Guidance Handbook* as a practical reference when exporting dairy products to Indonesia and to familiarise themselves with the relevant Indonesian ministries and agencies involved in the importation and marketing of such products. This would allow businesses to establish effective channels of communication with the competent authorities, either directly or through experienced local importers and distributors, where appropriate. Given the complexity of Indonesia's import and market access requirements and the possibility of evolving administrative practices, early and ongoing engagement with competent authorities can help businesses clarify regulatory requirements and expectations, stay informed of regulatory developments, anticipate and address potential compliance issues, and facilitate the timely resolution of market access challenges;
- **Prepare for the implementation of the *EU-Indonesia CEPA*:** EU businesses should actively prepare for the entry into force and implementation of the *EU-Indonesia CEPA*, including by familiarising themselves with the provisions relevant to their operations, such as rules of origin and the applicable preferential tariffs. Businesses should also closely monitor developments relating to the implementation of the Agreement and assess how its provisions may affect their operations and market access conditions; and
- **Coordination with the European Commission and industry associations:** EU businesses should maintain close coordination with the European Commission and relevant industry associations to communicate market access challenges and other issues affecting trade in dairy products. Such coordination can facilitate the identification of common concerns across the industry and help ensure that issues encountered by businesses are effectively raised and addressed through the appropriate bilateral mechanisms established under the *EU-Indonesia CEPA*. Active engagement by businesses in sharing information and practical experiences will be important to help ensure that the Agreement delivers tangible benefits in practice and contributes to a more transparent, predictable, and business-friendly trading environment.

For the EU, the *EU-Indonesia CEPA* presents an important opportunity to **advance discussions on regulatory cooperation and alignment** in areas relevant to trade in goods. In particular, the Agreement may serve as a framework for dialogue on the recognition of the EU as a Single Market within Indonesia's regulatory system, thereby facilitating more predictable market access conditions for EU exporters.

A first step could be the recognition of *Halal* certificates issued by certification bodies established anywhere in the EU. Extending such recognition across the EU would reduce duplication and lower compliance costs for businesses.

Beyond *Halal* certification, the *EU-Indonesia CEPA* could support the broader recognition of EU-wide compliance with other regulatory requirements, including veterinary certification and, where appropriate, other import requirements. For example, the country approval granted by the Ministry of Agriculture to one EU Member State could serve as the basis for a streamlined approval process for other or all EU Member States, given the EU's harmonised food safety and veterinary control system.

Sustained regulatory dialogue between the EU and Indonesia would provide a mechanism to address implementation issues, monitor regulatory developments, and identify further opportunities for regulatory cooperation.

ANNEXES

ANNEX I: LIST OF RELEVANT LEGISLATION

No.	Name of Legislation	Date of Enactment
1	<u>Law No. 10 of 1995 on Customs</u>	30 December 1995
2	<u>Law No. 17 of 2006 on Amendments to Law No. 10 of 1995 on Customs</u>	15 November 2006
3	<u>Law No. 40 of 2007 on Limited Liability Company</u>	16 August 2007
4	<u>Law No. 25 of 2007 on Investment</u>	26 April 2008
5	<u>Law No. 33 of 2014 on Halal Product Assurance</u>	17 October 2014
6	<u>Law No. 21 of 2019 on Animal, Fish, and Plant Quarantine</u>	18 October 2019
7	<u>Law No. 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation Law</u>	31 March 2023
8	<u>Government Regulation No. 28 of 2023 on Types and Tariffs for Types of Non-Tax State Revenue Applicable to the Ministry of Agriculture</u>	30 May 2023
9	<u>Government Regulation No. 42 of 2024 on Implementation of Halal Product Assurance</u>	17 October 2024
10	<u>Government Regulation No. 28 of 2025 on the Implementation of Risk-Based Business Licensing</u>	5 June 2025
11	<u>Government Regulation No. 1 of 2026 on Amendment to Government Regulation No. 86 of 2019 on Food Safety</u>	5 January 2026
12	<u>Minister of Health Regulation No. 1031/MENKES/PER/V/2011 on Maximum Limits of Radioactive Contamination in Food</u>	15 June 2011
13	<u>Minister of Agriculture Regulation No. 14/PERMENTAN/PK.350/5/2017 of 2017 on the Classification of Veterinary Medicinal Products</u>	9 May 2017
14	<u>Minister of Agriculture Regulation No. 15 of 2021 on Standards for Business Activities and Product Standards in the Implementation of Risk-Based Business Licensing in the Agricultural Sector</u>	1 April 2021
15	<u>Minister of Trade Regulation No. 16 of 2025 on Import Policies and Regulations</u>	30 June 2025
16	<u>Minister of Trade Regulation No. 11 of 2026 on the Second Amendment to Minister of Trade Regulation No. 18 of 2025 on Policies and Regulations on Imports of Agricultural and Livestock Goods</u>	24 April 2026
17	<u>Presidential Regulation No. 44 of 2018 on Indonesia National Single Window</u>	31 May 2018
18	<u>Presidential Regulation No. 61 of 2024 on Commodity Balance</u>	21 May 2024
19	<u>Presidential Regulation No. 7 of 2025 on Amendment to Presidential Regulation No. 61 of 2024 on Commodity Balance</u>	3 February 2025
20	<u>BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia</u>	21 December 2017
21	<u>BPOM Regulation No. 31 of 2018 on Labels for Processed Food</u>	19 October 2018
22	<u>BPOM Regulation No. 8 of 2018 on Maximum Limit of Chemical Contaminants in Processed Foods</u>	26 June 2018
23	<u>BPOM Regulation No. 11 of 2019 on Food Additives</u>	1 July 2019
24	<u>BPOM Regulation No. 13 of 2019 on Maximum Limits of Microbial Contamination in Processed Foods</u>	9 July 2019
25	<u>BPOM Regulation No. 20 of 2019 on Food Packaging</u>	26 July 2019
26	<u>BPOM Regulation No. 15 of 2020 on Amendment to BPOM Regulation No. 30 of 2017 on the Supervision of the Importation of Medicines and Food into the Territory of Indonesia</u>	13 July 2020
27	<u>BPOM Regulation No. 20 of 2021 on Amendments to BPOM Regulation No. 31 of 2018 on Processed Food Labelling</u>	30 July 2021
28	<u>BPOM Regulation No. 9 of 2022 on Requirements for Heavy Metal Contamination in Processed Food</u>	22 April 2022
29	<u>BPOM Regulation No. 13 of 2023 on Food Category</u>	6 June 2023

30	<u>BPOM Regulation No. 23 of 2023 on Processed Food Registration</u>	11 September 2023
31	<u>BPOM Regulation No. 28 of 2023 on Amendments to BPOM Regulation No. 27 of 2022 on the Supervision of the Importation of Drugs and Food into the Territory of Indonesia</u>	8 November 2023
32	<u>BPOM Regulation No. 6 of 2024 on Second Amendment to BPOM Regulation No. 31 of 2018 on Processed Food Labels</u>	5 April 2024
33	<u>BPOM Regulation No. 10 of 2026 on Nutrition Information on Processed Food Labels</u>	9 June 2026
34	<u>Quarantine Agency Regulation No. 9 of 2024 on Quarantine Documents and Seals</u>	6 August 2024
35	<u>Minister of Religious Affairs Decree No. 748 of 2021 on Types of Products Required to be Halal Certified</u>	29 June 2021
36	<u>Minister of Religious Affairs Decree No. 1360 of 2021 on Materials Exempted from the Mandatory Halal Certification Requirement</u>	27 December 2021
37	<u>Minister of Health Decree No. HK.01.07/Menkes/301/2026 on the Inclusion of Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods</u>	14 April 2026
38	<u>Head of the BPJPH Decree No. 221 of 2025 on Implementation Procedures of Foreign Halal Certificate Registration</u>	15 September 2025
39	<u>Draft BPJPH Regulation on Format and Procedures for the Affixing of Non-Halal Statements</u>	N/A

ANNEX II: CONTACT INFORMATION

For further inquiries, EU businesses could reach out to the following Indonesian agencies and ministries:

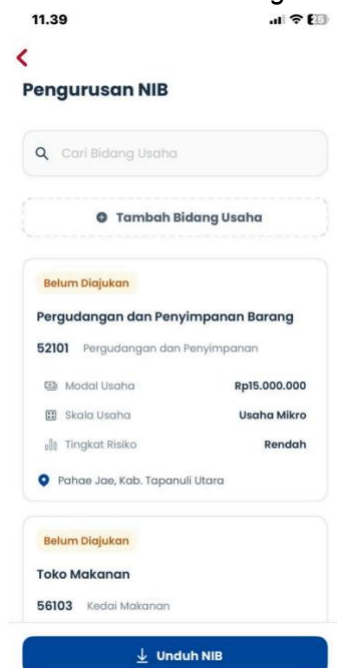
Ministry or Government Agency	Contact Information	Subject Matter of Inquiries
Halal Product Assurance Organising Agency (BPJPH)	- Telephone: 176 - WhatsApp at +62 8111421142 - Email: layanan@halal.go.id - Address: Jl. Raya Pd. Gede No.13, RW.1, Pinang Ranti, Kec Makasar, Kota Jakarta Timur, Daerah Khusus Ibukota Jakarta 13560	<i>Halal</i> labelling and certification requirements
Food and Drug Authority (BPOM)	- Telephone: +62 214244691 / +62 2142883309 / +62 2142883462 - Email: halobbpom@pom.go.id - Address: Gedung Merah Putih Lt.2 Jalan Percetakan Negara Nomor 23 Jakarta Pusat, 10560, Indonesia	<i>Post-Border Import Certificate</i>, compositional, contaminant and residue limits, and packaging, labelling, product registration requirements, and nutrition labelling
Ministry of Agriculture	- Telephone: +62 217806131 - WhatsApp: +62 85179657867 - Email: layanan-ip@pertanian.go.id - Address: Jl. Harsono RM No.3, RT.5/RW.7, Ragunan, Ps. Minggu, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12550	<i>Technical Recommendation</i>, country and establishment approval, product registration, and veterinary drug residue requirements
Ministry of Health	- Telephone: 1500-567 - WhatsApp at +62 8111050-0567 - Email: helpdesk@kemkes.go.id - Address: Jl. H.R. Rasuna Said Blok X-5 Kav. 4-9, South Jakarta 12950, Indonesia	"<i>Nutri-Level</i>" labelling scheme
Ministry of Investment/Indonesia Investment Coordinating Board	- Telephone: 169 - WhatsApp at +62 81511828000 - Email: kontak@oss.go.id - Address: Jl. Gatot Subroto No.44 7, RT.7/RW.1, Senayan, Kec. Kby. Baru, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12190	NIB
Ministry of Trade	- Telephone: +62 213858171 - Email: contact.us@kemendag.go.id - Address: Jl. M. I. Ridwan Rais, No. 5 Daerah Khusus Ibukota Jakarta 10110, Indonesia	API-U, API-P, and <i>Import Approvals</i>

ANNEX III: GUIDE FOR NIB REGISTRATION

1. Log in to the OSS application using a Micro and Small Enterprise account.
2. On the homepage, select the “Kelola NIB” menu.



3. Select “Tambah Bidang Usaha”.



4. Complete the information on the Type of Business, Business Sector, Scope of Business, and select the business sector corresponding to the relevant KBLI code, then click “*Lanjut*”.

11.40

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Pengembangan
KBLI

Isi berdasarkan Klasifikasi Baku Lapangan Usaha Indonesia (KBLI) 2020.

Jenis Usaha

Utama

Bidang Usaha

10710 - Industri Produk Roti Dan Kue

Kelompok ini mencakup usaha pembuatan berbagai macam roti, kue dan produk bakeri lainnya seperti industri roti tawar dan roti kadet; industri kue, pie, tart; industri biskuit dan produk roti kering lainnya; industri pengawetan kue kering dan cake; industri produk makanan ringan baik yang manis atau asin; industri tortillas; dan industri produk roti yang dibekukan, seperti pancake, waffle dan roti kadet.

Ruang Lingkup Usaha

Seluruh

Lanjut

5. After completing the above information, fill in the Land Area, Unit of Measurement, and Business Capital data. Then select “*Validasi Risiko*”.

11.41

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Pengembangan
Validasi Risiko

Luas Lahan

20 m²

Satuan

☒ m²

☐ ha

Modal Usaha

Rp 100.000.000

Validasi Risiko

6. After completing the Risk Validation, fill in the “*Perizinan Usaha*” information and select “*Lanjut*”.

The screenshot shows a mobile application interface for business registration. At the top, the status bar displays the time 11:42 and signal strength. The app header includes a back arrow, the title 'Pengembangan', and the subtitle 'Perizinan Usaha'. Below this is a summary box with two items: 'Skala Usaha' (Micro) and 'Tingkat Risiko' (Low). The form contains two questions with radio button options: 'Apakah usaha ini sudah berjalan?' (Already/Not yet) and 'Apakah usaha ini memiliki NPWP tersendiri?' (Yes/No). The 'Nama Usaha' (Business Name) field contains 'Toko kue'. The 'Deskripsi Usaha' (Business Description) dropdown is set to 'Skala industri kecil dan menengah'. The 'Jumlah Tenaga Kerja Indonesia' (Number of Indonesian Workers) field contains '5'. A blue 'Lanjut' (Next) button is at the bottom.

11:42

< Pengembangan
Perizinan Usaha

Skala Usaha Mikro
Tingkat Risiko Rendah

Apakah usaha ini sudah berjalan?

☐ Sudah
☒ Belum

Apakah usaha ini memiliki NPWP tersendiri?

☐ Ya
☒ Tidak

Nama Usaha

Toko kue

Deskripsi Usaha

Skala industri kecil dan menengah

Jumlah Tenaga Kerja Indonesia

5

Lanjut

7. Complete the “*Lokasi Usaha*” information and select “*Lanjut*”.

11.43

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Pengembangan
Lokasi Usaha

Apakah alamat sama dengan data di KTP pelaku usaha?

☐ Ya

☒ Tidak

Pilih berdasarkan alamat lokasi usaha sebelumnya?

☐ Ya

☒ Tidak

Provinsi

DKI Jakarta

Kabupaten/Kota

Kota Adm. Jakarta Utara

Kecamatan

Tanjung Priok

Desa/Kelurahan

Sunter Jaya

Kode Pos

24531

Alamat Lengkap

Alamat Jalan

Lat: -6.1502614
Long: 106.8795785

Ubah

Koordinat lokasi telah dipilih.

Apakah akan melakukan pembangunan gedung?

