

OVERARCHING POLICY RECOMMENDATION

Indonesia

Collaborative Actions for Single Use Plastic Prevention in Southeast Asia (CAP SEA)



KEMENTERIAN KOORDINATOR BIDANG
KEMARITIMAN DAN INVESTASI

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CAP-SEA Policy Recommendations for Indonesia

1 Background

The aim of the project “Collaborative Actions for Single-Use Plastic Prevention in South-East Asia (CAP SEA)” is to reduce single-use plastic and packaging waste with a clear focus on upstream strategies of prevention and re-use. To this end, the project employs a blended approach, consisting of policy advice, capacity development for key stakeholders implementing pilot activities and support for innovative business models. The project contributes directly to the Sustainable Development Goal to ensure sustainable production and consumption patterns (SDG 12), especially Target 12.5 “By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse”. This is in line with the target of the Indonesian Government to reduce 70% marine debris by 2025 (based on Presidential Regulation 83/2018) and the target that producers shall reduce 30% of waste by 2030 (as stipulated by the Ministry of Environment and Forestry regulation No. 75/2019)

CAP SEA is funded by the German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV) and is part of the GIZ global project to support the “Export Initiative Environmental Protection. “ The project is implemented in Malaysia, Thailand, and Indonesia from May 2020 until March 2023. In Indonesia, CAP SEA is in partnership with the Coordinating Ministry of Maritime Affairs and Investment (CMMAI) and working closely with the Ministry of Environment and Forestry (MoEF), Ministry of Industry (MoI), DKI Jakarta Provincial Government, along with plastic industries and associations, recycling industries and associations, and business solution to facilitate a comprehensive and collaborative effort to prevent single-use plastics and packaging waste in Indonesia.

The main objective of this paper is to provide recommendations to the Indonesian government for the prevention of single-use plastics and packaging waste in Indonesia. The recommendations have been drafted on the basis of the CAP-SEA’s support activities to the political partners in Indonesia. The CAP-SEA working structure involved:

- Working Package 1: Circular Economy Policy Framework,
- Working Package 2: Circular Economy Product Criteria and Material related Aspects,
- Working Package 3: Single-Use Plastic Prevention Piloting.

2 Current challenges in Indonesia

In Indonesia, the current institutional landscape faces many challenges. While these challenges are not specific to the problem of single-use plastics and packaging waste, they are bound to affect measures and policies in many ways. The focus of this paper's recommendations is only on specific policies and measures to tackle single-use plastics and packaging waste. Institutional reform and stability are a precondition for the effectiveness of recommended policies and measures but addressing all of them goes beyond the scope of this paper.

In the following, few challenges at the institutional level are summarized that need to be kept in mind:

- **Policy / Regulation:** Regulation development is conducted at the sectoral level which results in a fragmented policy, for instance between the MoEF and the MoI.

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- **Institutions:** The sectoral approach results in silo strategies and limited authority to tackle current challenges. For example, on the reuse system, institutional mandate to supervise “reuse operators” has not been formulated and is challenging to define due to the complex value chain. Nevertheless, the presence of CMMAI has improved the institutional coordination and communication between different sectors and is underway to fill the gaps to accelerate marine debris reduction.
 - **Infrastructure:** Lack of decentralized infrastructure system and the vast geographical condition of Indonesia limits the effectiveness of the services infrastructure, including logistic system for goods transportation and waste management for segregation. Main production of goods mainly happens in Java Island which implies that products need to have a long shelf life and recovery of material from post-consumer stage is economically challenging.
 - **Finance:** Transformation of products and system from linear to circular economy is costly and needs to have enhanced contribution from private sector. Virgin plastic material and single use products are too cheap which makes other alternatives not attractive. Additionally, investment in recycling facilities, especially in outer Java, is not appealing and economically not viable to be established due to low supply and demand when compared to Java Island.
 - **Stakeholder Awareness and Capacity:** The limited awareness on the importance and benefits of preventing single-use plastics (e.g., straw, single-use cutlery, etc) and upscaling the reuse sector have shaped current initiatives to focus more on downstream waste management.
 - **Data Inventory:** Lack of integrated data inventory has prohibited data driven policy making. Plastic waste composition database is developed under MoEF while there is no publicly available database for plastic production from the private sector. There is limited data transparency from private sector subject to related regulation. As a result, the monitoring is uncoordinated, geographically challenging.

This paper was written in collaboration with GIZ, CMMAI and Oeko-Institut, Germany.

