



BALI PROVINCIAL GOVERNMENT

BerAKHLAK
Berorientasi Pelayanan Akuntabel Kompeten
Harmonis Loyal Adaptif Kolaboratif

**# bangga
melayani
bangsa**

FOREIGN DIRECT INVESTMENT IN BALI 2025

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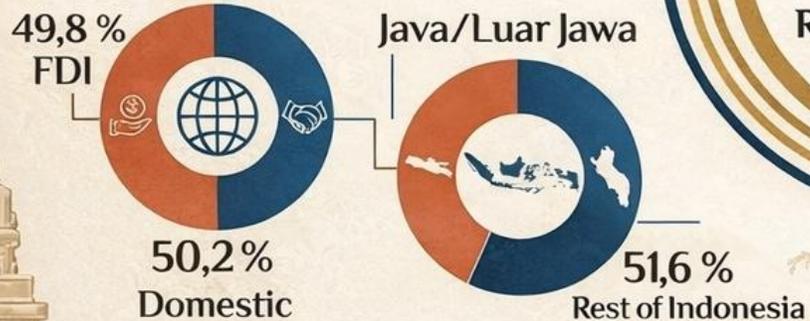
Bali Province Investment Realization: 2020 - 2025

FDI + Domestic Investment Realization Rankings January - December 2025:
Based on Location

Indonesia's Job Absorption:



FDI/Domestic



Investment Realization
Q4 2025

Rp 247,5
Trillion
(28,7% YoY)



Rp 256,3
Trillion
(4,3% YoY)



Rp 240,6
Trillion
(16,2% YoY)



Triwulan Q4

Investment Realization Q4:

Rp 496,9 Trillion ↑
+29,8% (YoY) ↑ 1,1% (QoQ)

Table of Investment Realization in the Province of Bali: Year 2020 - 2025

Investment Realization in the Province of Bali, 2021 - 2025 (Rp Trillion)



| Investment (Rp Trillion) | Tahun | | | | |
|--------------------------|-------|-------|-------|-------|-------|
| | 2021 | 2022 | 2023 | 2024 | 2025 |
| PMDN | 6,36 | 6,00 | 6,95 | 12,31 | 17,21 |
| FDI | 6,60 | 6,60 | 11,97 | 24,21 | 25,60 |
| Total | 12,95 | 12,45 | 18,92 | 36,52 | 42,82 |

