

**Voluntary Report** – Voluntary - Public Distribution

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**Report Name:** Indonesia Issues New Halal Regulations with Trade Implications

**Country:** Indonesia

**Post:** Jakarta

**Report Category:** Biotechnology - Plants and Animals, Grain and Feed, Livestock and Products, Oilseeds and Products, Special Certification - Organic/Kosher/Halal

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**Report Highlights:**

As the October 17, 2026 deadline for mandatory halal certification for most agricultural products approaches, Indonesia's halal authority (BPJPH) has issued several regulations with trade implications for approximately \$2.5 billion in U.S. agricultural exports. Notably, BPJPH formally exempted soybeans, corn, and other plant-based genetically engineered raw commodities from halal certification requirements, greenlighting approximately \$1.25 billion in annual U.S. exports. However, BPJPH also clarified halal slaughter requirements and issued measures which would require U.S. exporters to have pre-shipment inspections, hire halal supervisors, and meet labeling requirements for non-halal products. FAS continues to seek clarity since many details related to the implementation of these regulations remain uncertain and invites comments from U.S. industry.

*Note: FAS Jakarta is currently awaiting written confirmation of several topics outlined below. However, given fast-approaching deadlines of multiple new regulations, we are providing our current understanding in this report. We recognize many uncertainties remain and will provide additional clarifications as they become available. While Indonesia made halal-related commitments under the [U.S. – Indonesia Agreement on Reciprocal Trade](#), those are not outlined in this report since the Agreement may not be implemented before the new halal-related measures outlined in this report come into effect.*

This report provides an overview of several regulations and proposed regulations that the Government of Indonesia published and/or notified to the World Trade Organization (WTO) Committee on Technical Barriers to Trade (TBT), organized by category of impacted U.S. products:

## **ALL AGRICULTURAL PRODUCTS**

As FAS Jakarta reported previously, after October 17, 2026, many food, beverage, and non-agricultural products must be certified halal under Government Regulation No. 42/2024. Meat and dairy products are already subject to halal requirements. Please review our previous report which provides a general overview of these requirements [here](#). BPJPH verbally confirmed that products with a bill of lading date before October 17, 2026 must still be in compliance and that it does not plan to issue a written extension or relaxation of this deadline. We encourage U.S. companies to work closely with their importers to ensure U.S. products comply with BPJPH's halal certification and labeling requirements before that date.

### **Products which Require Halal Certification**

*Now through October 17, 2026*

FAS Jakarta understands that BPJPH is not currently enforcing halal certification requirements for products other than meat and dairy, which have long-standing halal certification requirements. Other products on the list are expected to be certified halal by October 17, 2026.

*After October 17, 2026*

After October 17, 2026, food and beverages must be certified halal unless they are listed in the “Halal Positive List,” meaning those products are inherently halal and therefore do not require halal certification. There have been multiple iterations of these exemptions, outlined below:

- The original Halal Positive List was published via Ministry of Religious Affairs Decree No. 1360/2021.
- On May 6, 2026, BPJPH published Decree No. 307/2025, which listed over 950 Harmonized Tariff Schedule (HTS) codes of food and beverages, and 65 HTS codes of food additives which must be certified halal. Please refer to FAS Jakarta's previous report on this Decree [here](#). This Decree identified several products which would newly require halal certification, even though they were previously exempt under the Halal Positive List. An unofficial English translation of Decree 307/2025 can be seen [here](#).