3 Recommendations

3.1 Establishing a Waste Hierarchy for the Circular Economy

A waste hierarchy is a universally accepted notion that ranks waste management options according to what is best for the environment. According to this principle, waste prevention and re-use are the most preferred options, followed by recycling (including composting), then energy recovery, while waste disposal through landfills should be the very last resort. Various legislation mandate waste prevention e.g., Law Number 18/2008, Presidential Regulation Number 83/2018, MoEF regulation Number 75/2019, Government Regulation Number 81/2012. “Reuse” is still currently defined as part of “waste reutilization” effort under such regulations with focus on raw material recovery/circulation.

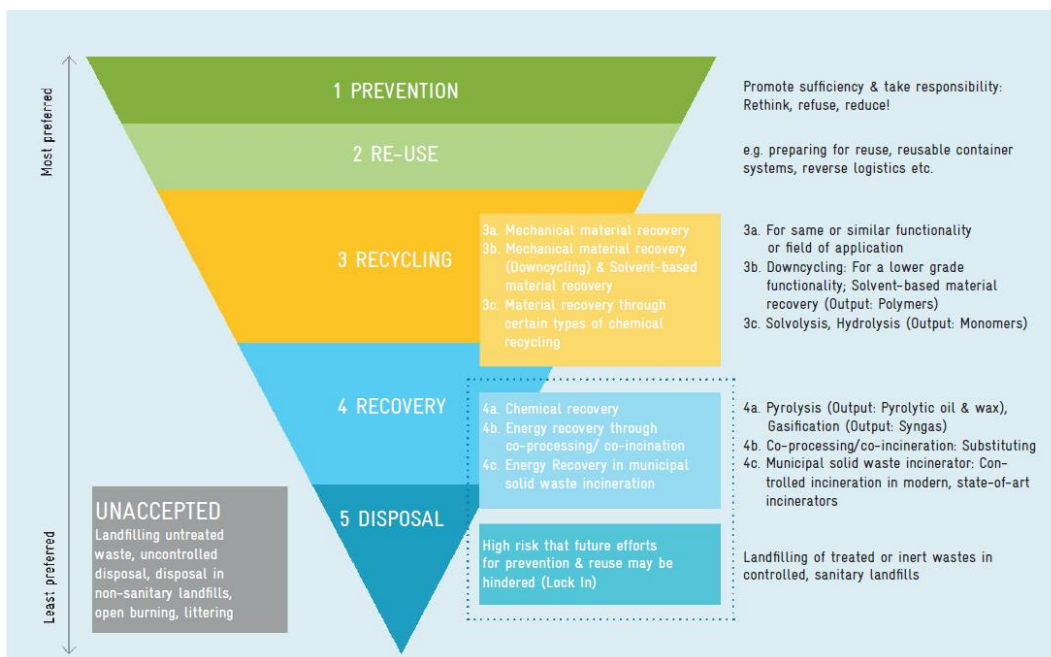
In the context of plastics, specific measures and activities appear to focus strongly on the downstream part of the plastic value chain, i.e., recycling, material and energy recovery and end-of-pipe waste management solutions. While not underestimating the potential of such measures, technological, logistical, and economic barriers will always lead to irreversible losses of primary raw materials. Furthermore, the environmental impact reduction potential of the downstream measures is much lower than the measures targeting the upstream part of the plastic value chain, i.e prevention, reduction, and reuse.

It is deemed important that measures and activities should contribute towards an absolute reduction of material and energy. Such an approach will also be in line with the concept of a circular economy where “the value of products and materials is maintained for as long as possible, waste resources are minimized, and when a product reaches the end of its life, it is used again to create further value.” It seeks to slow down and close resource loops in our current linear production systems by preventing, reducing, reusing, and recycling materials instead of primarily extracting finite resources to produce new materials. Meanwhile, circular economy is currently defined under MoEF regulation Number 14/2021 regarding Waste Bank, focusing towards “waste reutilizations”. Nevertheless, in related waste management regulation instruction to minimise waste has been mandated but has limited enforcement.

The CAP-SEA project recommends setting a **clear definition of a Circular Economy, in the high-level policy objectives of Indonesia**, as mentioned above. At the same time, measures, activities, investments, and other support mechanisms should be designed according to a Circular Economy Waste Hierarchy. A **Circular Economy Waste Hierarchy** should also differentiate between different forms of recycling. In this regard, mechanical recycling should be preferred to other forms of recycling.

A recommendation for a Circular Economy Waste Hierarchy is presented below:

Figure 3-1: Circular Economy Waste Hierarchy for Packaging



Source: (Oeko Institut, 2022)

3.2 Implementing economic and fiscal measures for SUP (Single Use Plastic) and packaging reduction

Economic and fiscal measures for packaging waste reduction build an important pillar for triggering a transformation towards sustainability. They are a means to influence the demand and supply for particular packaging materials and/or product groups.

