



PRODUCT REGISTRATION INDONESIA

Part of MMW Strategic Group

Comprehensive Guide to Indonesia Halal Compliance 2026 for Medical Device Manufacturers

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Part I. Foundations of Halal Product Assurance

Chapter 1. Why Halal Matters

Halal means “permissible” according to Islamic law and covers not only food and beverage ingredients but also how goods are prepared, stored and distributed. In a country with roughly 237 million Muslims, halal certification assures that products conform with religious norms and allows consumers to purchase with confidence. The Halal Product Assurance Law (UU 33/2014) clearly states that the objectives of halal product assurance are to provide comfort, security, safety and certainty for consumers and to enhance the added value of businesses producing halal goods. These dual goals underscore that halal certification is both a moral obligation and an economic opportunity.

The global halal industry has become one of the fastest-growing segments of the world economy. Demand for halal products is increasing sharply, driven by a growing Muslim population and greater awareness about hygiene and ethical supply chains. Indonesia, with the world’s largest Muslim-majority population, is strategically positioned to capture a significant share of this market. However, certification is not just a formality; without internationally recognised halal certificates, Indonesian products face barriers when exporting to Middle Eastern, South Asian and Western markets.

From a business perspective, halal certification is an instrument for building trust and competitiveness. Studies show that non-Muslim consumers increasingly perceive halal-certified goods as higher in quality and hygiene. Certification therefore broadens the consumer base and can differentiate products in crowded markets. Beyond food and beverages, Indonesia also has opportunities in halal pharmaceuticals, cosmetics, tourism and modest fashion, the State of the Global Islamic Economy report ranked Indonesia third in 2023, reflecting its improving competitiveness. Recent data from Indonesia’s Halal Product Assurance Agency (BPJPH) valued the global halal market at around Rp 20,670 trillion; capturing even a small share could significantly contribute to Indonesia’s GDP.

Indonesia’s halal economy is also attracting international investment. A 2025 market analysis projected Indonesia’s halal economy to reach US\$281 billion by 2025, comprising a US\$45 billion compliance-driven market for certification services and production upgrades, and a US\$130 billion domestic demand for halal lifestyle products. The government aims to capture 10% of global halal trade by 2025, and halal exports grew 12% year-on-year in 2024, led by processed foods and modest fashion. These figures make clear that understanding halal requirements is not merely a religious duty but a gateway to a rapidly expanding economic sector.

Chapter 2. The Legal Framework for Halal Product Assurance

2.1. Legislation and Objectives

Indonesia's halal framework is anchored by Law No. 33/2014 on Halal Product Assurance (UU JPH). Article 4 makes halal certification mandatory for products entering, circulating and traded in Indonesia, while Article 3 identifies the purposes of the law: to provide comfort, security, safety and certainty of halal products for consumers and to enhance added value for businesses. To implement the law, Government Regulation (PP) No. 42/2024 replaced PP 39/2021 and requires that every product be classified as either halal or non-halal. Products made from materials prohibited under Islamic law (haram) are exempt from certification but must be clearly labelled as non-halal, ensuring transparency for consumers.

2.2. Phased Implementation and Deadlines

The transition to mandatory certification is being implemented in phases. The first phasing period of the halal certification obligation ran from 17 October 2019 to 17 October 2024. BPJPH announced that from **18 October 2024** the halal certification obligation officially applies to products entering, circulating and traded in Indonesia. In this stage, medium and large enterprises producing food and beverages, raw materials, additives and slaughtering services must obtain halal certificates; failure to comply can result in sanctions such as written warnings or product withdrawal. Micro and small enterprises producing these products have been given an extension until **17 October 2026** to secure their certificates. A two-year extension to 2026 has also been granted for most imported food and beverage products (excluding meat) to allow international businesses more time to comply.

Beyond food and beverage products, Government Regulation No. 42/2024 outlines future phases for other categories. Deputy Head of BPJPH Afriansyah Noor emphasised that **after 17 October 2026** certain products, including **medicinal products, cosmetics, chemical products, genetically engineered products and consumer goods**, must have halal certification. The regulation similarly sets 2026 deadlines for clothing, headgear, household appliances, office supplies and low-risk medical devices. Higher-risk medical devices and some pharmaceutical categories have longer transition periods, with deadlines in 2029 and 2034. Businesses should consult the detailed schedules to ensure compliance as the mandatory certification expands beyond the initial sectors.

Government Regulation No. 42/2024 also updated the validity of halal certificates. Under the previous regulation, certificates were valid for four years and needed to be renewed at least three months before expiration. Under the new rule, certificates have **indefinite validity** as long as the product's composition and halal production process remain unchanged. Renewal is required only when a change in ingredients or process occurs, and businesses must notify BPJPH accordingly. The regulation also introduced new obligations: certified products must

display the halal label; companies must maintain separate facilities and equipment for halal and non-halal items; they must renew their certificates if there are changes in composition or process; and they must obtain a Product Halal Consistency Certificate after an evaluation of their Halal Product Assurance System (SJPH). Non-compliance can lead to penalties such as fines, certificate revocation or product recalls.

2.3. Institutions and Roles

The Halal Product Assurance Organizing Body (BPJPH) is the central authority responsible for implementing halal product assurance. **Until mid-2025 it operated under the Ministry of Religious Affairs**; however, a government reorganisation separated BPJPH from the ministry. On **29 July 2025** the Minister of Religious Affairs and the head of BPJPH signed an asset-transfer agreement, officially making BPJPH a non-ministerial institution. The separation is part of a broader restructuring under Ministerial Regulation No. 33 of 2024. Within the Ministry of Religious Affairs a new **Directorate of Halal Product Assurance (JPH)** has been established. The ministry explains that this directorate focuses on strategic policy development, evaluation and public awareness, while technical tasks, such as registration, verification, certification and supervision of halal product assurance, remain under BPJPH. BPJPH continues to formulate halal policies, set norms and standards, issue and revoke halal certificates and labels, register foreign certificates, conduct public education, accredit Halal Inspection Bodies (LPH) and register halal auditors. It also supervises halal product assurance and cooperates with domestic and international institutions to strengthen the halal ecosystem. In performing its duties, BPJPH collaborates with Halal Inspection Bodies (LPH), Halal Product Process Assistance Agencies (LP3H), the Indonesian Ulema Council (MUI) and the Halal Product Fatwa Committee.