☒ Ya

☐ Tidak

Lanjut

8. Select “*Tambah Produk atau Jasa*”.

11.45

<

Pengembangan
Tambah Produk/Jasa

Tambah Produk atau Jasa

Simpan

9. Complete the Product/Service information and select “*Simpan*”.

11.45

<

Pengembangan
Produk/Jasa

Jenis Produk atau Jasa

Nastar

Kapasitas per tahun

500

Satuan Kapasitas

Pcs

Apakah anda sudah memiliki sertifikat Standar Nasional Indonesia (SNI)?

☐ Ya

☒ Tidak

Apakah bahan atau proses produksinya halal?

☒ Ya

☐ Tidak

Apakah sudah memiliki sertifikat halal?

☐ Ya

☒ Tidak

Simpan

10. Once the product has been successfully saved, a notification will appear. Then select “*Kembali*”.

11.46

<

Satuan Kapasitas

Pcs

Apakah anda sudah memiliki sertifikat Standar Nasional Indonesia (SNI)?

☐ Ya

☒ Tidak

Apakah bahan atau proses produksinya halal?

☒ Ya

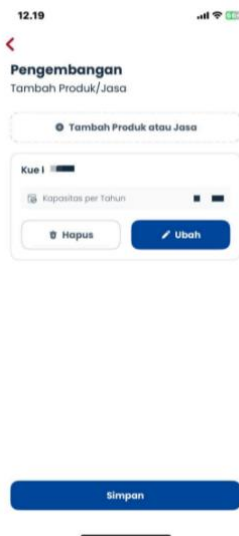
☐ Tidak

Berhasil Menyimpan Produk

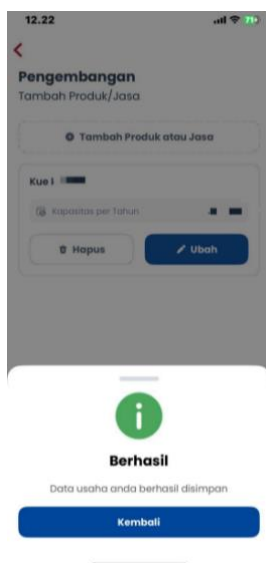
Produk telah berhasil disimpan untuk bidang usaha ini!

Kembali

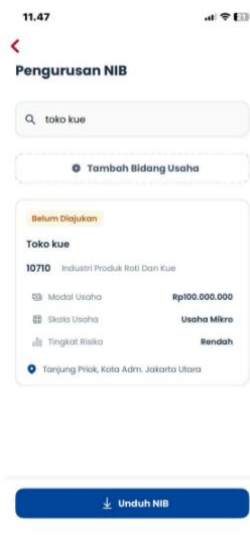
11. Click “*Simpan*”.



12. After the information has been saved, a notification stating “*Data Usaha Anda Berhasil Disimpan*” will appear.



13. In the NIB application section, search for the business name that was previously submitted. Then click on the relevant business.



11.47

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Pengurusan NIB

Q toko kue

+ Tambah Bidang Usaha

Belum Diajukan

Toko kue

10710 Industri Produk Roti Dan Kue

Modal Usaha Rp100.000.000

Skala Usaha Usaha Mikro

Tingkat Risiko Rendah

Tanjung Priok, Kota Adm. Jakarta Utara

Unduh NIB

14. Click “Kelola”.



11.48

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Detail Kegiatan Usaha

Belum Diajukan

KBLI

10710 - Industri Produk Roti Dan Kue

Nama Usaha

Toko kue

Lokasi Usaha

Alamat Jalan, Sunter Jaya, Tanjung Priok, Kota Adm. Jakarta Utara, DKI Jakarta

Status Permohonan

Data Usaha

Jumlah TK 5

Modal Usaha Rp100.000.000

Skala Usaha

Usaha Mikro

Hapus Kelola

15. Select “*Proses Penerbitan NIB*”



11:49

<

Detail Kegiatan Usaha

Belum Dilakukan

KBLU
10710 - Industri Produk Roti Dan Kue

Nama Usaha
Toko kue

Lokasi Usaha
Alamat Jalan, Sunter Jaya, Tanjung Priok, Kota Adm, Jakarta Utara, DKI Jakarta

Status Permohonan

Data Usaha

Kelola Kegiatan Usaha

🔍 Lacak Permohonan

➡ Perubahan Data Usaha

🔄 Proses Penerbitan NIB

16. Click “*Terbitkan*”.



11:50

<

Draft NIB

UJICOBAB

Terbitkan

17. In the Self-Declaration section, tick the box “*Saya sudah membaca dan menyetujui*”, then click “*Simpan*”.

The screenshot shows a mobile application interface for the 'Pernyataan Mandiri' (Self-Declaration) section. At the top, the time is 11:49. Below the title, there is a reference to 'Undang-undang Nomor 11 Tahun 2020 tentang Cipta Kerja'. The 'Nama Pelaku Usaha' (Business Actor Name) is listed as 'SITI FATONAH'. A checkbox labeled 'Saya sudah membaca dan menyetujui:' (I have read and agree:) is checked. Below this, there are several links: 'Menjaga Keselamatan, Keamanan, Kesehatan dan Pelestarian Fungsi Lingkungan (K3L)', 'Kesediaan Memenuhi Kewajiban', 'Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup (SPPL)', and 'Pernyataan Tambahan'. At the bottom, there is a blue button labeled 'Simpan' (Save).

18. The NIB has been successfully issued.

The screenshot shows a mobile application interface for the 'Draft NIB' (Draft NIB) section. At the top, the time is 11:50. Below the title, there is a table with columns for 'No', 'Nama Usaha', 'Alamat Usaha', 'Kategori Usaha', 'Status Usaha', 'Tanggal Pendaftaran', 'Tanggal Berlaku', 'Tanggal Kadaluarsa', and 'Status NIB'. The table contains several rows of data. Below the table, there is a green circular icon with a white 'i' inside, followed by the text 'NIB Anda Sudah Terbit' (Your NIB has been issued). At the bottom, there is a blue button labeled 'Ok'.

ANNEX IV: APPLICATION LETTER FOR A TECHNICAL RECOMMENDATION FROM THE MINISTRY OF AGRICULTURE

COMPANY LETTERHEAD

Number: _____

Place/Date/Year

Attachments: _____

Subject: Application for the Importation of Milk and Dairy Products

To:

Director General of Livestock and Animal Health
Ministry of Agriculture
Central Office Building
Building C, 8th Floor, Jl. Harsono RM No. 3
Ragunan, South Jakarta

We hereby submit an application for the issuance of an import recommendation letter for milk and dairy products from abroad as follows:

No.	Product Type	Quantity (Ton/kg)	Country of Origin	Port of Entry

Company Name :
Company Address :
Storage Warehouse Address :
Business Unit Name in the Country of Origin :

As supporting documents for this application, we attach the following import requirements:

1. Copy of Taxpayer Identification Number (NPWP)
2. Copy of Taxpayer Identification Number (NPWP)
3. Copy of Trading Business Licence (SIUP)
4. Copy of Company Registration Certificate (STDP)
5. Copy of Importer Identification Number (API)
6. Copy of Deed of Incorporation
7. Copy of Veterinary Control Number (NKV)
8. Provincial Service Recommendation
9. Copy of Health Certificate (HC)
10. Copy of Certificate of Origin (COO)
11. Copy of Certificate of Analysis (COA)
12. Copy of Halal Certificate
13. Copy of Invoice / Purchase Order (PO)
14. Customs Registration Card

Thus, we submit this application letter.

Thank you for your attention and kind consideration.

Sincerely,
Company Leadership,

(_____)
(Signature, Name in Block Letters, Company Stamp)

ANNEX V: COMPOSITIONAL REQUIREMENTS FOR DAIRY PRODUCTS

BPOM Regulation 13/2023 details the specifications of processed dairy products that EU exporters must comply with in order to place their products on the Indonesian market.¹⁸⁸ The compositional requirements, as laid out under Annex I to *BPOM Regulation 13/2023*, are as follows:

No	Milk Product	Content Requirement
01	Milk	Milk means the liquid obtained from the udders of cows, buffaloes, horses, goats, sheep, and other milk-producing livestock, whether fresh or subjected to heating through pasteurisation, Ultra High Temperature (UHT) processing, or sterilisation.
01.1	Liquid Milk and Dairy Products	Includes all types of plain and flavoured liquid milk in the form of skim milk, partially skimmed milk, and full cream milk, excluding fermented products (plain) and rennet dairy products (plain) Liquid milk means a dairy product obtained from the processing of milk. Fresh milk must not contain any food additives.
01.1.1	Plain Liquid Milk	Plain Liquid Milk means milk obtained through the milking process from the udders of healthy cows, goats, sheep, buffaloes, horses, and other milk-producing livestock, carried out using proper milking methods and subsequently processed. This includes pasteurised milk, UHT milk, sterilised milk, homogenised milk, or milk with adjusted fat content (using milk fat). This category includes, but is not limited to, skim milk, partially skimmed milk, and full cream milk. Under this category, the addition of other food ingredients is not permitted. 1. Full Cream Milk: means a liquid dairy product obtained from fresh milk whose fat content has not been reduced, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. The product name may be accompanied by the processing method, for example: pasteurised full cream milk or pasteurised milk. Basic characteristics: • Milk fat content: not less than 3%; • Total milk solids non-fat (MSNF): not less than 7.8%; and • Protein content: not less than 2.7%.

¹⁸⁸ *BPOM Regulation No. 13 of 2023 on Food Category*, available at <https://jdih.pom.go.id/download/rule/1492/13/2023/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2013%20Tahun%202023%20tentang%20Kategori%20Pangan> (accessed 22 June 2026).

		2. Skim Milk is a liquid dairy product from which most of the fat has been removed, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: not more than 0.5%; and • Protein content: not less than 2.7%. 3. Partially Skimmed Milk is a liquid dairy product from which part of the fat has been removed, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: 0.6% to less than 2.9%; and • Protein content: not less than 2.7%.
01.1.2	Other Liquid Milk (Plain)	This includes, but is not limited to: • plain recombined liquid milk; • plain reconstituted liquid milk; • plain composite milk; • plain liquid milk fortified with vitamins and minerals; • protein-adjusted milk; • low-lactose milk; and • plain milk-based beverages. Under this category, plain products must not contain other food ingredients that impart flavour, but may contain non-milk ingredients. 1. Recombined Full Cream Milk is a dairy product whose fat content has not been reduced, produced by combining milk fat and milk solids non-fat (MSNF), with or without the addition of water, to achieve the appropriate milk composition, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: not less than 3%; • Total milk solids non-fat (MSNF): not less than 7.8%; and • Protein content: not less than 2.7%. 2. Reconstituted Full Cream Milk is a dairy product whose fat content has not been reduced, produced by adding water to dried milk powder or evaporated milk products to restore the appropriate water-to-solids ratio, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics:

		• Milk fat content: not less than 3%; • Total milk solids non-fat (MSNF): not less than 7.8%; and • Protein content: not less than 2.7%. 3. Reconstituted Skim Milk is a liquid dairy product produced by adding water to skim milk powder or evaporated skim milk, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: not more than 0.5%; and • Protein content: not less than 2.7% 4. Reconstituted Partially Skimmed Milk is a liquid dairy product produced by adding water to partially skimmed milk powder or evaporated partially skimmed milk to achieve the appropriate composition of partially skimmed milk, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: 0.6% to less than 2.9%; and • Protein content: not less than 2.7%. 5. Recombined Partially Skimmed Milk is a liquid dairy product produced by combining milk fat and milk solids non-fat (MSNF), with or without the addition of water, to obtain the appropriate composition of partially skimmed milk, and which has been pasteurised, sterilised, or processed using Ultra High Temperature (UHT) treatment. Basic characteristics: • Milk fat content: 0.6% to less than 2.9%; and • Protein content: not less than 2.7%. 6. Filled Milk (vegetable fat milk / vegetable oil milk) is a liquid dairy product produced by replacing part or all of the milk fat with vegetable oil, vegetable fat, or a mixture thereof in an equivalent amount. This product has a general composition, appearance, and intended use similar to fresh milk. Basic characteristics: • Total fat content: not less than 3%; • Total milk solids non-fat (MSNF): not less than 7.8%; and • Protein content: not less than 2.7%. 7. Milk Beverage is a beverage made from fresh milk, reconstituted milk, or recombined milk, to which other food
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		ingredients may be added, and which has been sterilised or pasteurised. Basic characteristics: • Milk fat content: 1.2% to less than 2%; • Total milk solids non-fat (MSNF): not less than 4.4%; and • Protein content: not less than 1%. 8. Milk-Containing Beverage is a beverage made using fresh milk, reconstituted milk, or recombined milk, to which other food ingredients may be added, and which has been sterilised or pasteurised. Basic characteristics: • Milk fat content: not less than 0.3%; • Total milk solids non-fat (MSNF): not less than 0.78%; and • Protein content: not less than 0.27%.
01.1.3	Liquid Buttermilk (Plain)	Liquid buttermilk is a liquid that is almost free of milk fat, obtained from the butter-making process (i.e. churning fermented or non-fermented milk and cream). Liquid buttermilk may also be produced through the fermentation of liquid skim milk, either by spontaneous acidification through the activity of lactic acid bacteria or aroma-producing bacteria, or inoculation of heated milk with pure bacterial cultures (fermented buttermilk). Liquid buttermilk may be pasteurised or sterilised. The lactic acid bacteria used for fermentation include, but are not limited to <i>Lactococcus</i> spp.; <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus thermophilus</i>, used either individually or in combination, with or without the addition of <i>Bifidobacterium</i> spp.
01.1.4	Flavoured Liquid Milk Beverage	Includes all milk-based beverages, whether fermented or non-fermented, in liquid or ready-to-drink form, with added flavourings and/or food ingredients imparting flavour, excluding cocoa mixes (cocoa powder-sugar mixtures, category 05.1.1). Examples include, but are not limited to, chocolate milk, malted chocolate milk beverages, strawberry-flavoured yogurt drinks, lactic acid bacteria fermented milk beverages, whey-based beverages, and lassi. 1. Full cream (flavoured) milk is a beverage made from fresh milk, reconstituted milk, or recombined milk with no reduction in milk fat content, with the addition of natural ingredients/extracts imparting flavour, with or without added flavourings, and may contain sugar and other food ingredients, and is sterilized or pasteurized. Examples include chocolate milk and strawberry milk.

