

# Clear Paths to Product Registration in Indonesia



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# Why Product Registration Matters in Indonesia

Indonesia is one of Southeast Asia's fastest-growing consumer markets, but entering it requires more than having a good product. To sell legally, your product must first be registered with the right authorities.

From **BPOM** approvals for food, beverages, supplements, and cosmetics to SNI standards for safety and Halal certification for consumer trust, compliance is the key to unlocking market access.



The challenge? Regulations differ by product category, involve multiple agencies, and carry strict technical requirements. For many businesses, this complexity leads to costly mistakes such as shipment delays, product recalls, or even market bans.

That's why **product registration is not just paperwork** — it is a strategic compliance step that protects your business, builds credibility, and opens the door to Indonesia's vast market opportunities.

## IN THIS GUIDE, WE'LL BREAK IT DOWN. YOU'LL LEARN:

- What does product registration mean in Indonesia
- The key approvals and certifications by sector
- Common mistakes businesses make — and how to avoid them
- How InCorp Indonesia helps simplify the process

## Sidebar: What's at Stake with Poor Product Registration?

ISSUE	POTENTIAL IMPACT
<b>Unregistered Products</b>	Products cannot enter the market, and there is a confiscation risk
<b>Incomplete Documentation</b>	Delays of weeks or months, extra costs
<b>Wrong Classification (HS Code, BPOM Category)</b>	Rejection at customs, forced re-application
<b>Non-Compliance with Halal/SNI</b>	Market recall, loss of consumer trust
<b>Reputational Damage</b>	Risk of being flagged as an unreliable or unsafe supplier

**The bottom line** → Even small registration errors can block your market entry. Staying compliant safeguards your investment, reputation, and growth in Indonesia.

# What Is Product Registration?

Product registration is Indonesia's way of ensuring products meet safety, quality, and labeling standards before they reach consumers. It is a gatekeeper step – without it, your goods cannot legally enter the market.



This process covers a wide range of sectors:

- ✓ BPOM oversees food, beverages, cosmetics, and supplements
- ✓ Ministry of Health (MoH) manages medical devices and PKRT (household health supplies)
- ✓ BPJPH enforces Halal certification under Law No. 33/2014
- ✓ BSN/Kemenperin mandate SNI certification for specific goods

Each authority applies different rules and timelines, meaning businesses must map their products carefully.

## Sidebar: Why Registration Is More Than Paperwork



Protects consumers from unsafe or counterfeit products



Builds credibility with retailers and e-commerce platforms



Prevents costly customs holds or market recalls



Creates a long-term foundation for expansion in Indonesia

# Key Benefits for Businesses

For companies entering Indonesia, product registration is not only a legal requirement but also a **strategic business advantage**.



A registered product signals compliance, builds consumer trust, and helps avoid unnecessary disruption in distribution. Understanding and leveraging this advantage can empower businesses in their market entry strategy.

The benefits go beyond market entry. With approvals, businesses gain easier access to **retail networks, e-commerce platforms, and modern trade channels**, where proof of registration is mandatory. This credibility also strengthens relationships with distributors and investors, who view registered products as lower risk.

A good registration strategy helps companies stay compliant and cut costs. By keeping classification, labeling, and permits organized, businesses can avoid expensive mistakes like reworks, recalls, and relabeling campaigns.

This sets up a clear system for product expansion and supports growth in Indonesia, helping businesses feel secure about long-term success.

# Sidebar: Why Registration Strengthens Your Business



**Market Access**  
smooth entry to retail and  
online platforms



**Trust & Credibility**  
consumers prefer products with  
BPOM, Halal, or SNI marks



**Operational Efficiency**  
fewer delays at customs and  
checkpoints



**Cost Control**  
avoid penalties, recalls, or  
unnecessary re-submissions



**Scalable Growth**  
a compliant system for adding more SKUs in the future

# Medical, Food & Consumer Product Registrations

Product registration in Indonesia isn't a single process — it's a set of pathways tailored to different product types. Each regulator applies its own rules, evidence requirements, and timelines. Misplacing your product in the wrong lane can mean delays, added costs, or outright rejection.



