Government Regulation No. 24 of 2026: Indonesia's New Export Governance Framework for Strategic Natural Resource Commodities

Background

On 20 May 2026, the Government of the Republic of Indonesia ("**Government**") enacted Government Regulation No. 24 of 2026 on the Governance of Exports of Strategic Natural Resource Commodities ("**GR 24/2026**"), which became effective on 1 June 2026. GR 24/2026 introduces a centralized export mechanism for certain strategic natural resource commodities through state-owned enterprises ("**Export SOEs**").

GR 24/2026 was issued in furtherance of the principles embodied in Article 33 of the 1945 Constitution of the Republic of Indonesia (*Undang-Undang Dasar 1945),* which emphasizes that the management of natural resources should serve the greatest benefit of the Indonesian people. The regulation reflects the Government's position that, where adequate financial resources, technological capabilities, and managerial expertise are available, the State should play a more direct role in managing strategic natural resource commodities. Such an approach is intended to maximize the economic value generated from these resources and ensure that the resulting benefits contribute more effectively to national prosperity and public welfare.

GR 24/2026 forms part of the Government's broader regulatory agenda concerning the management of natural resource exports and Foreign Export Proceeds (*Devisa Hasil Ekspor* or *DHE*). GR 24/2026 complements Government Regulation No. 2 of 2026 on Second Amendment to Government Regulation No. 36 of 2023 on Foreign Export Proceeds from the Exploitation, Management, and/or Processing of Natural Resources which enacted on 14 January 2026 and became effective on 26 February 2026 ("**GR 2/2026**") and Government Regulation No. 21 of 2026 on Third Amendment to Government Regulation No. 36 of 2023 on Foreign Export Proceeds from the Exploitation, Management, and/or Processing of Natural Resources which enacted on 6 May 2026 and became effective on 1 June 2026 ("**GR 21/2026**").

Taken together, these regulations reflect the Government's integrated approach to the governance of strategic natural resources, covering both export activities and the subsequent management of the Foreign Export Proceeds generated therefrom. While GR 2/2026 and GR 21/2026 focus on strengthening the domestic placement and utilization of Foreign Export Proceeds, GR 24/2026 addresses the upstream aspect of the Foreign Export Proceeds by establishing a single-window export framework for designated strategic commodities. The three regulations therefore form a broader policy framework aimed at enhancing the overall governance of Indonesia's natural resource sector and supporting long-term economic resilience.

Scope of Strategic Commodities

GR 24/2026 adopts a phased approach in determining strategic natural resource commodities. In its initial implementation stage, Article 2 of GR 24/2026 designates the following commodities as strategic commodities, reflecting their significance to Indonesia's exports and trade surplus, as follows:

1. Coal;
2. Palm oil; and
3. Ferro alloys (*Paduan Besi).*

The Government retains the authority to expand the list of strategic commodities through further inter-ministerial coordination mechanisms. GR 24/2026 further provides that the specific categories of strategic natural resource commodities will be stipulated by the minister responsible for trade affairs through implementing regulations.

Centralized Export Mechanism

The most significant feature of GR 24/2026 is the requirement that exports of strategic natural resource commodities must be conducted through designated Export State-Owned Enterprises ("**Export SOEs**" or *BUMN Ekspor).* Such Export SOEs may act either as the exporter or as the sole intermediary in export transactions.

While GR 24/2026 does not expressly designate a specific entity as the Export SOE, on 31 May 2026, the Indonesian government confirmed that Danantara, through PT Danantara Sumberdaya Indonesia ("**DSI**"), will serve as the single-window Export SOE for strategic natural resource commodities. The establishment of DSI is intended to strengthen export governance, promote greater transparency in commodity trading, and optimize the management of Foreign Export Proceeds to support national economic resilience. It also aims to mitigate practices such as under-invoicing, transfer pricing, and the outflow of Export Foreign Proceeds.
This mechanism represents a substantial shift from the previous framework, under which private business actors could directly enter export transactions with overseas buyers, subject to applicable licensing and regulatory requirements. Under GR 24/2026, export activities for designated commodities must instead be routed through the Export SOE framework.

Pricing Authority

GR 24/2026 also grants the Export SOEs the authority to determine the selling price of strategic natural resource commodities and to establish a reasonable commercial margin in accordance with applicable laws and regulations. However, the regulation does not yet provide detailed methodologies regarding price determination, leaving further clarification to implementing regulations or operational guidelines.

Export Governance Measures and Exceptions

Article 4 of GR 24/2026 provides that the governance of strategic natural resource commodity exports may be implemented through various measures, including: (i) export controls (including verification or technical traceability requirements); (ii) regulations on transportation and export insurance; and (iii) other mechanisms in accordance with applicable laws and regulations.

GR 24/2026 also allows certain exemptions from the requirement to export through designated Export SOEs. Such exemptions may be granted to business actors that have contracts or agreements with the Government containing provisions on investment, divestment, and domestic processing and/or refining activities. The granting of these exemptions is subject to a coordination meeting chaired by the relevant coordinating minister.

Transitional Provisions

Articles 7 and 8 of GR 24/2026 provide a transition period for implementing the single-window export framework. Exports of strategic natural resource commodities must be conducted through designated Export SOEs no later than 31 December 2026. However, the Government may accelerate this timeline based on the outcome of an evaluation to be conducted within 3 (three) months of GR 24/2026 becoming effective.

