



New Payment System Providers (PJP) Framework

In our previous Advisory, [Redrawing the Rules: Bank Indonesia's New Payment System Regime](#), we discussed Bank Indonesia's overhaul of the payment system regulatory framework, including the introduction of new licensing and supervision for Payment Services Providers ("PJP") and Payment System Infrastructure Providers ("PIP").

This Advisory focuses only on the PJP regime. It highlights the key changes, clearer distinctions, and new obligations for PJP under Bank Indonesia Regulation No. 10 of 2025 and Board of Governors Regulation No. 32 of 2025 (together, the "**Regulations**").

A. Comparison of Activities

Under the previous regime, Bank Indonesia grouped PJP licenses by type of activity. The new Regulations replace this with a bundled approach, where related activities are grouped together.

Previous Regime	Current Regulations
License Category 1	Bundling Activity 1
<ol style="list-style-type: none"> 1. Providing sources of funds information. 2. Initiating payments and/or acquiring services. 3. Administering sources of funds. 4. Fund remittance services. 	<ol style="list-style-type: none"> 1. Administration of sources of funds, which includes: <ol style="list-style-type: none"> a) administration of payment accounts; and b) issuance and/or provision of access to source of funds. 2. Forwarding payment transactions, including: <ol style="list-style-type: none"> a) forwarding payment data and instructions, which may include facilitating receipt of payment proceeds through sub-accounts for merchants or service providers; and b) forwarding fund transfer instructions, digitally or non-digitally.
License Category 2	Bundling Activity 2
<ol style="list-style-type: none"> 1. Providing sources of funds information. 2. Initiating payments and/or acquiring services. 	<p>Payment forwarding activities, including:</p> <ol style="list-style-type: none"> 1. forwarding payment transaction data and instructions, which may include facilitating receipt of payment proceeds; and 2. forwarding fund transfer instructions, digitally or non-digitally.
License Category 3	Bundling Activity 3
<ol style="list-style-type: none"> 1. Fund remittance services. 2. Other activities as determined by Bank Indonesia. 	Forwarding non-digital fund transfer instructions.

Bank Indonesia will review the activities of existing PJPs to determine how their current licenses will be converted into the new bundled structure

By no later than 31 March 2027, Bank Indonesia will:

1. convert the activities attached to an existing PJP license into the relevant activity bundles; and
2. reclassify PJPs under the new provider categories (primary or non-primary).

B. Updates in Capital Requirements

The Regulations maintain the same initial capital levels for new PJPs. These are set by license category (now activity bundle), as shown below.

Previous Regime	Current Regulations
License Category 1	Bundling Activity 1
Minimum IDR15 billion (approx. USD892,857) ¹	
License Category 2	Bundling Activity 2
Minimum IDR5 Billion (approx. USD297,619)	
License Category 3	Bundling Activity 3
If providing a system for other PJPs holding License Category 3 / Bundling Activity 3: minimum IDR1 billion (approx. USD59,524)	
Otherwise: minimum IDR500 Million (approx. USD29,762)	

PJPs must also meet ongoing capital requirements. These are largely the same as before, but the Regulations adjust the capital surcharge based on the PJP's risk profile.

Previous Regime	Current Regulations
1. At least 10% of the risk-weighted transactions. 2. Additional capital requirements (surcharges) according to the PJP classification of: a) 2.5% of risk-weighted transactions for a PJP with a systemic impact; and b) 1.5% of risk-weighted transactions for a PJP with a critical impact.	1. At least 10% of the risk-weighted transactions. 2. Additional capital requirements (surcharges) according to the PJP classification of: a) 1.5% of risk-weighted transactions for PJPs with a transaction and interconnection assessment rating of moderate to high; and b) 2.5% of risk-weighted transactions for PJPs with a transaction and interconnection assessment rating of high.

¹ All USD figures assume an exchange rate of USD1 = IDR16,800

C. Grandfathered Conditions

The Regulations provide transactional protection for PJP^s that were already licensed before the new rules took effect. These existing PJP^s do not need to comply with certain ownership requirements, provided there are no changes by foreign parties:

1. **Ownership**: existing PJP^s do not need to meet the rule that at least 15% of shares must be owned by Indonesian individuals or Indonesian legal entities, as long as there is no change in foreign ownership composition.
2. **Control**: existing PJP^s do not need to meet the rule that at least 51% of shares must be owned by Indonesian individuals or Indonesian legal entities, as long as there is no change in foreign control.



Maria Sagrado
Managing Partner
maria.sagrado@makarim.com



Budhy Apriastuti Evita
Senior Associate
budhy.apriastuti@makarim.com



Kaila Arinta Nazneen
Associate
kaila.nazneen@makarim.com

M&T Advisory is a digital publication prepared by the Indonesian law firm, Makarim & Taira S. It informs generally on the topics covered and should not be treated as legal advice or relied upon when making investment or business decisions. Should you have any questions on any matter contained in M&T Advisory, or other comments in general, please contact us at the emails provided at the end of this article.