		Basic characteristics: • Milk fat content not less than 2%; • Milk solids-not-fat content not less than 5.2%; • Protein content not less than 2%; and • Natural ingredient/extract content not less than 0.5%. 2. Flavoured milk/milk with flavour is a beverage made from fresh milk, reconstituted milk, or recombined milk with added flavourings, and may contain sugar and other food ingredients, and is sterilised or pasteurised. Examples include chocolate-flavoured milk and strawberry-flavoured milk. Basic characteristics: • Milk fat content not less than 2%; • Milk solids-not-fat content not less than 5.2%; and • Protein content not less than 2%. 3. Flavoured milk beverage is a beverage made from fresh milk, reconstituted milk, or recombined milk with added flavouring substances or flavour, and may contain sugar and other food ingredients, and is sterilised or pasteurised. Basic characteristics: • Milk fat content from 1.2% to less than 2%; • Milk solids-not-fat content not less than 4.4%; and • Protein content not less than 1%. 4. Beverage containing milk is a beverage made using fresh milk, reconstituted milk, or recombined milk with added flavouring substances or flavour, and may contain sugar and other food ingredients, and is sterilised or pasteurised. Basic characteristics: • Milk fat content not less than 0.26%; • Protein content not less than 0.23%; and • Milk solids-not-fat content not less than 0.66%. 5. Flavoured fermented milk beverage is a beverage made from fermented milk with added flavourings or flavour, and may contain sugar and other food ingredients, with or without heat treatment. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 6. Flavoured kefir beverage is a beverage made from kefir with added flavourings or
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		flavour, and may contain sugar and other food ingredients, with or without heat treatment. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 7. Flavoured kumys beverage is a beverage made from kumys with added flavourings or flavour, and may contain sugar and other food ingredients, with or without heat treatment. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 8. Flavoured yogurt beverage is a beverage made from yogurt with added flavourings or flavour, and may contain sugar and other food ingredients, with or without heat treatment. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 9. Flavoured lassi is a beverage obtained from milk fermented using lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp., with added flavourings/flavour, until curd (milk protein coagulum) is formed and then churned. 10. Whey-based beverage is a beverage made from whey, which may contain sugar and other food ingredients, in powder or liquid form. An example is chocolate-flavoured whey beverage. 11. (Flavoured) milk powder is milk powder with the addition of food ingredients such as cocoa powder, strawberry extract, vanilla extract, and/or other suitable ingredients, and may contain sugar and/or flavourings. Product names include chocolate milk powder, strawberry milk powder, vanilla milk powder, honey milk powder, and others. Basic characteristics: • Moisture content not more than 5%; • Milk fat content not less than 26%; • Protein content not less than 11%; and
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		• Sugar content calculated as sucrose not more than 55%. 12. (Flavoured) skim milk powder is skim milk powder with the addition of food ingredients such as cocoa powder, strawberry extract, vanilla extract, and/or other suitable ingredients, and may contain sugar and/or flavourings. Product names include chocolate skim milk powder, strawberry skim milk powder, vanilla skim milk powder, honey skim milk powder, and others. Basic characteristics: • Milk fat content not more than 1.5%; • Moisture content not more than 5%; • Protein content not less than 11%; and • Sugar content calculated as sucrose not more than 55%. 13. (Flavoured) partly skimmed milk powder is partly skimmed milk powder with the addition of food ingredients such as cocoa powder, strawberry extract, vanilla extract, and/or other suitable ingredients, and may contain sugar and/or flavourings. Product names include chocolate partly skimmed milk powder, strawberry partly skimmed milk powder, vanilla partly skimmed milk powder, honey partly skimmed milk powder, and others. Basic characteristics: • Milk fat content more than 1.5% and less than 26%; • Moisture content not more than 5%; • Protein content not less than 11%; and • Sugar content calculated as sucrose not more than 55%. 14. Flavoured milk powder/milk powder with flavour is milk powder with added flavouring substances or flavour, and may contain sugar. Product names include chocolate-flavoured milk powder, strawberry-flavoured milk powder, vanilla-flavoured milk powder, honey-flavoured milk powder, and others. Basic characteristics: • Moisture content not more than 5%; • Protein content not less than 11%; and • Sugar content calculated as sucrose not more than 55%. 15. Flavoured skim milk powder/skim milk powder with flavour is skim milk powder with added flavouring substances or flavour, and may contain sugar. Product names include chocolate-flavoured skim milk powder, strawberry-flavoured skim milk powder, vanilla-flavoured skim milk powder, honey-flavoured skim milk powder, and others.
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		Basic characteristics: - Moisture content not more than 5%; - Protein content not less than 11%; and - Sugar content calculated as sucrose not more than 55%. 16. Flavoured partly skimmed milk powder/partly skimmed milk powder with flavour is partly skimmed milk powder with added flavouring substances or flavour, and may contain sugar. Product names include chocolate-flavoured partly skimmed milk powder, strawberry-flavoured partly skimmed milk powder, vanilla-flavoured partly skimmed milk powder, honey-flavoured partly skimmed milk powder, and others. Basic characteristics: - Moisture content not more than 5%; - Protein content not less than 11%; and - Sugar content calculated as sucrose not more than 55%. 17. Flavoured vegetable fat milk powder/flavoured vegetable oil milk powder is a powdered dairy product in which part of the milk fat has been removed and replaced with vegetable oil/fat in an equivalent amount, with added flavouring substances or flavour, and may contain sugar or other food ingredients. Basic characteristics: - Moisture content not more than 5%; - Total fat content not less than 26%; - Protein content not less than 11%; and - Sugar content calculated as sucrose not more than 55%. 18. Flavoured milk and cream powder mixture or milk and cream powder mixture with flavour is a powdered dairy product made from milk powder with the addition of sugar and flavourings in the form of cocoa powder, coffee powder, and others. 19. Flavoured beverage containing milk powder or beverage containing milk powder with flavour is a beverage made using milk, reconstituted milk, or recombined milk with added flavourings or flavour, and may contain sugar. Basic characteristics: - Moisture content not more than 5%; and - Protein content not less than 1.1%.
01.2	Fermented Milk and Rennet-Coagulated Milk Products (Plain)	Includes all plain products based on milk, skim milk, partly skimmed milk, and full-fat milk that are fermented or treated with rennet, excluding category 01.1.4 Flavoured Milk-Based Drinks and category

		01.7 Milk-Based Desserts (e.g. pudding, flavoured yogurt, or yogurt with fruit). 1. Dadih is a dairy product obtained through the spontaneous fermentation of buffalo milk by lactic acid bacteria.
01.2.1	Fermented Milk (Plain)	Includes all plain fermented milk, acidified milk, and cultured milk products. Plain yogurt and plain fermented milk-based beverages that do not contain flavourings or colourings are included in food subcategory 01.2.1, depending on whether or not they have been heat-treated after fermentation.
01.2.1.1	Unheated Fermented Milk Products (Plain)	Includes all plain liquid and non-liquid products, such as yogurt and plain fermented milk-based beverages. The products are not sterilised or pasteurised after the fermentation process. 1. Acidified milk is a dairy product obtained from fresh milk, pasteurised milk, reconstituted milk, or recombined milk that has been acidified, with or without the addition of bacteria, vitamins, and other food ingredients, without heat treatment. The types of acid used must comply with applicable requirements. The lactic acid bacteria used for fermentation may include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Total milk solids-not-fat not less than 6.6%. 2. Acidophilus milk is a dairy product obtained through the fermentation of milk using the lactic acid bacterium <i>Lactobacillus acidophilus</i>, with or without the addition of other suitable bacteria. Basic characteristics: • Total milk solids-not-fat not less than 6.6%; and • Lactic acid content not less than 0.5%. 3. Yogurt is a dairy product obtained through the fermentation of milk using the lactic acid bacteria <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, with or without the addition of other suitable bacteria, without heat treatment. Other bacteria that may be added include lactic acid bacteria such as <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp.

		<i>thermophilus</i>, either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Total milk solids-not-fat not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.5%. 4. Yogurt drink is a beverage based on yogurt, with or without the addition of other food ingredients, and without heat treatment. Basic characteristics: • Total milk solids-not-fat not less than 2.6%; and • Milk protein content not less than 0.92%. 5. Alternate culture yogurt is a dairy product obtained through the fermentation of milk using the lactic acid bacterium <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i> and <i>Lactobacillus</i> species, with or without the addition of other suitable bacteria, without heat treatment. Product naming shall follow the provisions of the Codex Standard for Fermented Milks. Other bacteria that may be added include lactic acid bacteria such as <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Total milk solids-not-fat not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.5%. 6. Kefir is a dairy product obtained through the fermentation of milk using a starter culture made from kefir grains, without heat treatment. Kefir grains contain <i>Lactobacillus kefir</i>, species of the genera <i>Leuconostoc</i>, <i>Lactococcus</i>, and/or <i>Acetobacter</i> growing in symbiosis, lactose-fermenting yeasts (<i>Kluyveromyces marxianus</i>, <i>Debaryomyces hansenii</i>), and non-lactose-fermenting yeasts (<i>Saccharomyces unisporus</i>, <i>Saccharomyces cerevisiae</i>, and <i>Saccharomyces exiguus</i>). Basic characteristics: • Total milk solids-not-fat not less than 6.6%;
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		• Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.6%. 7. Kefir drink is a beverage based on kefir, with or without the addition of other food ingredients, and without heat treatment. Basic characteristics: • Total milk solids-not-fat not less than 2.6%; and • Milk protein content not less than 0.92%. 8. Kumys is a dairy product obtained through the fermentation of milk using <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and <i>Kluyveromyces marxianus</i>, with or without the addition of other suitable bacteria, without heat treatment. Other bacteria that may be added include lactic acid bacteria such as <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. Basic characteristics: • Total milk solids-not-fat not less than 6.6%; • Milk protein content not less than 2.3%; • Lactic acid content not less than 0.7%; and • Ethanol content not less than 0.5%. 9. Kumys drink is a beverage based on kumys, with or without the addition of other food ingredients, and without heat treatment. Basic characteristics: • Total milk solids-not-fat not less than 2.6%; and • Milk protein content not less than 0.92%. 10. Cultured milk or fermented milk is a dairy product produced through the fermentation of fresh milk, reconstituted milk, or recombined milk using lactic acid bacteria such as <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination, without heat treatment, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Total milk solids-not-fat not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.5%.
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		11. Fermented milk drink is a beverage based on fermented milk, with or without the addition of other food ingredients, and without heat treatment. Basic characteristics: • Total milk solids-not-fat not less than 2.6%; and • Milk protein content not less than 0.92%. 12. Lassi is a beverage obtained from milk fermented with lactic acid bacteria such as <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination, until curd formation occurs, then churned without heat treatment, with or without the addition of <i>Bifidobacterium</i> spp.
01.2.1.2	Heat-Treated Fermented Milk Products (Plain)	Heat-treated fermented milk (plain) products are fermented milk products that are sterilized or pasteurised after the fermentation process. 1. Acidified milk is a dairy product obtained from fresh milk, pasteurised milk, reconstituted milk, or recombined milk that is acidified, with or without the addition of bacteria, vitamins, and other food ingredients, and subsequently heat-treated. The types of acids used shall comply with the applicable provisions. Lactic acid bacteria used for fermentation include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat not less than 6.6%. 2. Acidophilus milk is a dairy product obtained through the fermentation of milk using the lactic acid bacterium <i>Lactobacillus acidophilus</i>, with the possible addition of other suitable bacteria. Basic characteristics: • Milk solids-not-fat content not less than 6.6%; and • Lactic acid content not less than 0.5%. 3. Yogurt is a dairy product obtained through the fermentation of milk using the lactic acid bacteria <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, with the possible addition of other suitable bacteria, and subsequently heat-treated.

		Other bacteria that may be added include lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat content not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.5%. 4. Yogurt drink is a yogurt-based beverage that may contain other food ingredients and is heat-treated. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 5. Alternate culture yogurt is a dairy product obtained through the fermentation of milk using the lactic acid bacterium <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i> and <i>Lactobacillus</i> species, with the possible addition of other suitable bacteria, and subsequently heat-treated. Product naming shall follow the provisions of the Codex Standard for Fermented Milks. Other bacteria that may be added include lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat content not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.5%. 6. Kefir is a dairy product obtained through the fermentation of milk using a starter culture made from kefir grains, and subsequently heat-treated. Kefir grains contain <i>Lactobacillus kefir</i>, species of the genera <i>Leuconostoc</i>, <i>Lactococcus</i>, and/or <i>Acetobacter</i> growing in symbiosis, lactose-fermenting yeasts (<i>Kluyveromyces marxianus</i>, <i>Debaryomyces hansenii</i>) and non-lactose-fermenting yeasts (<i>Saccharomyces unisporus</i>, <i>Saccharomyces cerevisiae</i>, and <i>Saccharomyces exiguus</i>).
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		Basic characteristics: • Milk solids-not-fat content not less than 6.6%; • Milk protein content not less than 2.3%; and • Lactic acid content not less than 0.6%. 7. Kefir drink is a kefir-based beverage that may contain other food ingredients and is heat-treated. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 8. Kumys is a dairy product obtained through the fermentation of milk using <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and <i>Kluyveromyces marxianus</i>, with the possible addition of other suitable bacteria, and subsequently heat-treated. Other bacteria that may be added include lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination. Basic characteristics: • Milk solids-not-fat content not less than 6.6%; • Milk protein content not less than 2.3%; • Lactic acid content not less than 0.7%; and • Ethanol content not less than 0.5%. 9. Kumys drink is a kumys-based beverage that may contain other food ingredients and is heat-treated. Basic characteristics: • Milk solids-not-fat content not less than 2.6%; and • Milk protein content not less than 0.92%. 10. Fermented milk or cultured milk is a dairy product produced through the fermentation of fresh milk, reconstituted milk, or recombined milk using lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, and subsequently heat-treated, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat content not less than 6.6%; • Milk protein content not less than 2.3%; and
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		- Lactic acid content not less than 0.5%. 11. Fermented milk drink is a fermented milk-based beverage that may contain other food ingredients and is heat-treated. Basic characteristics: - Milk solids-not-fat content not less than 2.6%; and - Milk protein content not less than 0.92%. Alternate culture yogurt is a dairy product Lassi is a beverage obtained from milk fermented with lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, until curd (milk protein coagulum) is formed, then churned and heat-treated, with or without the addition of <i>Bifidobacterium</i> spp.
01.2.2	Rennet-Coagulated Milk (Plain)	Rennet-coagulated milk is milk coagulated using milk-clotting enzymes, including renin/rennet. Flavoured rennet milk products are included in category 01.7. Basic characteristics: Total milk solids-not-fat not less than 7.8%.
01.3	Condensed Milk and Analogues	Includes condensed milk products, evaporated milk and their analogues (including beverage creamers), both plain and sweetened. Includes products based on milk, skim milk, partially skimmed milk, mixtures of evaporated skim milk with vegetable fat, and mixtures of sweetened condensed skim milk with vegetable fat.
01.3.1	Condensed Milk	Condensed milk is a dairy product obtained by removing part of the water from milk, with or without the addition of other food ingredients. This includes partially dehydrated milk, evaporated milk, sweetened condensed milk, and khoa. 1. Evaporated milk is a liquid dairy product obtained by removing part of the water from fresh milk, reconstituted milk, or recombined milk using an evaporation process or another process to achieve a certain concentration level. Basic characteristics: - Milk fat content not less than 7.5%; - Total milk solids not less than 25%; and - Protein content not less than 5.5%. 2. Evaporated skim milk is a liquid dairy product obtained by removing part of the water from skim milk or reconstituted skim