- Following U.S. engagement, BPJPH updated the Halal Positive List via BPJPH Decree No. 301/2026, dated August 31, 2026. An unofficial translation can be seen [here](#). Key aspects of the Decree are summarized below:
  - The Decree classifies products and ingredients that are exempt from halal certificate requirements, including those derived from plants (soybeans, corn, apples, and almonds), non-slaughtering halal animals (e.g. fresh milk, egg), algae, natural water, and certain chemicals used in food processing.
  - It also clarifies that cotton is exempt from halal certification.
  - Under this Decree, genetically engineered (GE) seeds and resulting GE plants (e.g. soybean and corn) are exempt from halal certification if they already have had food safety approvals from the Indonesian authority.
  - Products and ingredients that have minimal processing methods, such as washing, peeling, cooling, freezing, cutting, drying, salting, grinding, blanching, heating, homogenization, centrifugation, sieving, filtering, pressing, pre-treatment, size reduction, evaporation, sorting, classification, and fractional distillation do not need to have halal certificates.
  - While Decree No. 307/2025 noted that frozen, salted, and dried seafood and dried fruit without additional ingredients (e.g., raisins) would require halal certification, under the new Decree, FAS Jakarta understands that these products do not require certification.
  - U.S. producers or importers may be asked to submit supporting documents to justify products on the Halal Positive List to BPJPH. This is typically a one-page summary of production process flow, product composition, certificate of analysis, or other supporting documents.
  - BPJPH confirmed that the decree is already in effect. The six-month implementation period outlined in the decree is for ingredients that were effectively removed from the Halal Positive List.

## **Ingredients**

FAS Jakarta understands that food and beverages exported to Indonesia must be certified halal unless they are listed on the Halal Positive List. This is true even if the product will serve as an ingredient only in Indonesia.

## **Labeling**

Government Regulation No. 42/2024 outlines the labeling requirements for halal products, including the inclusion of the Indonesia halal logo and the import-specific halal registration number for that product. There is a long-standing practice for importers to apply these compliant product labels upon arrival in Indonesia (referred to as “stickering”), which is an effective means of providing essential information to consumers worldwide. FAS Jakarta understands that stickering continues to be allowed. Please refer to our previous report for additional information on halal labeling [here](#).

## **Bulk Products**

FAS Jakarta understands that food and beverages packaged in bulk (i.e., are not in retail packages) must still be certified halal unless they are exempt under the Halal Positive List, but do not require halal labeling.

### **Pre-Shipment Inspections**

On July 30, 2026, BPJPH notified a draft regulation on pre-shipment inspection requirements to the WTO TBT Committee as [G/TBT/N/IDN/190](#), with a comment deadline of September 28, 2026. This regulation creates a pre-shipment verification regime, which would be conducted by BPJPH-appointed Inspection Bodies (not yet appointed) at the country of origin. The regime's purpose is to confirm that all imported products that are certified halal or labeled as non-halal (see below) match their documentation before they can be imported into Indonesia, with a formal reporting, fee, and sanctions framework to enforce compliance. Based on the regulation, pre-shipment inspections will be required for each shipment, and the resulting report serves as a required document for customs clearance and is exchanged electronically with the Indonesia's National Single Window system.

However, BPJPH verbally described pre-shipment inspections as being random instead of being conducted for each shipment. They noted that inspectors would not need to be present during shipment loading and that shipping vessels would not need to be opened for the inspection. FAS understands that ingredients and products that are exempted from halal certification (e.g., soybeans, fresh fruit, and cotton) are not subject to this regulation. In addition, BPJPH verbally allowed stickering for halal or non-halal label to continue to be conducted in Indonesia. Therefore, according to BPJPH, U.S. products that do not yet have Indonesia halal labels can still be exported to Indonesia. They confirmed that Indonesian customs will release these products, but they will inform BPJPH to confirm the product is labeled correctly in the market.

Although notified to the WTO as a draft, this proposed regulation was signed as BPJPH Regulation No. 4/2026 on August 7, 2026, making it effective on September 10, 2026. However, BPJPH must propose the fees to the Ministry of Finance within 1 year of enactment, appoint inspection bodies, and take other critical steps which have not yet occurred. We understand that pre-shipment inspections are not currently required. FAS is currently drafting detailed comments outlining our significant concerns and advocating for the implementation of this requirement to be held. We are awaiting written clarity on many aspects of the pre-shipment inspection requirement and will provide updates as we receive them.