While BPJPH manages the administrative aspects of certification, the MUI still plays a pivotal religious role. The MUI issues halal fatwas (legal opinions) based on inspection results, providing the religious legitimacy for certification. Halal Inspection Bodies (LPH), often private or university-affiliated institutions, conduct audits of ingredients, processes, and facilities to verify compliance. The American Halal Foundation notes that BPJPH works closely with LPHs to ensure that products meet the criteria set by the Halal Product Assurance Law. Businesses therefore interact with multiple agencies: they register with BPJPH, undergo inspection by an LPH, receive a fatwa from the MUI, and finally obtain a certificate from BPJPH.

For foreign products, BPJPH recognises halal certificates issued by overseas agencies if there is a mutual recognition agreement. When a foreign certificate is recognised, the product only needs to be registered in BPJPH's system; otherwise, the product must undergo the full Indonesian certification process. Imported goods must still display halal or non-halal labels, and non-compliance can result in administrative penalties.

Chapter 3. The Global and Indonesian Halal Market

The halal market extends beyond religious observance; it is a rapidly expanding sector driven by consumer demand for quality, ethics and safety. According to a 2025 analysis, Indonesia is positioning itself as the **global epicentre of the halal economy**, which is projected to reach **US\$281 billion** by 2025. This figure includes a **US\$45 billion compliance-driven market** created by the mandatory certification law and a **US\$130 billion domestic market** fuelled by rising middle-class spending on halal lifestyle products. The government's export ambitions aim for Indonesia to capture **10% of global halal trade**; halal exports grew 12% in 2024, led by processed foods (US\$18 billion) and modest fashion (US\$8 billion). These numbers indicate that compliance with halal regulations is not a burden but a gateway to significant revenue.

Indonesia's large population, abundant natural resources and strong government support give it strategic advantages. The Indonesian Ulama Council (MUI) highlights that the global halal market is vast and that Indonesia is well-positioned to capture a significant share due to these factors. The State of the Global Islamic Economy (SIGE) report ranked Indonesia third worldwide in 2023, reflecting improvements across the halal food, cosmetics, pharmaceuticals, tourism and fashion sectors. Government initiatives, such as tax holidays for halal industrial parks and subsidies for certification fees, further stimulate growth.

Halal certification also appeals to non-Muslim consumers who associate halal standards with higher quality, hygiene and ethical production. As global demand rises, competition intensifies; countries like Malaysia, Thailand and the United Arab Emirates have established sophisticated halal ecosystems. To succeed, Indonesia must not only enforce strict regulatory compliance but also invest in innovation, technology and international cooperation to harmonise standards and improve traceability. The integration of blockchain and AI for supply chain transparency and the development of halal industrial parks demonstrate how technology is shaping the future of halal business.

Ultimately, the global and Indonesian halal markets offer enormous opportunities for businesses that understand and adhere to halal requirements. Compliance opens access to Muslim consumers while signalling quality to a broader audience. With a robust legal framework and support from BPJPH, LPH and MUI, Indonesia aims to become a leading hub for halal products, tapping into both domestic demand and international trade.

Part II. Understanding the Halal Product Assurance System (SJPH)

Chapter 4. What Is SJPH?

The **Sistem Jaminan Produk Halal (SJPH)** is Indonesia's halal assurance system designed to guarantee the halal status of products from farm to fork. It is mandated by Law No. 33/2014 and Government Regulation No. 42/2024 and requires every business that produces, processes or distributes products in Indonesia to implement a structured halal management system. SJPH covers the entire *Halal Product Process (Proses Produk Halal/PPH)* from sourcing materials and processing to storage, packaging, distribution, marketing and even product display. The system ensures that products remain halal throughout these stages and that non-halal contamination is prevented.

At its core, SJPH acts as both a compliance framework and a quality management system. To be certified halal, a business must show that it has written halal policies, documented procedures and trained personnel who understand Islamic requirements. The system requires continuous monitoring, internal audits and reporting to the Halal Product Assurance Agency (BPJPH) at least twice a year, with corrections if any non-conformity is found. Implementation of SJPH is not a one-time exercise, businesses must obtain a **Product Halal Consistency Certificate**, which is issued after BPJPH conducts an evaluation of the SJPH every four years.

For micro and small enterprises (MSEs), GR 42/2024 allows a **self-declaration** pathway: MSEs may submit a statement affirming that their products and materials are halal and that they follow the halal production process. BPJPH forwards this declaration to the Halal Product Fatwa Committee; if approved, a halal certificate is issued. This simplified route is intended to help MSEs comply without extensive audits while still committing to the SJPH principles.

Chapter 5. Key Players in SJPH

Successfully implementing SJPH requires coordination among several stakeholders. Each has defined roles under the law and regulations.

5.1. Business Actors (*Pelaku Usaha*)

Business actors, ranging from large manufacturers to micro entrepreneurs, are ultimately responsible for ensuring their products meet halal requirements. They must register products via BPJPH's SIHALAL system, prepare complete documentation (ingredient lists, supplier certifications, process flowcharts, facility photos, etc.) and implement the SJPH internally. Businesses must also **appoint a Halal Supervisor** and create a Halal Management Team to oversee compliance. They are obligated to:

- Use materials and auxiliary substances that correspond exactly to those approved in their certification application, and report any changes to BPJPH.
- Separate halal and non-halal materials and ensure dedicated equipment, facilities and storage areas for halal products.
- Label halal products clearly and place halal logos or statements on packaging or menus; if products are non-halal, a non-halal statement must be displayed as mandated by GR 42/2024.
- Conduct internal audits at least once a year and submit ingredient lists and PPH reports to BPJPH every six months.