		milk using an evaporation process or another process to achieve a certain concentration level. Basic characteristics: • Milk fat content not more than 1%; • Total milk solids not less than 20%; and • Protein content not less than 6%. 3. Evaporated partly skimmed milk is a liquid dairy product obtained by removing part of the water from partly skimmed milk or reconstituted partly skimmed milk using an evaporation process or another process to achieve a certain concentration level. Basic characteristics: • Milk fat content more than 1% and less than 7.5%; • Total milk solids not less than 20%; • Protein content between 4% and 6%. 4. Sweetened condensed milk is a thick liquid dairy product obtained by removing part of the water from a mixture of milk and sugar or reconstituted milk and sugar, or by another process to achieve a certain concentration level, with or without the addition of other ingredients. The added sugar must be sufficient to prevent product spoilage. Basic characteristics: • Milk fat content not less than 8%; and • Protein content not less than 6.5%. 5. Sweetened condensed skim milk is a thick liquid dairy product obtained by removing part of the water from skim milk with added sugar to achieve a certain concentration level, or through the reconstitution of skim milk powder with added sugar, with or without the addition of other ingredients. The added sugar must be sufficient to prevent product spoilage. Basic characteristics: • Milk fat content not more than 1%; and • Milk protein content not less than 7%. 6. Sweetened condensed cream is a thick liquid dairy product obtained by reconstituting cream with added sugar to achieve a certain concentration level. The added sugar must be sufficient to prevent product spoilage. Basic characteristics: • Milk fat content not less than 45%; and • Total solids not less than 65%. 7. Khoa is a dairy product obtained from cow's milk or buffalo milk concentrated through a boiling process.
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01.3.2	Beverage Creamers	Includes condensed milk analogues, mixtures of evaporated skim milk with vegetable fat, and mixtures of sweetened condensed skim milk with vegetable fat. 1. Evaporated vegetable fat milk/evaporated vegetable oil milk is a liquid dairy product obtained by partially removing water from fresh milk, recombined milk, or reconstituted milk in which part or all of the fat has been replaced with vegetable fat, until a certain level of concentration is achieved. Basic characteristics: • Fat content not less than 6%; and • Total solids not less than 23.5%. 2. Sweetened condensed vegetable fat milk/sweetened condensed vegetable oil milk is a thick liquid dairy product obtained from fresh milk, recombined milk, or reconstituted milk in which part or all of the fat has been replaced with vegetable fat, with added sugar to achieve a certain concentration, with or without the addition of other ingredients. The added sugar must be sufficient to prevent product spoilage. Basic characteristics: • Total fat content not less than 8%; and • Total protein content not less than 2%. 3. Sweetened condensed creamer is a thick liquid dairy product obtained from milk with added sugar and vegetable fat, from which part of the water has been removed to achieve a certain concentration, or produced through the reconstitution of milk powder with added sugar, vegetable fat/vegetable oil, and other ingredients. The added sugar must be sufficient to prevent product spoilage. Basic characteristics: • Protein content not less than 1%; and • Total fat content not less than 8%. 4. Beverage creamer is a milk or cream substitute consisting of an oil-in-water emulsion made from hydrogenated vegetable oil. The product may be in liquid or powder form and is used in beverages such as coffee and tea. Basic characteristics: • Liquid product: fat content not less than 3.25% and total solids not more than 8.25%; and • Powder product: fat content not less than 26% and moisture content not more than 5%.
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		5. Foaming beverage creamer is a powdered milk or cream substitute made from an oil-in-water vegetable fat emulsion that produces foam when added to beverages such as coffee or other drinks. Basic characteristics: • Total fat content not less than 16%.
01.4	Cream and Similar Products	Includes all cream or cream analogue products in liquid, semi-liquid, or semi-solid form. 1. Cream is a dairy product rich in milk fat obtained through a separation process that separates milk fat from other milk components. Basic characteristics: • Milk fat content not less than 35%.
01.4.1	Pasteurised Cream (Plain)	Includes milk cream and Half and Half. 1. Pasteurised cream is cream that has undergone a heating process to eliminate pathogenic microbial contamination. Basic characteristics: • Milk fat content not less than 10%. 2. Half and half is a dairy product consisting of a mixture of milk and not less than 10.5% cream, with a milk fat content of not less than 18%. This product is pasteurised or ultra-pasteurised and may be homogenised, with or without added sugar. Basic characteristics: • Milk fat content not less than 18% and not more than 34%.
01.4.2	Sterilised Cream or UHT Cream, Whipping Cream, Whipped Cream, and Low-Fat Cream (Plain)	1. Sterilised cream is cream that has undergone a sterilisation process to eliminate pathogenic microbial contamination. Basic characteristics: • Milk fat content not less than 10%. 2. Whipping cream is a cream product, reconstituted cream, and/or blended cream specifically intended for whipping purposes. Basic characteristics: • Milk fat content not less than 10%. 3. Whipped cream is a cream product, reconstituted cream, and/or blended cream incorporating air or inert gas without affecting the fat in the skim milk emulsion. Basic characteristics:

		Milk fat content not less than 10%.
01.4.3	Coagulated Cream (Plain)	Thick cream made from cream coagulated with milk-clotting enzymes, cream acidified through lactic acid fermentation, or cream with added acidifying agents. - Enzyme-coagulated cream is cream coagulated using rennet enzyme. - Sour cream is a dairy product obtained through the acidification of pasteurised cream using lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: - Milk fat content not less than 10%. - Acidified cream is a dairy product obtained through the acidification of pasteurised cream using suitable acids. Basic characteristics: - Milk fat content not less than 18%.
01.4.4	Cream Analogues	Cream products in which part or all of the fat has been replaced with vegetable fat, in the form of oil-in-water liquid emulsions or powders, used for purposes other than beverage creamers (category 01.3.2). This category includes instant whipped cream toppings and sour cream substitutes. - Cream substitute is a milk cream product in which part or all of the milk fat has been replaced with vegetable fat, used as a substitute for cream, in powder or semi-solid form. Basic characteristics: - Not less than 10% (semi-solid form); and - Not less than 20% (powder form).
01.5	Milk Powder and Cream Powder and Powdered Analogues	Includes plain milk powder, cream powder, or combinations thereof, as well as their analogue products. These products may be obtained from milk, skim milk, and partially skimmed milk.
01.5.1	Plain Milk Powder and Cream Powder	Plain milk powder and cream powder are products obtained by removing water from milk and cream in powdered form. This category includes Casein and Caseinate. It does not include diabetic dietary milk powder under category 13.3. Full cream milk powder is a powdered dairy product with no reduction in fat content,

		obtained from liquid milk; or from milk produced by mixing liquid milk with condensed milk or cream powder; or from milk produced by mixing liquid milk with condensed milk or milk powder, which has been pasteurised and dried. The designated product name is full cream milk powder. Basic characteristics: • Milk fat content not less than 26%; • Moisture content not more than 5%; and • Protein content not less than 32% of milk solids-not-fat. 2. Instant full cream milk powder is full cream milk powder that has undergone an instantization process. The designated product name is instant full cream milk powder. Basic characteristics: • Milk fat content not less than 26%; • Moisture content not more than 5%; and • Protein content not less than 32% of milk solids-not-fat. 3. Partly skimmed milk powder is a powdered dairy product obtained through the drying of milk from which part of the milk fat has previously been removed using a cream separator, or from milk produced by mixing liquid milk with condensed milk or skim milk powder. Basic characteristics: • Milk fat content more than 1.5% and less than 26%; • Moisture content not more than 5%; and • Protein content not less than 32% of milk solids-not-fat. 4. Skim milk powder is a powdered dairy product obtained through the drying of pasteurised skim milk. Basic characteristics: • Milk fat content not more than 1.5%; • Moisture content not more than 5%; and • Protein content not less than 32% of milk solids-not-fat. 5. Skim milk powder is a powdered dairy product obtained through the drying of pasteurised skim milk. Basic characteristics: • Milk fat content not more than 1.5%; • Moisture content not more than 5%; and
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		- Protein content not less than 32% of milk solids-not-fat. 6. Plain milk and cream powder blend is a powdered dairy product obtained through the drying of pasteurised milk; or from milk produced by mixing liquid milk with condensed milk or cream powder; or from milk produced by mixing liquid milk with condensed milk or milk powder; or through recombination of milk powder and cream powder. Basic characteristics: - Milk fat content not less than 26%; and - Moisture content not more than 5%. 7. Cream powder is a powdered dairy product obtained by removing most of the water from milk cream through a drying process. Basic characteristics: - Milk fat content not less than 42%; - Moisture content not more than 5%; and - Protein content not less than 32% of milk solids-not-fat. 8. Buttermilk powder is a product obtained from dried liquid buttermilk. 9. Milk-containing powdered beverage (plain) is a beverage made using milk, reconstituted milk, or recombined milk, with optional added sugar. Basic characteristics: - Milk fat content not less than 2.6%; - Moisture content not more than 5%; and - Protein content not less than 3.2% of milk solids-not-fat.
01.5.2	Milk and Cream Powder Analogues	Milk powder and cream powder in which part or all of the milk fat has been replaced with vegetable fat. These products may be produced through drying processes and/or dry blending of skim milk powder and powdered vegetable fat, and may contain other food ingredients. The products are intended for purposes other than beverage creamers under food category 01.3.2. 1. Vegetable fat milk powder/vegetable oil milk powder is a powdered dairy product in which part of the fat has been removed and replaced with vegetable oil/vegetable fat in an equivalent amount. Basic characteristics: - Moisture content not more than 5%; - Total fat content not less than 26%; and - Protein content not less than 32% of milk solids-not-fat.

01.6	Cheese and Cheese Analogues	Includes cheese products and cheese analogues based on oil-in-water emulsions. This category covers cheese products and cheese analogues. Cheese and cheese analogues are milk protein coagulation products containing water and fat. This category does not include cheese sauces (category 12.6.2), cheese-flavoured snack foods (category 15.3), or composite foods containing cheese used as an ingredient (such as macaroni and cheese under category 16.0). Cheese may be a fresh or ripened solid or semi-solid product obtained by coagulating milk, cream, skim milk, partially skimmed milk, recombined milk, reconstituted milk, whey cream, or buttermilk, or mixtures thereof, using rennet or coagulating enzymes (of animal, plant, or microbial origin) or acid, subject to milk fat and moisture content requirements depending on the cheese type, with or without the addition of other food ingredients. Based on texture, cheese is classified as soft cheese, semi-hard cheese, hard cheese, and very hard cheese. Soft cheese contains more than 67% moisture calculated on a fat-free solids basis. Semi-hard cheese contains 54% to 69% fat-free solids, hard cheese contains 49% to 56% fat-free solids, and very hard cheese contains less than 51% fat-free solids. Cheese Analog refers to cheese products in which part or all of the milk fat has been replaced with other fats. In cheese production, microorganism cultures suitable for the specific cheese type (as identified under the cheese names below) may be added, or microorganisms permitted under food category 01.0 may be used.
01.6.1	Unripened Cheese	Unripened cheese (fresh cheese) is cheese that has not undergone ripening (maturation) and is ready for consumption, including cottage cheese, creamed cottage cheese, cream cheese, and mozzarella. 1. Cottage cheese is a soft unripened cheese made from fresh milk, skimmed fresh milk, or recombined milk. Basic characteristics: • Milk solids-not-fat content not less than 18%. 2. Creamed cottage cheese is a soft unripened cheese made from fresh milk, skimmed fresh milk, or recombined milk with added cream. 3. Cream cheese is a soft unripened cheese made from cream or milk with added cream,

		using lactic acid bacteria cultures and coagulating enzymes (rennet or other coagulating enzymes). The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. Basic characteristics: • Milk fat from total solids not less than 25%; • Moisture content in fat-free matter not less than 67%; and • Total solids not less than 22%. 4. Mozzarella cheese is a soft or semi-hard/hard unripened cheese made from milk and/or dairy products, with or without the use of starter cultures of <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and/or <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i> and/or other suitable lactic acid bacteria, with or without flavour-producing bacteria, coagulated using rennet or other coagulating enzymes, through the “<i>pasta filata</i>” process or other suitable processing techniques, with or without the addition of other food ingredients. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. The pasta <i>filata</i> process consists of heating the protein curd at an appropriate pH value (4.5-5.8), stirring and kneading until the protein curd becomes smooth. While warm, the protein curd is cut and shaped, then firmed through cooling. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 20% (high-moisture type) and not less than 18% (low-moisture type). 5. Bocconcini cheese is a soft, fresh cheese with stretch-curd characteristics, a plastic texture, mild flavour, and fresh aroma.
01.6.2	Ripened Cheese	Includes cheese in brine, namely semi-hard to soft ripened cheese, white to yellowish in colour, with a compact texture and without a rind, ripened in brine until ready for consumption.
01.6.2.1	Ripened Cheese, Including the Rind	Ripened cheese in its entirety refers to cheese that is fully ripened, including the rind or portions of