FDI + Domestic Investment Realization Rankings

January – December 2025: Based on Location

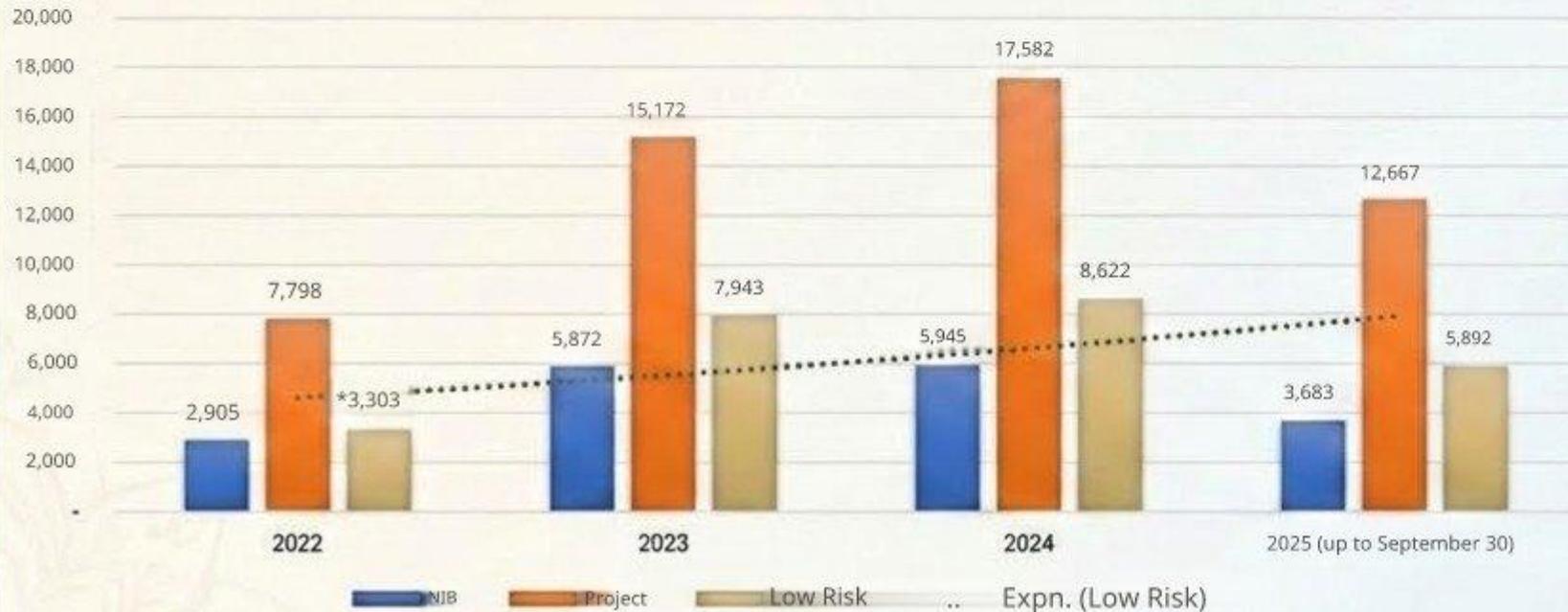
| No. | Province | Investment (Rp Billion) | Projects |
|--------------|-----------------------------------|-------------------------|----------------|
| 1 | West Java | 296,825.1 | 106,412 |
| 2 | Special Capital Region of Jakarta | 270,927,8 | 226,584 |
| 3 | East Java | 145,114,2 | 92,856 |
| 4 | Banten | 130,161.6 | 47,807 |
| 5 | Central Sulawesi | 127,180.6 | 8,024 |
| 6 | North Maluku | 90,698.3 | 59,264 |
| 7 | Central Java | 88,500.3 | 44,982 |
| 8 | East Kalimantan | 87,787.5 | 20,864 |
| 9 | Riau | 69,469.5 | 28,733 |
| 10 | Riau Islands | 64,675.5 | 19,992 |
| 11 | South Sumatra | 62,668.1 | 19,091 |
| 12 | West Nusa Tenggara | 59,187.6 | 6,781 |
| 15 | Bali | 42,816.3 | 18,885 |
| 16 | South Kalimantan | 32,857.4 | 11,714 |
| 17 | Southeast Sulawesi | 28,974,6 | 5,715 |
| 18 | Central Papua | 28,458.4 | 5,871 |
| Total | | 1,931,165.4 | 880,011 |

| No. | Province | Investment (Rp Billion) |
|--------------|------------------------------|-------------------------|
| 21 | South Sulawesi | 19,544,8 |
| 22 | Jambi | 17,267,3 |
| 23 | West Sumatra | 16,813,7 |
| 24 | Lampung | 15,915.5 |
| 25 | Bangka Belitung Islands | 10,196.5 |
| 26 | North Sulawesi | 10,176.6 |
| 27 | Papua 10 ⁺ 28 | 9,917.6 |
| 28 | Special Region of Yogyakarta | 8,292.7 |
| 30 | West Papua | 7,377.7 |
| 31 | Gorontalo | 6,620.8 |
| 32 | East Nusa Tenggara | 6,206.0 |
| 33 | West Papua | 6,053.6 |
| 34 | Bengkulu | 4,315.6 |
| 35 | West Sulawesi | 4,288.5 |
| 36 | Maluku | 1,425.3 |
| 37 | Papua Highlands | 7,253,4 |
| TOTAL | | 880,011 |

Summary of NIB Issuance & Project Submissions in OSS Bali Province (2021 - 2025*)

| Data Elements | August 4, 2021 - October 21, 2025 | 2022 | 2023 | 2024 | 2025 (up to September 30) |
|----------------------|-----------------------------------|-------|--------|--------|---------------------------|
| PMA NIB | 19,262 | 2,905 | 5,872 | 5,945 | 3,683 |
| PMA Project | 55,458 | 7,798 | 15,172 | 17,582 | 12,667 |
| PMA Low-Risk Project | 26,736 | 3,303 | 7,943 | 8,622 | 5,882 |

