

**Voluntary Report** – Voluntary - Public Distribution

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**Report Name:** Requirement to Register Fresh Food of Animal Origin

**Country:** Indonesia

**Post:** Jakarta

**Report Category:** Agricultural Situation, Sanitary/Phytosanitary/Food Safety, Trade Policy Monitoring, Livestock and Products, FAIRS Subject Report

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**Report Highlights:**

On October 27, 2022, FAS Jakarta published a report summarizing the Directorate General of Livestock and Animal Health Service's (DGLAHS)'s new requirements for importers to register fresh food of animal origin and obtain the resulting distribution license. Since DGLAHS has recently begun to enforce these requirements, importers are now asking U.S. exporters to provide a certificate of analysis (CoA) for at least one of the required testing parameters every six months. This report is based on our assessment of information gathered from DGLAHS and local industry to help U.S. exporters comply with the CoA requirements. U.S. exporters should endeavor to meet this requirement as soon as possible to avoid jeopardizing their sales to Indonesia. Since these requirements primarily impact U.S. beef exports, this report is focused accordingly. Please note that this guidance is based on information gathered informally and may be subject to change.

## Background on the Fresh Food of Animal Origin Registration

On October 27, 2022, FAS Jakarta published a report summarizing the Directorate General of Livestock and Animal Health Service's (DGLAHS)'s new requirements for importers to register fresh food of animal origin (FFAO) and to obtain a distribution license (see [GAIN Report ID2022-0026](#)). This registration requirement is one of the provisions of the Ministry of Agriculture Regulation Number 15/2021 (page 2576), which was notified to the World Trade Organization on June 17, 2022. On April 18, 2023, Ministerial Decree Number 3859/2023 was published, stating that registration of animal products was now mandatory for all Indonesian businesses intending to distribute packed fresh animal products (see list below). This includes distributors of these products which are produced domestically, imported, and exported. While not immediately enforced, DGLAHS is now requiring the certificate of analysis (CoA) to be done by each plant as further described below. The stated goal of this requirement is to help ensure the safety and quality of animal products that are consumed in Indonesia.

## Scope of Products

The animal products subject to Regulation No. 15/2021 are listed below:

1. Fresh untreated milk of dairy cattle, buffalo, goat/sheep, and other livestock<sup>1</sup>
2. Meat/carcass:
  - a. Fresh whole/cut untreated, including offal and hide,
  - b. Chilled/frozen ground or mechanically deboned,
  - c. Chilled whole/cut including offal and hide,
  - d. Frozen whole/cut including offal and hide of cattle, buffalo, goat, pig, chicken, duck, quail, other poultry, and other game animals.
3. Eggs:
  - a. Fresh untreated eggs in shell. Food coloring can be used for decoration, coloring, or marking on the shell.
  - b. Salted eggs (raw and cooked), braised hard-boiled eggs, century eggs, clay-salted eggs, and eggs preserved in other ways,
  - c. Other eggs for consumption (organic chicken eggs, low-cholesterol eggs, omega-3 eggs, antibiotic residue free eggs, etc.) of chicken (commercial, local, commercial local), duck, and quail
4. Honey (wild, farm, Trigona) with diastase enzyme activity not less than 3 DN<sup>2</sup>
5. Sun- or oven-dried swallow birds' nest

## Certificate of Analysis

Importers are responsible for obtaining the product registration and resulting distribution licenses required for beef and other affected products. However, a key provision of Regulation 15/2021 is that importers must provide a copy of the CoA that is issued by an accredited laboratory in the country of

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<sup>1</sup> Fresh untreated milk or fresh milk (raw milk) is liquid originated from the clean udder of healthy cow that is obtained by proper milking, which natural content is not reduced or added with anything and has not been treated in any way with the exception of cooling (DGLAHS Decree 3859/2023)

<sup>2</sup> Diastase number (DN) is a honey quality parameter. The minimum is 3 DN for cultivated honey and 1DN for forest and stingless honeybees' honeys.

origin. The CoA is valid for six months and must therefore be renewed every six months. Since DGLAHS has recently begun to enforce these requirements, importers are asking U.S. exporters to provide this required certificate of analysis. The below reflects FAS Jakarta's analysis of information gathered from DGLAHS and local industry. It is intended to help U.S. exporters comply with this requirement to facilitate continued U.S. beef exports to Indonesia.

Regulation 15/2021 requires that the CoA include multiple parameters in several categories: physical examination, biological examination, and chemical examination (see Attachment 1, pages 11-15). However, according to Indonesian meat industry associations, their negotiations with the Ministry of Agriculture has resulted in an unofficial decision that allows the CoA from the country of origin to contain at least one of the parameters; the others can be tested in an accredited laboratory in Indonesia. FAS Jakarta's understanding is that any U.S. laboratory is acceptable. A CoA is required from each production facility (e.g., meat plant), but is only required for one meat cut (e.g., strip loin) that facility ships to Indonesia. As stated above, the CoA must be renewed every six months. While the every-six-month renewal is reportedly not currently being enforced, it could be at any point. If a U.S. plant exports to multiple Indonesian importers, we understand it may supply the same CoA to each importer.

Importers assert that without a CoA from the country of origin, they are unable to register products and receive the resulting license to distribute products from that facility. In addition, importers anticipate that product registration will soon be a prerequisite for obtaining import licenses for beef. Under Commodity Balance mechanism regulations, the Ministry of Agriculture verifies the import plans (need proposals and technical requirements) that importers submit each September. The Ministry of Agriculture has stated that importers who cannot provide the CoA may face consequence by not getting their import license the following year. FAS Jakarta understands that in this transition period, only one product registration is currently being required from each importer and that other foreign suppliers have provided CoAs under the guidelines described in this report. U.S. exporters should endeavor to meet this requirement as soon as possible to avoid jeopardizing their sales to Indonesia and are encouraged to work closely with importers.

**Attachments:**

[DGLAHS Decree 3859 2023.pdf](#)