Four general considerations on designing the economic and fiscal instruments for single-use plastic prevention and reducing the packaging waste are important¹:

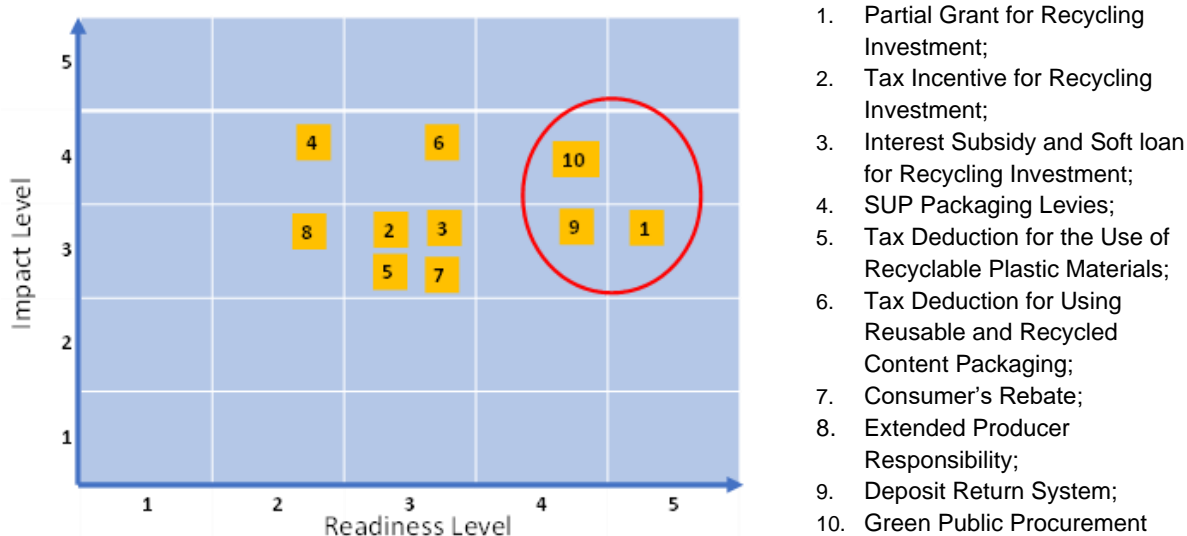
- Economic and fiscal policy instruments need to be embedded within a bundle of policy instruments in order to be effective e.g., mandatory national level targets, product-specific and sectoral requirements, financial support programs. Economic and fiscal policy instruments are sensitive and contentious subjects; hence its formulation should be thoroughly developed considering conflicting interests while minimizing impact for affected stakeholders. Effective communication, accompanying awareness raising measures, and participative process to involve broad stakeholders in the formulation of the instrument should be present to enhance the success of proposed economic and fiscal measures.
- Economic and fiscal policy instruments must be well designed to primarily encourage reduction, followed by reuse and recycling.
- The revenues of an economic and fiscal instruments should be earmarked for environmental purposes such as upgrading the infrastructure for reuse logistics, waste segregation, collection, and high-quality recycling.

In the CAP-SEA project, a wide range of economic and fiscal instruments for single-use plastic prevention and reducing the packaging waste were analyzed through the study “Economic and Fiscal Measures for Single-Use Plastic Reduction and Packaging Prevention in Indonesia”². The project identified three instruments with a high impact level as well as high readiness level: *Partial Grant for Recycling Investment*, instrument, *Deposit Return Scheme (DRS)* and *Green Public Procurement (GPP)*.

¹ Oeko-Institut (2022): Economic Measures for Packaging Waste Prevention: <https://greentechknowledgehub.de/publications/economic-measures-packaging-waste-prevention>

² The study can be downloaded from <https://www.greentechknowledgehub.de/publications/economic-and-fiscal-measures-single-use-plastic-reduction-and-packaging-prevention>

Figure 3-2: Assessment of impact level and readiness level for 10 selected economic and fiscal instruments in Indonesia



Source: Economic and Fiscal Measures for Single-Use Plastic Reduction and Packaging Prevention in Indonesia (GIZ, 2023)

In the following, an implementation plan, and designated responsibilities for the three highlighted measures are summarized.

