
Newsletter

January 13, 2025

Indonesia: 2025 Antitrust and Competition Enforcement Recap - Increased Enforcement Intensity and Legal Amendment on the Horizon



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Introduction

KPPU's competition enforcement activity in 2025 reflected both continuity and escalation in intensity. Merger control and bid-rigging cases remained at the core of enforcement efforts, in line with previous years. However, KPPU also moved beyond its typical pipeline to pursue several notable cases, including those involving the solicitation of competitively sensitive information, vertical integration, and abuse of dominance. The year was further marked by a high-profile digital market case, record fines, and continued expansion of KPPU's compliance initiatives. In contrast, enforcement in relation to MSME (micro, small and medium enterprises) partnership issues remained limited, with only one case recorded during the year.

As we step into 2026, major legislative reforms are on the horizon. Proposed amendments to the Indonesian Competition Law (Law No. 5 of 1999, as amended) have been tabled in Parliament and are expected to be finalized in 2026. If enacted, these reforms would signal a move toward a more modernized and robust competition law framework in Indonesia, with important implications for businesses operating in or into the Indonesian market.

1. 2025 Case Statistics: Continuity with Escalation

KPPU concluded 12 cases in 2025:

- **five** late merger filing cases
- **three** bid-rigging cases
- **one** MSME partnership case
- **one** case involving the solicitation of competitively sensitive information
- **one** vertical integration case
- **one** abuse of dominance case

A key takeaway from these outcomes is the discernible shift in enforcement posture under the current KPPU leadership, particularly in the level of administrative fines imposed. In 2025, KPPU imposed its highest administrative fine to date on a company found to have violated Indonesian competition law. This more punitive stance has also drawn renewed attention to KPPU's fine-calculation methodology, which continues to raise eyebrows.

Alongside enforcement activity, KPPU continued to advance its compliance agenda. In 2025, it granted competition compliance certification to four companies across different sectors. These were a foreign subsidiary of a Malaysian oil and gas company, two privately held companies, and a publicly listed palm oil plantation and processing company.

2. Marking 25 Years of Competition Enforcement in Indonesia: 3rd Jakarta International Competition Forum

On 11 December 2025, KPPU hosted the 3rd Jakarta International Competition Forum under the theme "Legal Reform, International Alignment & Enforcement Evolution", as part of its 25th anniversary celebrations.

The forum brought together regulators, practitioners, and industry stakeholders from Indonesia and abroad to discuss emerging enforcement challenges, including digital dominance, heightened merger scrutiny, fair contract terms for MSMEs, and the detection of bid rigging in public procurement. The agenda and discussions also signaled KPPU's growing focus on the digital economy and the oil and gas sector as priority areas for enforcement and policy engagement.

3. Indonesian Competition Law amendment on the Horizon

A draft bill to amend the Indonesian Competition Law has been included in Parliament's 2026 Priority National Legislative Program (*Prolegnas*).

The proposed amendments are intended to modernize Indonesia's competition framework. Key features under discussion include strengthening KPPU's institutional authority, introducing extraterritorial reach, moving to a mandatory pre-merger notification

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regime, establishing a leniency program for cartel cases, and streamlining procedural rules.

Taken together, these developments suggest that 2025 marked both continuity and escalation in Indonesian competition enforcement. Merger control compliance and bid-rigging remained dominant themes, while KPPU also signaled a broader substantive agenda, including tougher fine-setting, expanded compliance initiatives, and sustained policy leadership through forums and thought leadership.

With proposed amendments to the Indonesian Competition Law now included in the 2026 Priority Prolegnas and parliamentary deliberations expected to conclude later this year, businesses should prepare for a more modern and assertive competition regime and consider proactive steps to review merger control processes, procurement practices, and competition compliance programs in anticipation of the next phase of reform and enforcement.