Following the expiry of the applicable transition period, all exports of strategic natural resource commodities must be carried out exclusively through Export SOEs. If the transfer of export activities to Export SOEs is completed before the prescribed deadline, the new framework will apply from the date of such transfer.

In addition, existing sales contracts entered into before 1 June 2026 and remaining in force will be subject to review by the relevant Export SOE to facilitate the transition to the new export regime.

Commodity-Specific Licensing and Compliance Requirements

To implement GR 24/2026, the Ministry of Trade ("**MoT**") issued MoT Regulation No. 15 of 2026 on the Policy and Regulation of Exports of Strategic Natural Resource Commodities for Coal ("**MoT Reg 15/2026**"), MoT Regulation No. 16 of 2026 on the Policy and Regulation of Exports of Strategic Natural Resource Commodities for Palm Oil ("**MoT Reg 16/2026**"), and MoT Regulation No. 17 of 2026 on the Policy and Regulation of Exports of Strategic Natural Resource Commodities for Ferro Alloys ("**MoT Reg 17/2026**"), all of which became effective on 1 June 2026. These regulations set out the detailed export requirements, licensing framework, and compliance obligations applicable to each strategic commodity.

The key licensing and compliance requirements under each regulation are summarized below:

1. Coal

   Based on MoT Reg 15/2026, for coal exports, exporters must hold an Exporter Registration for Coal (*Eksportir Terdaftar Batubara*) issued by the Director General of Foreign Trade on behalf of MoT as the relevant business license. In addition, all exports are subject to Verification or Technical Traceability (*Verifikasi atau Penelusuran Teknis*) conducted by a surveyor appointed by the MoT, and the results must be documented in a Surveyor Report (*Laporan Surveyor*). The Surveyor Report constitutes a mandatory supporting customs document when submitting the Export Customs Declaration (*Pemberitahuan Pabean Ekspor*) to the customs office *(kantor pabean)*. Exporters are also required to submit electronic reports on export realizations (*laporan realisasi ekspor*), including both completed and uncompleted export activities, in accordance with the prevailing export regulations.

   Under the transitional provisions of MoT Reg 15/2026, existing Exporter Registration for Coal licenses remain valid until 31 December 2026 or until their respective expiry dates, whichever is earlier. During this transition period, business actors may continue to use their existing Exporter Registration licenses and surveyor reports as supporting customs documents for exports. Exporters are required to submit export reports, sales contracts, and other relevant documents, along with any additional data requested by the Export SOE, through an integrated system.

2. Palm Oil

   MoT Reg 16/2026 generally maintains the existing export framework for palm oil during the transition period ending on 31 December 2026. The regulation covers 5 (five) categories of palm oil products, namely Crude Palm Oil (CPO), Refined Bleached Deodorized Palm Oil (RBDPO), Refined Bleached Deodorized Palm Olein (RBDPL), Used Cooking Oil (UCO), and residues. Export activities continue to require an Export Approval (*Persetujuan Ekspor*) issued by the Director General of Foreign Trade on behalf of MoT as the relevant business license. Exporters are also required to submit electronic reports on export realizations, including both completed and uncompleted export activities, in accordance with the prevailing export regulations.

   During the transition period, exporters may continue to conduct exports through the Export SOE using their valid Export Approval. Exporters are also required to provide export reports, sales contracts, and other supporting documents, as well as any additional information requested by the Export SOE through an integrated system.

3. Ferro Alloys

MoT Reg 17/2026 establishes a commodity-specific export regime for ferro alloys based on the relevant Harmonized System (HS) codes. The regime classifies ferro alloy products into those prohibited from export, those requiring a Surveyor Report, and those that may be exported without a Surveyor Report. For products subject to verification, the Surveyor Report must be issued by a surveyor appointed by the MoT and serves as a mandatory supporting document for customs. During the transition period ending on 31 December 2026, eligible exporters may continue exporting and using surveyor reports as supporting customs documents, provided they submit export documents, sales contracts, and other required information to the designated Export SOE and comply with any additional reporting requirements through the integrated system with the Export SOE.

Notwithstanding the transitional arrangements, MoT Reg 15/2026, MoT Reg 16/2026, and MoT Reg 17/2026 provide that, where the Government completes the transfer of exports of strategic natural resource commodities to the designated Export SOE prior to 31 December 2026, all such exports must subsequently be conducted exclusively through the Export SOE. In any event, as of 1 January 2027, exports of strategic natural resource commodities may only be carried out through the designated Export SOE.

Conclusion

GR 24/2026 introduces a new framework for the export of strategic natural resource commodities through designated Export SOEs, reflecting the Government's broader efforts to strengthen export governance and the management of Foreign Export Proceeds.

However, notwithstanding the issuance of GR 24/2026 and its implementing regulations, several key aspects of the single-window export framework remain unregulated or unclear. These include, among others, the nature of the legal relationship between exporters and the Export SOE, the standard contractual arrangements to govern such relationships, and the methodology for determining export prices and margins. Further implementing regulations and technical guidance are therefore expected to provide greater legal certainty.

Businesses operating in the affected sectors should therefore closely monitor further regulatory developments and assess the potential impact of the new framework on their existing operations and commercial arrangements.

Further information

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