An unofficial English translation of the proposed regulation can be seen [here](#).

### **Halal Supervisors**

On August 28, 2026, BPJPH notified a new proposed regulation to the WTO TBT Committee, [G/TBT/N/IDN/193](#), which would require each establishment seeking halal certification to have a halal supervisor. Notably, each supervisor can only work for one company and must meet certain qualifications, such as being a Muslim and qualified as a halal supervisor, evidenced by training and/or a competence certificate. This proposed regulation could create potential conflicts with U.S. employment law and workforce availability challenges. While BPJPH already requires halal supervisors for products

they certify directly, it is unclear whether this proposed regulation is also intended for companies certified by Halal Certification Bodies (HCBs). The comment deadline is October 27, 2026.

[Here](#) is an unofficial translation of the draft regulation.

### **Other Halal Logistics**

On November 17, 2025, BPJPH notified a draft decree on halal logistics to the WTO TBT Committee as [G/TBT/N/IDN/183](#), which would require halal certification of the entire supply chain. The United States submitted detailed comments outlining how U.S. agricultural exports would be significantly impacted. To date, this regulation has not been finalized and these requirements are not in effect.

Please see our GAIN Report: [Indonesia Notifies Draft Decree on Halal Logistic Requirements](#), for more information regarding the proposed decree on the halal logistics.

An unofficial English translation of this proposed decree is available [here](#).

### **BPJPH Enforcement**

On May 11, 2026, the Head of BPJPH signed Regulation No. 2/2026 on the administrative sanctions for violations of the halal product assurance implementation. This regulation outlines that BPJPH can revoke foreign halal certificate registration numbers for products certified by foreign HCBs as an administration sanction, with public announcements. In addition, BPJPH can similarly revoke the accreditation of foreign HCBs. This regulation was not notified to the WTO and became effective on June 5, 2026.

[Here](#) is an unofficial English translation of BPJPH Regulation No. 2/2026.

### **GENETICALLY ENGINEERED COMMODITIES**

Under [Ministry of Religious Affairs' Decree No. 748/2021](#), GE products must be certified halal by October 17, 2026. Following significant U.S. Government engagement, BPJPH notified a proposed regulation to the WTO TBT Committee ([G/TBT/N/IDN/192](#)) on August 28, 2026, which explains the scope of GE products that require halal certification and updated the Halal Positive List accordingly on August 31, 2026 via BPJPH Decree No. 301/2026 as noted above. An unofficial English translation of the draft decree is available [here](#).

The deadline for comments is October 27, 2026.

### **Soybeans, Corn, and Other Plant-Based Raw Commodities**

Under the draft regulation, GE seeds and resulting GE plants are exempt from halal certification if Indonesia's Food and Drug Administration (BPOM) granted food safety approval for the specific GE plant event. As of today, more than 80 GE plant events have received BPOM food safety approvals, listed at [GAIN Report ID2025-0038](#). BPJPH subsequently updated the Halal Positive List as noted

above, which formalized this exemption. As a result, U.S. soybean and corn exports, valued at approximately \$1.25 billion annually, can continue entering Indonesia without halal certification.

### **GE Plant-Based Processed Products**

While GE seeds and resulting GE plants are exempt, all processed food products require halal certification. Consequently, any food and beverage products derived from GE and non-GE raw commodities (e.g., corn tortillas, corn starch, corn/soy oil, soy protein isolate, and soy milk) need halal certification. These requirements are under [the Ministry of Religious Affairs' Decree No. 748/2021](#), [the Ministry of Religious Affairs' Decree No. 944/2024](#), and [the Head of BPJPH Decree No. 307/2025](#).

### **GE Feed, Feed Ingredients, and Cotton**

Product categories which must be certified halal by October 17, 2026, are limited to food, beverages, medicines, and cosmetics. As a result, GE products used for feed (e.g., soybean meal and dried distillers grains with solubles) and cotton fiber are exempt from halal certification requirements since they are not consumed by humans.