3.2.1 Partial grant for recycling investment

The partial grant for recycling investments is considered a low hanging fruit that can be implemented within a brief period. The preparation of the initial concept can be carried out by the MoEF or Ministry of Finance (MoF) before being followed up more technically by Indonesian Environment Fund / Badan Pengelola Dana Lingkungan Hidup (BPDLH), which is deemed adequate and eligible for implementing this measure. To ensure a smooth implementation process, BPDLH needs to have a mandate for single-use plastic and packaging prevention. It also needs to develop guidelines for planning, implementation, monitoring, and evaluation. Thus, BPDLH needs to establish a strong coordination with other related ministries (CMMAI, Bappenas, and MoI). Further implementation steps and responsibilities are shown in the following table:

Table 3-1: Proposed preparation activities for partial grant for recycling investment

#	Proposed Activities	Preparation	Proposed Institutions	Leading	Proposed Implementing Institutions
1	Concept development for grant provision to boost recycling industries		CMMAI, Bappenas		MoEF, MoF, MoI
2	Elaboration of potential funding sources		CMMAI, Bappenas, MoEF	MoF,	BPDLH
3	Determination of special mandate for BPDLH to include plastic and packaging waste into its' eligibility sector (Ministerial Decree/KMK)		MoF		BPDLH
4	Agreement with various development partners or IFIs		MoF		BPDLH

	(International Financial Institution) as potential funding sources		
5	Institutional capacity strengthening of BPD LH	MoF	BPD LH, Development Partners, such as The World Bank, Green Climate Fund (GCF), GIZ, KfW (Kreditanstalt Für Wiederaufbau), World Resource Institute, Global Green Growth Institute, etc.
6	Concept development for business process	MoF	BPD LH, Mol, MoEF
7	Development of Guidance and Standards for Conducting Due Diligence to ensure equal treatment	MoF	BPD LH, Mol, MoEF
8	Development of Standard Operating Procedure for Grant Provision (Planning, Operation, Monitoring & Evaluation)	MoF	BPD LH
9	Agreement with national FIs (Financial Institutions) to set up grant scheme to support financing facilities for recycling projects provided by Fis	MoF, Financial Services Authority/ Otoritas Jasa Keuangan (OJK)	BPD LH

Source: Economic and Fiscal Measures for Single-Use Plastic Reduction and Packaging Prevention in Indonesia (GIZ, 2023)

3.2.2 Deposit Return System (DRS)

In a DRS, a deposit is charged when a product with certain packaging is purchased and returned when the empty packaging is returned. Consumers return their packaging waste avoiding litter and generating relatively clean streams of reusable or recyclable materials, reducing packaging from virgin materials, or reducing the overall material and energy use for packaging.

At first, it is recommended to launch a one-way DRS, which means collecting empty packaging for sound recycling. It is important to start with a targeted scope, for instance with beverage containers. This will help in showing the benefits of the system without overwhelming the institutions with the complexity and challenges.

In the second step, a DRS for reusable beverage containers should be enhanced covering more products beyond water packaging. Nation-wide, refillable gallon using deposit system with manual system (involving actors' interaction) in partners' retail stores have commonly found and effectively implemented. The NPAP (National Plastic Action Partnership) platform could be used to discuss and elaborate the DRS concept for reusable beverage containers with smaller volumes and its' potential implementation. After showing the success of DRS for recyclable and reusable beverage containers, the scope shall be steadily expanded for other functions, such as food containers, non-food applications etc.

DRS implementation will be more coordinated at the local level, so it needs to be supported by the local governments, particularly at the city level. To expedite its' implementation, the national government should strengthen the institutional and human resources of the local government.

In the following, the main implementation steps and respective responsibilities are summarized:

Table 3-2: Deposit Return System

#	Proposed Preparation Activities	Proposed Leading Institutions	Proposed Institutions	Implementing
1	Concept development for deposit return system (DRS) for reusable packaging.	CMMAI, Bappenas	MoEF, Mol, Ministry of Trade (MoTrade)	
2	Elaboration of potential industries/producers and commercial actors that can get involved in DRS	CMMAI, Bappenas	MoEF, Mol, MoTrade	
3	Selection of local governments (LGs) as pilot projects (provincial-regency-city governments)	CMMAI, Bappenas	MoEF, Ministry of Home Affairs (MoHA)	
4	Development of basic regulation (ministerial decree) on DRS implementation	MoEF	Mol, MoTrade, MoHA	
5	Development of Guidance and Standard Operating Procedure for implementing DRS for reusable packaging products	CMMAI, Bappenas	MoEF, Mol, MoTrade, MoHA	
6	Agreement between the national government, local governments (pilot project), selected industries, and selected commercial actors (rights, obligation, responsibility, incentive, sharing budget, etc)	CMMAI, Bappenas	MoEF, Mol, MoTrade, MoHA, local governments (pilot project), selected industries, and selected commercial actors	
7	Capacity strengthening for relevant stakeholders	MoEF	Local governments (pilot project), selected industries, and selected commercial actors	