5.2. Halal Supervisor (*Penyelia Halal*)

A **Halal Supervisor** is an internal staff member appointed by the business who serves as the focal point for halal compliance. Government Regulation No. 39/2021 defines the halal supervisor as a person responsible for the halal production process within a company. Their duties include supervising every stage of the PPH, determining corrective and preventive actions, coordinating halal activities and accompanying the Halal Inspection Body (LPH) during audits. They act as the company's **internal halal auditor** and must be credible, competent and knowledgeable about Sharia requirements.

Under Article 51 of PP 39/2021, halal supervisors must: (1) implement halal product assurance laws; (2) develop and implement the company's SJPH; (3) prepare the halal production process plan; (4) conduct risk management; (5) propose replacement of non-halal materials; (6) recommend stopping production if the process does not meet halal standards; (7) report on the supervision of the halal production process; (8) review the implementation of PPH; (9) prepare materials and samples for auditors; and (10) provide accurate information during inspections. They must be Muslim and possess a halal supervisor certificate obtained through formal training.

5.3. Halal Auditors and Halal Inspection Bodies (LPH)

Halal auditors are professionals who inspect and test products and production processes to verify their halal status. There are two categories:

1. **External Halal Auditors** are part of accredited Halal Inspection Bodies (*Lembaga Pemeriksa Halal/LPH*). They conduct on-site inspections, review documentation, test samples and compile reports on whether products comply with halal criteria. LPHs are designated by BPJPH based on expertise and capacity and are independent of the business being audited.

2. **Internal Halal Auditors** are company staff who ensure continuous compliance with the SJPH. In Indonesia's current framework, the internal auditor role is essentially the same as the **halal supervisor**.

The LPH submits its inspection results to the Indonesian Ulema Council (MUI) or a provincial/city MUI, which then holds a **halal fatwa hearing** to determine the product's halal status. This must occur within three days of receiving the LPH report.

5.4. Halal Product Assurance Agency (BPJPH)

BPJPH is a **non-ministerial institution** responsible for implementing halal product assurance in Indonesia. Following the July 29 2025 reorganization, BPJPH now reports directly to the President instead of operating under the Ministry of Religious Affairs; a separate Directorate of Halal Product Assurance within the Ministry focuses on policy and public awareness. BPJPH's key functions include: registering halal certification applications; conducting document reviews; designating LPHs; issuing halal certificates based on MUI fatwa decisions; maintaining the SIHALAL system; monitoring compliance; and providing training for halal supervisors.

BPJPH also holds authority to enforce compliance. Under GR 42/2024 it may issue administrative sanctions, including warnings, fines, certificate revocation and product withdrawal if businesses violate halal assurance obligations.

5.5. Indonesian Ulema Council (MUI) & the Halal Product Fatwa Committee

The Indonesian Ulema Council (*Majelis Ulama Indonesia*/MUI) plays the religious adjudication role in the halal certification process. After receiving inspection results from LPH, MUI (or its provincial/regency offices or the Aceh Ulema Consultative Assembly) convenes a **fatwa session** within three days to decide whether the product is halal. The fatwa is the religious basis upon which BPJPH issues or denies the halal certificate. MUI's decisions ensure that certification aligns with Islamic jurisprudence, and no certificate can be issued without this religious ruling.

5.6. Other Supporting Entities

- **Halal Management Team:** A group within the company that supports the halal supervisor in developing and maintaining SJPH. Training institutions emphasise that the success of halal certification depends on competent human resources in the Halal Management Team and halal supervisors.
- **Directorate of Halal Product Assurance (Direktorat JPH):** A unit within the Ministry of Religious Affairs created in 2024 to handle policy formulation, evaluation and public awareness programmes related to halal assurance. This directorate does not issue certificates but supports national policy and outreach.

Chapter 6. SJPH Criteria

The SJPH evaluates businesses against five core criteria: Commitment and Responsibility, Materials, Product Halal Process (PPH), Products, and Monitoring & Evaluation, as outlined in the official BPJPH guidelines. A company must satisfy all five to maintain its halal certificate.

6.1. Commitment and Responsibility

Management commitment is foundational to SJPH. Companies must issue a written statement from top management declaring their dedication to implement SJPH, adapt to regulatory changes and allocate resources for halal assurance. This statement should establish a halal policy, communicate it to all employees and relevant parties, and define responsibilities throughout the organization. Businesses are expected to train personnel and develop human resources competent in halal requirements.

6.2. Materials

The materials criterion requires businesses to ensure that **all raw materials, additional ingredients, auxiliary substances and processed materials** are halal and identical to those listed in their certification application. If a company intends to change or add any material or supplier, it must obtain approval from BPJPH before use. This includes verifying that slaughtered animal ingredients come from sharia-compliant slaughterhouses and that no cross-contamination with haram or najis substances occurs.

6.3. Product Halal Process (PPH)

This criterion covers the facilities, equipment and procedures used in production. Businesses must ensure that halal and non-halal production facilities are separate or clearly segregated and that equipment is dedicated to halal products or thoroughly cleansed according to Islamic rules. Standard operating procedures for each step, receiving materials, processing, packaging, storage, and distribution, must be documented and followed. If a company outsources part of its processing or uses third-party services (e.g., logistics or cleaning), those services must also meet halal standards and be audited.

6.4. Products

Under the products criterion, businesses must ensure that the **finished products** they manufacture, store, distribute, sell or serve meet halal requirements. Packaging and labelling must correspond exactly to the products approved in the certificate. If products are served unpackaged (e.g., in restaurants), halal labels or statements must be displayed in menus or on signs. GR 42/2024 extends the mandatory certification to new categories such as cosmetics, medicines, chemical products, genetically engineered products and consumer goods, all of which must be halal-certified by October 17 2026.

6.5. Monitoring and Evaluation

Continuous monitoring is essential to ensure ongoing compliance. Companies must conduct **internal audits** at least once a year to assess the effectiveness of SJPH. They must report ingredients and PPH updates to BPJPH every six months and inform BPJPH of any changes to production units, suppliers or facilities. GR 42/2024 introduces the requirement for businesses to obtain a **Product Halal Consistency Certificate**, which involves BPJPH evaluating the SJPH every four years. Failure to comply with these monitoring requirements may lead to administrative sanctions, including written warnings, fines, certificate revocation or product withdrawal.

