

Circular Letter on the Implementation of the 2025 KBLI book

In brief

Companies in Indonesia must have specific lines of business, based on five-digit business classification codes (known as KBLI numbers). The activities that can be conducted must be within the scope of activities of the relevant KBLI numbers. The KBLI numbers also determine the licensing requirements and obligations, and foreign investment restrictions.

The KBLI book is updated from time to time. The 2025 KBLI book was issued on 17 December 2025, and became effective on 18 December 2025. The 2025 KBLI book provides that all KBLI users (including the authorities) must adjust in line with this KBLI book at the latest six months after the issuance date of the book, i.e., at the latest on 18 June 2026.

While the licensing systems have not yet been updated to cater for the new 2025 KBLI book, and therefore the 2025 KBLI book is not yet being implemented, recently several government institutions issued a joint circular letter to provide guidance on the implementation of the 2025 KBLI book.

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Joint circular letter

Up to now, the Indonesian licensing systems (including the Ministry of Law system and the Online Single Submission (OSS) system) have not been updated to accommodate the 2025 KBLI book. However, the following authorities issued a joint circular letter on 27 March 2026, though it was only made publicly available recently, on guidelines on the implementation of the 2025 KBLI book:

- The Minister of Investment and Downstream Industry/the Chairman of BKPM, the authority that manages the OSS system
- The Minister of Law, the authority that manages the Ministry of Law system
- The Head of the Central Statistics Bureau, the authority that issues KBLI books, including the 2025 KBLI book

The following are the key points of the joint circular letter and its attachments:

- All basic licensing (*persyaratan dasar/PD*), business licensing (*perizinan berusaha/PB*), and/or supporting licensing (*perizinan berusaha untuk menunjang kegiatan usaha/PB UMKU*) that was issued, verified and approved before the implementation of the 2025 KBLI book will remain valid.
- The implementation of the 2025 KBLI book in the OSS system and the Ministry of Law system will be conducted at the latest on 18 June 2026. Before the 2025 KBLI book is implemented in both systems, the OSS system and the Ministry of Law system still use the 2020 KBLI book.
- Both the OSS system and the Ministry of Law system will have a conversion table (prepared by both authorities) setting out a comparison between the 2020 KBLI numbers and the 2025 KBLI numbers.
- By system, the 2020 KBLI numbers will be changed to the 2025 KBLI numbers once the 2025 KBLI book has been implemented in both systems. As such, companies are not required to adjust their KBLI with the 2025 KBLI book if such adjustment is only numerical code adjustment based on the conversion table without substantial change on the business line and/or activity of the company.

Existing companies are required to adjust their KBLI with the 2025 KBLI through an amendment of their articles of association if there is a corporate action that changes their business line or business activity.

- Despite the above, the conversion table will not apply to the 2017 KBLI book. As such, KBLI users that still have 2017 KBLI numbers would need to do a KBLI adjustment in the OSS system and the Ministry of Law system. KBLI adjustment is basically updating the KBLI numbers recorded in both systems. The KBLI adjustment must be conducted at the Ministry of Law system before the OSS system. KBLI users would need to submit to the Ministry of Law system a notarial deed restating the shareholders resolutions acknowledging the KBLI numbers of the KBLI users under the 2025 KBLI book.

Things to watch

Again, at the time of the issuance of this alert, the OSS system and the Ministry of Law system have not accommodated the 2025 KBLI book. As such it remains to be seen how the table conversion will work, whether the conversion will indeed be conducted automatically, and if it is, whether the automatic conversion is accurate (the code within the 2025 KBLI book vs the business activities).

Suggested actions

Companies should consider taking the following actions:

- Check what KBLI book your company's KBLI numbers are - if your company is still using 2017 KBLI numbers, a KBLI adjustment may need to be conducted
- Review the 2025 KBLI book to check the equivalent of your KBLI numbers (from either the 2017 KBLI numbers or the 2020 KBLI numbers)

Contact Us



Daniel Pardede

Senior Partner

Jakarta

daniel.pardede@hhplawfirm.com



Mita Djajadiredja

Senior Partner

Jakarta

mita.djajadiredja@hhplawfirm.com



Adhika Wiyoso

Partner

Jakarta

adhika.wiyoso@hhplawfirm.com



Preti Suralaga

CCS Manager

Jakarta

preti.suralaga@hhplawfirm.com

