

# New Rules on Industrial Data Reporting: What Businesses Need to Know in 2025

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Indonesia's industrial sector is entering a new era of data governance. With the issuance of Ministry of Industry Regulation No. 13 of 2025 ("MOI Regulation 13/2025"), companies in the industrial sector are now expected to provide more detailed, accurate, and timely data through the National Industrial Information System ("SIINas"). This regulation replaces the earlier MOI Regulation No. 2 of 2019 ("MOI Regulation 2/2019") and introduces a more robust reporting framework designed to support faster, more responsive policy-making and economic planning.

So, what's changed—and more importantly, what does this mean for your business?

In this article, we break down the key updates, new obligations, and compliance risks under MOI Regulation 13/2025.

# Why the Update?

Industrial policy is only as strong as the data it's built on. The government's goal with the updated regulation is to boost the quality and reliability of industrial data, which in turn enables smarter, faster decisions at both the national and regional levels. Accurate data helps ensure that regulations are relevant, infrastructure development is targeted, and industrial growth is well supported.

#### Why the New Regulation Matters

Industrial policy today depends on real-time insights. Through MOI Reg 13/2025, the Ministry of Industry seeks to strengthen economic planning by improving the quality of industrial data submitted by businesses. In doing so, the regulation aligns with broader national goals of infrastructure development, investment planning, and industrial resilience.

### Who Needs to Report and What Do They Have to Provide?

If you're a manufacturer or an industrial estate operator, then under MOI Regulation 2/2019 you are already required to report data through SIINas, the Ministry of Industry's centralized platform for managing industrial information. That has not changed.

What has changed is how much information you need to report and how often you need to do it. Under MOI Regulation 13/2025, companies must now provide pre-submission information before filing their regular industrial data reports. This includes:

## **Pre-Submission Data Requirements**

Information Category	Industrial Company	Industrial Zone Company
Company Details	<b>√</b>	✓
Industrial Zone Name		✓
Person in Charge	<b>√</b>	✓
Business Sector	<b>✓</b>	<b>√</b>
Location Info	✓	✓
Permits and Operations	✓	✓
Machinery and Capacity	✓	

This pre-submission step ensures that SIINas has up-to-date and verified baseline information about each reporting entity before any regular data submissions are made.

#### More Frequent Reporting, Tighter Deadlines

Previously, companies reported data twice a year. Now, under MOI Regulation 13/2025, **industrial and industrial zone data must be submitted quarterly**, with very specific deadlines and limited correction periods.

#### **New Reporting Schedule**

Reporting Period	Submission Window	Correction Deadline
January – March	April 1 – April 10	April 12
April – June	July 1 – July 10	July 12
July – September	October 1 – October 10	October 12
October – December	January 1 – January 10	January 12 (following year)

These deadlines are **strict** and missing them may expose companies to administrative sanctions. Timely, complete, and accurate submissions are therefore crucial.

Aside from industrial and industrial zone data, business actors may also be asked by the Ministry of Industry to submit **other data** through SIINas—such as additional information, clarifications, or reports of extraordinary events. The rules on other data **remain unchanged** since they were first introduced in MOI Regulation 2/2019.

# **Data Requirements Now Tailored by Business Phase**

MOI Regulation 13/2025 also refines the classification of data requirements based on a company's **business phase** (construction or production) and **industry type** (e.g., small, medium-large, or specialized industries like shipyards). All categories are required to submit data under both construction and production phases, with slight variations depending on their scale and business model.

#### Verification Gets an Upgrade: Enter the Independent Agencies

One of the most significant developments is the formal **introduction of Independent Verification Agencies (LVIs)** into the reporting ecosystem. These agencies may now assist in the on-site verification of submitted industrial data—especially when a company's activities span multiple sectors.

Here's how the process works:

- Initial verification of the data is automatically done through SIINas.
- The relevant Sector Supervisor (Pembina Sektor) then reviews and validates the submitted data.
- In certain cases, an **LVI** may be appointed by the Sector Supervisor to carry out additional **field verification**, including factory visits or clarification checks, to further validate the submitted data.

To ensure confidentiality and competence, any LVI must:

- 1. be licensed to provide survey services; and
- 2. have at least **five years of experience** in relevant industrial sectors.

LVIs are held to strict confidentiality standards — violations can lead to sanctions, including a **three-year ban** on future appointments.

#### Compliance and Sanctions: What's at Stake?

Companies that fail to comply with the updated requirements may face **administrative sanctions**, as outlined under Government Regulation No. 2 of 2017 ("**GR 2/2017**"). These may include:

- Written warnings
- Administrative fines
- Temporary suspension of business activities
- · Revocation of industrial permits

While MOI Regulation 13/2025 does not spell out the exact penalties for every violation, the signal is clear: data compliance is no longer optional — it's critical to business continuity.

#### **Key Takeaways for Industry Players**

MOI Regulation 13/2025 marks a significant shift in how industrial data is reported, verified, and used in policymaking. Here's what businesses need to do:

- Review and update internal reporting procedures to comply with the new deadlines and presubmission rules.
- Ensure complete and accurate data is submitted to SIINas, including pre-submission info and other data requirements.
- Prepare for potential field verifications and potential engagement with LVIs.
- Stay ahead of compliance risks by reviewing your obligations under both MOI Reg 13/2025 and GR 2/2017, especially on data governance and sanctions.

With this regulation, the government is doubling down on transparency and accountability in the industrial sector. For businesses, aside from the utmost importance of staying compliant to avoid penalties, which may trigger disruption of business operation, it is also about contributing to a stronger, more data-informed industrial policy framework.

# **Why Legal Support Now Matters**

As a leading law firm with deep experience advising stakeholders across Indonesia's industrial landscape, we at **Dentons HPRP** understand that regulatory understanding and readiness extends beyond compliance — it is integral to protecting operations, securing licenses, and safeguarding business continuity.

Whether your company is reviewing its reporting obligations under SIINas, preparing for potential data verification, or assessing risk exposure under **GR 2/2017**, our team is well-positioned to support your legal and strategic needs.

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The article above was prepared by Dentons HPRP's lawyers

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