Part III. SJPH Manual in Practice

This part translates regulatory requirements into operational steps. Each section provides detailed guidance based on multiple official sources so that newcomers can implement **Sistem Jaminan Produk Halal (SJPH)** correctly.

Chapter 7. Preparing Your Halal Ingredient List

Every SJPH manual begins with a **Daftar Bahan Halal**, a verified inventory of all materials used in the business. Without a complete and accurate list, auditors cannot assess whether products meet halal standards. Regulations and training manuals stress that **raw materials, additives, processing aids, packaging and cleaning agents** all need to be inventoried and supported by evidence of their halal status. The list should be downloaded from the SIHALAL system after registration and updated whenever there is a change in suppliers, brands or formulations.

Key steps to prepare the ingredient list are:

1. **Collect information on every material.** Gather data on all inputs used in production, including brand names, manufacturers, countries of origin, suppliers, halal certificates and expiry dates. According to the SKKNI Halal Supervisor unit *M.74PHI00.002.2*, materials include raw ingredients, additives, processing aids (such as lubricants and cleaning chemicals) and packaging. Each material must be categorised by its halal criticality and supported by a valid halal certificate or other documented proof.
2. **Verify supporting documents.** Cross-check purchase receipts, labels and stock records to ensure the brand names and producers match the certificates submitted to BPJPH. This requires checking each product recipe and verifying that every ingredient listed is covered by a certificate; missing or mismatched materials must be replaced or reported immediately. MUI's guidelines further stress that all materials, except those deemed non-critical or bought retail, must have supporting documents.
3. **Compile the *Daftar Bahan Halal*.** Using the information above, complete the official template provided by BPJPH. The BPJPH manual includes a table for each material with columns for material name, type (raw, additive or auxiliary), producer, country, supplier, halal certificate issuer, certificate number, expiry date and supporting documents. After compilation, export the list from SIHALAL and distribute it to purchasing, production and storage teams so that only approved materials are used.
4. **Maintain purchase and inspection records.** Keep a running log of all purchases and material inspections. The BPJPH template includes a ***Catatan Pembelian Bahan*** (purchase record) capturing the date, material name, quantity and responsible person. There is also a ***Form Pemeriksaan Bahan*** to document inspections of incoming materials, including whether the product matches the approved list and if the certificate is

valid. These records facilitate traceability and support internal audits.

5. **Review and update regularly.** Ingredients and suppliers change over time. The pendamping manual instructs businesses to report any changes in brand, supplier or formulation to BPJPH and to add alternative brands in the SIHALAL system to avoid delays when stock runs out. Training providers emphasise that management must communicate these changes across all units and ensure staff know that only materials on the approved list may be used. After updates, download a new *Daftar Bahan Halal* and circulate it to the team.

Chapter 8. Halal Product Processes and Facilities

The ***Proses Produk Halal (PPH)*** covers everything from the receipt of materials through production, storage, packaging and distribution. Regulations require businesses to ensure that the production environment, equipment and procedures prevent contamination with haram or najis substances. MUI's SJH criteria stipulate that production facilities for halal products must prevent cross-contamination; in processing plants the same line can be used for halal and non-certified products only if it is free from pork derivatives and there are procedures to prevent contamination. Restaurants and catering kitchens must dedicate their facilities solely to halal production.

To implement PPH correctly:

- **Separate and clean equipment.** Use dedicated equipment for halal production or ensure strict cleaning and ritual purification (*samak*) when equipment is also used for non-certified products. Cross-contamination with haram or najis substances is prohibited. For restaurants and caterers, separate utensils, cooking surfaces and serving tools must be maintained.
- **Establish written procedures for critical activities.** MUI's SJH criteria require written procedures for all critical points such as selection of new materials, purchase, receipt inspection, formulation, production, equipment washing, storage, transport and display. The SKKNI unit on supervising halal processes directs Halal Supervisors to document each step and ensure procedures are understood and implemented across all departments.
- **Train and supervise personnel.** All employees involved in production must understand halal requirements, including hygiene, cross-contamination prevention and correct cleaning methods. The Halal Supervisor should periodically check that personnel wear appropriate protective gear, wash hands properly and follow sanitation standards.
- **Control third-party and auxiliary services.** If parts of production (e.g., storage or processing) are outsourced or equipment is rented, these external facilities must also

comply with halal standards. The LPPOM article on restaurant audits notes that all facilities within the scope of SJPH, including warehouses and rented kitchens, are subject to audit. Contracts with suppliers and service providers should include halal requirements.

- Ensure traceability and documentation.** Companies must have procedures for tracing ingredients and products through batch numbers, production dates and storage records. The BPJPH manual provides a ***Catatan Penyimpanan Bahan dan Produk*** log for recording the entry and exit of materials and products. Documenting storage conditions helps auditors verify that halal products are not mixed with non-halal items.

Chapter 9. Documenting and Writing Your SJPH Manual

Your SJPH manual is the central reference for auditors and staff. It describes how the business meets each criterion and contains the forms and records needed for verification. The BPJPH template outlines required attachments, including:

Attachment	Purpose
<i>Daftar Bahan</i>	Inventory of all materials used, with halal certificate details
<i>Daftar Bahan per Produk</i>	Matrix showing which ingredients are used in each product
<i>Catatan Pembelian Bahan</i>	Log of material purchases with quantities, dates and responsible personnel
<i>Form Pemeriksaan Bahan</i>	Checklist to record inspections of incoming materials
<i>Surat Pernyataan Bebas Babi</i>	Declaration, signed by top management, that the facility and materials are free from pork and its derivatives
<i>Layout/Denah Ruang Produksi</i>	Floor plan showing the separation of halal and non-halal zones
<i>Catatan Penyimpanan Bahan dan Produk</i>	Record of storage movements for traceability

To compile the manual:

1. **Describe your company and policy.** Summarise company identity, licence numbers and commitment to implementing SJPH. Outline roles of top management, the Halal Supervisor and the halal team. Use a written policy to formalise this commitment and communicate it to all employees.
2. **Explain procedures for each criterion.** Provide step-by-step instructions for preparing ingredient lists, receiving materials, production processes, storage, product release and handling non-conformities. Include the written procedures required by MUI for critical activities.
3. **Insert forms and evidence.** Attach the completed tables and logs listed above. Maintain them in an organised file so auditors can verify each record. Also include product recipes, photos and copies of halal certificates as supporting documents.
4. **Version control and distribution.** Assign a version number and effective date to the manual. Ensure all departments receive the latest version and old versions are withdrawn. Update the manual whenever there is a change in materials, processes or organisational structure.