Source: Economic and Fiscal Measures for Single-Use Plastic Reduction and Packaging Prevention in Indonesia (GIZ, 2023)

3.2.3 Green and Sustainable Public Procurement

The instruments of the Green Public Procurement (GPP) and Sustainable Public Procurement (SPP) are ready for implementation as the legal basis for is established. Green Public Procurement (GPP) policy has been mandated in Law Number 32/2009 concerning Environmental Protection and Management, Government Regulation Number 46/2017 concerning Environmental Economic Instruments, and Presidential Regulation Number 16/2018 concerning Procurement of Government Goods / Services, and MoEF Ministerial Regulation Number 5/2019 concerning Procedures of Green Labels Implementation for Green Public Procurement. Encouraging and implementing sustainable government procurement (SPP) has been included as the objective and policy in Government Procurement in accordance with Presidential Regulation Number 16/2018 concerning Procurement of Government Goods / Services (Article 4 letter h and article 5 letter i).

To advance SUP and packaging prevention, GPP and SPP could be extended to include reusable and recycled content packaging into its definition of a green product, and it could become mandatory in public procurement. The concept note for this idea could be prepared by the MoEF with support from the Mol, the Ministry of Trade (MoTrade) and the National Research and Innovation Agency (Badan Riset dan Inovasi Nasional/BRIN). After the preparation stage, National Procurement Board (Lembaga Kebijakan Pengadaan Barang dan Jasa Pemerintah/LKPP) will lead and coordinate its implementation. The mandatory introduction of GPP/SPP related to reusable and recycled content plastic and packaging could significantly influence the reduction of SUP in the entire public spending process. The main activities regarding GPP/SPP are summarized below:

Table 3-3: Green and Sustainable Public Procurement

#	Proposed Preparation Activities	Proposed Leading Institutions	Proposed Implementing Institutions
1	Concept development for green public procurement (GPP)/ sustainable public procurement (SPP) for reusable packaging and packaging with recycled content	CMAI, Bappenas	BRIN (Badan Riset dan Inovasi Nasional), MoEF, MoI, MoTrade
2	Determination of special mandate for LKPP to include non-SUP packaging into GPP/SPP eligibility sector	CMAI, Bappenas, MoEF	LKPP
3	Development of basic regulation (Decree of Head of LKPP)	LKPP	
4	Development of Guidance and Standard for GPP/SPP of non-SUP packaging products	Bappenas, MoEF	LKPP, Development Partners
5	Adjustment of GPP/SPP system within LKPP	LKPP	Related Procurement Units at national and sub-national levels
6	Development of Standard Operating Procedure of GPP/SPP for non-SUP packaging products	LKPP	Related Procurement Units at national and sub-national levels
7	Institutional capacity strengthening for LKPP	MoEF	LKPP
8	Capacity strengthening for related procurement units at national and sub-national levels	LKPP	Related Procurement Units at national and sub-national levels

Source: Economic and Fiscal Measures for Single-Use Plastic Reduction and Packaging Prevention in Indonesia (GIZ, 2023)

3.3 Strengthening Recycling Market in Indonesia

The CAP-SEA project supported in conducting two studies that lay the basis for deriving recommendations for strengthening the recycling market in Indonesia:

- **Baseline of recycled plastic market for packaging:** To strengthen recycling plastic market in the transition phase towards a circular economy in Indonesia, the project has conducted a study to assess the baseline for recycled plastic market for packaging and its forecast in Indonesia. The analysis has been complemented by an overview of the typical technologies applied for collection and recycling processes of (plastic and packaging) waste in the country. According to National Information System of Waste Management (Sistem Informasi Pengelolaan Sampah Nasional/SIPSN) database, in 2022, plastic waste made up about 18.61% of total waste generated in Indonesia, which is the second largest proportion after food waste. The study shows that Indonesia actively trades, exports and imports recycled polymers. The country is unable to rely on domestic supply due to the unmet quality and quantity of domestic input. The maximum capacity of assessed sorting and recycling facilities covering community-based, government-based, privately owned, and informal sector range from 0.02 ton/day up to 65 ton/day has not been exhaustively utilized for most facilities (range from 0.22% up to 99.9%) due to the limited waste infrastructure for waste segregation as well as the poor recyclability of most packaging. As a result, the recycling rate of most polymers (PET, HDPE, LDPE, PP, and PVC) does not meet the maximum potential. The material flow analysis of assessed facilities reveals the domination HDPE, PP and PET (higher quantity of weight) than LDPE and PVC products based. These polymers proportion in the assessed

facilities varied, range from 27%- 82% for HDPE, 5%-57% for PP, and 9%-30% for PET. Nevertheless, PET and rPET are estimated to be the most competitive polymer, due to its growing demand, high recyclability, and limited contamination. The high domestic and overseas demand of rPET have made positive impact to price of rPET and the high recycling rate which essentially promote the advancement of rPET ecosystem when compared to other polymers.

