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New mandatory one-stop export regime for strategic natural resources through state-owned export companies

I. Introduction

On 21 May 2026, the Government issued Government Regulation No. 24 of 2026 on Strategic Natural Resource Commodity Export Governance (**GR 24/2026**). This regulation requires exports of designated strategic natural resource commodities to be conducted through a state-owned entity (**SOE**). This regulation stipulates that exports of designated strategic natural resource commodities must be channelled through a single export gateway, namely a government-appointed export SOE ("**Export SOE**").

This policy is part of the Government's broader strategy to maintain domestic supply stability, national economic resilience, increase added value, sustainable national development, and the utilisation of natural resources for the greatest prosperity of the people. The Government, through export policies and controls, regulates exports pursuant to Law No. 7 of 2014 on Trade, particularly Article 38(1) thereof.

Following the issuance of GR 24/2026, the Ministry of Trade (**MoT**) issued three implementing regulations governing the export of designated strategic natural resource commodities: (i) MoT Regulation No. 15 of 2026 for coal (**MoT Reg. 15/2026**), (ii) MoT Regulation No. 16 of 2026 for palm oil (**MoT Reg. 16/2026**), and (iii) MoT Regulation No. 17 of 2026 for ferro alloys (**MoT Reg. 17/2026**). These regulations provide the operational framework for the implementation of the new export governance regime under GR 24/2026.

II. Key points

A. Determination of strategic natural resource commodities

The determination of strategic natural resource commodities will be carried out in stages. Currently, strategic natural resource commodities include:

1. Coal
2. Crude palm oil
3. Ferro alloy

1. Coal under MoT Reg. 15/2026

MoT Reg. 15/2026 introduces additional compliance requirements for coal exports, including the requirement for exporters to hold a valid registered exporter licence and to obtain a surveyor report through mandatory verification or technical traceability procedures. The regulation also reinforces the use of integrated electronic systems for export administration and reporting.

2. Palm oil under MoT Reg. 16/2026

MoT Reg. 16/2026 introduces a more structured export entitlement framework for palm oil products, whereby export activities are linked to the availability, allocation, transfer, and conversion of export rights and the issuance of the corresponding export approval. The regulation also increases reliance on integrated electronic processing and reporting through SINSW and INATRADE.

3. Ferro alloy under MoT Reg. 17/2026

MoT Reg. 17/2026 introduces a differentiated regulatory framework for ferro alloy exports. Under this framework, certain products remain subject to mandatory verification or technical traceability, as well as the issuance of a surveyor report, as part of the export process. The regulation also provides limited exemptions from the requirement to export through the Export SOE for specified categories of exporters, including those holding qualifying government agreements.

B. Export SOE as a sole exporter

For strategic natural resource commodities, the Government will implement a phased transition toward an Export SOE, which is an SOE specifically appointed by the Government to undertake the export of such commodities. PT Danantara Sumber Daya Indonesia has been identified as the entity expected to assume the role of Export SOE and to perform the functions envisaged under the new export regime.

C. Implementation scheme

The designation of strategic natural resource commodities will be implemented on a phased basis. During the transitional period from 1 June 2026 to 31 December 2026, exporters will continue to perform certain key export-related functions, including the submission of export declarations (PEB), customs clearance formalities, payment of export levies and royalties, and export proceeds (*Devisa Hasil Ekspor* or DHE) reporting obligations. In addition, exporters will be required to submit export and transaction data through the designated system (CEISA 4.0), provide DHE reporting to the Export SOE, and furnish any supplementary information requested by the Export SOE.

Effective 1 January 2027, the Export SOE will assume the role of the sole exporter of record for the export of designated strategic natural resource commodities. As a consequence, responsibility for export documentation, customs administration, shipping and logistics arrangements, transaction administration, DHE reporting, and export compliance functions will be transferred from exporters to the Export SOE. The framework also contemplates a review process following August 2026, which may result in adjustments to the implementation timeline, including a potential acceleration of exports through the designated state-owned export entity prior to the full transition date.

D. Exceptions

Certain business actors may be exempted from the requirement to export strategic natural resource commodities through the Export SOE if they have contracts or agreements with the Government that include:

1. Investment
2. Divestment
3. Domestic processing and/or refining

Further exemptions may be granted based on the outcome of ministerial coordination meetings.

III. Conclusion

Business actors should assess whether their products fall within the scope of strategic natural resource commodities and understand the implications of the mandatory single export gateway via the Export SOE, effective 1 January 2027. This new policy may give rise to contractual, operational, commercial, and compliance risks, including uncertainty in respect of existing commercial arrangements, potential changes to pricing dynamics, and transitional challenges associated with the centralisation of export functions under the Export SOE.

Companies should review existing government-related agreements to determine eligibility for exemptions and monitor further implementing regulations. Businesses should proactively align their export processes, contractual arrangements, and compliance strategies to manage transition risks and ensure readiness under the new regime.

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