		ripened cheese, whether in the form of chunks, grated cheese, coarsely grated cheese, or slices. 1. Cheddar cheese is a hard cheese made from cow's milk and ripened at a temperature of not less than 35°C for not less than 60 days. Cheddar cheese may also be processed at different temperatures and ripening periods depending on the technology used. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 22%. 2. Edam cheese is a semi-hard cheese originating from the Netherlands. Edam is also produced in various countries. This cheese has an elastic, supple texture and is softer than Gouda cheese. It contains only a few gas holes. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 30%. 3. Camembert cheese is a soft cheese ripened with lactic acid bacteria and/or aroma-producing bacteria and other microorganisms, including <i>Geotrichum candidum</i> and <i>Brevibacterium linens</i>. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 30%. 4. Bath cheese is a traditional English soft cheese made from unpasteurised cow's milk. 5. Bondard cheese is a traditional French cheese made from unpasteurised cow's milk. 6. Bougon cheese is a traditional French soft cheese made from goat's milk. 7. Bouquet des Moines is a traditional Belgian cheese made from cow's milk. 8. Blue cheese is a hard cheese made using lactic acid bacteria starter cultures and ripened with <i>Penicillium roqueforti</i> for not less than 60 days, characterised by the presence of blue-green mold throughout the cheese. Blue cheese may also be processed at different temperatures and ripening periods
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		depending on the technology used. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. 9. Brick cheese is a hard cheese obtained from milk and other ingredients. If made from fresh milk, the ripening process is carried out at a temperature of not less than 1.7°C for not less than 60 days. Brick cheese may also be processed at different temperatures and ripening periods depending on the technology used. 10. Gouda cheese is a traditional Dutch cheese made using suitable lactic acid bacteria starter cultures. It is classified as a semi-hard cheese with a hard rind coated with wax or other materials. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 30%. 11. Havarti cheese is a semi-hard cheese, with or without a rind, obtained through coagulation by lactic acid bacteria, rennet, or other coagulants, and fermented with lactic acid bacteria and/or aroma-producing bacteria and other microorganisms. The product ranges in colour from nearly white to pale yellow or yellow, is easy to slice, and contains gas holes. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. Basic characteristics: • Milk fat calculated on a dry matter basis not less than 30%. 12. Brie cheese is produced using lactic acid bacteria starter cultures and ripened with molds, yeasts, and other suitable bacteria. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. Other suitable bacteria used include <i>Geotrichum candidum</i> and <i>Brevibacterium linens</i>. The molds used include <i>Penicillium candidum</i>, and/or <i>Penicillium camemberti</i> and <i>Penicillium caseicolum</i>. Basic characteristics:
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		• Milk fat calculated on a dry matter basis not less than 40%. 13. Emmental/Swiss cheese is a hard ripened cheese ranging in colour from ivory white to pale yellow or yellowish, with an elastic form, sliceable but non-sticky texture, and gas holes. Emmental/Swiss cheese is obtained through fermentation by thermophilic lactic acid bacteria followed by fermentation with propionic acid bacteria. The lactic acid bacteria used include <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, either singly or in combination. The propionic acid bacteria used include <i>Propionibacterium freudenreichii</i> subsp. <i>shermanii</i>. 14. Parmesan cheese is a traditional Italian (Parma) cheese obtained from heated milk coagulated before all cream is removed. The curd is cut and heated to 52°C, cooked until reaching 55°C, shaped, and then ripened in brine. Parmesan cheese may also be processed at different temperatures and ripening periods depending on the technology used. 15. Other ripened cheeses are ripened cheeses not included in the above categories, for example <i>Feta</i>.
01.2.1.2	Ripened Cheese Rind	Ripened cheese rind is the outer layer of cheese that has undergone a ripening process and brining in a salt solution. The cheese rind is the outermost part of the cheese, which may have the same composition as the inner part of the cheese, but may become dry after the ripening and brining process. Some types of cheese use a wax coating for the rind, which may contain permitted colour additives to protect the cheese.
01.6.2.3	Powdered Cheese (For Reconstitution, for Example in Cheese Sauce Preparation)	Powdered cheese is obtained from the drying of various types of processed cheese. Powdered cheese is reconstituted with water or milk for the preparation of sauces or used as an ingredient (e.g. for macaroni and cheese), including spray-dried cheese.
01.6.3	Whey Cheese	Whey cheese is a solid or semi-solid product obtained from the concentration of whey, with or without the addition of milk, milk cream, or other milk components, and then formed into shape. This category includes cream whey cheese, whey cheese, and skim whey cheese.

01.6.4	Processed Cheese	This product is obtained by melting and emulsifying cheese. It includes products made by heating and emulsifying mixtures of cheese, milk fat, milk protein, milk powder, and water in varying amounts. The products may contain other food ingredients such as flavourings, seasonings, fruits, vegetables, and/or meat. The products may be in spreadable, sliced, or cut forms. The term “<i>processed</i>” does not refer to cutting, grating, or similar physical treatment of cheese. Cheese subjected only to such physical treatment falls within food category 01.6.2 Ripened Cheese. Examples include processed cheddar cheese and processed gouda cheese.
01.6.4.1	Plain Processed Cheese	Plain processed cheese is a processed cheese product without the addition of flavourings, seasonings, fruits, vegetables, or meat.
01.6.4.2	Flavoured Processed Cheese, Processed Cheese with Added Fruit, Vegetables, and/or Meat	Flavoured processed cheese is a processed cheese product with added flavourings, seasonings, fruits, vegetables, and/or meat. Examples include Neufchâtel cheese spread with vegetables, Pepper Jack, cheddar cheese spread with wine, and cheese balls (processed cheese coated with nuts, herbs, or spices).
01.6.5	Cheese Analog (Vegetable Fat Cheese)	Cheese analog is a cheese-like product in which part or all of the milk fat has been replaced with other fats. This category includes cheese analogs, cheese analog blends, and cheese analog powder.
01.6.6	Whey Protein Cheese	Whey protein cheese is cheese made from protein extracted from whey. This product is essentially produced through the coagulation of whey proteins. An example is Ricotta. It is different from whey cheese (food category 01.6.3).
0.1.7	Milk-Based Desserts (e.g., pudding, flavoured yogurt, or yogurt with fruit)	Includes milk-based dessert products and instant dessert powders, frozen milk confectionery, milk-based fillings, and flavoured yogurt. These products differ from food category 03.0 (edible ices, including sherbet and sorbet), in which the products in category 01.7 are milk-based, whereas those in category 03.0 are water-based and do not contain milk. 1. Dairy ice cream is a frozen product obtained from milk, dairy products, or a mixture thereof, without the addition of fats other than milk fat, with or without the addition of other food ingredients. Basic characteristics:

		• Milk protein content not less than 2.7%; • Milk fat content not less than 5%; and • Total solids not less than 31%.
		2. Ice cream is a frozen product obtained from milk, dairy products, or a mixture thereof, in which part of the milk fat is replaced with vegetable fat, with or without the addition of other food ingredients. Basic characteristics: • Total fat content not less than 5%; • Milk solids content not less than 5%; and • Total solids not less than 31%.
		3. Milk ice is a frozen product made from a mixture of milk and/or dairy products with water, with or without the addition of other food ingredients. Basic characteristics: • Milk protein content not less than 1%.
		4. Ice cream premix is a powdered or liquid product made from milk, dairy products, or mixtures thereof, with or without the addition of other food ingredients, to which water may be added before further processing into ice cream. Basic characteristics: • Total fat content not less than 15%; • Milk solids content not less than 15%; and • Moisture content not more than 5%.
		5. Ice cream premix is a powdered or liquid product made from milk, dairy products, or mixtures thereof, with or without the addition of other food ingredients, to which water may be added before further processing into ice cream. Basic characteristics: • Powder form: ○ Total fat content not less than 15%; ○ Milk solids content not less than 15%; and ○ Moisture content not more than 5%. • Liquid form: ○ Total fat content not less than 5%; ○ Milk solids content not less than 5%; and ○ Total solids not less than 31%.
		6. Milk ice premix is a powdered or liquid product made from milk, dairy products, or mixtures thereof, with or without the

		addition of other food ingredients, to which water may be added before further processing into milk ice. Basic characteristics: • Powder form: ◦ Milk protein content not less than 3%. • Liquid form: ◦ Milk protein content not less than 1%. 7. Flavoured yogurt is a dairy product obtained from the fermentation of milk using lactic acid bacteria <i>Lactobacillus delbrueckii</i> subsp. <i>bulgaricus</i> and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>, to which other suitable bacteria and flavourings may be added. Other bacteria that may be added include lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat content not less than 4.6%; • Milk protein content not less than 1.6%; and • Lactic acid content not less than 0.5%. 8. Flavoured alternate culture yogurt is a dairy product obtained from the fermentation of milk using lactic acid bacteria <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i> and <i>Lactobacillus</i> species, with the possible addition of other suitable bacteria. Product naming follows the Codex Standard for Fermented Milks, with the addition of flavouring. Other bacteria that may be added include lactic acid bacteria (including <i>Lactococcus</i> spp., <i>Lactobacillus</i> spp., <i>Leuconostoc</i> spp., and <i>Streptococcus salivarius</i> subsp. <i>thermophilus</i>), either singly or in combination, with or without the addition of <i>Bifidobacterium</i> spp. Basic characteristics: • Milk solids-not-fat content not less than 4.6%; • Milk protein content not less than 1.6%; and • Lactic acid content not less than 0.5%. 9. Flavoured kefir is a dairy product obtained from the fermentation of milk using a starter culture made from kefir grains, with the addition of flavouring.
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		of water before further processing into pudding. Basic characteristics: • Milk solids and/or derivatives content not less than 5%. 15. Milk candy is a solid product with a hard or soft texture made from sucrose and/or other sugars and/or polyols, milk, with or without the addition of other food ingredients. Basic characteristics: • Milk protein content not less than 0.135% or milk fat content not less than 0.15%; • Moisture content of hard-texture candy not more than 3.5%; • Moisture content of soft-texture candy not more than 7.5%; and • Moisture content of jelly-texture soft candy not more than 20%. 16. Milk-based dessert is a semi-solid dessert made from fresh milk, dairy products, or mixtures thereof, with the addition of starch or gelling agents, with or without the addition of other food ingredients. Basic characteristics: • Milk and/or dairy product content not less than 30%. 17. Cheese balls in sugar syrup (Rasgulla/Rasagola/Roshogolla/Rasogolla) are milk-based processed foods made from chhena/chhana/chhanna/channa/chana (obtained through milk coagulation by heating and the addition of acids such as citric acid, lactic acid, and malic acid), cooked in sugar syrup. 18. Fried cheese balls in sugar syrup (Gulab jamun/gulaab jamun/gulab ki janu) are milk-based processed foods made from chhena/chhana/chhanna/channa/chana (obtained through milk coagulation by heating and the addition of acids such as citric acid, lactic acid, and malic acid) and milk solids formed into balls, then fried and cooked or soaked in sugar syrup, with or without the addition of other food ingredients.
0.1.8	Whey and Whey Products, Except Whey Cheese	Includes various whey-based products in liquid and powder form.
01.8.1	Liquid Whey and Its Products, Except Whey Cheese	1. Whey is the liquid separated from milk after the coagulation of milk, cream, skim milk, or buttermilk using rennet or other enzymes in the production of cheese, casein, and similar products.

		2. Acid whey is the liquid separated after the coagulation of milk using acid, particularly in the production of fresh cheese (without ripening).
01.8.2	Whey Powder and Its Products, Except Whey Cheese	3. Whey powder is a whey product obtained by drying (either by spray drying or drum drying) whey or acid whey from which most of the fat has been removed. Demineralized Whey Powder. 4. Demineralized whey powder is a whey product obtained by drying (either by spray drying or drum drying) whey or acid whey from which most of the fat has been removed and whose mineral content has been reduced as required. 5. Whey permeate powder is a whey product obtained by drying whey from which the protein has been separated.

ANNEX VI: MICROBIAL CRITERIA FOR DAIRY PRODUCTS

The Annex to *BPOM Regulation 13/2019* details the microbial criteria for processed food. The details of maximum limits of microbial contamination for dairy products are as follows:

Notes:

- “*n*” represents the number of samples that must be collected and analysed from one lot/batch of processed food;
- “*c*” represents the number of samples, out of the *n* analysed samples, that may exceed *m* but must not exceed *M* in determining the acceptability of the processed food;
- “*m*” represents the acceptable microbiological limit demonstrating that the processed food has been produced in accordance with GMP for processed food; and
- “*M*” represents the maximum permissible microbial limit.

Product Category	Type of processed food	Type of Microorganism	n	c	m	M	Analysis method
Milk (Plain)	Pasteurised Milk	ALT	5	1	10 ⁴ colony/ ml	10 ⁵ colony/ ml	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	1 APM/ml	5 APM/ml	SNI ISO 21528-1
		<i>Salmonella</i>	5	0	Negative/25ml	NA	ISO 6579; SNI 2897
Buttermilk (plain)		<i>Enterobacteriaceae</i>	5	2	10 colony/ml	10 ² colony/ml	ISO 21528-2;
		<i>Salmonella</i>	5	0	Negative/25ml	NA	ISO 6579; SNI 2897
Flavoured and/or Fermented Milk-Based Beverages (e.g., Chocolate Milk, Eggnog, Yogurt Drink, Whey-Based Beverage)	Flavoured Milk Containing Milk	ALT	5	1	10 ⁴ colony/ml	10 ⁵ colony/ ml	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	10 colony/ml	10 ² colony/ml	ISO 21528-2;
		<i>Salmonella</i>	5	0	Negative/25ml	NA	ISO 6579; SNI 2897
	Flavoured Fermented Milk Beverages, Flavoured Yogurt Drinks, Lassi	<i>Enterobacteriaceae</i>	5	2	10 colony/ml	10 ² colony/ml	ISO 21528-2
		<i>Salmonella</i>	5	0	Negative 25/ml	NA	ISO 6579; SNI 2897
Fermented Milk (Plain)		<i>Enterobacteriaceae</i>	5	2	10 colony/ml	10 ² colony/ml	ISO 21528-2
		<i>Salmonella</i>	5	0	Negative 25/ml	NA	ISO 6579; SNI 2897

