

USDA Foreign Agricultural Service

GAIN Report

Global Agricultural Information Network

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Indonesia

Post: Jakarta

Retail Product Registration Guide for Imported Food and Beverages

Report Categories:

Exporter Guide

FAIRS Subject Report

Retail Foods

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Report Highlights:

The Government of Indonesia (GOI) requires all food and beverage products in retail packaging and food additives to obtain a distribution authorization from The National Agency for Drug and Food Control (BPOM) before entering retail market. This report provides a general overview of the registration process and requirements.

OVERVIEW

The Government of Indonesia (GOI) requires all food and beverage products in retail packaging and food additives to obtain a distribution authorization from The National Agency for Drug and Food Control (BPOM) before entering retail market. BPOM will issue a registration approval number for products that meet the necessary requirements for distribution by issuing a ML (Makanan Luar) number for imported products and a MD (Makanan Dalam) number for domestically produced products.

The food safety control system in Indonesia for processed food and beverages in retail packaging and food additives involves a broad range of pre-market and post-market controls. Pre-market controls are conducted by evaluating the food safety of products to ensure compliance with safety, quality, nutrition, and labeling requirements prior to retail. If a product meets the necessary requirements, the product is authorized for distribution and provided a registration approval number. Post-market controls, such as on site retail sampling, are conducted after products are distributed in the market and/or retail outlets. The National Agency for Drug and Food Control (BPOM) places greater emphasis on the pre-market control due to the wide area of coverage and the sheer geographical nature of Indonesia.

The most recent registration procedures are cited in BPOM Regulation No. 27/2017. The process can be conducted online through <http://e-reg.pom.go.id>. The registration process is categorized based on risk level: high risk, medium-risk, low-risk and very low-risk. The risk level is determined by various factors such as target consumers, statement claims, use of food additives, certain production processes and certain raw material/ingredient. Product registration is valid for 5 years. Importers wishing to renew registration may submit a request within one year of the expiration dates.

Food and beverage products produced by home industries; with 7 day or less shelf life; ingredients (for further processing); samples for the purpose of requesting a registration approval letter and for research are exempt from BPOM product registration. Small quantities for personal consumption do not require registration. The registration process is also required for products that have identical compositions but do not share similar packaging. A new registration is thus required for products with different sized retail packages, different labeling designs, different names and production addresses, and different names and/or addresses of importers and distributors.

A local agent or importer typically handles the registration process. Depending on the product, the process may take longer than the officially reported timeframe. Detailed requirements from the food manufacture/supplier and product samples are required for the registration process. This may include information considered proprietary in nature.

IMPORTED PRODUCT REGISTRATION

There are three registration types: new registrations, variation registrations (changing of data) and re-registrations (to be conducted from 1 year up to 10 days prior to the registration number's expiration).

Registration Procedures

The registration can be done through E-Registration (e-reg). Obtaining an ML number typically will take between 4 – 6 months, though this often depends on the associated risk level as well as how fast suppliers/applicants are able to submit the additional data once requested by BPOM. BPOM head office in Jakarta has a responsibility to review the application and make a final decision.

Risk Level Category:

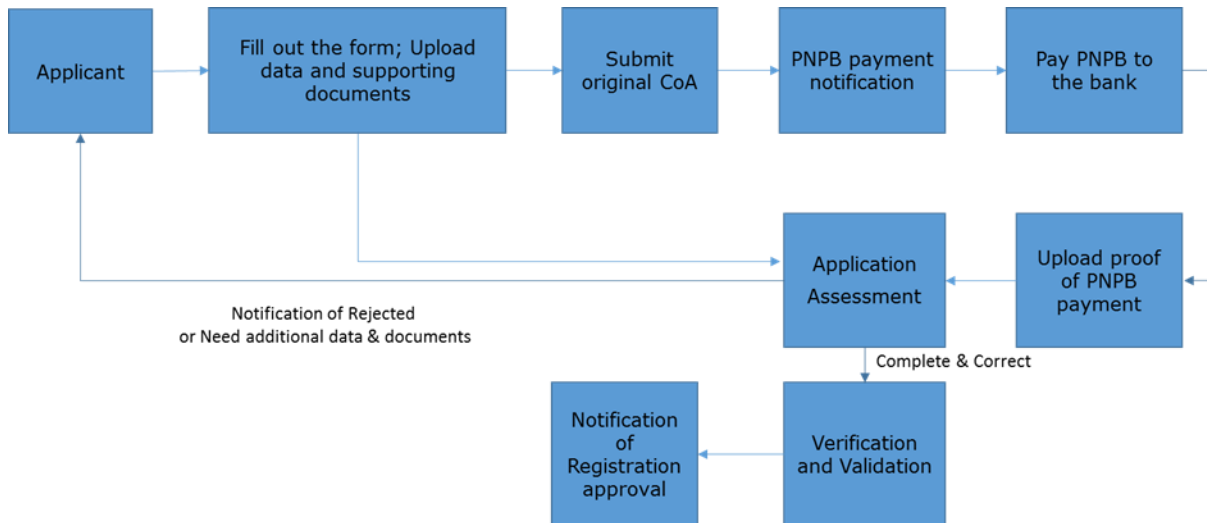
- **Very Low:** contains few ingredients, no food additive, no animal derivative, and is minimally processed (pasta, honey, olive oil, frozen vegetables, etc.)
- **Low:** jam, sausage, instant noodles, cereal, cheese flavored snacks, crackers, seasoning, fruit juice, other food additives, etc.
- **Medium:** carried out for certain processed food facing a process of sterilization, pasteurization, irradiation, organic, GMO, alcoholic beverages, flavor, foods with claims, such as milk, canned food, cheese, no sugar, gluten, etc.
- **High:** certain processed foods for specific target consumer and specific health condition such as baby food, baby formula, food for pregnant women, special diet foods, etc.