- **Implementing Design-for-Recycling:** Design-for-recycling is a design principle addressing the recyclability of all sorts of items and therefore including end-of-life considerations in the design phase. This concerns products as well as their packaging materials. A broad understanding of recyclability also includes the consideration of the prevailing collection, sorting, and recycling system³. It was concluded in a multi-stakeholder network (NPAP) that redesign plastic products and packaging is one from five main action points to target plastic crisis.

The outstanding variety of plastic products found in Indonesia and the limited integrated-publicly accessible database for specific plastic products increase the challenges for the prioritization its standard development. Defining industries' interest to develop such standards on certain products (i.e with the highest production rate) for transitional phase is deemed to be an effective solution to accelerate standard development. In longer term, the establishment of a mandatory requirement for standard adoption in national scale need to be formulated to create a level playing field for all actors.

Within this project, three types of packaging, namely HDPE and LDPE non-food, PET water bottle, and PP Cup were selected for which D4R (Design 4 Recycling) criteria are developed. For each, the rationale of choice is summarized: The detailed criteria can be downloaded from <https://www.greentechknowledgehub.de/publications/design-recycling-d4r-guidelines-prioritized-plastic-packaging-indonesia>.

On the basis of the above-mentioned studies, following recommendations can be given to the Indonesian government for effectively strengthening plastic recycling market in Indonesia:

- In order to analyse the status quo, monitoring progress and setting achievable and ambitious targets, it is recommended to **mandate a reporting framework for plastic products and packaging with meaningful indicators**, such as import, export, production, and consumption data on different polymer types, including virgin and recycled plastics. In the medium-term, it is important to update and improve HS code tracking for import and export of plastic resins and products.
- Strengthen **collection and waste segregation** at a basic level in the households and industries, for instance, separate collection of wet waste, dry waste, sanitary waste, and e-waste. Efforts to increase collection can be accompanied by mandatory collection targets for plastic using industries.
- Financially **support decentralized Material Recovery Facilities** in order to boost low cost and labour-intensive small and medium-scale enterprises
- Incentivize **increase of recycling capacities** for all resins, specifically polyolefins. The studies have shown that the recycling potential of polyolefins has not yet been exhausted.

³ Oeko-Institut (2021): <https://greentechknowledgehub.de/publications/design-recycling-d4r-state-play>, <https://www.oeko.de/publikationen/p-details/design-for-recycling-d4r-state-of-play>

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- Develop and promote **common “Design for Recycling” standards** in the industry, while putting a special focus on supporting the SMEs (Small Medium Enterprises) in the process.
 - Implementing **green public procurement** for recycled plastic products: The inclusion of recycled plastic products in the public procurement system provides advantages for sustainable packaging industries in bidding process not only for procurement at national but also local level.
 - Set incentives for using **recycled content**, allow the use of recycled plastics in food contact applications and communicate the safety of food contact recycled material, e.g., through Halal labelling.
 - Introduce **mandatory recycled content targets** in packaging applications in the mid-term. An optimum recycled content target needs to be established using mandatory framework specifically for targeted products to ensure barrier for adoption is minimum while it is adequate to drive growth of domestic plastic recycling market. Indonesia has succeeded to establish domestic content target (*Tingkat Komponen Dalam Negeri/TKDN*) in some industries such as automotive and electronics, which create job opportunities and triggered domestic economic growth. A replication of this mechanism for recycled content in plastic sector is estimated to drive significant domestic demand for recycled plastic and trigger green jobs.

3.4 Strengthening Reuse

The CAP-SEA project implemented piloting in the city of Jakarta to test the viability of reuse packaging solutions for food and beverage delivery to strengthen government’s efforts for reducing the plastic packaging waste. The recommendations drafted here include input for national government and are mainly targeted towards the DKI Jakarta Provincial Government, while applicable to other local governments in Indonesia.

In the city of Jakarta, the legal basis for waste reduction to support the national policy framework is already strong⁴. However, to create an optimal reuse ecosystem, there are three areas for which it is recommended to further develop the legal bases and derive concrete policies, namely:

1. At national level, standard development regarding reuse containers in cooperation with the National Food and Drug Agency, the Ministry of Health, the National Standardization Agency, Ministry of Industry, and others.

