



Issue 7 | March 2025

Your Guide to Halal Certification in Indonesia: Key Changes under Government Regulation No. 42 of 2024 on the Implementation of Halal Product Assurance

As the country with the largest Muslim population, Indonesia has an important responsibility to ensure the halal status of products consumed and used by its vast Muslim community. "Halal", an Arabic term, means "permissible" or "lawful" and refers to items prepared according to Islamic guidelines, free from forbidden ingredients.

To fulfill this responsibility, the Indonesian government issued Law No. 33 of 2014 on Halal Product Assurance, later amended by Law No. 6 of 2023 on the Implementation of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation ("Halal Product Assurance Law"). This was followed by the latest regulation — Government Regulation No. 42 of 2024 on Halal Product Assurance ("GR 42/2024") which revoked Government Regulation No. 39 of 2021 on the Implementation of Halal Product Assurance ("GR 39/2021"). However, all regulations of GR 39/2021 remain valid unless they conflict with GR 42/2024.

GR 39/2021 previously outlined the **phased implementation of halal certification requirements**, with different product types requiring certification at different stages. For medium and large-scale businesses, the certification requirement for food, beverages, slaughtered animal products, and related services was set from 17 October 2019 to **17 October 2024** – **the deadline has now passed**. While the certification deadline for foreign products is **extended until 17 October 2026**.





GR 42/2024 was issued **on the same day as the deadline (17 October 2024)** and has since been the prevailing implementing regulation on halal product assurance in Indonesia.

This Advisory highlights the key changes introduced under GR 42/2024.

1. Mandatory Halal Certification



All products in Indonesia, including food, beverages, medicines, cosmetics, chemical products, biological products, genetically engineered products, and consumer goods and services used and traded must have halal certification. This also applies for goods containing or made from animal sources, except for products made from non-halal materials.

2. Procedure for Obtaining Halal Certification

A Submitting an Application

To get a Halal Certificate, business owners must submit an application to the Halal Product Assurance Organizing Agency (*Badan Penyelenggara Jaminan Produk Halal* – "**Assurance Agency**") through the <u>SIHALAL Application</u>. The review should, in theory, be completed within one working day after receiving a complete application.



Appointment of the Inspection Agency



A business owner must choose a Halal Inspection Agency (*Lembaga Pemeriksa Halal* – "**Inspection Agency**") within one working day after the application is complete. The Inspection Agency will verify the documents and inspect or test the halal products or both.



There are many inspection agencies available. When selecting an Inspection Agency, factors such as its accreditation, scope of activities, accessibility, workload, and performance must be considered to ensure that it meets the standards required and can effectively fulfil its responsibilities.

Inspection and Halal Testing of Products

The Inspection Agency will conduct an inspection, halal testing, or both based on the standards set by the Assurance Agency. This includes verifying documents and inspecting or testing the products. The expected timeline is as follows:

Remarks	Domestic Products	Overseas Products
Timeline for inspection	15 working days as of payment for inspection and/or halal testing fees.	15 working days as of payment of inspection and/or halal testing fees.
Deadline Extension	Up to 10 additional working days.	Up to 15 additional working days.

After the inspection or testing is completed, the Inspection Agency will send the results to the Indonesian Ulama Council (*Majelis Ulama Indonesia* – "**MUI**"), copied to the Assurance Agency, for a decision on issuing the Halal Certificate.

Halal Certification of Products

The MUI holds a halal fatwa session at which it determines whether a product is halal or not. If the product is declared halal, the Assurance Agency is expected to issue a Halal Certificate within one working day of the MUI's decision.



If the MUI decides that a product is non-halal, the Assurance Agency will issue a Non-halal Certificate within one working day of receiving the MUI's decision.

Halal Certificate Validity



D

The Halal Certificate is valid for **4 years**, provided there are no changes to the ingredients or manufacturing process.

Fee for Halal Certificate Issuance

The fee for issuing a Halal Certificate will be set by the relevant ministerial regulation.



3. Halal Labels and Non-Halal Statements

a. Halal Labels



Halal-certified products must display the requisite halal label, which must include the logo and certificate or registration number. The logo can be an image, text, or both, as shown on the left.

The halal label must be placed on the product's packaging or a visible part of the product, where it is easy to see and read. It should also be durable and not easily removed or damaged.

Products in very small packages do not need a halal label if: the packaging is too small for all required information, they are sold and packaged directly in front of the buyer in small quantities, or they are sold in bulk or limited quantities.

b. Non-Halal Statements

Producers of products with prohibited ingredients **must include a non-halal statement** on the packaging, where it is easy to see and read, and not easily removed or damaged.



