

Voluntary Report – Voluntary - Public Distribution

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Report Name: Indonesia Clarifies Prior Notice and Export Timing Requirements with Key Barriers Remaining

Country: Indonesia

Post: Jakarta

Report Category: Sanitary/Phytosanitary/Food Safety, Trade Policy Monitoring

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Report Highlights:

Upon request from Post, the Indonesian Quarantine Agency clarified in writing that the export timing and Prior Notice requirements take effect on June 4, 2025, via regulation 14/2024 and provided additional clarifications on the regulation. Notably, the cutoff date refers to the shipment's departure date as stated on the Bill of Lading. In addition, the Indonesian Quarantine Agency clarified the export timing requirement is different than previously reported, without resolving the fundamental concerns. This report provides additional guidance to help industry prepare for implementation of the regulation while FAS Jakarta seeks an extension and long-term solution. In addition, it provides confirmation of previously provided guidance regarding Prior Notice submissions for genetically engineered products.

On January 8, 2025, the Indonesian Quarantine Authority (IQA) notified to the World Trade Organization (WTO) IQA regulation number 14/2024, “Decree of The Head of the Indonesian Quarantine Authority concerning Procedures for Integrated Quarantine and Surveillance Measures” (WTO notification G/SPS/N/IDN/154). This regulation applies to the importation, exportation, and distribution of animal and animal products, plant and plant products, and fish and fish products in Indonesia. It has several articles which could impact U.S. agricultural exports to Indonesia in the following areas, originally reported in [ID2025-0011](#) with some aspects clarified further in this report:

- **Prior notice:** U.S. exporters must complete a “Prior Notice” submission in IQA’s online system before each shipment departs the U.S. port (*update: effective June 4, 2025, by regulation, although IQA stated it is seeking ways to allow additional flexibility via forthcoming implementing guidance.*)
- **Export timing:** *Update: Restrictions surrounding the timing of plant shipments depends on whether the phytosanitary certificate is issued before or after the shipment departs the U.S. port (please see the updated interpretation below).* (effective June 4, 2025)

Following multiple discussions and written correspondence with IQA, Post seeks to provide clarity on multiple concerning articles of the IQA regulation 14/2024 as follows:

Article 11

- (1) Regarding the QAPD Carrier Media that will be imported into the territory of the Republic of Indonesia must provide initial notification in the form of prior notice (PN).
- (2) PN as intended in paragraph (1), must be delivered by the exporter in the country of origin through the Quarantine information system.
- (3) PN as intended in paragraph (1) is submitted no later than before the departure of the QAPD Carrier Media from the country of origin.
- (4) In the case of a quarantine information system as referred to in paragraph (2) experiences interference, PN can be given through other information systems.
- (5) Disturbance as intended in paragraph (4), officially conveyed by the Quarantine Agency Indonesia.

Article 288

Updated Guidance: Prior Notice – Animal Products (Article 11)

This Article states that exporters must submit the Prior Notice (PN) before the vessel departs, which comes into effect on June 4, 2025 (confirmed in writing). However, IQA also indicated its intent to allow Prior Notice submissions later if they are completed prior to the shipment’s arrival in Indonesia. However, unless and until updated guidance is provided, FAS Jakarta recommends that beginning June 4, 2025, U.S. exporters submit PNs before each shipment departs the U.S. port. Please see [ID2024-0028](#) for instructions on submitting PNs.

In the meantime, FAS continues to advocate for IQA to formally allow PN submissions after complete and accurate information about the shipment is known (i.e., prior to arrival in Indonesia). In addition, upon learning the “edit” and “copy” buttons in the PN system are not fully functional, we also continue to urge IQA to allow exporters to easily amend PN submissions.

- (1) Regarding the QPPO Carrier Media that will be imported into the territory of the Republic of Indonesia must provide initial notification in the form of prior notice (PN).
- (2) Prior notice as intended in paragraph (1), must be submitted by the exporter in the country of origin through the quarantine information system.
- (3) Prior notice as intended in paragraph (1) is submitted no later than before departure of the QPPO Carrier Media from the country of origin.
- (4) In the case of a quarantine information system as referred to in paragraph (2) experiences interference, initial notification (prior notice) can be given through other information systems.
- (5) Disturbances as intended in paragraph (4), will officially be conveyed by the Indonesian Quarantine Authority.