PMA LOW-RISK PROJECT SUBMISSIONS IN BALI (2022 - Q3 2025)



On average, 47.55% of PMA projects in Bali are classified as Low Risk, thus not requiring Standard Certificates or Permits



There was a surge in 2023 where KBLI 68111 (Self-Owned or Leased Real Estate) increased 114.4% YoY, and KBLI 70209 (Other Management Consulting Activities) increased 168.4% YoY.

Recapitulation of the Top 5 KBLI PMA Project Submissions in OSS (2021 – 2025*)

BALL PROVINCE

| Rank | August 4, 2021 - October 21, 2025 | 2022 | 2023 | 2024 | 2025 (s/d 30 September) |
|------|---|---|---|---|---|
| #1 | 13,146 KBLI 68111 (Owned or Rented Real Estate) | 1,594 KBLI 68111 (Owned or Rented Real Estate) | 3,417 KBLI 68111 (Owned or Rented Real Estate) | 4,329 KBLI 68111 (Owned or Rented Real Estate) | 3,355 KBLI 68111 (Owned or Rented Real Estate) |
| #2 | 7,909 KBLI 70209 (Other Management Consulting Activities) | 883 KBLI 70209 (Other Management Consulting Activities) | 2,370 KBLI 70209 (Other Management Consulting Activities) | 2,606 KBLI 70209 (Other Management Consulting Activities) | 1,811 KBLI 70209 (Other Management Consulting Activities) |
| #3 | 4,321 KBLI 68200 (Real Estate Based on Fee and Contract) | 702 KBLI 56101 (Restaurant) | 1,298 KBLI 68200 (Real Estate Based on Fees and Contracts) | 1,621 KBLI 68200 (Real Estate Based on Fees and Contracts) | 1,001 KBLI 68200 (Real Estate Based on Fee and Contract) |
| #4 | 3,699 KBLI 56101 (Restaurant) | 316 KBLI 68200 (Real Estate Based on Fee and Contract) | 871 KBLI 56101 (Restaurant) | 1,071 KBLI 56101 (Restaurant) | 831 KBLI 56101 (Restaurant) |
| #5 | 1,782 KBLI 55900 (Provision of Other Accommodation) | 172 KBLI 56301 (Bar) | 335 KBLI 55900 (Provision of Other Accommodation) | 650 KBLI 55900 (Provision of Other Accommodation) | 551 KBLI 55900 (Provision of Other Accommodation) |

NATIONAL

| Rank | August 4, 2021 - October 21, 2025 | 2022 | 2023 | 2024 | 2025 (e/d 30 September) |
|------|--|--|--|--|--|
| #1 | 18,235 KBLI 68111 (Owned or Rented Real Estate) | 2,556 KBLI 68111 (Owned or Rented Real Estate) | 4,263 KBLI 68111 (Self-Owned or Leased Real Estate) | 5,576 KBLI 68111 (Owned or Rented Real Estate) | 4,922 KBLI 68111 (Owned or Rented Real Estate) |
| #2 | 12,721 KBLI 70209 (Other Management Consulting Activities) | 1,778 KBLI 56101 (Restaurant) | 3,483 KBLI 70209 (Other Management Consulting Activities) | 5,932 KBLI 70209 (Other Management Consulting Activities) | 3,179 KBLI 70209 (Other Management Consulting Activities) |
| #3 | 9,114 KBLI 56101 (Restaurant) | 1,878 KBLI 70209 (Management Consulting Activities Other) | 1,867 KBLI 56101 (Restaurant) | 2,546 KBLI 56101 (Restaurant) | 2,817 KBLI 46900 (Wholesale Trade of Various Kinds of Goods) |
| #4 | 7,897 KBLI 46900 (Wholesale Trade of Various Kinds of Goods) | 633 KBLI 63122 (Web Portal and/or Digital Platform for Commercial Purposes) | 1,701 KBLI 46900 (Wholesale Trade of Various Kinds of Goods) | 2,249 KBLI 46900 (Wholesale Trade of Various Kinds of Goods) | 2,294 KBLI 56101 (Restaurant) |
| #5 | 6,119 KBLI 46491 (Wholesale of Household Appliances and Equipment) | 625 KBLI 46491 (Wholesale of Household Equipment and Supplies) | 1,466 KBLI 68200 (Real Estate Based on Fee and Contract) | 1,940 KBLI 46491 (Wholesale of Household Equipment and Supplies) | 1,821 KBLI 46491 (Large Trade in Equipment and Household Appliances) |