The Halal Product Assurance Law states that a **non-halal statement** is a key part of the product, which can be in **the form of images, signs, and/or text**. While the exact format will be decided by the Assurance Agency, the law makes it clear that just as restaurants display a halal logo, those serving non-halal food and drinks must also display a visible logo indicating they are not halal, ensuring clarity for consumers.

What about restaurants that say "No Pork and No Lard?"



This statement does not mean the restaurant is halal certified. Halal certification covers not only ingredients but also all processes from sourcing and handling to preparation and presentation meet the halal standards.



What if the menu has both halal and non-halal dishes?

A menu free from non-halal ingredients does not guarantee the food is halal, especially if the halal and non-halal processes are not separated. In such cases, a clear non-halal statement should be displayed.

4. Phased Implementation of Halal Certification by Product Type

As mentioned earlier, halal certification is being implemented in phases, with requirements enforced gradually based on product type, as shown below.

Halal Certification Requirement Phase	Product Category
17 October 2019 – 17 October 2024	For Medium and Large Businesses (food, beverages, slaughtered animal products and slaughtering services)
17 October 2019 – 17 October 2026	For Micro and Small Businesses (food, beverages, slaughtered animal products and slaughtering services)
17 October 2021 – 17 October 2026	Consumer goods (class A medical devices) Herbal medicines, quasi-medicines and health supplements Cosmetics, chemical products, and genetically engineered products Consumer goods (clothing, headgear, accessories) Consumer goods (household health supplies, household appliances, religious items, stationery, office supplies)

Halal Certification Requirement Phase	Product Category
17 October 2021 – 17 October 2029	Consumer goods (class B medical devices)
	Over-the-counter medicines and restricted over-the-counter medicines
17 October 2021 – 17 October 2034	Consumer goods (class C medical devices)
	Prescription medicines (excluding psychotropic drugs)
To be determined by the Minister of Religious Affairs by 17 October 2026, upon the completion of mutual recognition agreements for halal certificates.	Imported food products, beverages, slaughtered animal products and slaughtering services
In accordance with the prevailing laws and regulations.	Pharmaceutical products, biological products, and medical devices (not made from halal materials or with non-halal production methods)

5. **Sanctions for Not Obtaining Halal Certification**

The following administrative sanctions may be applied for failing not meeting the certification requirements under GR 42/2024:









Written warning

Administrative fine

Revocation of Halal Certificate

Withdrawal of products from circulation

These sanctions can be imposed in hierarchical, alternative, and/or cumulative ways.

6. **Foreign Products Halal Certification**



The halal certification requirement for foreign food and beverages entering the Indonesian market is extended until 17 October 2026. This timeline allows foreign exporters enough time to meet the new halal requirements, so they do not need to follow the certification until the new deadline.

7. **International Cooperation: Mutual Recognition of Halal Certificates**

GR 42/2024 includes provisions for internal cooperation, allowing the government, through the Assurance Agency, to collaborate with foreign halal certification bodies to support the global integration and mutual recognition of halal standards.

Closing

Halal certification is culturally and religiously important in Indonesia, where majority of its population is Muslim. Its main goal is to ensure Muslims easily find halal products, especially when shopping outside the home. Halal certification offers reassurance that a product is prepared according to Islamic guidelines, helping to avoid the worry of unintentionally consuming non-halal products.

We hope this guide will assist your business in navigating the halal certification process and addressing the growing demand for certified halal products in Indonesia.

Disclaimer

All logos and images used in this advisory are sourced from platforms that allow their use. Most logos featured are from via Flaticon, specifically from Freepik, Hendra Tri, Viktor Turchyn, Aficons studio, VectorPortal, Luvdat, Pixel perfect, Flat Icons, smashingstocks, and IconsNova.

ABOUT M&T ADVISORY

M&T Advisory is a digital publication prepared by the Indonesian law firm, Makarim & Taira S.

It informs generally on the topics covered and should not be treated as legal advice or relied upon when making investment or business decisions.

Should you have any questions on any matter contained in M&T Advisory, or other comments in general, please contact us at the emails provided at the end of this article.

A Summitmas I, 16th & 17th Floors
Jl. Jend. Sudirman Kav. 61-62
Jakarta 12190

P +6221 5080 8300
+6221 252 1272

makarim.com in Makarim & Taira S.

MORE INFORMATION



Norma Mutalib

Partner

norma.mutalib@makarim.com



Mira Ayu Lestari

Associate
mira.ayu@makarim.com



Aliya Ilysia Irfana Ampri Associate aliya.ampri@makarim.com