



PERMANENT MISSION OF THE
REPUBLIC OF INDONESIA TO THE UNITED NATIONS
WORLD TRADE ORGANIZATION (WTO)
AND OTHER INTERNATIONAL ORGANIZATIONS
IN GENEVA

No.: 174/POL-II/XI/2025

The Permanent Mission of the Republic of Indonesia to the United Nations, the World Trade Organization, and Other International Organizations in Geneva presents its compliments to the Office of the United Nations High Commissioner for Human Rights, and has the honor to refer to the latter's note verbale dated 27 October 2025 conveying the report entitled '*Anti-Corruption and Human Rights in ASEAN: Areas of Overlap based on the UNCAC Implementation Review Mechanism and UN Human Rights Mechanisms Recommendations.*'

The Permanent Mission has further the honor to transmit herewith, the comments of the Government of the Republic of Indonesia on the above-mentioned report for the Office's further consideration.

The Permanent Mission of the Republic of Indonesia to the United Nations, the World Trade Organization, and Other International Organizations in Geneva, avails itself of this opportunity to renew to the Office of the United Nations High Commissioner for Human Rights, the assurances of its highest consideration.

Geneva, 14 November 2025



Office of the United Nations High Commissioner for Human Rights
GENEVA

**Comments of the Government of the Republic of Indonesia on
the OHCHR report entitled ‘*Anti-Corruption and Human Rights in ASEAN:
Areas of Overlap based on the UNCAC Implementation Review Mechanism and
UN Human Rights Mechanisms Recommendations*’**

1. The Government of Indonesia appreciates the OHCHR’s initiative to identify anti-corruption efforts and their interlinkages with human rights promotion undertaken by ASEAN Member States, including Indonesia.
2. Indonesia reiterates its firm and unwavering commitment to advancing the anti-corruption and human rights agenda at the global level, as demonstrated, inter alia, by its active role in the core group of the resolution “The negative impact of corruption on the enjoyment of human rights” at the Human Rights Council.
3. In response to the report prepared by the OHCHR on anti-corruption and human rights in ASEAN, Indonesia regrets that no consultation was undertaken by the OHCHR with ASEAN Member States, including Indonesia, prior to the preparation of the report, and that Member States were not engaged from the outset of the process.
4. Indonesia further notes that the report was not initiated on the basis of a mandate emanating from an intergovernmental process under the Human Rights Council.
5. Notwithstanding the above concerns, Indonesia wishes to offer the following factual comments on the content of the report:
 - a. On the issue of “labour exploitation and trafficking” as well as “land acquisition and indigenous rights”
 - i. We note the references in the report to “labour exploitation and trafficking” and to “land acquisition and indigenous rights” as key areas of overlap between human rights mechanisms and the UNCAC Implementation Review Mechanism (IRM).
 - ii. Indonesia is cited in the OHCHR report as one of the nine States in relation to “labour exploitation and trafficking” and as one of the six States in relation to “land acquisition and indigenous rights”, as reflected on pages 17 and 19 of the report.
 - iii. We recognize that the UNCAC IRM does not identify specific thematic focus areas.
 - iv. In this regard, Indonesia requests clarification from the OHCHR on the documents or sources related to the UNCAC IRM that explicitly indicate “labour exploitation and trafficking” and “land acquisition and indigenous rights” issues in Indonesia.
 - b. On the issue of freedom of opinion and expression and right to information
 - i. We note that freedom of opinion and expression and the right to information are grouped as a single key theme in the table on page 28 of the report.
 - ii. Taking into account the distinct nature and scope of these two rights, Indonesia requests that the OHCHR consider separating them into two different key themes.

c. On the issue of creation of a publicly regulated recruitment system for migrant workers

- i. We would like to refer to one of the recommendations of the Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families addressed to Indonesia in 2017, as reflected in the table on page 20 of the report, which is quoted as follows:

“Create a publicly regulated recruitment system to reduce abuse by private employment agencies.”

- ii. We note that this quotation does not accurately reflect the wording of the Committee’s recommendation in its concluding observations on the initial report of Indonesia in 2017 (CMW/C/IDN/CO/1), paragraph 53(a), which reads:

“Establish a recruitment system subject to public administration in order to reduce the irregularities caused by private employment agencies”

- iii. Indonesia therefore requests the OHCHR to amend the reference in the report so that it accurately reflects the Committee’s actual recommendation.

6. In addition, Indonesia wishes to provide further information on its recent progress in advancing anti-corruption efforts and the protection of human rights, as follows:

- a. Indonesia has established a legal framework for asset recovery, including the Anti-Corruption Law, the Anti-Money Laundering Law, and legislation governing the management of regional assets. The Corruption Eradication Commission (KPK) is currently formulating policy recommendations, while the Ministry of Law is preparing an academic paper for the amendment of the Anti-Corruption Law, with a view to harmonizing it with UNCAC and the requirements related to Indonesia’s accession process to the OECD.
- b. With regard to corruption prevention in the public sector, Indonesia has developed an advanced and digitalized system of asset declarations for public officials (LHKPN). These declarations are accessible to the public through the KPK website, representing a concrete example of progressive transparency. Indonesia acknowledges that compliance rates with reporting obligations still need to be improved, and that in-depth verification of assets has yet to be fully optimized.
- c. In response to the 2024 recommendations of the Committee on Economic, Social and Cultural Rights to Indonesia to review its National Strategy on Business and Human Rights, the Government of Indonesia is currently drafting a Presidential Regulation on the implementation of compliance assessment of business enterprises in relation to business and human rights.

In support of Indonesia’s accession process to the OECD, the drafting of this Regulation is being aligned with OECD standards on business and human rights, in particular the OECD Due Diligence Guidance for Responsible Business Conduct, in accordance with the Roadmap for the OECD Accession Process of Indonesia.

- d. On public participation, the report does not sufficiently acknowledge the strength and vibrancy of civil society in promoting accountability. Indonesia has a robust network of

anti-corruption civil society organizations, such as Indonesian Corruption Watch, FITRA and others. Innovative platforms such as “Lapor!” and “Jaga” have further encouraged public participation in monitoring and reporting irregularities.

- e. Indonesia has also been actively involved in international cooperation to combat corruption, including through ASEAN, UNODC and various bilateral partnerships. Recognizing that corruption is often transnational in nature, Indonesia views effective international cooperation as essential for advancing human rights globally.
7. Indonesia is of the view that reflecting progress achieved by States would add value and contribute to a more comprehensive, up-to-date, contextual and proportionate report.
 8. We also would like to draw the OHCHR’s attention on the Universal Periodic Review mechanism which provides space for Member States participating in the process to indicate their position on recommendations received from their peers, including whether they support, partially support or note them.
 9. The absence of any information on States’ positions regarding UPR recommendations addressed to them (support/partially support/note) does not provide a sufficiently clear and comprehensive picture that is fully consistent with the context of the UPR process. It is worth noting that the Government of Indonesia supports most of the relevant UPR recommendations addressed in the OHCHR report.
 10. In closing, Indonesia reiterates its strong commitment to combating corruption and promoting and protecting human rights, and to engaging constructively with the OHCHR. In the same spirit, Indonesia hopes that the OHCHR will also genuinely and consistently engage with Member States from the outset in the development of initiatives that relate to them and have an impact on them.

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