



# Client Alert

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## UPDATED REGULATION ON FUEL OIL BUSINESS REGISTRATION NUMBERS

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## UPDATED REGULATION ON FUEL OIL BUSINESS REGISTRATION NUMBERS

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The requirement for business entities in the fuel oil sector to obtain Business Registration Numbers (*Nomor Registrasi Usaha* - "NRU") is not a new obligation. The requirement has long formed part of the regulatory oversight framework of the Downstream Oil and Gas Regulatory Agency (*Badan Pengatur Hilir Minyak dan Gas* – "BPH Migas") and was previously governed under the Regulation of the BPH Migas No. 3 of 2022 regarding Fuel Oil Business Registration Numbers ("BPH Migas Regulation 3/2022").

On 18 August 2026, the BPH Migas Regulation No. 2 of 2026 regarding Fuel Oil Business Registration Numbers ("BPH Migas Regulation 2/2026") came into effect. This regulation revokes and replaces BPH Migas Regulation 3/2022.

While the obligation to obtain an NRU remains unchanged, BPH Migas Regulation 2/2026 introduces several enhancements, including the digitalization of the NRU issuance process, integration with business licensing systems, the implementation of QR codes, and strengthened supervisory mechanisms by BPH Migas.

Key provisions under BPH Migas Regulation 2/2026 include the following:

#### 1. Mandatory NRU Ownership

BPH Migas Regulation 2/2026 restates that every business entity holding a license for fuel oil supply and distribution activities is required to obtain an NRU for each type of business license it possesses. An NRU is issued to business entities undertaking fuel oil processing, pipeline transportation, storage, and/or trading activities.

In addition, the regulation expressly recognizes the NRU as the official identity of a business entity for the purpose of conducting downstream fuel oil business activities. This underscores the role of the NRU as a key regulatory instrument within the downstream fuel oil sector, rather than merely an administrative registration requirement.

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Accordingly, a business entity operating under more than one type of business license should ensure that each license is supported by the appropriate NRU corresponding to the relevant licensed activity.

## 2. Integration of NRU with the OSS System and MEMR Licensing System

One of the principal changes introduced by BPH Migas Regulation 2/2026 is that NRUs are now issued based on licensing data obtained through the integration of the BPH Migas system, the licensing system of the Ministry of Energy and Mineral Resources ("**MEMR**"), and the Online Single Submission ("**OSS**") system.

This integration reflects a shift from a largely administrative registration process toward a more digitalized system connected to the national business licensing framework.

## 3. Issuance of QR Codes as Part of the NRU

BPH Migas Regulation 2/2026 provides that an NRU will be issued in the form of an electronic certificate and a QR code. A QR code forms part of the registration identity issued by BPH Migas and serves as a digital verification tool for registered business entities.

In addition, business entities are required to display the QR code at their principal facilities and infrastructure and to report its installation to BPH Migas through the designated system. These requirements reflect BPH Migas' broader effort to digitalize NRU administration and enhance regulatory oversight of downstream fuel oil activities.

## 4. Sanctions

Administrative sanctions may be imposed on NRU holders that: (i) fail to install the NRU QR code on their main facilities and/or infrastructure as required under BPH Migas Regulation 2/2026; and/or (ii) fail to report the installation of such QR code to BPH Migas through the designated system. The available administrative sanctions include written warnings and/or revocation of the NRU.

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With the introduction of this sanctioning mechanism, compliance with NRU requirements is no longer limited to merely obtaining and maintaining registration status. It also encompasses ongoing obligations relating to the use, installation, and reporting of QR codes as part of BPH Migas' digital supervisory framework.

### **Conclusion**

Although BPH Migas Regulation 2/2026 does not introduce a new obligation to obtain an NRU, it reflects a broader move toward a more integrated and digitalized regulatory environment. Accordingly, business entities should ensure that the information reflected in the OSS system and their business licenses remains accurate, consistent, and up to date, and that any changes to corporate information or licensing details are promptly updated, as such information will serve as the basis for the issuance and ongoing supervision of NRUs by BPH Migas.

This Client Alert is provided for general informational purposes only and does not constitute legal advice. Please contact us should you require further information regarding the implications of BPH Migas Regulation 2/2026 on your business activities.

For further information regarding the above Client Alert and future updates, please contact our counselors at:

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