Chapter 10. Monitoring and Supervision

Once the manual is in place, continual monitoring ensures the system operates as intended. The Halal Supervisor plays a central role in checking compliance and preventing deviations, including:

- **Verify procurement and receipt of materials.** Ensure procurement follows the approved ingredient list; new materials are reviewed and approved; and receipts are checked against the *Daftar Bahan Halal*. Incoming materials must be inspected using the *Form Pemeriksaan Bahan* and stored in clean, designated areas.
- **Monitor production and hygiene.** Supervise that production uses only halal materials, equipment is free from contamination, and personnel observe hygiene and clothing requirements. Check that washing and sanitising procedures are followed, including ritual cleansing when needed.
- **Ensure traceability and recordkeeping.** Review storage logs, batch numbers and production codes to confirm traceability. The Halal Supervisor should inspect transport vehicles and distribution to ensure no cross-contamination.
- **Control product labelling and release.** Verify that products are labelled correctly with the halal certificate number and that only approved products are released after the certificate is issued. MUI's restaurant audit article warns that all menu items must be

included in the certification scope; partial certification is not allowed.

- **Train and communicate.** Conduct periodic training for employees so they understand critical control points, hygiene and SJPH procedures. Review performance with management and update training when new products or processes are introduced.
- **Document everything.** Keep detailed records of inspections, deviations and corrective actions. FAHI's article on SJPH criteria emphasises that documentation of materials, audit results and certificates simplifies compliance checks.

Monitoring should be a daily activity, not just a pre-audit exercise. Regular supervision helps identify problems early and ensures that changes (e.g., new suppliers or equipment) are assessed for halal impact before implementation.

Chapter 11. Handling Products That Do Not Meet Halal Criteria

Despite best efforts, non-conformities can occur. Non-halal products may arise if unapproved materials are used, equipment is contaminated, or procedures are violated. Businesses are instructed to **identify, trace, handle, evaluate and report** non-halal products. A clear procedure protects consumers and maintains trust.

Recommended handling steps:

1. **Identification and isolation.** Use monitoring and inspection records to detect products that do not meet halal criteria. Immediately segregate suspect items to prevent them from entering distribution.
2. **Tracing and investigation.** Determine the root cause (e.g., incorrect ingredient, cross-contamination, processing error). Evaluate whether other batches are affected and stop production if necessary. Non-conforming products must be separated and handled appropriately.
3. **Disposition.** Decide whether the product can be salvaged. If halal status cannot be guaranteed, the product should be destroyed or repurposed for permissible uses such as animal feed. MUI's certification criteria state that products not meeting halal requirements must not be sold and must be recalled if they have already reached consumers.
4. **Recall and public communication.** If products have been distributed, initiate a recall. In a press release, the government explains that nine certified products containing porcine were withdrawn from circulation; this action underscores that recall is mandatory when halal integrity is compromised. BPJPH urged the public to report suspicious products

and emphasised that continuous monitoring is required even after certification.

5. **Reporting and corrective action.** Document the incident and report it to BPJPH through the SIHALAL system. Evaluate the effectiveness of handling measures and update procedures to prevent recurrence. Internal reviews help strengthen the SJPH system and restore consumer trust.

Chapter 12. Internal Audit and Management Review

Internal audits and management reviews close the loop by evaluating whether the SJPH system is functioning and identifying areas for improvement. Multiple sources emphasise their importance:

- **Frequency and independence.** MUI's SJH criteria require businesses to conduct internal audits at least every six months.
- **Planning.** The Halal Supervisor or designated auditor should prepare an audit plan, including schedules, checklists and audit methods. Identify priority areas based on risk (e.g., new ingredients, high-risk processes) and ensure all SJPH criteria are covered.
- **Execution.** During the audit, examine evidence such as ingredient lists, procurement records, inspection forms, production logs and storage records. Interview staff to verify understanding of procedures and check that corrective actions from previous audits have been implemented, auditors will inspect entire facilities, including third-party warehouses, and expect all menu items to be included in the certification scope.
- **Reporting and follow-up.** Compile a report detailing findings, non-conformities and recommendations. The report should be communicated to top management and submitted to BPJPH where required. Management must review the report, decide on corrective actions and assign responsibilities. MUI's criteria require at least one management review each year to evaluate SJPH effectiveness and drive continual improvement.
- **Continuous improvement.** Use audit results to refine procedures, update training, and improve documentation. Halal auditors highlight that inconsistent internal audits are a common weakness among restaurants. By acting on audit findings and monitoring corrective actions, businesses maintain compliance and prepare for external inspections.

Properly conducted internal audits not only satisfy regulatory requirements but also reinforce a culture of accountability and continuous improvement. When management commits to regular review and corrective actions, the SJPH system becomes a living process rather than a static document.

Part IV. Compliance & Continuous Improvement

Consistent implementation of the **Sistem Jaminan Produk Halal (SJPH)** does not end when the manual is drafted and the initial certification is issued. A halal-assured business must monitor performance, identify problems and take corrective actions so that products remain compliant throughout the certificate's validity period. This part explains how to perform internal audits, handle non-conforming products and conduct management reviews (*kaji ulang manajemen*) to ensure continual improvement.