Importers must register the food & beverage manufacturer from which they are importing prior to applying for product registration. Food & beverage manufacturer registration includes submitting hard copies of their Letter of Appointment (legalized by Indonesian Embassy/Chamber of Commerce/Notary Public), HACCP/ISO 22000/GMP/FSS Certificate or equivalent and Free Sale Certificate (FSC).

E-Registration

Phase I: Registration of Business Account (Importer)

1. Fill out the on-line Business Registration Form at <http://e-reg.pom.go.id>
2. Upload the Administrative documents
3. Submit a hardcopy of Administrative Document to the BPOM counter to be verified
4. Wait for verification process. This includes data verification by the BPOM on-line system (4 - 7 working days)
5. Once verification is complete and correct, applicant will receive a “User ID” and “Password”. The applicant is ready to begin the product registration process.
6. If data is incomplete or incorrect, all documents will be returned to the applicant to be completed or corrected for re-submitted to BPOM



Phase II: Apply for Product Registration and Pay Non-Tax State Revenue

1. Fill out the on-line registration form at <http://e-reg.pom.o.id> using the given “User ID” and “Password”
2. Upload data and supporting documents and submit the original Certificate of Analysis (CoA)
3. Make a payment of Non-Tax State Revenue (Penerimaan Negara Bukan Pajak or PNPB) (max 10 days after receiving a pay order)
4. Upload proof of PNPB payment
5. BPOM will assess the application (14 - 30 working days depending on the complexity of documents and BPOM workload)
6. If the application is rejected, requires additional documentation or unclear data, BPOM must notify the applicant no later than 30 days after receiving the application. Applicant must submit additional documents or data no more than in 60 days after receiving the notification for incomplete document and unclear data.
7. For successful applications, BPOM will conduct a verification and validation process
8. The result of the verification and validation process will be notified on-line a maximum of 35 working days after the application, with complete and correct documents and data, was received. Notification of registration approval and product registration number may be issued at such time.
9. The applicant for low-risk and very-low risk products may receive the product registration as soon as 10 working days after the application is declared complete and correct.

Requirements for imported products

Administrative Requirements

- Trade Business License (SIUP) or Importer Registration Number (API) or Letter of Appointment as registered importer for alcoholic beverages
- Audit results of distribution facilities.
- GMP Certificate/HACCP/ISO 22000/Risk Management Program Charter/Similar certificate issued by the competent authority/accredited and/or the result of local government audit in the

country of origin

- Notary of deed of establishment of the importer company
- Letter of Appointment from company of country of origin.
- Health Certificate or Free Sale Certificate from country of origin
- Authorization letter to register the processed food products. Authorization letter can be issued by :
 - Producer: giving a direct authorization to an importer to register, import, distribute and sell their products
 - Brand owner: if the product is not produced by the brand owner but produced by another company, then BPOM will ask for two kinds of Authorization letter :
 - A letter from Brand Owner giving authorization to importer to register, import, distribute and sell into Indonesia
 - A letter from Brand Owner to confirm that their products are produced by (mentioning the producer name, address and product they produced)
 - Exporter: BPOM will ask for two authorization letters :
 - A letter from the Exporter that gives authorization to an importer to register, import, distribute and sell the product into Indonesia
 - A letter from the Producer that gives authorization to an exporter to distribute and sell the products worldwide or to Indonesia
 - Or the letter can be provide by a Producer to appoint :
 - (Mentioning the exporter name and address) to export their products into Indonesia
 - (Mentioning the importer name and address) to register, import, distribute and sell their product into Indonesia

Technical Requirements for Determining Risk Level

- Target consumer.
- Information on temperature and time of Commercial Sterile Food that is sterilized after packaging or processed with aseptic process.
- Information on certain processes such as organic, irradiation, and genetic engineering
- Information about the ozonation process, pasteurization and new technology (non-conventional)
- Information on cold and frozen storage
- Inclusion of claims and/or information about nutrition value on the label
- The use of food additives especially those with Average daily Intake (ADI) and/or maximum usage.
- Certain raw material

Technical Requirements Based on Risk Level

- Composition or ingredients list including origin of certain raw material and or food additive information.
- Manufacturing processes
- Shelf life information.
- Production code information.
- Label design (in color)
- Photo of the product showing clear information on the label
- Translation of the label other than English from sworn translator

- Certificate of Analysis

Additional Requirements

- Trademark Certificate (for product with TM and or [®] logo on the label)
- Certificate of product using Indonesia National Standard mark (SPPT SNI) for SNI-mandatory products or product that have SNI logo on the label
- Organic Certificate (for organic products that have organic logo on the label)
- Information on GE/GMO for raw material such as potato, soybean, maize, tomato and sugarcane). Note: Derivative products that have undergone multiple refining processes in high temperature such as fat or oil (including lecithin) do not need non-GMO statement.
- Information on Food Irradiation (for irradiated products)
- Halal certificate for product with Halal information on the label
- Other supporting documents