Updated Guidance: Prior Notice – Plant Products (Article 288)

This Article states that exporters must submit the Prior Notice (PN) before the vessel departs, which comes into effect on June 4, 2025 (confirmed in writing). However, IQA also indicated its intent to allow Prior Notice submissions later if they are completed prior to the shipment's arrival in Indonesia. However, unless and until updated guidance is provided, FAS Jakarta recommends that beginning June 4, 2025, U.S. exporters submit PNs before each shipment departs the U.S. port. Please see [ID2024-0028](#) for instructions on submitting PNs.

In the meantime, FAS continues to advocate for IQA to formally allow PN submissions after complete and accurate information about the shipment is known (i.e., prior to arrival in Indonesia). In addition, upon learning the “edit” and “copy” buttons in the PN system are not fully functional, we also continue to urge IQA to allow exporters to easily amend PN submissions.

Confirmed Guidance: Submitting Prior Notice for Genetically Engineered Products

FAS Jakarta previously provided guidance to U.S. exporters regarding PN submissions for genetically engineered products (see [ID2024-0028](#)). Following reports that importers were requesting additional documentation, FAS Jakarta confirmed with IQA that its interpretation was correct (detailed below). However, please note this clarity was provided informally, while the other clarifications in this report were provided formally.

U.S. exporters should continue to select the “GMO” option, which will be treated as a self-declaration for U.S. GMO products. IQA also confirmed that U.S. exporters may enter “not applicable” in the “additional information” box. This is because genetically engineered U.S. commodities exported to Indonesia (e.g., soybeans, corn) are fresh products of plant origin (FFPO) that are on the approved list. This box is only applicable for FFPO products that are not on the approved list; such products would require a certificate of analysis (CoA) from a laboratory approved by IQA, although there are not currently any such U.S. laboratories. We understand that “not applicable” may also be entered for shipments of products derived from FFPO-approved genetically engineered products (e.g., U.S. soybean meal).

Article 293

The plant health certificate in the printed form as intended in Article 292 a is stated true and valid, if:

- a. issued by the NPPO of the country of origin and/or transit country.
- b. published in the format according to the notification format at the origin and/or transit country.
- c. contains clear and complete QPPO Carrier Media information in accordance with the standards set by International Plant Protection Convention (IPPC)
- d. legible and not damaged.
- e. issued before the QPPO Carrier Media is shipped from the country of origin and/or transit country; and
- f. delivery of QPPO Carrier Media from the country of origin and/or transit countries do not exceed 21 (twenty-one) days from the issuance date of the plant health certificate.

Updated Guidance: If Phytosanitary Certificate Issued Before the Shipment Departs – (Article 293)

IQA clarified in writing that if the phytosanitary certificate is issued before the shipment departs a U.S. port, the vessel must depart within 21 days of the phytosanitary certificate's issuance. While the IQA regulation itself does not place any restrictions in relation to the inspection date, the USDA Animal and Plant Health Inspection Service requires that the phytosanitary certificate be issued within 30 days of the phytosanitary inspection. FAS Jakarta is aware that IQA's export timing restrictions are not tenable for U.S. container shipment exports. We are seeking an extension to allow for a more long-term solution and will continue to provide updates.

Article 294

- (1) In terms of issuing plant health certificates conducted after the QPPO Carrier Media departs from the country of origin and/or transit country, it must include the completion date of the quarantine inspection on the plant health certificate.
- (2) The certificate as intended in paragraph (1) is declared invalid if the QPPO Carrier Media's departure from the country of origin and/or transit country exceeds 21 days from the date of completion of the quarantine inspection.

Updated Guidance: If Phytosanitary Certificate Issued After the Shipment Departs – (Article 294)

IQA clarified in writing that if the phytosanitary certificate is issued after the shipment departs a U.S. port, the shipment must depart within 21 days of the phytosanitary inspection. The phytosanitary inspection date must be stated on the phytosanitary certificate in the "additional declaration" field. FAS Jakarta is aware this restriction is not tenable for U.S. container shipment exports. We are seeking an extension to allow for a more long-term solution and will continue to provide updates.

Attachments:

No Attachments.