To help you navigate, here's how the main categories break down:

## Medical Device Registration (MoH)

Medical devices fall under the **Ministry of Health (MoH)** and are classified by risk, from Class A to D. Higher classes demand stricter evidence and documentation.

Foreign businesses cannot register directly — they need a **local Marketing Authorization Holder (MAH)**. Choosing the wrong MAH model (such as letting a distributor hold your licenses) may complicate future control.

The most common delays come from incomplete technical files or unclear classification. Even a Class B device can be delayed for months if predicate evidence is missing.

## QUICK POINTERS

- Risk classes A–D → higher class = more evidence
- MAH required for all applications
- Complete files: predicate device, test reports, labeling
- **Pitfall:** assuming MoH accepts overseas approvals

## Food & Beverage Registration (BPOM)

**BPOM** oversees food and beverages, with separate routes: **ML for imports and MD for local manufacturing**. Both require dossiers covering formula, origin, shelf-life data, and labels in Bahasa Indonesia.

A recurring issue is **HS Code mismatch with BPOM categories** – shipments often get stuck at customs because of this. Early classification alignment helps prevent such setbacks.

## QUICK POINTERS

- Routes: ML (imported) / MD (local)
- Labels must include a nutrition panel in Bahasa
- Shelf-life & origin certificates required
- **Pitfall:** HS Code mismatch → customs hold

## Food Supplement Registration (BPOM)

Supplements undergo a stricter review than conventional F&B products. BPOM monitors both **ingredients and claims**, ensuring they stay within approved lists.

For example, claims like “supports immunity” are only permitted when supported by dosage and evidence.

Novel ingredients require additional scientific data, often extending approval timelines.

The smart approach is to **finalize claims, then design the formula and label to match.**

### QUICK POINTERS

- Stricter controls than F&B
- Claims must match dosage & approved lists
- Novel ingredients = more evidence
- **Pitfall:** formulating first, checking later

## Cosmetic Registration (BPOM)

Cosmetics are filed through a notification system, which is faster but requires detailed documentation. Each product needs a **Product Information File (PIF)** that covers formula, safety testing, and Bahasa Indonesia labeling.

The most significant risk is **claim creep** – when cosmetic claims edge into therapeutic territory. If this happens, BPOM may reclassify the product, creating substantial delays.

Accurate **INCI naming** and avoiding restricted substances are also essential.

### QUICK POINTERS

- Notification system, not complete registration
- PIF is required for each product
- INCI list must be accurate
- **Pitfall:** claim creep (cosmetic → medicinal)

# Household Products (PKRT – MoH)

The **MoH** regulates household health supplies (**PKRT**), including disinfectants, wipes, and sanitary products. These products require efficacy testing and hazard labeling, even when they seem “simple.”

Companies often assume PKRT approvals are easier, only to find that dossiers need the same level of care as other categories.

## QUICK POINTERS

- Covers disinfectants, wipes, and sanitary items
- Efficacy tests mandatory
- Hazard labeling in Bahasa is required
- **Pitfall:** underestimating dossier complexity

Each product type has its own pathway, but the **core challenge is the same:** aligning your dossier, classification, label, and claims from the start. Whether it’s a Class B device, a multivitamin, or a household cleaner, the key is knowing the rules early and preparing accordingly.

# Certifications & Supporting Compliance

Securing product registration is only part of the journey. In Indonesia, many categories require additional certifications to confirm quality, safety, and consumer trust. These certifications often run parallel with registration and are critical for avoiding bottlenecks later.



## SNI Certification (BSN/Kemenperin)

Some products — such as toys, electronics, helmets, or cables — must comply with **Indonesian National Standards (SNI)**. Certification involves product testing in accredited local labs and factory audits for particular schemes.