Condensed Milk		<i>Staphylococcus aureus</i>	5	1	10 ² colony/gram/ or 10 ² colony/ml	10 ³ colony/ gram or 10 ³ colony/ml	SNI ISO 6888-1; SNI 2897
		Moulds and Yeasts	5	1	10 colony/ gram or 10 colony/mL	10 ² colony/gram or 10 ² colony/mL	SNI ISO 21527-2
Beverage Creamer		ALT	5	2	10 ⁴ colony/ml	10 ⁵ colony/ml	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	1	10 colony/ml	10 ² colony/ml	ISO 21528-2
		<i>Staphylococcus aureus</i>	5	2	10 colony/ml	10 ² colony/ml	SNI ISO 6888-1; SNI 2897
		<i>Salmonella</i>	5	0	Negative/25g	NA	ISO 6579; SNI 2897
Pasteurised Cream		ALT	5	1	10 ⁴ colony/ml	10 ⁵ colony/ml	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	1 APM/ml	5 APM/ml	SNI ISO 21528-1
		<i>Salmonella</i>	5	0	Negative/25 ml	NA	ISO 6579; SNI 2897
Clotted Cream (Plain)	Clotted Cream (Plain), with heating after the fermentation process	ALT	5	1	10 ⁴ colony/ml	10 ⁵ colony/ml	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	1 APM/ml	5 APM/ml	SNI ISO 21528-1
		<i>Salmonella</i>	5	0	Negative/25 ml	NA	ISO 6579; SNI 2897
	Clotted Cream (Plain), without heating after the fermentation process	<i>Enterobacteriaceae</i>	5	2	1 APM/ml	5 APM/ml	SNI ISO 21528-1
		<i>Salmonella</i>	5	0	Negative/25ml	NA	ISO 6579; SNI 2897
Imitation Cream (Analogue cream)		ALT	5	2	10 ⁴ colony/g	10 ⁵ colony/g	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	1	1 colony/ml (for directly inoculated liquid samples)	10 colony/ml	ISO 21528-2
			5	1	10 colony/g (for solid samples with dilution)	10 ² colony/g	ISO 21528-2
		<i>Staphylococcus aureus</i>	5	2	10 colony/g	10 ² colony/g	SNI ISO 6888-1; SNI 2897

		Salmonella	5	0	Negative/25g	NA	ISO 6579; SNI 2897
Milk Powder, Cream Powder, and Analogue Powder		ALT	5	2	10 ⁴ colony/g	10 ⁵ colony/g	ISO 4833-1; SNI 2897
		ALT*	5	2	10 ⁴ colony/g	10 ⁵ colony/g	ISO 13559
		Enterobacteriaceae	5	0	10 colony/g	NA	ISO 21528-2
		Staphylococcus aureus	5	2	10 colony/g	10 ² colony/g	SNI ISO 6888-1; SNI 2897
		Salmonella	5	0	Negative/25g	NA	ISO 6579; SNI 2897
Unripened Cheese (Fresh Cheese)	Unripened Cheese (Fresh Cheese), made from fresh milk	Listeria monocytogenes	5	0	Negative/25g	NA	SNI ISO 11290-1; SNI 2897
		Staphylococcus aureus	5	2	10 ³ colony/g	10 ⁴ colony/g	SNI ISO 6888-1; SNI 2897
		Salmonella	5	0	Negative/25g	NA	ISO 6579; SNI 2897
	Unripened Cheese (Fresh Cheese), made from pasteurised milk	Listeria monocytogenes	5	0	Negative/25g	NA	SNI ISO 11290-1; SNI 2897
		Escherichia coli	5	3	10 colony/g	10 ² colony/g	ISO 16649-1; ISO 16649-2
Ripened Cheese, Including the Rind	Blue cheese, Brick cheese, Gouda cheese, Havarti cheese, Brie cheese, Parmesan cheese, Swiss cheese	Listeria monocytogenes	5	0	10 colony/g	NA	ISO 11290-2;
		Staphylococcus aureus	5	2	10 ² colony/g	10 ⁴ colony/g	SNI ISO 6888-1; SNI 2897
Ripened Cheese Rind		Listeria monocytogenes	5	0	10 ² colony/g	NA	ISO 11290-2
		Staphylococcus aureus	5	2	10 ² colony/g	10 ⁴ colony/g	SNI ISO 6888-1; SNI 2897
Whey Cheese		Listeria monocytogenes	5	0	Negative/25g	NA	SNI ISO 11290-1; SNI 2897
		Staphylococcus aureus	5	2	10 ² colony/g	10 ⁴ colony/g	SNI ISO 6888-1; SNI 2897

		<i>Escherichia coli</i>	5	1	10 colony/g	10 ² colony/g	ISO 16649-1; ISO 16649-2
Processed Cheese		<i>Staphylococcus aureus</i>	5	2	10 ² Colony/g	10 ³ colony/g	SNI ISO 6888-1; SNI 2897
		<i>Escherichia coli</i>	5	1	10 colony/g	10 ² colony/g	ISO 16649-1; ISO 16649-2
		<i>Listeria monocytogenes</i>	5	0	10 ² colony/g	NA	SNI ISO 11290-2; SNI 2897
Analogue Cheese (Vegetable Cheese)	Cheese Fat	ALT	5	2	10 ⁴ colony/g	10 ⁵ colony/g	ISO 4833-1; SNI 2897
		<i>Listeria monocytogenes</i>	5	0	10 ² colony/g	NA	SNI ISO 11290-2
Whey Protein Cheese		<i>Listeria monocytogenes</i>	5	0	Negative/25g	N/A	SNI ISO 11290-1
		<i>Staphylococcus aureus</i>	5	2	10 ² colony/g	10 ⁴ colony/g	SNI ISO 6888-1; SNI 2897
Milk-Based Desserts (e.g. pudding, flavoured yogurt, fruit yogurt)	Ice Cream	<i>Enterobacteriaceae</i>	5	2	10 colony/g	10 ² colony/g	ISO 21528-2
		<i>Salmonella</i>	5	0	negative 25/g	NA	ISO 6579; SNI 2897
		<i>Listeria monocytogenes</i>	5	0	10 ² colony/g	NA	ISO 11290-2
	Yogurt	<i>Enterobacteriaceae</i>	5	2	10 colony/g	10 ² colony/g	ISO 21528-2
		<i>Salmonella</i>	5	0	Negative/25g	NA	ISO 6579
	Milk Ice Cream, Milk Pudding	ALT	5	2	10 ³ colony/g	10 ⁵ colony/g	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	10 colony/g	10 ² colony/g	ISO 21528-2
		<i>Salmonella</i>	5	0	Negative 25/g	NA	ISO 6579; SNI 2897
Whey Liquid and Its Products, Excluding Whey Cheese		ALT	5	1	10 ⁴ colony/ml	10 ⁵ colony/ml	ISO 4833; ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	2	1 APM/ml	5 APM/ml	SNI ISO 21528-1
		<i>Salmonella</i>	5	0	Negative/25ml	NA	ISO 6579; SNI 2897

Whey Powder and Its Products, Excluding Whey Cheese		ALT	5	2	10 ⁴ colony/g	10 ⁵ colony/g	ISO 4833-1; SNI 2897
		<i>Enterobacteriaceae</i>	5	0	10 colony/g	NA	ISO 21528-2
Whey		<i>Salmonella</i>	5	0	Negative/25g	NA	ISO 6579; SNI 2897
		<i>Staphylococcus aureus</i>	5	2	10 colony/g	10 ² colony/g	SNI ISO 6888-1; SNI 2897

ANNEX VII: LIST OF ALLOWED FOOD CONTACT SUBSTANCES

A.1 Plasticisers

Specific Migration Compound	Specific Migration (ppm)
Phthalic acid, benzyl butyl ester (Butyl benzyl phthalate – BBP)	30
Phthalic acid, bis (2- ethylhexyl) ester (Diethyl hexyl phthalate – DEHP)	1,5
Phthalic acid, dibutyl ester (Dibutyl phthalate –DBP)	0,3
Phthalic acid, diesters with primary, saturated C8-C10 branched alcohols, more than 60 % C9 (Diisononyl phthalate –DINP)	9 (sum of the migration of DIDP and DINP)
Phthalic acid, diesters with primary, saturated C9-C11 alcohols more than 90 % C10 (Diisodecyl phthalate DIDP)	9 (sum of the migration of DIDP and DINP)
Soybean oil, epoxidised (Epoxidised soybean oil - ESBO)	- 60 - 30 (infants and young children)
Adipic acid, bis(2-ethylhexyl) ester (Diethyl hexyl adipate - DEHA)	18

A.2 Antioxidant

Specific Migration Compound	Specific Migration (ppm)
Thiodipropionic acid, didodecyl ester (DLTDP)	5 (sum of the migration of DLTDP and DSTDP)
Thiodipropionic acid, dioctadecyl ester (DSTDP)	5 (sum of the migration of DLTDP and DSTDP)
Octadecyl-3-(3,5-di-tertbutyl-4- hydroxyphenyl)propionate	6

A.3 Antistatic Agent

Specific Migration Compound	Specific Migration (ppm)
N,N-bis(2-hydroxyethyl)alkyl (C8-C18) amine	1.2 (in the form of a tertiary amine)
N,N-bis(2- hydroxyethyl)alkyl(C8-C18) amine hydrochlorides	1.2 (in the form of a tertiary amine)
Alkyl (C8-C22) sulphonic acids	6

A.4 Stabiliser

Specific Migration Compound	Specific Migration (ppm)
- Di-n-octyltin bis(n-alkyl(C10-C16) mercaptoacetate) - Di-n-octyltin bis(2-ethylhexyl maleate) - Di-n-octyltin bis(2-ethylhexyl mercaptoacetate) - Di-n-octyltin bis(ethyl maleate) - Di-n-octyltin bis(isooctyl maleate) - Di-n-octyltin bis(isooctyl mercaptoacetate) - Di-n-octyltin 1,4-butanediol bis(mercaptoacetate)	0.006 (expressed as tin)

• Di-n-octyltin dilaurate • Di-n-octyltin dimaleate • Di-n-octyltin dimaleate, esterified • Di-n-octyltin dimaleate, polymers (n = 2-4) • Di-n-octyltin ethyleneglycol bis(mercaptoacetate) • Di-n-octyltin mercaptoacetate • Di-n-octyltin thiobenzoate 2- ethylhexyl mercaptoacetate	
• Mono-n-octyltin tris(alkyl(C10-C16) mercaptoacetate) • Mono-n-octyltin tris(2- ethylhexyl mercaptoacetate) • Mono-n-octyltin tris(isooctyl mercaptoacetate)	1.2 (expressed as tin)
• Dimethyltin bis(ethylhexyl mercaptoacetate) • Dimethyltin bis (isooctyl mercaptoacetate) • Monomethyltin tris(isooctyl mercaptoacetate) • Monomethyltin tris(ethylhexyl mercaptoacetate) • Reaction products of oleic acid, 2-mercaptoethyl ester, with dichlorodimethyltin, sodium sulphide and trichloromethyltin	0.018 (expressed as total tin)
Soybean oil, epoxidised (ESBO)	- 60 - 30 (infants and young children)

A.5 Catalyst

Specific Migration Compound	Specific Migration (ppm)
Antimony trioxide	0.04 (expressed as antimony)

A.6 Degradants

Specific Migration Compound	Specific Migration (ppm)
Acetaldehyde	6

A.7 Adhesive

Specific Migration Compound	Specific Migration (ppm)
• 2,2-bis(4- hydroxyphenyl)propane bis(2,3-epoxypropyl) ether (BADGE)	9 or 9 mg/6 dm ²

- BADGE.H₂O - BADGE.2H₂O	
- BADGE.HCl - BADGE.2HCl - BADGE.H₂O.HCl	1 atau 1 mg/6 dm ²

A.8 Carrier for colourants

Specific Migration Compound	Specific Migration (ppm)
Adipic acid, bis(2-ethylhexyl) ester (Diethyl hexyl adipate - DEHA)	18

A.9 Carrier for colourants

Specific Migration Compound	Specific Migration (ppm)
2-Aminobenzamide	0.05

ANNEX VIII: CHECKLIST OF REQUIRED DOCUMENTS

Purpose	Required Documents	Check Box
<i>Import Licence for API-P Imports</i>	Effective industrial business permit	☐
	Risk-based industrial sector business licensing	☐
	Proof of a relationship with an overseas company, for the purpose of obtaining a <i>Complementary Goods Certificate</i>	☐
	Import plan for one calendar year	☐
<i>Technical Recommendation from the Ministry of Agriculture</i>	<i>Application Letter</i>	☐
	Identification of the head and/or the representative of the company assigned or authorised to act	☐
	Proof of control over the storage facility	☐
	<i>Halal</i> certificate (where required)	☐
	Stamped <i>Declaration Letter</i> stating that the submitted documents are true and legally valid.	☐
Country of Origin and/or Business Unit Approval	<i>Cover Letter</i> from the representative of the country of origin to Indonesia	☐
	<i>Country of Origin and/or Business Establishment Questionnaire</i> established by the national veterinary authority	☐
Product Registration	<i>Application Letter</i>	☐
	NIB	☐
	Proof of identity (e.g., <i>Identity Card</i> , passport of the company director, or authorisation from the company director)	☐
	<i>Taxpayer Identification Number</i>	☐
	Company profile	☐
	<i>Deed of Establishment</i> of the company and its latest amendment	☐
	<i>Recommendation Letter</i> for the importation of animal products	☐
	<i>Statement Letter</i> confirming that the submitted documents are true and accurate	☐
	<i>Veterinary Control Number</i> certificate	☐
Evidence that the Product Complies with the Safety and Quality Requirements Applicable to Animal Products in the Country of Origin	<i>Animal Product Health Certificate</i>	☐
	Copy of the <i>Certificate of Origin</i>	☐
	Copy of the <i>Certificate of Analysis</i>	☐
	Copy of the <i>Halal</i> Certificate (where required)	☐
Quarantine Documentation	<i>Application for Quarantine Measures and Supervision and/or Control, and Minutes of Handover of Carrier Media at Entry, Exit and/or Transit Points</i>	☐
	<i>Prior Notice</i>	☐
	<i>Arrival Report of Conveyance</i>	☐
	<i>Cargo Manifest Mutation Report of Conveyance</i>	☐
	<i>Results of Analysis of Application for Quarantine Measures</i>	☐
	<i>Official Assignment Letter</i>	☐
	<i>Minutes of Sampling</i>	☐