### **GE Animal Products and Microorganisms**

GE animals and their derivative products, including GE fish, require halal certification. However, the requirement for halal certification of products derived from GE plants or animal cells will be implemented following an assessment of the specific GE event. GE microorganisms will also require halal certification but it depends on the halal critical points identified during their production process.

## **FEED INGREDIENTS**

The Halal Law 33/2014 and Government Regulation No. 42/2024 do not require animal feed to be certified halal. Accordingly, FAS Jakarta understands that U.S. commodities that are fed to animals do not require halal certification. This includes plant-based, GE, and animal-origin feed ingredients.

## **FRESH FRUIT**

Fresh fruit is exempt from halal certification requirements. FAS Jakarta understands that fresh fruit with plant-based wax (e.g., carnauba wax) is also exempt. However, under [Decree 307/2025](#), products with bees and insects' waxes need to have a halal certificate.

## **MEAT**

All meat and poultry products must be certified halal, except for pork which is subject to non-halal labeling requirements described below.

### **Slaughter Requirements**

Signed May 19, 2026, BPJPH Decree 160/2026 provides guidelines on halal slaughtering for ruminant animals and poultry. This regulation replaces BPJPH Decree No. 77/2023. The key changes include:

- Detailed new rules for machine-based slaughter: the operator must be Muslim, of legal age, certified, must recite the *basmalah* before/at machine start, must re-recite it if the machine is restarted, and the machine must sever all four channels, namely the respiratory channel (hulqum), the digestive channel (mari'), and the two blood vessels (wadajain).
- Permitting only three stunning methods for ruminants: non-penetrative mechanical stunning, head-only electrical stunning, and electromagnetic stunning. For poultry, it permits water bath head-only electrical stunning.
- Ruminants not stunned must be slaughtered within 10 seconds of being laid down. Alternatively, stunned ruminants must be slaughtered within 30 seconds of stunning. Stunned poultry must be slaughtered within 10 seconds of stunning.
- Death indicators include cessation of breathing, blinking, and blood flow, with no other vital response.
- Packaged slaughter products must have halal labels that are easily visible, readable, and tamper resistant. Meanwhile, unpacked distributed products need to be accompanied by a copy of the slaughterhouse's halal certificate and a delivery note which contains information on the quantity, type, and destination of the distribution/shipment.
- Slaughterhouses must have separated halal and non halal zones within the facility (holding, slaughter, skinning, evisceration, chilling room, carcass handling, cooling room, waste facility).
- Monitoring and evaluation are conducted by BPJPH.

### **Animal-Origin Feed Requirements**

As noted above, animal feed and feed ingredients are exempt from halal certification requirements. However, Decree 160/2026 clarifies that the animal which will be slaughtered must not consume feed containing pork and its derivatives. This is to support the Ministry of Agriculture's regulation No. 13/2019, which requires that animal-origin feed ingredients not include ingredients derived from pigs or non-domesticated ruminants.

An unofficial English translation of Decree 160/2026 is available [here](#).

### **NON-HALAL PRODUCTS**

On July 13, 2026, BPJPH issued Regulation No. 3/2026, which outlines requirements for labeling non-halal products. This regulation gives a grace period of one year for non-halal products that are already in the market, meaning that U.S. products must comply by July 23, 2027.

#### **Pork**

Food and beverage products derived from pigs (e.g., bacon, pork dumplings, canned pork, beans with lard, and pork floss) must use this label, which translates to, "contains pork:"



### **Other Non-Halal Products**

Food and beverage products derived from prohibited (*haram*) ingredients other than pigs and their derivatives must include the below non-halal graphic on their label. Such products include those with haram ingredients (e.g. crocodile, frog, or blood), and products which contain more than 0.5 percent alcohol. In addition, this label may be required for non-haram products that share production facilities with products derived from pork or other haram products and are not able to adequately separate the production lines to prevent cross-contamination.