⁴ According to Article 20 Regional Regulation of Special Capital Region of Jakarta Province Number 03/2013, everyone is obliged to carry out waste reduction by using as little packaging/products as possible to limit the generation of waste.

According to Article 22 Regional Regulation of Special Capital Region of Jakarta Province Number 03/2013: Waste reduction is done by using materials that can be reused, materials that can be collected, returned and recycled, and/or materials that are easily decomposed by natural processes.

Governor Regulation of Special Capital City Region of Jakarta Number 142/2019 concerning the Obligation to Use Environmentally Friendly Shopping Bags in Shopping Centers, Modern Retails and Traditional Markets. Every business actor (shopping centers, modern retails, and traditional markets) must stop using single-use plastic bags and must provide shopping bags that can be used repeatedly.

Governor Regulation of Special Capital City Region of Jakarta Number 102/2021 concerning Obligations for Waste Management in Areas and Companies. Waste reduction which includes limiting waste generation must also be carried out by each person in charge or manager of Residential Areas, Commercial Areas, and Industrial Estates who must be in the area and/or facilities for which they are responsible.

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2. At local level, policies in the form of guidance, circulate letter, technical instructions to support the MoEF regulation Number 75/2019 for hotels, restaurants, cafes (horeca) at provincial, district and city level to reduce plastic waste by 2030 through reduce, substitute, or opt in for reusable products, and
 3. At local level in particular DKI Jakarta Province Government in the form of guidance, circulate letter, technical instructions as derivatives of Governor Regulation of Special Capital City Region of Jakarta Number 102/2021 concerning Obligations for Waste Management in Areas and Companies to support development of reuse grid infrastructure accompanied by social communication material.

Recommendations for National Government

Reuse adoption by public and business actors nationwide is still hindered by the absence of safety and hygiene standards as well as policies governing reuse practices. The current safety standard is following existing regulation based on the type of product inside the packaging (i.e food and beverage, cosmetics, personal and home care, etc).

Regulations for safety of food and beverage packaging standards are present (Presidential Regulation Number 86/2019 concerning Food Safety and the Food and Drugs Agency Law Number 20/2019 concerning Food Packaging). Meanwhile for cosmetics and personal and home care, it follows BPOM Decree HK.00.05.4.1745/2003 on Cosmetics. Nonetheless, packaging referred by these regulations mainly focus on single-use packaging. The same situation can be found for sanitary and hygiene standards, Ministry of Health has issued regulation Number 1098/2023 concerning Standards for Sanitary Hygiene Requirements for Eateries and Restaurants which application is limited to single-use packaging. For this reason, standard regarding reusable hygiene and/or sanitization containers and safety should be developed to maintain public trust.

To this end, under the leadership of CMMAI and utilizing existing multistakeholder platform such as NPAP and TKN PSL to coordinate with related ministries to formulate national standard regarding reuse containers both for safety and hygiene standard need to be pursued. The standard can provide assurance and guidance for business actors and enhance the confidence of consumers to shift from single use to reusable products thus accelerate plastic waste prevention initiatives.

Recommendation for the DKI Jakarta Provincial Government

Legal certainty and assurance of practices in accordance with guidelines and standards must be provided through Government policy instruments. This is very relevant, especially in Jakarta, because the Provincial Government has issued several policies to support the implementation of the Ministerial Regulation, Minister of Environmental and Forestry Number 75/2019 concerning the Roadmap for Reducing Waste by Producers. Instruments shall be appropriate in overcoming the existing single-use plastic problems through a wider range of regulated objects, not only single-use plastic bags which have been regulated in the previous Governor Regulation Number 142/2019.