	<i>Order to Enter Quarantine Installation or Other Location</i>	☐
	<i>Report on Escorting of Carrier Media</i>	☐
	<i>Report on Administrative Inspection and Document Conformity</i>	☐
	<i>Report on Health Inspection</i>	☐
	<i>Report on Isolation and Observation Results</i>	☐
	<i>Treatment Certificate</i>	☐
	<i>Report on Treatment Results</i>	☐
	<i>Detention Order</i>	☐
	<i>Minutes of Detention</i>	☐
	<i>Report on Detention Results</i>	☐
	<i>Rejection Letter</i>	☐
	<i>Minutes of Rejection</i>	☐
	<i>Report on Rejection Results</i>	☐
	<i>Notification of Non-Compliance</i>	☐
	<i>Destruction Order</i>	☐
	<i>Minutes of Destruction</i>	☐
	<i>Report on Destruction Results</i>	☐
PB-UMKU Licence	<i>Import Licence</i> from the Ministry of Trade	☐
	<i>Letter of Appointment</i> in the form of an agreement letter from the company in the country of origin	☐
Evidence that the Product Complies with GMP Requirements	<i>GMP Certificate</i>	☐
	<i>Hazard Analysis and Critical Control Points Certificate</i>	☐
	Equivalent certificates to the <i>GMP Certificate</i> or a <i>Hazard Analysis and Critical Control Points Certificate</i> issued by an authorised or accredited institution	☐
	Audit results from the local government in Indonesia	☐
<i>Halal Certificate</i> from the BPJPH	Business actor's data	☐
	Dairy product's name and category	☐
	List of dairy products and ingredients used	☐
	Dairy product's processing details	☐
Registering a Foreign <i>Halal</i> Certificate with the BPJPH	<i>Application Letter</i> of foreign <i>Halal</i> certificate registration	☐
	<i>Appointment Letter</i> in the form of an agreement issued by the EU business	☐
	NIB	☐
	Copies of the foreign <i>Halal</i> certificate	☐
	List of goods to be imported to Indonesia, including HS codes	☐
	Warehousing data, consisting of the name of the warehouse, the address of the storing warehouse, and the ownership status of the warehouse (<i>i.e.</i> , owned or leased)	☐
	<i>Declaration Letter</i> confirming that all submitted documents are correct and valid	☐
Customs Documentation	<i>Proforma Invoice</i>	☐
	<i>Commercial Invoice</i>	☐
	<i>Certificate of Origin</i>	☐

	<i>Bill of Landing or Airway Bill</i>	☐
	<i>Packing List</i>	☐
	<i>Insurance Certificate</i>	☐
Post Border Import Certificate	<i>Distribution Approval</i> from BPOM	☐
	<i>Commercial Invoice</i> for the imported goods	☐
	<i>Application Letter</i> signed by the company's director or an authorised representative of the director, bearing a stamp duty	☐
	The original <i>Statement Letter of Responsibility</i> bearing a stamp duty	☐
	NIB	☐
	<i>Import Authorisation Letter</i> in the form of a notarial deed (where the Post-Border applicant is a business entity that has been authorised by another company to carry out the importation)	☐
	The list of HS Codes for the commodities to be imported	☐
	Warehousing data	☐
Food Additives	<i>Quantitative Analysis Certificate</i>	☐
	Distribution licence from the BPOM (where the food additive is produced in, imported into, and distributed in Indonesia)	☐
	Written approval from the BPOM, which requires the submission of an <i>Application Letter</i> (where the food additive is not recognised under <i>BPOM Regulation 11/2019</i>)	☐

ANNEX IX: SPECIFIC REQUIREMENTS FOR FORMULA PRODUCTS

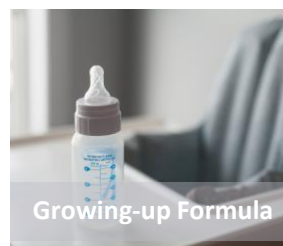
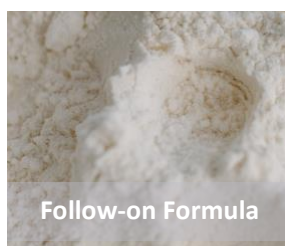
This Annex details Indonesia's regulatory framework applicable to **formula products**, including the requirements on labelling, composition, and food safety. This Annex also details the applicable tariff and product-specific rules of origin for formula products under the *EU-Indonesia CEPA*.

EU dairy businesses intending to place formula products on the Indonesian market must comply with the applicable **general and product-specific trade conditions and market access requirements**. Although formula products contain dairy ingredients, they are regulated as processed food products rather than dairy products.

BPOM Regulation No. 24 of 2020 on the Second Amendment to BPOM Regulation No. 1 of 2018 on the Supervision of Processed Food for Special Nutritional Purposes (BPOM Regulation 24/2020) provides that “Processed Food for Special Dietary Uses” comprises of:¹⁸⁹

- Infant formula;
- Follow-on formula;
- Growing-up formula; and
- Complementary foods for breastfed infants and young children.

The main **dairy-based products** within this category are:



1. IMPORT REQUIREMENTS

The **import requirements** for formula products are generally the same as those applicable to dairy products. These include the requirement to obtain an NIB, establishment approval and a *Technical Recommendation* from Indonesia's Ministry of Agriculture, as well as an *Import Approval* from the Ministry of Trade (see Section 5 of this *Guidance Handbook*).

Importers of formula products should note, however, that the **KBLI** used when obtaining an NIB may differ depending on the nature of their business activity, namely:

- KBLI No. 10791 on “*Manufacture of Baby Food and Special Food Products*”, if the dairy product is imported by an importer for use in the manufacture of formula products; or

¹⁸⁹ Article 2 of *BPOM Regulation No. 24 of 2020 on the Second Amendment to BPOM Regulation No. 1 of 2018 on the Supervision of Processed Food for Special Nutritional Purposes*, available at <https://peraturan.bpk.go.id/Details/181788/peraturan-bpom-no-24-tahun-2020> (accessed 22 June 2026).

- KBLI No. 46339 on “*Wholesale of Other Food and Beverage Products*”, which includes the wholesale trade of formula products.¹⁹⁰

2. INDONESIA’S MARKET ACCESS REQUIREMENTS FOR FORMULA PRODUCTS

Formula products are subject to the **same market access requirements** as dairy products with respect to shelf-life (see Section 6.5 of this *Guidance Handbook*), packaging (see Section 6.6 of this *Guidance Handbook*), transportation (see Section 6.7 of this *Guidance Handbook*), and *Halal* certification and labelling (see Section 6.8 of this *Guidance Handbook*).

However, different requirements apply with respect to:

- Product registration;
- Food safety; and
- Labelling and marketing.

2.1 PRODUCT REGISTRATION

Formula products are not subject to product registration with the Ministry of Agriculture (see Section 6.1 of this *Guidance Handbook*). However, they must still be registered with BPOM after the importer has obtained a PB-UMKU licence. The requirements for BPOM registration are the same as those applicable to dairy products, as elaborated in Section 6.2 of this *Guidance Handbook*.

2.2 FOOD SAFETY REQUIREMENTS

EU businesses must ensure that their formula products comply with the applicable **food safety requirements** administered by the BPOM, the Ministry of Health, and the Ministry of Agriculture.

Formula products are subject to different food safety requirements than those applicable to dairy products with respect to the maximum limits for heavy metal contaminants, radioactive contaminants, chemical contamination, microbiological contaminants, and melamine. Notably, the requirements for veterinary drugs used in cow’s milk production for formula products are the same as for dairy products, as set out in Section 6.3.2 of this *Guidance Handbook*.

¹⁹⁰ See https://web-api.bps.go.id/download.php?f=JRXN4CHvr4QX3XXieqBY8HdxTDgxQVfYR3lkZXpiWEp2MjFrZTJRcEIUCERZaEJveDR2dHBCUzg2ZFd4RGhIT2NsNWsxY0JPcjVpcVRJUIBoQFcwdG1LY2xiZ0RzcEdxVDRjTThzajNjWGI0WWhEQIZxaS80TUdGcytrL0VKWTRrNTZPRm51UkRMdWhlMU4yUnBjb2ZzK3lWZTkwU3RBcU1sdnFCVDFxcEovd0ZUVWw1SEdsZjczcU9tYS9DLzNkL1dhY2xoVjBaQ2gzSDhMUTaThaNIIE0VEhmcIN0ckNUNGJlVWpKUnNoRDFBMWVhpbSFBqbnVNWVhHdgK2RNOXRgdG1MGVJc1RES1kwSmh5NE9TaIBXQ2JlVWVhIN0lwQ1Jvb0xSNHJhcHJnPT0=&_gl=1*13n439o* ga*MTc5NTc3NjY1Mi4xNzc5NzgyOTk2* ga_XXTTVXWHDB*czE3ODEXNjYwODgkbzMkZzEkdDE3ODEXNjYwOTkkaJQ5JGwwJGgw (accessed 22 June 2026).

2.2.1 MAXIMUM LIMITS FOR HEAVY METAL CONTAMINANTS

B POM Regulation 9/2022 establishes the **maximum limits for heavy metal contaminants** in processed food. For formula products, the applicable limits are as follows:

Name	Maximum limit (mg/kg)			
	As*	Pb	Hg	Cd
Infant Formula, Follow-on Formula, and Growing-up Formula	0,02	0,01	0,01	0,01

2.2.2 MAXIMUM LIMITS FOR RADIOACTIVE CONTAMINANTS

Minister of Health Regulation 1030/2011 establishes the maximum permissible limits of radioactive contaminants in food products.

For formula products, the applicable limits are as follows:¹⁹¹

Name	Maximum limit (Bq/kg)	
Infant Food	I-131	Cs-137
	100	150

2.2.3 MAXIMUM LIMITS OF CHEMICAL CONTAMINATION

B POM Regulation 8/2018 details the types and maximum limits of chemical contaminants in processed food. For formula products, the applicable limits are as follows:¹⁹²

- Aflatoxin M1: 0,03 µg/kg; and
- Polycyclic Aromatic Hydrocarbon/PAH:

Name	Maximum limit (Bq/kg)	
Infant Formula	Benzo[a]pyrene	Total benzo[a]pyrene, benz[a]anthracene, benzo[b]fluoranthene, dan chrysene
	1.0 µg/kg	1,0 µg/kg,

2.2.4 MAXIMUM LIMITS OF MICROBIOLOGICAL CONTAMINANTS

¹⁹¹ Minister of Health Regulation No. 1031/MENKES/PER/V/2011 on Maximum Limits of Radioactive Contamination in Food, available at <https://jdih.pom.go.id/download/rule/360/2052/2011/Batas%20Maksimum%20Cemaran%20Radioaktif%20Dalam%20Pangan> (accessed 22 June 2026).

¹⁹² B POM Regulation No. 8 of 2018 on Maximum Limit of Chemical Contaminants in Processed Foods, available at <https://peraturan.bpk.go.id/Details/183202/peraturan-bpom-no-8-tahun-2018> (accessed 22 June 2026).

BPOM Regulation 13/2019 sets out the microbiological criteria applicable to processed foods. The microbiological limits of contaminants in formula products are as follows:

Food Category	Processed Food Type	Microorganism/Test Parameter	n	c	M	M
Infant Formula	In powdered form	ALT	5	2	5×10 ² colonies/g	5×10 ³ colonies/g
		ALT*	5	2	5×10 ² colonies/g	5×10 ³ colonies/g
		<i>Enterobacteriaceae</i>	10	2	Negative/10 g	NA
		<i>Cronobacter sakazakii</i>	30	0	Negative/10 g	NA
		<i>Salmonella</i>	30	0	Negative/25 g	NA
Follow-on Formula	In powdered form	ALT	5	2	5×10 ² colonies/g	5×10 ³ colonies/g
		ALT*	5	2	5×10 ² colonies/g	5×10 ³ colonies/g
		<i>Enterobacteriaceae</i>	10	2	Negative/10 g	NA
		<i>Salmonella</i>	30	0	Negative/25 g	NA
Growing-up Formula	Growing-up Formula	ALT	5	2	10 ⁴ colonies/g	10 ⁵ colonies/g
		ALT*	5	2	10 ⁴ colonies/g	10 ⁵ colonies/g
		<i>Enterobacteriaceae</i>	10	2	Negative/10 g	NA
		<i>Salmonella</i>	30	0	Negative/25 g	NA

2.2.5 MAXIMUM LIMITS FOR MELAMINE

Pursuant to *Minister of Health Regulation No. 34 of 2012 on Maximum Limits of Melamine in Food*, the maximum limits for melamine in infant formula are as follows:¹⁹³

- Powdered infant formula: 1 mg/kg; and
- Ready-to-consume infant formula: 0.15 mg/kg.

2.2.6 SPS INSPECTIONS

Pursuant to *Quarantine Agency Regulation No. 5 of 2025 on Amendments to Quarantine Agency Regulation No. 1 of 2024 on Types of Commodities Subject to Animal, Fish, and Plant Quarantine Inspection*, formula products are subject to SPS inspection.¹⁹⁴

Quarantine clearance for the shipment of formula products is generally conducted through documentary verification and risk-based inspections. Where no physical inspection or sampling is required, and the clearance process is completed with the issuance of a *Quarantine Certificate* or a *Carrier Media Relocation Order*.

¹⁹³ *Minister of Health Regulation No. 34 of 2012 on Maximum Limits of Melamine in Food*, available at <https://peraturan.go.id/files/bn840-2012.pdf> (accessed 22 June 2026).

¹⁹⁴ *Quarantine Agency Regulation No. 5 of 2025 on Amendments to Quarantine Agency Regulation No. 1 of 2024 on Types of Commodities Subject to Animal, Fish, and Plant Quarantine Inspection*, available at <https://peraturan.bpk.go.id/Details/333383/peraturan-baratin-no-5-tahun-2025> (accessed 22 June 2026).

Formula products are not subject to the *Prior Notice* requirement, as they are treated as a processed food product rather than animal or animal-origin products regulated under *Quarantine Agency Regulation 9/2024*.

2.3 LABELLING AND MARKETING OF FORMULA PRODUCTS

Each category of formula product is subject to distinct labelling and marketing requirements.

2.3.1 NUTRITION INFORMATION

BPOM Regulation No. 10 of 2026 provides the general framework for nutrition labelling applicable to dairy and formula products. For formula products, *BPOM Regulation No. 24 of 2020* is the primary Regulation and must be complied with.

Pursuant to *BPOM Regulation No. 10 of 2026*, formula products must:

- Present the Nutrition Information Panel (NIP) per 100 g and per 100 kcal, or per 100 ml and per 100 kcal, depending on the form of the product;¹⁹⁵
- Be accompanied by a measuring scoop to facilitate accurate measurement and preparation of the product;¹⁹⁶
- The Nutrition Information Panel must specify the amount of each nutrient and/or non-nutrient, where applicable;¹⁹⁷ and
- Not display the *Nutri-Level* front-of-pack nutrition label on formula products.

2.3.2 INFANT FORMULA

Under *BPOM Regulation 24/2020*, **infant formula** is defined as formula intended as a substitute of breast milk for infants up to six months of age and is specially formulated to serve as the sole source of nutrition during the first months of life until the infant is introduced to complementary foods for breastfed infants and young children (*i.e.*, foods intended to complement breast milk from six months of age onwards, such as infant cereal porridge or mashed fruit and vegetable-based baby foods).¹⁹⁸

The quality requirements for infant formula are as follows:

- A product made from cow's milk, milk from other animals, a mixture of both, and/or other ingredients that have been demonstrated to be suitable for infants. The safety and nutritional adequacy of the infant formula must be scientifically proven to support infant growth and development;

¹⁹⁵ Article 9(2) of *BPOM Regulation No. 10 of 2026*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

¹⁹⁶ Article 11 of *BPOM Regulation No. 10 of 2026*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

¹⁹⁷ Article 19 of *BPOM Regulation No. 10 of 2026*, available at <https://jdih.pom.go.id/download/rule/1758/10/2026/Peraturan%20Badan%20Pengawas%20Obat%20dan%20Makanan%20Nomor%2010%20Tahun%202026%20tentang%20Informasi%20Nilai%20Gizi%20pada%20Label%20Pangan%20Olahan> (accessed 29 June 2026).