Another color with sufficient contrast may be used to ensure readability of non-halal labeling. Non-halal labeling is a self-attestation by U.S. producers or in Indonesia by the importers, but they need to provide supporting documents, such as the production process flow, product composition, certificate of analysis, and statement that the product originated from prohibited ingredients or the production process does not comply with the halal certification requirements.

Notably, products categories which are not on the Halal Positive List, such as peanut butter, sweeteners, and other processed food and beverages, are not eligible to be sold with the non-halal label. These products can only be sold in Indonesia after October 17, 2026, if they are certified halal and are labeled accordingly.

An unofficial English translation of Regulation No. 3/2026 can be accessed [here](#).

### **SEAFOOD PRODUCTS**

On August 31, 2026, BPJPH clarified that frozen, dried, and salted seafood is exempt from halal certification via Decree No. 301/2026. While this conflicts with Decree No. 307/2025, which required halal certification for frozen, dried, and salted fish/seafood, Post understands that BPJPH will revise Decree No. 307/2025 to be clear that seafood products are exempt from halal certification.

### **AGRICULTURAL PRODUCTS CERTIFIED HALAL BY BPJPH**

Most U.S. companies obtain halal certification from one of five U.S. halal certified bodies accredited by BPJPH. However, U.S. companies may instead seek halal certification directly by BPJPH. BPJPH recently issued two proposed regulations clarifying halal certificate renewal processes and periodic assessments, which only apply to operations which obtain halal certification by BPJPH:

### **Halal Certificate Renewal**

On July 23, 2026, BPJPH notified a proposed regulation on the renewal of halal certificates to the WTO TBT Committee as [G/TBT/N/IDN/189](#), with comments due on September 21, 2026. This draft regulation establishes the procedures and requirements for the renewal of halal certificates following changes to product ingredients, the halal product process, or product development after a halal certificate has been issued. The regulation also sets out the eligibility requirements, application procedures, supporting documentation, and provisions governing the renewal process through an integrated electronic system.

This proposed regulation will only apply to local and foreign business actors that get halal certification directly from BPJPH. Therefore, this regulation doesn't apply to Halal Certificates issued by BPJPH-accredited foreign HCBs.

[Here](#) is an unofficial English translation of the proposed regulation.

### **Periodic Assessments**

On July 23, 2026, BPJPH notified a proposed regulation regarding the assessment of halal product assurance system implementation to the WTO TBT Committee as [G/TBT/N/IDN/188](#), with comments due on September 21, 2026. The proposed regulation establishes the procedures for the assessment of the implementation of the Halal Product Assurance System to ensure the continued compliance of halal-certified products with halal requirements after certification has been granted. It sets out the requirements and procedures for periodic assessments (every four years), including reporting obligations, document verification, on-site and remote assessments, self-assessments for eligible business operators, risk-based assessment mechanisms, follow-up actions, administrative sanctions, and transitional provisions.

This proposed regulation will apply exclusively to domestic and foreign business actors holding halal certificates issued by BPJPH. Therefore, this regulation doesn't apply to Halal Certificates issued by BPJPH-accredited foreign HCBs.

An unofficial English translation of this proposed regulation is available at this [link](#).

### **U.S. INDUSTRY COMMENTS**

Throughout the report, comment deadlines are referenced for multiple proposed regulations that BPJPH notified to the WTO TBT Committee. U.S. industry is welcome to submit comments to FAS by contacting Abraham Inouye at [Abraham.Inouye@usda.gov](mailto:Abraham.Inouye@usda.gov). Please reference the specific WTO notification for your comments to ensure they are incorporated appropriately.

We appreciate U.S. industry's patience as we continue to seek clarity on the recent and forthcoming halal regulations, which will be referenced in future GAIN reports.

### **Attachments:**

No Attachments.