H.E. Mrs. Fientje Maritje Suebu
Ambassador of the Republic of Indonesia to New Zealand
Embassy of the Republic of Indonesia
70 Glen Road
Kelburn, Wellington 6012
New Zealand

H.E. Mr. Dwisuryo Indroyono Soesilo,
Ambassador of the Republic of Indonesia to the United States
Embassy of the Republic of Indonesia,
2020 Massachusetts Avenue NW,
Washington, DC 20036
United States

H.E. Mr. Andy Rachmianto
Ambassador of the Republic of Indonesia to the European Union
Embassy of the Republic of Indonesia
Boulevard de la Woluwe 38, 1200
Brussels, Belgium

H.E. Dr. Siswo Pramono
Ambassador of the Republic of Indonesia to Australia
Embassy of the Republic of Indonesia
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Yarralumla, ACT 2600 Australia

15 October 2026

Serious risks to Indonesian food security and trade relations arising from Indonesia's new Halal requirements

Dear Ambassadors Suebu, Soesilo, Rachmianto, Pramono,

We write on behalf of organisations representing or supporting dairy exporters from New Zealand, Australia, the United States and the European Union to express our serious concern about the impact of new halal requirements that Indonesia is moving to implement.

We caution that these requirements constitute significant new barriers to trade and risk upending Indonesia's food supply system by disrupting the supply chains Indonesian food companies rely on to source complementary business inputs. If these measures are implemented as scheduled this month, they would adversely affect Indonesian consumers, companies and the exporters we represent.

More specifically, we are deeply concerned that, under BPJH Regulation 4/2026, new pre-shipment inspection requirements and an additional charge on halal products entering Indonesia are scheduled to take effect on 17 October. These

changes would impose significant additional costs, burdens and complexity, creating a risk of major trade disruption.

We recognise the importance of halal conformity to the Indonesian people, and our industry participants remain committed to ensuring that halal dairy products meet all applicable requirements. In fact, all of the dairy products exported from our markets to Indonesia are already halal certified by Indonesian-approved halal certification bodies. However, we are concerned that no clear justification has been provided for these changes and it remains unclear what risks they are intended to manage, particularly given the existing halal certification system which is reliably ensuring the availability of halal products for Indonesian consumers. There has also been no meaningful consultation with trading partners on this measure, and the implementation date falls less than three weeks after the deadline for submissions on Indonesia's WTO notification.

With the implementation date rapidly approaching and only limited notice having been provided, our exporters have struggled to obtain clarity about how the requirements are intended to operate in practice. The information available to date indicates that the proposed system would be costly and commercially impractical, while duplicating information already provided through existing systems.

We are also concerned that other proposed halal regulation changes would add further cost and complexity, compounding these risks of disruption to trade and Indonesian food supplies. On 28 August, Indonesia notified the WTO of a further proposed requirement for each establishment seeking halal certification to appoint a dedicated halal supervisor. Separate requirements, proposed in a draft decree on halal logistics dated 17 November 2025, appear impracticable to meet if extended to international shipping. As with the pre-shipment inspection requirements and additional charge, no clear justification has been provided for these proposals or for the risks they are intended to manage.

Indonesia's changing halal regulatory approach to food imports appears inconsistent with recent joint statements by APEC economies on the importance of trade facilitation in supporting food security and market resilience. Moreover, these policies are poised to create significant new trade conflicts with four of Indonesia's most important trading partners while threatening the availability and accessibility of products for Indonesian companies and consumers.

We respectfully urge Indonesia to pause implementation of these measures while it reconsiders whether the intended outcomes could be achieved through a less trade-disruptive approach such as reliance on the existing halal certification system.

Yours sincerely,

Kimberly Crewther
Chief Executive
Dairy Companies Association of New Zealand (DCANZ)

Ben Bennett
Chair
Australian Dairy Industry Council (ADIC)

Jukka Likitalo
Secretary General
European Association of Dairy Trade (Eucolait)

Alexander Anton
Secretary General
European Dairy Association (EDA)

Gregg Doud
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International Dairy Foods Association (IDFA)

cc:

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