A product without the SNI mark cannot be entered or sold in Indonesia, even if it already has BPOM or MoH approval.

### QUICK POINTERS

- Mandatory for selected categories
- Testing + factory audits required in accredited labs
- Products must carry the SNI mark before sale
- **Pitfall:** checking SNI status too late → shipment delays

**Transition** → Beyond safety standards, Indonesia also enforces faith-based assurance through Halal certification.

## Halal Certification (BPJPH)

Under **Law No. 33/2014**, many food, beverage, supplement, and cosmetic products must obtain Halal certification. This requires verifying every production stage, from raw materials to cleaning agents.

BPJPH manages the process in cooperation with accredited Halal inspection bodies (LPH). Once certified, products must display the Halal mark on their packaging.

### QUICK POINTERS

- Mandatory for most consumables & cosmetics
- Requires full supply chain traceability
- Involves facility audits & ingredient verification
- **Pitfall:** overlooking hidden inputs (e.g., flavorings, processing aids)

**Transition** → While Halal protects consumer trust, trademark registration protects your brand.

## Trademark Registration (DGIP)

Trademark registration isn't required to sell a product, but it is a **strategic safeguard**. Without it, companies risk losing brand control to local distributors or copycat registrants.

By registering with the **Directorate General of Intellectual Property (DGIP)**, businesses secure their name and logo, making it easier to protect their approvals and prevent disputes.

## QUICK POINTERS

- Protects brand name, logo, and product identity
- Prevents distributor or competitor hijacking
- Recommended before or alongside regulatory filings
- **Pitfall:** relying only on contracts without IP protection

Certifications like **SNI, Halal, and trademarks** may seem secondary, but they are as critical as BPOM or MoH approval in practice.

Together, they form a compliance package that satisfies regulators and builds consumer confidence and long-term brand security.

With both registration and certifications in place, the next challenge is navigating **import and export regulations**, where permits and HS Codes determine how smoothly your products can reach the Indonesian market.

# Import & Export Regulatory Support

Product registration ensures your goods are legally recognized. However, market entry can fail if **import and export requirements** are overlooked. In Indonesia, customs authorities check permits and whether your registration aligns with HS codes, labels, and import licenses.



## Why Import Matters After Registration

Even with BPOM or MoH approval, shipments can be delayed if:

- ✗ HS Code does not match the registered category
- ✗ Import permits are missing or incomplete
- ✗ The appointed Importer of Record (IoR) isn't authorized for your product type

A seamless process requires treating **registration and import as one system**, not separate tasks.

## Table: How Import & Registration Interact

ELEMENT	WHAT CUSTOMS SEES	LINK TO REGISTRATION
<b>HS Code</b>	Determines tariff, import permits	Must align with dossier category
<b>Import Permit (API/NIB)</b>	Legal license to import	Must match the product's controlled status
<b>Labeling</b>	Checked at customs inspection	Must match the approved BPOM/MoH label
<b>Importer of Record (IoR)</b>	Entity responsible for clearance	Must also act as holder/authorized distributor

## Export Considerations

For businesses producing in Indonesia, **export rules** apply when products are shipped abroad. Correct HS codes, SNI certification (if required), and Halal labeling can improve acceptance in target markets.

Import and export mechanics may look like logistics tasks, but in reality, they are part of the compliance chain. The smoothest market entries happen when businesses plan registration, certification, and import permits together, ensuring customs sees one consistent story.

# What Businesses Should Do — and Avoid

Even the best products fail in Indonesia when compliance steps are overlooked. Success depends not only on registering but also on how you manage the process.