- 72.1% of all 68111 national real estate projects are located in Bali.
- 62.2% of all national 70209 consulting projects are in Bali.

Bali Province Investment Analysis: Sectoral Dominance vs. National Realization (2021-2025*)

KBLI's dominance in Bali

Recapitulation of the Top 5
KBLI PMA Project Submissions in OSS



72%

Bali accounts for 72% (13,146 of 18,235) of national projects. 72.1% of all national real estate projects are located in Bali.

Recapitulation of the Top 5
KBLI PMA Project Submissions in OSS



62,2%

62.2% of all national consultant projects are in Bali.

National FDI Contribution

(2010-TW III 2025)



National Foreign Investment

NIB 37.2%

Bali Province has 37.2% of the national PMA NIB.



National PMA

Project 20.7%

Bali Province has 20.7% of national PMA projects.

Investment Realization Challenges (PMA+PMDN)



Achievement

1.64% Realization

It only contributed 1.64% of the national investment realization since the OSS-RBA, despite having a high portion of NIB and projects.

Since OSS-RBA

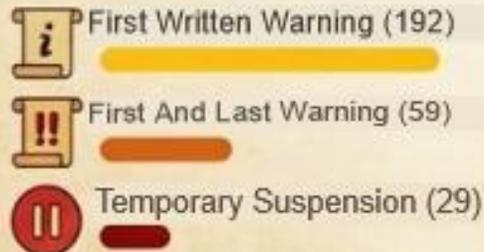
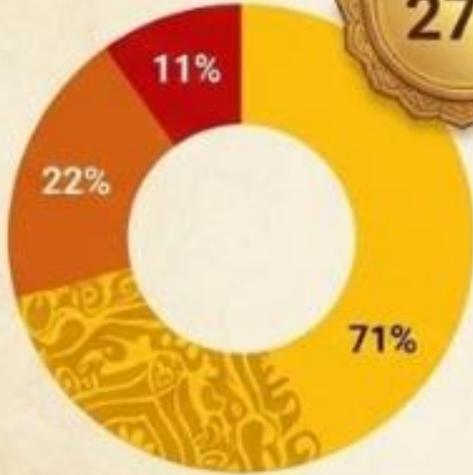
Surveillance results business entity

BATCH 1 (December 2024-March 2025)

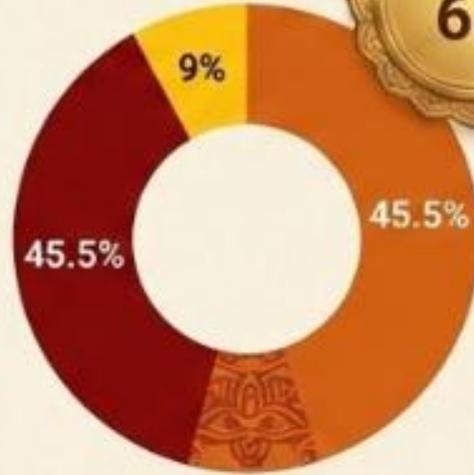
BATCH 2 (September 2025)

BATCH 3 (October 2025)

