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NEW EXPORT GOVERNANCE FRAMEWORK FOR STRATEGIC NATURAL RESOURCE COMMODITIES

Overview

The Government of Indonesia has introduced a new export governance framework for strategic natural resource commodities through Government Regulation No. 24 of 2026 on the Export Governance of Strategic Natural Resource Commodities (“**GR 24/2026**”), issued on 20 May 2026 and effective from 1 June 2026.

GR 24/2026 establishes a centralized framework under which designated strategic natural resource commodities are exported through a designated state-owned company for export purposes. The Government has identified PT Danantara Sumberdaya Indonesia (“**DSI**”) as the relevant company, acting either as owner or as the sole intermediary.

The framework forms part of the Government's broader effort to strengthen oversight and transparency in strategic commodity exports, support domestic supply and national economic resilience, reduce mis-invoicing and improve the integrity of trade and export-proceeds data.

Key Provisions

- **Commodities:** At the initial stage, GR 24/2026 covers coal, palm oil and ferroalloy commodities, with the applicable product and tariff-line coverage as well as detailed export requirements set out in Minister of Trade Regulation No. 15 of 2026 for coal, Minister of Trade Regulation No. 16 of 2026 for palm oil, and Minister of Trade Regulation No. 17 of 2026 for ferroalloy. Additional strategic natural resource commodities may be designated in phases.
- **Export Governance:** GR 24/2026 provides that export governance for strategic natural resource commodities may include: (i) export

controls, including the technical verification or tracing, (ii) transportation and export-insurance arrangements, and/or (iii) other mechanisms in accordance with applicable laws and regulations.

- **Transition Period:** The Government has described the period from 1 June through 31 December 2026 as a transition period, with full implementation of the DSI export mechanism to commence no later than 1 January 2027, subject to Government evaluation and the possibility of earlier implementation. During the transition, eligible existing business actors may continue to use specified existing licenses, approvals and supporting documents in exports conducted through DSI, subject to the applicable reporting and data-submission requirements.

For coal, for example, registered-exporter authorization issued before the new regulation remains valid until 31 December 2026 or its earlier expiry. Such authorization, together with the applicable surveyor documentation, may be used for transitional coal exports through DSI. The applicable transitional arrangements also require reporting and submission of export documents, sales contracts and other relevant information.

- **Pricing and Margins:** GR 24/2026 authorizes DSI to determine export prices and margins within a reasonable range, but it does not itself establish detailed criteria for what constitutes a “reasonable” range. It is expected that DSI will apply a fair, transparent and accountable methodology that takes into account differences in commodity quality and specifications, logistics costs and contract structures.

Businesses should therefore maintain contemporaneous documentation supporting pricing adjustments and other relevant comparability factors while monitoring further binding technical rules or guidance.

- **Exemption:** The requirement to export through DSI may be exempted for qualifying business actors that have contracts or agreements with the Government containing provisions concerning investment, divestment and domestic processing and/or refining.
- **Existing Export Contracts:** Sales contracts signed before 1 June 2026 and remaining in force are subject to evaluation by DSI. GR 24/2026 does not provide detailed private-law mechanics for any amendment, novation or other contractual adjustment that may result from that evaluation. Practically, signed contracts may continue to be performed provided no under-invoicing is identified.

Conclusion

GR 24/2026 represents a significant change in Indonesia's governance of strategic natural-resource exports, initially covering specified coal, palm-oil and ferro-alloy products. The principal compliance issue during the 2026 transition is how the new reporting and oversight framework interacts with each exporter's existing authorizations, commodity-specific requirements, transaction structures and contracts.

Businesses exporting covered products should promptly map their products against the applicable tariff classifications; confirm the validity and transition treatment of their licenses, approvals and surveyor documentation; review contracts signed before 1 June 2026 and maintain appropriate pricing documentation for potential DSI evaluation; and establish processes for timely submission of required contracts, export documents and transaction data.

Businesses entering new export arrangements should also address DSI's role expressly in their contracting, invoicing, documentation, information-sharing and operational workflows.

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