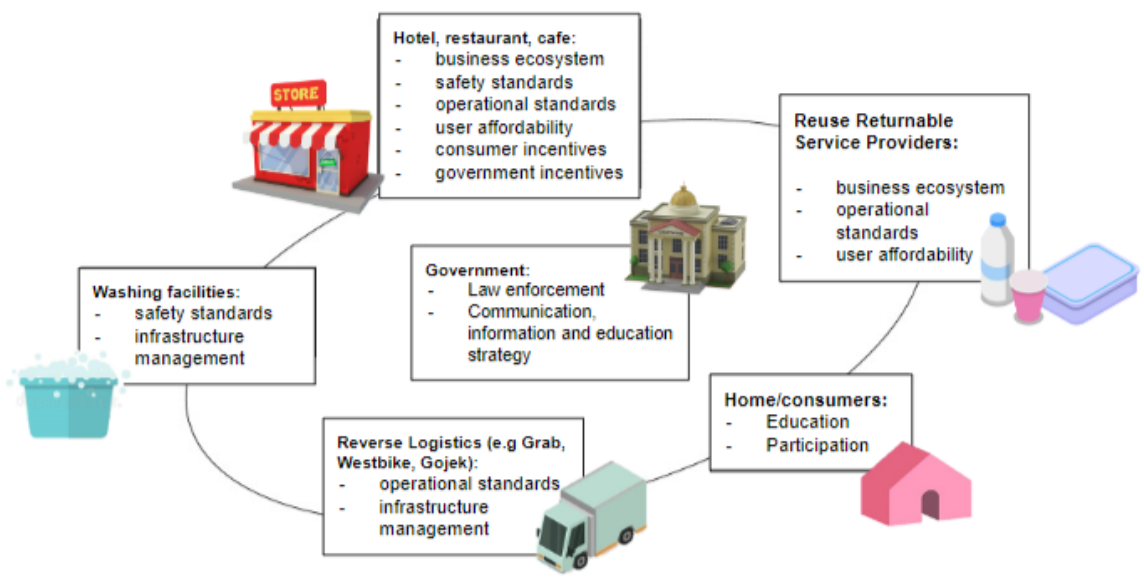
The DKI Jakarta Provincial Government shall set up specific policies to not provide single-use plastic in hotels, restaurants and cafes (horeca). Further, the DKI Jakarta Provincial Government can contribute by providing various facilities (such as licensing and washing) and incentives (fiscal or non-fiscal) to business actors including horeca who use reusable containers. In order to increase

consumer involvement, special incentives for consumers could be given to keep product prices affordable.⁵

Availability of infrastructure and parties involved in the washing activity can be developed with various innovations while taking into account the sanitation/hygiene guidelines and standards that apply at the national level.

The following figure presents an overview of proposals and recommendations in the actors in a food and Beverage Delivery Services in DKI Jakarta Province.

Figure 3-3: Proposals and recommendations for a Reuse Infrastructure Ecosystem Model for Food and Beverage Delivery Services in DKI Jakarta Province



Source: GIDKP (Gerakan Indonesia Diet Kantong Plastik) (2023) Draft Policy Recommendation: Single-Use Plastic Restrictions on Food and Beverage Delivery Services in DKI Jakarta Provincial Government

Information, education and communication are also important indicators to increase capacity of each party involved in this reuse ecosystem. Therefore, socialization and/or public awareness regarding the DKI Jakarta Provincial Government's plan to regulate different types of single-use plastic (other than plastic bags) needs to be strengthened.

In addition to regulatory recommendations, other recommendations to the Government include determining the Highest Retail Price (HET) for reusable containers, setting standards for reusable packaging and giving sanctions on those who still use single-use plastic containers.

Recommendation for Hotels, Restaurants and Cafes (horeca)

From public consultation results, the participants agreed that hotels, restaurants and cafes must strengthen their own business ecosystem to support the reuse ecosystem and to stop the use of

⁵ This proposal is submitted because The DKI Jakarta Provincial Government has implemented a similar policy by issuing Governor Regulation of Special Capital City Region of Jakarta Number 142/2019 concerning Obligations to Use Environmentally Friendly Shopping Bags at Shopping Centers, Modern Retailers and Traditional Markets and strengthens the regulation by issuing Governor Regulation of Special Capital City Region of Jakarta Number 111/2021 concerning Procedures for Providing Regional Fiscal Incentives for the Obligation to Use Reusable Bags.

single-use plastic. In this regard, it requires commitment and agreement from all business actors to participate in using reuse containers and reducing single-use plastics.

An important factor that needs to be considered is related to safety standard of using reusable containers. Currently, in the absence of safety standard for reusable packaging, horeca shall implement the Government Regulation Number 86/2019 concerning Food Safety and the Food and Drugs Agency Regulation Number 20/2019 concerning Food Packaging to ensure hygiene and health standards.

Recommendations for Reusable Container Service Providers

Reuse container service providers shall develop business operational standards that are safe for consumers. Such standards may include internal company policy for containers that have reached their usage limit (end-of lifetime), the existence of container return control (quality, shape, damage, etc.), user-friendly containers picking as well as door-to door system initiatives.

Reuse container service providers shall identify, measure and categorize environmental impacts. These can be communicated and reported to strengthen the image and visualize the actual impact consumers' decisions have.

The scope of activities from reusable container service provider is also related to one business process that is often neglected, namely washing activity with the aim of maintaining the hygienic or sanitization aspect for consumers convenience.