Chapter 13. Internal Audits, Ensuring Continual Compliance

An **internal audit** is a systematic, independent and documented process to obtain evidence of halal assurance activities and objectively evaluate whether SJPH criteria are met. Every certified business must conduct an internal audit at least **once per year** to monitor SJPH implementation. The audit should be planned, executed and reported by the *penanggung jawab* or *penyelia halal* (Halal Supervisor) and must include a management review meeting to discuss results. Businesses are also required to report the audit results to BPJPH and to submit updated lists of ingredient compositions and halal production processes every six months. The self-declare manual explicitly states that internal audits must be performed annually, evidence of the audit and corrective actions must be maintained and the audit findings must be reported to BPJPH.

13.1. Planning the audit

1. **Define scope and objectives.** Establish what parts of the business will be audited (e.g., ingredients, production flow, storage, distribution) and define objectives such as assessing compliance with the five SJPH criteria.
2. **Develop an audit plan.** Prepare a schedule, identify auditors and determine methods (interviews, document review or observation). Use a standard checklist – the KNEKS and BPJPH manuals provide sample checklists for internal audits.
3. **Prepare audit questions.** Create a list of questions that cover each SJPH criterion and critical control points. Ensure that audit evidence (material records, facility inspections, training logs and previous corrective actions) will be available.

13.2. Conducting the audit

1. **Collect evidence.** Examine documentation (purchase records, ingredient lists, process flow diagrams, cleaning logs) and observe operations to verify compliance. Interview staff to assess understanding of halal procedures and verify that equipment, facilities and storage conditions meet halal requirements.
2. **Identify non-conformities.** Compare practices against SJPH criteria and identify deviations (e.g., unapproved ingredients, improper cleaning procedures, incomplete records). Each non-conformity must be documented with details of the location, observed problem and evidence.
3. **Maintain independence and objectivity.** Auditors should be trained, impartial and free from conflicts of interest. They must communicate findings calmly and constructively so that staff are motivated to improve.

13.3. Reporting and follow-up

1. **Compile an audit report.** Summarise the scope, methods, evidence reviewed, non-conformities found and positive practices. Identify responsible persons for corrective actions and set deadlines.
2. **Conduct a management review.** Discuss the audit results with management and employees, evaluate root causes of non-conformities and agree on corrective and preventive actions. If an internal audit reveals non-compliance, improvements must be implemented promptly and evidence of corrective actions must be retained. A formal management review meeting should be held at least once a year to evaluate SJPH implementation.
3. **Report to BPJPH.** Submit the internal audit report to BPJPH and update the ingredient list and halal production process twice a year. The self-declare manual confirms that audit results and corrective actions must be reported annually and evidence kept until the certificate expires.
4. **Document everything.** All audit plans, checklists, reports, meeting minutes and corrective action records must be stored in the SJPH file. This documentation demonstrates continuous compliance and will be reviewed during external audits.

Chapter 14. Handling Non-Conforming Products, Managing Failures Responsibly

Despite careful planning, situations may arise where a product does not meet halal criteria. A non-conforming product is one that is made from unapproved materials or produced in facilities contaminated by haram or *najis* substances. When such a product is identified, the business must handle it in a manner that preserves consumer trust and complies with Islamic law. The FAHI guide emphasises that products failing halal requirements should be destroyed or, where appropriate, diverted for non-human use such as animal feed.

14.1. Identifying and isolating the product

1. **Detect the issue.** Identify the non-conforming product through internal audits, routine monitoring or consumer complaints. Determine whether the problem stems from ingredients, process contamination or storage.
2. **Isolate and stop distribution.** Immediately segregate the affected batch, label it clearly and cease its sale or distribution to prevent further consumption.
3. **Trace the root cause.** Investigate supply records, cleaning logs and production sequences to understand how the non-conformity occurred. Document the type of non-conformity and underlying causes (e.g., supplier error, cross-contamination or procedural lapse).

14.2. Taking corrective action

1. **Decide on the disposition of the product.** If the product cannot be made halal through cleansing or reprocessing, destroy it or divert it for use that does not conflict with Islamic law, such as animal feed.
2. **Clean and restore facilities.** If contamination occurred, perform the appropriate *pensucian* (ritual cleansing). Procedures for cleaning *mutanajjis* items vary depending on the severity of impurity: seven washes including one with earth for severe impurities, or washing until taste, colour and odour of the impurity disappear for moderate impurities.
3. **Implement preventive measures.** Update the SJPH manual, revise procurement or cleaning procedures, and train employees to prevent recurrence. This may include qualifying new suppliers, segregating equipment or modifying production flow.
4. **Document and report.** Record the non-conformity, root cause analysis, corrective actions taken and preventive measures adopted. Report the incident and actions to

management and, if required, to BPJPH.

Chapter 15. Evaluation & Corrective Action. Continuous Improvement through Management Review

A management review (*kaji ulang manajemen*) is an organised evaluation by top management of the SJPH's effectiveness and suitability. Businesses must conduct this review at least once per year alongside the internal audit. The review assesses audit results, non-conformities, corrective actions, customer feedback, changes in regulations and new products. Its goal is to ensure that the halal assurance system remains effective and to identify opportunities for improvement.

15.1. Steps in the management review process

1. **Plan the review.** Set a date, identify participants (management, Halal Supervisor, quality representatives) and prepare inputs (internal audit reports, non-conformity records, consumer complaints, regulatory updates). A management review is most effective when led by the highest level of management to demonstrate commitment.
2. **Evaluate performance.** Discuss each SJPH criterion, commitment, materials, processes, products and monitoring, looking for trends, recurring issues or changes in operations. Evaluate whether previous corrective actions resolved the root causes and whether training remains adequate.
3. **Set corrective and preventive actions.** Develop a corrective action plan for each identified weakness. According to SKKNI unit M.74PHI00.006.2, the plan must specify the action, responsible person, timeline and verification method. After implementation, verify and validate the effectiveness of corrective and preventive actions and ensure they prevent recurrence.
4. **Update SJPH documentation.** Revise the SJPH manual, procedures and forms to reflect any changes to ingredients, processes or organisational responsibilities. Communicate updates to all relevant personnel.
5. **Record and maintain evidence.** Document the review agenda, discussions, decisions, action plans and follow-up status. Maintain these records throughout the certificate's validity period as proof of continuous improvement and to demonstrate compliance during external audits.
6. **Report to BPJPH.** If significant changes or corrective actions impact the halal status, report them to BPJPH along with updated ingredient lists and process descriptions.

