

NEW MECHANISM ON API REVOCATION AND CHANGES ON IMPORT POLICY

November 2025

The Ministry of Trade (“MOT”) has issued Regulation No. 37 of 2025 on 22 October 2025 (“MOT Reg No. 37/2025”) to amend certain provisions of the existing importer regulatory framework established under MOT Regulation No. 16 of 2025. This revisions aim to achieve regulatory harmonization and simplify the business licensing procedures for importers.

The following are the key amendments introduced by MOT Reg No. 37/2025:

1. MOT Reg No. 37/2025 introduces mechanisms to allow the following:
 - (i) A company’s Business Identification Number (*Nomor Induk Berusaha* or “NIB” which previously under MOT Reg No. 16/2025 was also applicable as the Importer Identification Number *Angka Pengenal Importir* or “API”) can be converted into an API-P now via an application through the INATRADE electronic system (which is integrated with the Online Single Submission (“OSS”) system).
 - (ii) The revocation of an API is now regulated and may only be applied once. This provision is to address cases where an importer mistakenly registered an API during the business licensing process through the OSS system. Such revocation may be conducted if the importer does not have valid permits or it has valid permits but has not currently realized any import shipment.

The application must be submitted electronically through the OSS system and must include a statement specifying the reason for such revocation and confirmation that the importer:

 - has valid import permits but has not currently realized any import shipment; and
 - will not transfer or trade the goods (raw materials, capital goods, auxiliary materials) previously imported under API for Producer.
2. MOT Reg No. 37/2025 adds types of good, *i.e.*, electronic goods with a cooling device are now allowed for limited import by an importer which does not hold an API. This requirement also applies for imports conducted by an importer for foreign governments or is sports related (such as a sport organization or sports event).
3. MOT Reg No. 37/2025 amends the import policy which was based on a masterlist (specifically for free-import goods or limited-import goods). Importers who previously secured such a masterlist must now also adhere to and fulfill all import restrictions. This



includes obtaining the required import permits and following verification procedures, as stipulated under the respective cluster regulations (*i.e.*, MOT Regulations Nos. 17 through 23 of 2025 and their amendments). Based on the socialization held by MOT, a transitional period has been established to allow shipments that were delivered before November 5, 2025, remain subject to the previous regulation; provided they arrive at the destination port no later than February 3, 2026.

For further assistance, please contact Ananda Aviati, Partner (ananda@mkklaw.net).