## Do's

✓ **Decide category early**

Align claims, formula, and HS Code before filing

✓ **Appoint the right local holder**

Ensure contracts give you access to data and approvals

✓ **Localize labels properly**

Bahasa Indonesia, nutrition panels, and hazard info must follow format

✓ **Plan for change control**

Ingredients, suppliers, or packaging shifts can trigger re-approval

✓ **Think ahead for renewals**

Set reminders for validity periods and post-market reporting

## Don'ts

- ✗ **Don't assume global approvals are enough**  
BPOM/MoH won't accept EU or US certificates directly
- ✗ **Don't let distributors own everything**  
You risk losing control over licenses and labels
- ✗ **Don't over-promise claims**  
Pushing "medical" claims can lead to reclassification
- ✗ **Don't treat Halal or SNI as afterthoughts**  
They often run parallel with registration
- ✗ **Don't ignore HS Code checks**  
Customs and BPOM categories must align

## Takeaway

The most innovative companies approach product registration as a **compliance strategy, not just paperwork**. By locking the basics early – category, holder, HS Code, and labels – they save months, avoid rework, and protect their brand in Indonesia's competitive market.

# Case Study

## Insight

Real-world cases show how the right strategy can prevent costly mistakes. Below is an example of how one global brand navigated Indonesia's regulatory environment—and what others can learn from it.

### YOUNG LIVING – CONSUMER PRODUCTS IN A REGULATED MARKET

Young Living, a global essential oils and wellness company, had to register multiple SKUs for the Indonesian market. Each product had to comply with BPOM requirements, Halal obligations, and labeling rules in Bahasa Indonesia.



### CHALLENGES THEY FACED

- ⚠ Harmonizing product claims across dozens of SKUs
- ⚠ Aligning global formulations with Indonesia's approved ingredient list
- ⚠ Creating bilingual labels that met local format rules
- ⚠ Coordinating import permits and BPOM notifications to avoid staggered launches

## HOW COMPLIANCE HELPED

- ✓ Developed a master claims and label system that covered all SKUs consistently
- ✓ Streamlined the BPOM notification process to minimize approval gaps
- ✓ Ensured smooth market entry with fewer delays and more substantial distributor confidence

**Lesson** → Large portfolios succeed in Indonesia when compliance is standardized across claims, labels, and approvals – not managed SKU by SKU.

## Contrast: IDAK License Case

While Young Living highlights consumer product registration, another case shows the importance of **distribution readiness**. A company seeking an **IDAK license** (distributor license for medical devices) had to revise internal processes before applying.

**Lesson** → Product registration is only effective if distribution licenses are aligned; otherwise, approvals cannot be used.

## Takeaway

Whether you're a multinational with hundreds of SKUs or a distributor preparing to enter the market, the principle is the same: **plan compliance as an integrated system**. Each step connects from product registration to licensing, and one weak link can slow the entire market entry.

# How We Help at InCorp Indonesia

At InCorp Indonesia (an Ascentium Company), we see product registration not just as paperwork, but as a strategic gateway to the Indonesian market. Our role is to simplify the process, reduce risks, and give your business a clear path forward.



We combine deep knowledge of Indonesian regulations with hands-on experience across industries – from medical devices and consumer goods to food, supplements, and cosmetics. This means we don't just file applications; we help you **plan the correct route**, avoid common pitfalls, and stay compliant long after approval.

## Where We Add Value

### ✓ Early feasibility checks

Product classification, claims, HS Code, and label review

### ✓ Dossier preparation & filing

Complete, compliant submissions to BPOM, MoH, BPJPH, or BSN

### ✓ Label & claim compliance

Clear, consumer-ready labeling in Bahasa Indonesia

✓ **Local holder strategy**

Choosing the right model (your entity, appointed holder, or IoR)

✓ **Parallel certifications**

Coordinating Halal, SNI, or trademark alongside registration.

✓ **Post-market support**

Renewals, amendments, reporting, and compliance monitoring.

Ready to enter Indonesia with confidence? Let InCorp Indonesia guide you on your registration and compliance journey. We'll assess your portfolio, map the fastest viable route, and handle the filings – so you can focus on growth. **Contact us today** to get started.

CONTACT US

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