Regular reporting fosters transparency and builds trust with regulators and consumers.

15.2. Why continual improvement matters

Continuous evaluation and improvement are critical to maintaining consumer trust and ensuring long-term compliance. Info Jasa emphasises that the SJPH evaluation criterion requires businesses to have written procedures for internal audits and management review, to maintain evidence and to report both the audit results and updated ingredient lists to BPJPH. The FAHI guide notes that regular audits and management reviews reassure consumers that halal assurance is taken seriously. By adopting a culture of continuous improvement, businesses not only comply with regulatory requirements but also demonstrate a commitment to quality and integrity that can differentiate them in the competitive halal market.

Part V. Halal Certification for Medical Devices

Introduction

Indonesia's Halal Product Assurance Law extends halal requirements beyond food to include **medical devices**. Under this framework, *all products imported, distributed or traded in Indonesia must be halal certified*. However, certification only applies to **devices containing animal-derived materials**.

Devices made entirely from non-halal materials (e.g., pig-derived tissue) are exempt from certification but must carry a clear non-halal label (for example, **Bahan Tidak Halal** for devices made with haram ingredients, or **Proses Belum Halal** for devices made from halal materials but produced on non-halal facilities). Foreign halal certificates from recognized halal bodies may also be accepted if a mutual recognition agreement (MRA) exists. These provisions are designed to protect Muslim consumers without unnecessarily burdening manufacturers and importers.

Implementation timeline by risk class

Halal certification for medical devices is being implemented in stages. Government Regulation No. 39/2021 and its amendment (GR 42/2024) set the following deadlines:

Risk class	Certification deadline
Class A	17 October 2026
Class B	17 October 2029
Class C	17 October 2034
Class D	Not yet determined (expected after 2039)

Manufacturers are therefore advised to follow the deadlines to avoid compliance risks.

Pre-submission preparation

Before submitting a halal certification application, medical device companies should:

- Classify the device.** Determine the risk class (A, B, C, or D) according to Ministry of Health regulations. Higher-risk classes require more rigorous evaluation and have later halal deadlines.
- Assess ingredients and components.** Identify whether the device contains animal-derived materials. Only devices with animal-derived components (e.g., gelatin coatings, collagen plugs, bone grafts) require halal certification. Compile a **list of all materials**, including the supplier, halal certificate (if any), and the country of origin. For imported devices, check whether a foreign halal certificate is recognized by BPJPH through an MRA.

3. **Develop a Halal Product Assurance System (SJPH).** Prepare an SJPH manual detailing halal policies, roles, material control, production processes, storage, documentation and internal audits. Use the templates described in Part III of this manual.
4. **Separate facilities and processes.** Ensure halal and non-halal materials do not share equipment or production lines. Locations, tools and procedures must be clearly separated. For contract manufacturers, verify that outsourcing partners also comply with halal requirements.
5. **Prepare legal and business documents.** Gather the business identification number (NIB), manufacturer or distributor licences (e.g., IDAK for manufacturers), quality system certificates (CPAKB and CDAKB) and product registration number (NIE) from the Ministry of Health. Imported devices must appoint an Indonesian authorised representative.
6. **Plan for financing and resources.** Certification fees vary by business size. Micro and small enterprises may be eligible for free “self-declare” certification through the **Sehati** program.

Registration for imported medical devices (foreign halal certificates)

If a medical device has been certified by an overseas halal body recognized by BPJPH, it can be registered through the **Sertifikat Halal Luar Negeri (SHLN) registration**. This pathway simplifies market entry and is detailed in BPJPH Regulation No. 90/2023. The importer (or an authorised local representative) applies SIHALAL and uploads:

1. **Application letter** signed by the importer.
2. **Names and addresses** of the importer and foreign manufacturer.
3. **Product HS code** and classification.
4. **Letter of appointment** authorising the importer to represent the manufacturer.
5. **Business licence** of the importer (e.g., NIB, distribution permit).
6. **Apostilled foreign halal certificate** issued by an MRA-recognised halal body.

BPJPH conducts a formality review within five working days and a substantive review within a further five working days. The whole process must be completed within 20 working days. Once



approved, a payment order is issued; after payment, BPJPH provides a registration number that must be displayed near the halal logo. The registration remains valid for the same period as the foreign certificate.

Post-certification obligations

Obtaining a halal certificate is not the end of the journey. Businesses must:

- **Maintain halal integrity.** Continue sourcing only approved materials, update the **Daftar Bahan** when suppliers change and report any changes to BPJPH. Non-conformities must be handled immediately and non-halal products destroyed or relabeled.
- **Conduct internal audits and management review.** At least once per year, perform internal audits of the SJPH implementation and review results with top management. Submit reports and revised ingredient lists to BPJPH every six months (see Part IV for audit procedures).
- **Monitor supply chain.** Address supply-chain challenges highlighted by BPJPH and MUI, such as the limited number of halal slaughterhouses and the need for competent halal supervisors. Participate in training initiatives and collaborate with Halal Science Centers to strengthen expertise.

Conclusion

Halal certification for medical devices is a **strategic necessity** in Indonesia. The staged deadlines (2026–2034) provide time for companies to prepare, but early action offers market advantages and builds consumer trust. By understanding the legal basis, timelines, preparation steps and submission processes, both for domestic and imported devices, manufacturers and importers can navigate Indonesia’s halal landscape effectively. Leveraging government programs, partnering with certified suppliers and investing in employee training will help ensure compliance and position businesses to serve Indonesia’s rapidly growing healthcare market.