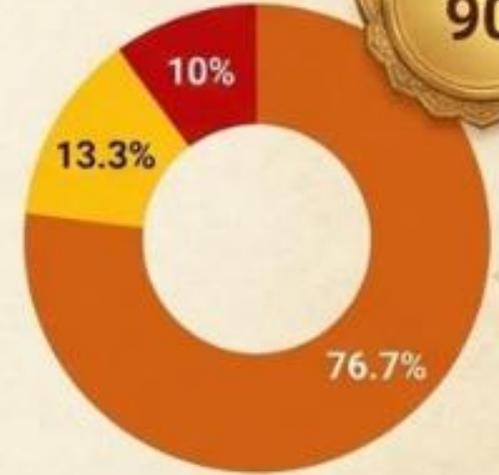
TOTAL:
270



TOTAL:
66



TOTAL:
90



PMA problems in Bali Province

1

Misappropriation of business classification (KBLI)



Using KBLI 68111 to build a villa rental land, used as tourist accommodation term map/private residence.

KBLI 68111
(Real Estate)

Villa on land
Rent

Facts:
Tourist Accommodation /
Private Residence

2

Invasion of the MSME sector



Foreign citizens enter the MSME sector (motorcycle rental, salon, photography, retail trade).

Found 613 business actors
PMA in the special sector of SMEs.

3

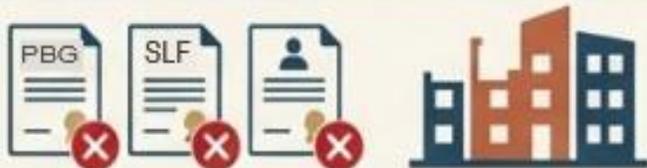
Legality & Administrative Violations

Investments below the Minimum



Many pmAs do not comply minimum capital IDR 10 billion (Up to 20% within testing).

Incompleteness Of Licensing



Operating without environmental approval, PBG, SLF, as well as verified standard certificates.

4

Manipulation Of Company Status

Systemic Nominee Practice



Using the WNI name as Holder shares for foreigners, pohankal kan (citizen).

Fictitious Investment & Virtual Office

Using a Virtual Office address for administrative purposes only and Kitties, without real business.



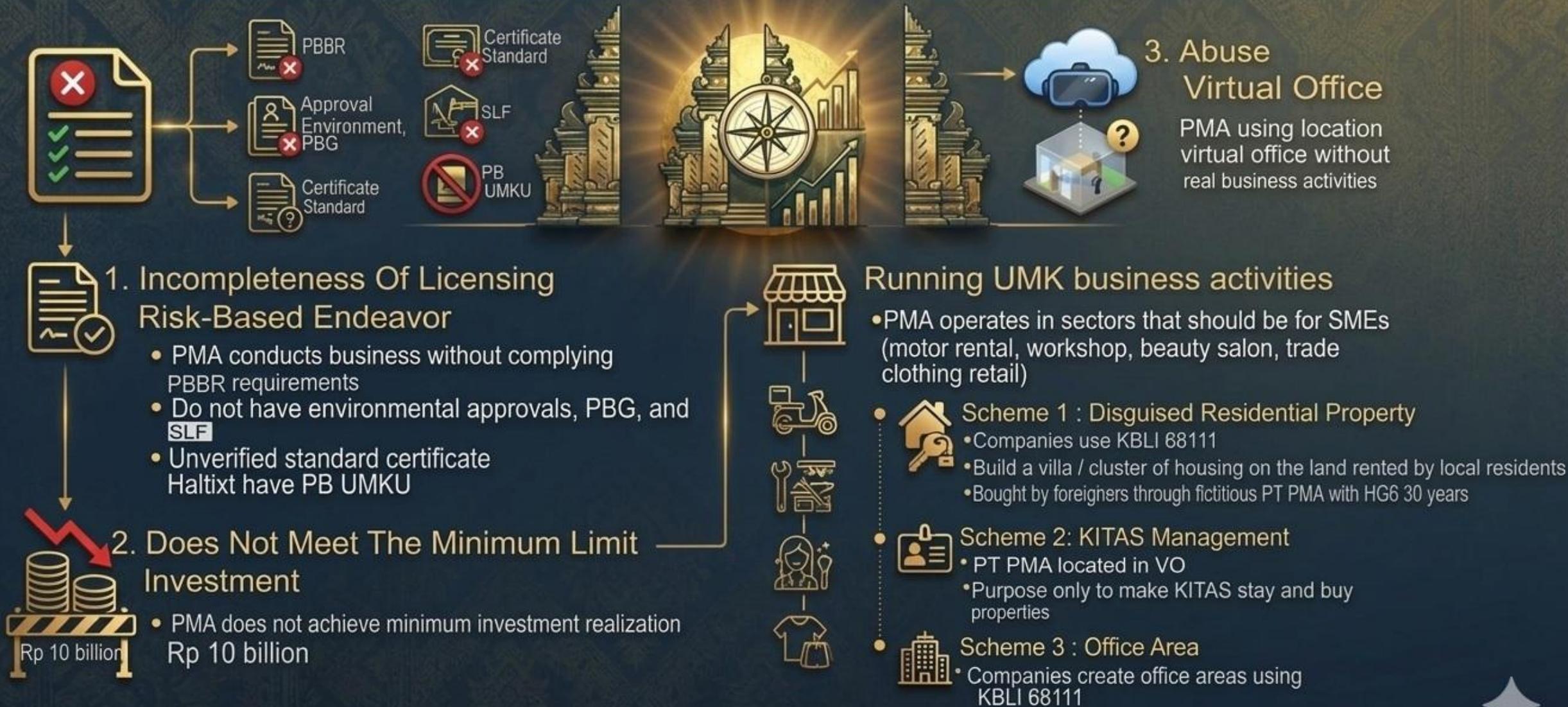
Using the name of the citizen as a shareholder to outsmart the negative list of investments, full control in the hands of WNA.

