Indonesia Policy / Commodity Export

PP 24/2026 — Tata Kelola Ekspor SDA · 5 June 2026

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PP 24/2026 Signed: Coal, CPO & Ferro Alloy Export via PT DSI (Danantara) — Full Implementation 1 January 2027; DSI Has Pricing Authority

Signed 20 May 2026 | Published 5 June 2026 | Transition reporting: 1 Jun 2026 | Full BUMN Ekspor: 1 Jan 2027 | 3 commodities: $65.39Bn (28.3% non-O&G exports) | DSI sets export selling prices | Exemption via formal govt contract only

PP Signed / Published	3 Commodities	Full Implementation	Combined Export Value
20 May / 5 Jun	**Coal · CPO · Ferro Alloy**	**1 Jan 2027**	**USD 65.39Bn**
PP Nomor 24 Tahun 2026	**28.30% of non-O&G exports**	**Transition reporting starts 1 Jun 2026**	**Jan–Apr 2026 (coal+CPO+ferro alloy)**

KEY TAKEAWAYS — PP 24/2026

- **PP Nomor 24 Tahun 2026 — signed by President Prabowo on 20 May 2026 and published 5 June 2026 — formally establishes PT Danantara Sumberdaya Indonesia (PT DSI Persero) as the designated BUMN Ekspor and sets the single-channel export regime for coal, CPO, and ferro alloy.** The three commodities contributed USD 65.39 billion in export value in January–April 2026 (coal USD 24.48Bn, CPO USD 24.42Bn, ferro alloy USD 16.49Bn) — representing 28.30% of Indonesia's total non-oil and gas exports. The signed PP resolves two key ambiguities from the draft: (1) the full implementation date is 1 January 2027 (not September 2026 as the draft phase structure implied), giving exporters a longer runway; (2) the transition starting 1 June 2026 requires only mandatory reporting of export activity to DSI via Bea Cukai's electronic portal — actual export flows are not yet redirected.
- **Two critical provisions in PP 24/2026 that were not explicit in the draft: DSI has legal authority to set export selling prices (Pasal 3(2)) and to charge a margin within a 'reasonable' threshold (Pasal 3(4)) — DSI is not a pass-through intermediary.** This is the most commercially significant detail in the signed PP. It means that for coal, CPO, and ferro alloy exporters without an exemption, DSI becomes the pricing authority for their products sold internationally. The 'kewajaran' (reasonableness) standard for DSI's margin is not defined in the PP — implementing regulations from sectoral ministers (Pasal 5) will determine the practical ceiling. Until the margin framework is published, producers face an open-ended cost risk on top of their existing royalty and DHE SDA obligations.
- **The exemption clause (Pasal 4(2)) is narrower than the draft implied: private exporters may only bypass DSI if they have an existing government contract that explicitly covers investment, divestment, AND domestic processing/refining — approved through a formal Kemenko rapat koordinasi.** This is not automatic — it requires application and inter-ministerial approval. The key beneficiaries are likely foreign-invested mining companies with existing Contracts of Work (COW) or Special Mining Business Licences (IUPK) that include all three conditions — such as Freeport, Vale Indonesia (INCO), and Amman Mineral. However, the PP does not specify whether pre-existing contracts satisfy the requirement or whether contracts must be renegotiated. Critically, the PP 24/2026 exemption does NOT exempt from DHE SDA obligations or ESDM royalty revisions — these are governed by separate regulations.
- **Three interlocking policy layers now fully in place — together creating the most comprehensive state control over Indonesia's commodity export chain since the ore export ban: PP 24/2026 (export channel), DHE SDA revision (FX retention), and ESDM royalty revision (fiscal extraction).** For a coal or CPO exporter with domestic borrowing and no government contract exemption: (1) Layer 1 — DSI charges margin on export selling price (PP 24/2026); (2) Layer 2 — 100% of FX proceeds must go to Himbara for 12 months, max 50% converted to IDR (DHE SDA, effective 1 July 2026); (3) Layer 3 — higher progressive royalty rates on production (ESDM, pending ratification). Each layer individually has precedent; all three simultaneously is a policy combination without recent historical parallel. Net margin compression risk is most acute for BUMI, ADRO, INDY (coal), AALI, SMAR (CPO), and MDKA, INCO (ferro alloy/nickel). ANTM and PTBA, as existing BUMN, are relatively insulated and may benefit as DSI operational partners.

DRAFT vs SIGNED PP 24/2026 — WHAT CHANGED

Parameter	Draft Rancangan PP (Prior Analysis)	Signed PP 24/2026 (5 June 2026)	Impact of Change
Full implementation	*Phase II: 1 September 2026*	1 January 2027	*4-month delay — longer runway for exporters to adjust*
Transition phase	*Phase I: 1 Jun–31 Aug (partial BUMN handover)*	1 Jun 2026 onward: mandatory reporting only; export flows unchanged	*Less disruptive — no export redirection during transition*
DSI pricing authority	*Not explicit in draft*	**CONFIRMED: Pasal 3(2)–(4) — DSI sets prices + charges margin**	*Most significant commercial risk — DSI is not a pass-through*
Exemption condition	*General 'no domestic borrow' concept*	**Pasal 4(2): formal govt contract (investment+divestment+processing) — Kemenko approval required**	*Narrower and more specific — not automatic*

Evaluation mechanism	*Not specified*	Mandatory rapat koordinasi after 3 months (Sept 2026)	*Built-in review; policy could be refined post-evaluation*
BUMN Ekspor identity	*'Likely Danantara sub-holding'*	PT Danantara Sumberdaya Indonesia (PT DSI Persero) — formally named	*Confirmed. Operational from 1 June 2026*

TRIPLE-LAYER POLICY FRAMEWORK — PP 24/2026 + DHE SDA + ESDM ROYALTY

Policy Layer	What It Controls	Effective Date	Cumulative Impact on Exporters
Layer 1 — PP 24/2026 (Export Channel)	Export channel: coal/CPO/ferro alloy via DSI only. DSI sets selling price; charges margin.	**Transition: 1 Jun 2026 Full: 1 Jan 2027**	*First cost layer — DSI margin on selling price before producer receives revenue*
Layer 2 — DHE SDA Revision (FX Retention)	FX retention: 100% at Himbara, 12-month lock-up, max 50% IDR conversion. 0% PPh on 12-mth placements.	**Effective: 1 Jul 2026**	*Cashflow lock-up for 12 months after export; USD opex must be repurchased at market rate*
Layer 3 — ESDM Royalty (Fiscal Extraction)	Progressive royalty hike on coal, nickel, gold, copper, tin — rate rises with commodity price.	**Pending ratification (June 2026 est.)**	*Higher royalty per ton reduces EBIT before layers 1 and 2 apply*

↳ For a coal/CPO exporter with domestic borrowing and no govt contract exemption: faces all 3 layers simultaneously. Net margin compresses from DSI intermediation (Layer 1) + 12-month FX lock-up (Layer 2) + higher royalty (Layer 3). BUMI, ADRO, AALI, SMAR, MDKA most exposed. ANTM and PTBA (existing BUMN) relatively insulated.

Sources: PP Nomor 24 Tahun 2026 (full text via CNBC Indonesia 5 June 2026); Kemenko Perekonomian press release 31 May 2026 (ekon.go.id); Airlangga press conference Wisma Danantara 31 May 2026; CNBC Indonesia (PT DSI, ferro alloy, Antam response); Kompas.com (Danantara operations); Beritasatu.com; The Econopost (HS codes). For informational purposes only.