¹⁹⁸ Annex to *BPOM Regulation No. 24 of 2020 on the Second Amendment to BPOM Regulation No. 1 of 2018 on the Supervision of Processed Food for Special Nutritional Purposes*, available at <https://peraturan.bpk.go.id/Details/181788/peraturan-bpom-no-24-tahun-2020> (accessed 22 June 2026).

- All ingredients must be clean, of good quality, safe, gluten-free, and suitable for infant consumption; and
- The product must be free from lumps and large particles and be suitable to meet the nutritional needs of infants.

BPOM Regulation 24/2020 details the nutritional composition requirements for infant formula, including, *inter alia*, energy content. For instance, a ready-to-consume infant formula must contain no less than 60 kcal and not more than 70 kcal per 100 ml of product.

The nutritional composition requirements for infant formula, including protein, carbohydrates, vitamins, minerals, and other nutrients, are detailed in the Annex to *BPOM Regulation 24/2020*.

BPOM Regulation 24/2020 imposes the following labelling requirements for infant formula:

- The product must be labelled as “**Infant Formula**”;
- The source of protein used in the product must be clearly stated on the label;
- Where cow’s milk is the sole source of protein, the product may bear the statement “**Cow’s Milk-Based Infant Formula**”;
- Products that do not contain milk or milk-derived ingredients must bear the statement “**Does not contain milk or milk-derived ingredients**” or a similar statement;
- Nutrition information must be declared per 100 g or per 100 ml and per 100 kcal;
- If the infant formula is not completely consumed in a single feeding, the label must provide instructions for storing the formula after the formula container has been opened;
- The label of the infant formula must be consistent with Indonesia’s breastfeeding promotion programmes, must include the following additional information, and be labelled in the following form:
 - The words “**Important Notice**” or similar wording;
 - Followed by the statement:

“Infant Formula is not a sterile product. Therefore, preparation instructions must be carefully followed”

This statement must appear on the principal display panel in a font size of at least 2 mm;
 - A statement should be added thereafter:

“Breast milk is the best food for your baby” or similar wording emphasising the superiority of breastfeeding/breast milk;
 - A statement that the product should only be used on the advice of a physician based on a medical indication, together with instructions for proper use;
- The label must not contain images of infants or women, or any images or statements that promote or encourage the use of infant formula. The label must not state that infant formula is of equivalent quality to breast milk;

- The label must not use terms or expressions that associate infant formula with mothers, human milk, or breastfeeding, or otherwise imply that the product is equivalent or comparable to breast milk;
- The label must include information that infants aged six months and above should be provided with complementary foods for breastfed infants and young children; and
- The label must be sufficiently clear to enable consumers to distinguish between infant formula and other formula products.

BPOM Regulation 24/2020 further requires that instructions for the preparation, use, and handling of infant formula be provided on the label and/or in an accompanying leaflet, which includes the following information:

- Liquid infant formula must bear the statement “*Ready to drink*”;
- Infant formula in concentrated form must include instructions for dilution with drinking water;
- The label must contain instructions on the preparation and use of the product, including storage and disposal after preparation (e.g., any remaining milk not consumed should be discarded);
- Powdered infant formula must include instructions for preparation of the infant formula with drinking water;
- The label must contain illustrations showing the method of preparation;
- The directions for use must be accompanied by a warning regarding the health risks associated with improper preparation, storage, or use of the product; and
- The label and/or leaflet must contain instructions for cleaning and sterilising feeding equipment, as well as preparing and serving infant formula, such as, *inter alia*, instructions to clean and sterilise the feeding equipment and steps to prepare and serve the infant formula. The details of these instructions are prescribed in the Annex to *BPOM Regulation No. 24/2020*.

2.3.3 FOLLOW-ON FORMULA

BPOM Regulation 24/2020 defines **follow-on formula** as formula produced from cow’s milk or the milk of other animals and/or ingredients derived from animals and/or plants that have been demonstrated to be suitable for infants aged six to twelve months.

The quality requirements for follow-on formula are as follows:

- A product made from cow’s milk, milk from other animals, a mixture of both, and/or other ingredients that have been demonstrated to be suitable for infants aged six to twelve months;
- The safety and benefits of the ingredients used in follow-on formula for infants aged six to twelve months must be scientifically substantiated. The formula must contain ingredients that meet the nutritional needs of infants aged six to twelve months;
- All ingredients must be clean, of good quality, safe, gluten-free, and suitable for the digestion of infants aged six to twelve months; and

- Follow-on formula must be free from lumps and large particles and must be suitable to meet the nutritional needs of infants.

BPOM Regulation 24/2020 details the nutritional composition requirements for follow-on formula, including, *inter alia*, its energy composition. For instance, a ready-to-consume follow-on formula must contain no less than 65 kcal per 100 ml and not more than 80 kcal per 100 ml.

The nutritional composition requirements for follow-on formula, including protein, carbohydrates, vitamins, minerals, and other nutrients, are set out in the Annex to *BPOM Regulation 24/2020*.

BPOM Regulation 24/2020 imposes the following labelling requirements for follow-on formula:

- The product must be labelled as “**Follow-on Formula**”;
- Where cow's milk is the sole source of protein, the statement “**Cow's Milk-Based**” may be added to the name “**Follow-on Formula**”;
- For follow-on formula that does not contain milk or milk-derived ingredients, the statement “**Does not contain milk or milk-derived ingredients**” or similar wording may be added to the product name;
- Nutrition information must be declared in the label per 100 g or per 100 ml and per 100 kcal;
- The recommended daily intake must be stated in the label to meet the nutritional requirements of infants aged six to twelve months;
- The label must contain information describing signs indicating that the follow-on formula is no longer suitable for consumption and should not be given to infants;
- The label must not use terms or expressions that associate follow-on formula with mothers, human milk, or breastfeeding, or otherwise imply that the product is equivalent or comparable to breast milk;
- The label must not contain images of infants or women, or any images or statements that promote or encourage the use of follow-on formula. The label must not state that follow-on formula is of equivalent quality to breast milk;
- If follow-on formula is not completely consumed in a single feeding, the label must provide instructions for storing the formula after the formula container has been opened;
- The label must include a statement that the product must not be given to infants under six months of age;
- The label must include information that infants aged six months and above should receive complementary foods alongside breast milk to support their growth and development; and
- The label of the follow-on formula must be consistent with Indonesia's breastfeeding promotion programmes, must include the following additional information, and be labelled in the following form:
 - The words “**Important Notice**” or similar wording;
 - Followed by statement:

“Powdered Follow-on Formula is not a sterile product. Therefore, preparation instructions must be carefully followed”;

- The following statement or similar wording emphasising the superiority of breastfeeding/breast milk:

“Breast milk is the best food for your baby”.

BPOM Regulation 24/2020 further requires that instructions for the preparation, use, and handling of the follow-on formula be provided on the label and/or in an accompanying leaflet, which includes the following information:

- Liquid follow-on formula must bear the statement ***“Ready to drink”***;
- For follow-on formula in concentrated liquid form, the label must include instructions for dilution with drinking water;
- Powdered follow-on formula must include instructions for preparation with drinking water;
- The label must contain instructions on the preparation, handling, and use of follow-on formula, including instructions on storage and disposal after preparation (e.g., any remaining follow-on formula not consumed should be discarded);
- The label must contain illustrations showing the method of preparation;
- The directions for use must be accompanied with a warning regarding the health risks associated with improper preparation, storage, or use of the product; and
- The label and/or leaflet must contain instructions for cleaning and sterilising feeding equipment, as well as preparing and serving follow-on formula. The details of these instructions are prescribed in the Annex to *BPOM Regulation No. 24/2020*.

2.3.4 GROWING-UP FORMULA

BPOM Regulation 24/2020 defines **growing-up formula** as formula made from cow’s milk, milk from other animals, and/or ingredients of animal and/or plant origin that have been demonstrated to be suitable for children aged over twelve months up to thirty-six months.

The quality requirements for growing-up formula are as follows:

- A product made from cow’s milk, milk from other animals, a mixture of both, and/or other ingredients that have been demonstrated to be suitable for children’s nutrition. The safety and nutritional adequacy of the growing-up formula must be scientifically proven to support children’s growth and development;
- The safety and benefits of the ingredients used in growing-up formula for children aged twelve to thirty-six months must be scientifically substantiated;
- All ingredients must be clean, of good quality, safe, gluten-free, and suitable for the digestion of children aged twelve to thirty-six months; and
- Growing-up formula must be free from lumps and large particles and must be suitable to meet the nutritional needs of children.

BPOM Regulation 24/2020 details the nutritional composition that must be present in growing-up formula, including, *inter alia*, its energy composition. For instance, a ready-to-consume growing-up formula must not contain less than 60 kcal per 100 ml and not more than 85 kcal per 100 ml. The nutritional composition requirements for growing-up formula, including protein, carbohydrates, vitamins, minerals, and other nutrients, are set out in the Annex to *BPOM Regulation 24/2020*.

BPOM Regulation 24/2020 imposes the following labelling requirements for growing-up formula:

- The product must be labelled as “**Growing-up Formula**” or, where milk is the sole source of protein, may be labelled as “**Growing-up Milk**”;
- Where cow’s milk is the sole source of protein, the statement “**Cow’s Milk-Based**” may be added to the name “**Growing-up Formula**” or “**Growing-up Milk**”;
- For growing-up formula that does not contain milk or milk-derived ingredients, the statement “**Does not contain milk or milk-derived ingredients**” or similar wording may be added to the product name;
- Nutrition information must be declared per serving, with a serving size of 30–50 g for powdered products and 200–250 ml for liquid products;
- The recommended daily intake must be stated in the label to meet the nutritional needs of children aged twelve months up to thirty-six months;
- The label must contain information describing signs indicating that the growing-up formula is no longer suitable for consumption and should not be given to children;
- If the growing-up formula is not completely consumed in a single feeding, the label must provide instructions for storing the formula after the formula container has been opened;
- The label of growing-up formula must include a statement that the product must not be given to infants; and
- The label of growing-up formula must include the statement “**Attention: Not suitable for infants**”:

**Perhatian:
Tidak cocok untuk Bayi**

BPOM Regulation 24/2020 further requires that instructions for the preparation, use, and handling of the growing-up formula be provided on the label and/or in an accompanying leaflet, which includes the following information:

- Liquid growing-up formula must bear the statement “*Ready to drink*”;
- For growing-up formula in concentrated form, it must include instructions for dilution with drinking water;
- Powdered growing-up formula must include instructions for preparation with drinking water;

- The label must contain instructions for the preparation, handling, and use of growing-up formula, including instructions on storage and disposal after preparation (e.g., any remaining growing-up formula not consumed should be discarded);
- The label must contain illustrations showing the method of preparation;
- The directions for use must be accompanied with a warning regarding the health risks associated with improper preparation, storage, or use of the product; and
- Instructions for the preparation and serving of the product must be included on the label.

3. APPLICABLE TARIFF RATE AND PRODUCT-SPECIFIC RULES

The **Customs procedures** and the requirement to obtain a **Post-Border Import Certificate** for formula products are the same as those applicable to general dairy products, as explained in Sections 7.4 and 7.5, respectively, of this *Guidance Handbook*.

The applicable tariffs and the product-specific rules under the *EU-Indonesia CEPA* are different, and are discussed further in Sections 3.1 and 3.2 below.

3.1 APPLICABLE TARIFF UNDER THE EU-INDONESIA CEPA

Indonesia's tariff commitments under the *EU-Indonesia CEPA* are set out in Appendix 2-A-1. In addition to tariffs on dairy products, Indonesia committed to eliminate import tariffs on formula products, which are classified under Chapter 19 on "*Preparations of cereals, flour, starch or milk; pastrycooks' products*" of the HS, specifically under subheading 1901.10.20 on "*Processed food suitable for infants or children, prepared for retail sale. Of goods of headings 04.01 to 04.04*".

The applicable tariff is as follows:

HS Code	Product Name	Base Tariff Rate	Staging Category
1901.10	Processed food suitable for infants or children, prepared for retail sale		
19011020	Of goods of headings 04.01 to 04.04	5%	A / Tariffs will be reduced to 0% on the date of the entry into force of the Agreement

Pending the entry into force of the *EU-Indonesia CEPA*, exports of EU formula products to Indonesia will remain subject to Indonesia's MFN applied tariff rates under the WTO framework.¹⁹⁹ Currently, formula products are subject to a **5%** applied tariff rate (while the bound tariff rate amounts to 40%).

¹⁹⁹ See <https://ttd.wto.org/en/data/idb/applied-duties?member=C360&product=19011020&year=2025> (accessed 22 June 2026).

3.2 PRODUCT-SPECIFIC RULES OF ORIGIN

Formula products from the EU may benefit from preferential tariff treatment under the *EU-Indonesia CEPA*, provided that they fulfil the applicable product-specific rules of origin under Chapter 3 of the Agreement (see Section 7.3 of this *Guidance Handbook*)

The **product-specific rules of origin** for formula products are as follows:

HS Code	Product-specific rules of origin
Heading 19.01.10 on “ <i>Processed food suitable for infants or children, prepared for retail sale</i> ”.	Change in Tariff Heading (CTH), provided that: • Non-originating materials of headings 11.01 (Wheat or Meslin Flour) to 11.08 (Starches and Inulin) used are milled, malted or otherwise processed from materials of other chapters in the territory of a Party; however, non- originating materials of headings 11.01 to 11.08 which do not respect that condition may be used provided that their total weight does not exceed 20% of the weight of the product; • All the materials of Chapter 4 (dairy products) used are wholly obtained; and • The total weight of non-originating materials of headings 17.01 (cane or beet sugar and chemically pure sucrose in solid form) and 17.02 (Other sugars, including chemically pure lactose, maltose, glucose and fructose, in solid form; sugar syrups not containing added flavouring or colouring matter; artificial honey, whether or not mixed with natural honey; caramel) used does not exceed 20% of the weight of the product.