Use a Virtual office address only for administrative requirements and KITAS, without real business activity.

Villa development and beach club expand the area Sacred, coastal boundaries, as well as protected rice fields (LSD).



Topology of FDI Violations in Bali



Business Sectors Frequently Misused by PMA

Supervision of Business Licensing

Property and Consultancy

- 68111 – Real estate owned or leased villas for sale by individuals
- 70209 – Other management consulting activities • Using Virtual Office address
- No on-site operations

Vehicle Rental

- 77311 – Motorcycle rental without options
Do not meet the minimum investment limit
- 77100 – Car, bus, pickup truck, and similar rentals •
Do not meet the minimum investment limit

Trade

- 47xxxx – Retail trade
–

Tourism

- 79121 – Travel agency activities
- Selling tour packages in **Bali or Lombok**
- Do not meet the minimum investment limit



FDI Issues and KBLI in Bali: Cross-Ministry Perspective



Ministry of Home Affairs

 Misuse of KBLI 68111 for foreign-owned villas





Ministry of Tourism

-  FDI Villa Status in Bali under KBLI 68111
-  Villas Listed on Online Sites (Airbnb, Booking) Without Permits
-  Villas Operating Without Proper Requirements

 SLA for Conversion to Hotel KBLI



Ministry of Trade

-  Supervision of FDI in Bali Trade Sector
-  FDI Using Virtual Office
-  Misuse of Trade KBLIs

 Status Changes to KBLI 47 (FDI Retail), KBLI 70 (Consulting), and Business Entity Updates

Recommended Actions Regarding FDI Audit Findings in Bali



Moratorium on KBLI Suspected of Violations

KBLI, 68111, 68111, 70209, 47711, 47192, 47192, 47144, 47233, 47274, 4521, 472, 47146, 47224, 47121



FDI in Bali Cannot Operate Business Office and Location Using Virtual Office



Minimum Capital of IDR 10 Billion Specifically for FDI in Bali
Proven by Document Proof of Capital Investment



When Ready for Commercialization, Attach Evidence that BBPR and Minimum Investment Requirements Met



Article 282: Supervisory Authority (Balinese Context)

In performing supervision as referred to in paragraph (1), the supervisor has the authority to:



INSPECTION & SUMMONING



conduct inspections



issue summons



request information

DOCUMENTATION



make copies of documents and/or take notes



take photographs



make audio recordings



create visual recordings

ACCESS LOCATIONS & FOLLOW-UP ACTIONS



take samples



enter business premises



inspect land, buildings, goods, or equipment



stop certain violations



perform other actions...



THANK YOU