Part VI. Tips For a Smooth Submission

- **Prepare documents in advance.** Gather your NIB, halal supervisor appointment letter, certificates of training, and all ingredient lists before starting. Ensure supporting documents (receipts, halal certificates, layout drawings) are clear and up-to-date.
- **Match names exactly.** The names of materials and producers in your ingredient list must match the purchase invoices and labels. The KNEKS guide advises verifying that brand names, producers and certificate numbers align with the data in SIHALAL to avoid rejection.
- **Register alternative suppliers.** If a certified ingredient may be unavailable, register alternative brands or suppliers in advance. SIHALAL allows multiple entries per item; this reduces delays when materials are out of stock.
- **Train your team.** Ensure that your halal supervisor and key staff understand how to use SIHALAL and maintain digital records. Regular internal audits and monitoring will make the digital reporting easier and prevent last-minute corrections.
- **Contact BPJPH for help.** If you encounter technical issues, use the call centre (**146**) or email layanan@halal.go.id. BPJPH's digital transformation team notes that the platform is continuously improved and support is available.

Glossary of Key Terms

- **Halal** – Permissible or lawful according to Islamic law. Halal products must come from approved sources (e.g., cattle or camels) and be slaughtered properly. Halal also refers to actions that are allowed without sin; performing them may bring reward, but omitting them does not incur punishment.
- **Tayyib** (thayyib) – Pure, wholesome and hygienic. A product must be both halal and tayyib; even if a material is lawful, contamination with filth (najis) or harmful substances renders it unacceptable. The concept emphasises safety, quality as well as lawfulness.
- **Haram** – Prohibited or unlawful. Haram materials include blood, carrion, pork, animals slaughtered without invoking God's name, intoxicants (khamr) and body parts. Consuming or using haram materials is sinful.
- **Najis** – Filth or impurity that contaminates food, equipment or facilities. Najis materials are categorised as heavy (pig and its derivatives; dog saliva), medium (urine, feces, carrion, khamr, blood) and light (urine of a breast-feeding baby boy). Any product contaminated with najis becomes haram.
- **Makruh** – Disliked actions that are not sinful but better to avoid. Performing them yields no reward; refraining from them is commendable.

- **Mandoob (Sunnah)** – Recommended actions that are liked and rewarded but not obligatory. An example is using a miswak stick for cleaning teeth.
- **Mashbooh (Mushtabahat)** – Doubtful or questionable matters that lie between halal and haram. Muslims are encouraged to avoid them to protect their faith.
- **Fard (Wajib)** – Obligatory actions that must be performed; failing to do them incurs sin, while performing them yields reward.
- **Halal Product Process (PPH)** – A series of activities to assure the halalness of the product, including procurement of materials, processing, storage, packaging, distribution, sales and presentation.
- **Material (Bahan)** – Ingredients used to produce or manufacture a product.
- **Halal Product Assurance (JPH)** – The legal assurance of a product’s halalness proven by a halal certificate.
- **Halal Product Assurance Organising Agency (BPJPH)** – A government agency responsible for organising halal product assurance. (Note: as of July 2025 BPJPH became a non-ministerial institution directly accountable to the President, although it continues to coordinate with the Ministry of Religious Affairs.)
- **Indonesian Ulema Council (MUI)** – A deliberation forum of Muslim scholars and intellectuals that issues halal fatwas.
- **Halal Examination Agency (LPH)** – An agency that conducts examinations and/or testing of a product’s halalness.
- **Halal Auditor** – A person authorised to examine the halalness of a product.
- **Halal Certificate** – A recognition of a product’s halalness issued by BPJPH
- **Halal Supervisor (Penyelia Halal)** – A person responsible for overseeing the halal product process (PPH) within a company.
- **Halal Product Assurance System (SJPH)** – A systematic approach designed to ensure the continuity of the halal product process. It identifies materials, contamination risks, resources and procedures and is based on principles of protection, justice, legal certainty, accountability, efficiency and professionalism.

Materials Exempt from Halal Certification



According to **Minister of Religious Affairs Decree No. 1360/2021**, not all ingredients require halal certification. BPJPH explains three categories of materials that are **exempt**:

1. **Unprocessed natural materials** – Plant-derived materials and non-slaughtered animal products that have not undergone processing (e.g., fresh or dried fruits and vegetables, cereals, tubers, nuts, seaweed, coconut, fresh milk, fresh eggs and fish).
2. **Low-risk materials** – Materials that pose no risk of containing prohibited substances, including those derived from nature without added additives and chemicals obtained from mining or synthesis.
3. **Safe chemicals** – Materials not classified as dangerous and not in contact with non-halal substances, such as chemicals produced through mining or refining and chemicals resulting from inorganic or organic synthesis.

Using exempt materials reduces the burden of certification. However, businesses must still ensure these materials are not contaminated with haram or najis substances and comply with safety regulations.

Contact Points & Additional Resources

- **BPJPH Headquarters** – Jl. Raya Pd. Gede No. 13, Pinang Ranti, Kecamatan Makasar, Jakarta 13560, Indonesia. Phone: 176; WhatsApp: 0811-1421-142; Email: layanan@halal.go.id. Use these contacts for inquiries about certification, training or regulatory updates.
- **LPPOM MUI (Halal Inspection Agency)** – LPPOM MUI offers halal inspection and guidance. Contact details can be found on its official website.
- **SIHALAL Manuals** – For step-by-step guidance on submitting certification applications, download the **SIHALAL Regular Manual** and **Self-Declare Manual** from the BPJPH website. These manuals explain account registration, filling company data, completing ingredient lists, uploading documents and submitting applications.
- **Halal Product Assurance Law & Decrees** – Refer to **Law No. 33/2014, PP 39/2021, Decree 57/2021 (amended by Decree 20/2023)** and **KMA 1360/2021** for the full legal framework of halal product assurance.

Company Profile

Our company is a professional consulting firm focused on providing comprehensive product registration and regulatory compliance services in Indonesia. We assist domestic and international businesses in securing the necessary licenses and approvals for a wide range of regulated products, including cosmetics, food and beverages, food supplements, traditional medicine, pharmaceuticals, medical devices, household products, halal certification include import/export support.



Hassle-Free
Licensing

Ready to obtain Halal certification for your medical device?

Our team is here to assist you through every step, from preparation to successful registration.

Contact Us to Get a **30-minute Free Consultation**

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