B Boreal Trade

MARKET ACCESS ASSESSMENT · SAMPLE 02

Branded rolled oats into Malaysia and Indonesia

Prepared for Assiniboine Mills Inc., Portage la Prairie, Manitoba · 6 September 2026

Illustrative worked example, not a client engagement. Assiniboine Mills Inc. is a fictional company invented to show the shape of this deliverable. Every regulatory value below is real: each was read off the primary source listed at the end and carries the date it was read. The commercial situation is invented; the regulation is not.

What you asked

Whether your retail-packed rolled oats can enter Malaysia and Indonesia, what the border costs, and what has to be true of the product before either market will take it.

Answer in one line

Both markets are open, and the decision that governs both of them is which halal certifier you appoint. Duty is close to irrelevant here: Malaysia takes this line free either way, Indonesia charges 5 per cent and no agreement removes it today. The constraint is that only one Canadian halal certifying body is recognised by both authorities, and that choice has to be made before you book an audit, not after.

Classification and duty position

MARKET	MFN DUTY	PREFERENTIAL	BASIS
Malaysia	Free	Free (CPTPP)	CPTPP in force between Canada and Malaysia
Indonesia	5%	None available	Canada-Indonesia CEPA signed 24 September 2025, not in force; Indonesia is not a CPTPP party

HS CLASSIFICATION · 1104.12 · ROLLED OR FLAKED GRAINS OF OATS

Customs duty only. Destination value-added tax and local levies sit on top and are not shown. Note also that this subheading covers rolled and flaked oats: an oat flour, an oat bran or a sweetened breakfast preparation classifies elsewhere, carries its own rate, and needs its own answer.

DO NOT BUDGET INDONESIA ON CEPA

The Canada-Indonesia agreement is signed and not in force, and a signature confers no preferential treatment. On a CAD 2 million Indonesian programme the 5 per cent is about CAD 100,000 a year, and it is a permanent line in your landed cost until entry into force, which has no date attached to it. Build your Indonesian price on the most-favoured-nation position and treat any future preference as upside rather than as plan.

The finding: your certifier decides your map

Halal certification is not a single qualification that a producer either holds or does not. It is a certificate from a particular body, and its worth in a particular market depends on whether that market's authority has recognised that body. Malaysia and Indonesia both publish lists. The lists do not agree, and between them they name only four Canadian certifiers.

CANADIAN CERTIFYING BODY	MALAYSIA (JAKIM)	INDONESIA (BPJPH)	SINGAPORE (MUIS)
Halal Montreal Certification Authority, Brossard QC	Listed	Listed	Listed
Islamic Food and Nutrition Council of Canada, Mississauga ON	Not listed	Listed	Listed
Halal Monitoring Authority, Scarborough ON	Listed	Not listed	Not listed
Halal Transactions, Mississauga ON	Not listed	Not listed	Listed

Read off the three authorities' own published lists on 6 September 2026. Malaysia's list is the one effective 21 August 2026; Indonesia's register carries 115 bodies worldwide and Singapore's 100.

For your two markets that reduces to one sentence. **Of the four Canadian bodies, exactly one is recognised by both Malaysia and Indonesia.** A producer certified by the Halal Monitoring Authority can sell in Malaysia and cannot use that certificate in Indonesia; one certified by the Islamic Food and Nutrition Council of Canada has the reverse problem. Neither has done anything wrong, and neither finds out until a buyer or a border asks.

This matters more than a duty rate because it cannot be corrected quickly. Certification is an audit of your plant, your ingredients and your suppliers, run on the certifier's calendar. Choosing the wrong body does not mean paying twice for a document. It means a second audit, a second queue, and months lost against a distributor already promised product.

Where the audit actually gets stuck

Rarely on the line. Almost always on the paper behind the ingredients: a certificate or specification from every supplier, including for inputs a miller does not think of as ingredients, such as processing aids, release agents and the carrier in any added vitamin or flavour. That depends on other companies replying, so it cannot be compressed by paying more. Start it before you book the audit.

What else decides the timeline

Indonesia: registration, and whose name it is in

Indonesian product registration is filed in-market and the number is issued to a local entity, in practice your importer. Changing importer can therefore mean refiling from the beginning, and because the number appears on the pack, it also means new artwork.

Artwork is an output of this process, not an input

This is a retail product, so the label is the deliverable. Bahasa Indonesia labelling is required, the registration number has to appear on it, and the halal mark depends on which body certified you. None of the three can be finalised before the underlying approvals are far enough along to supply them. Producers who print early on the assumption that a sticker will cover the difference generally reprint, and a reprint on retail cartons is not a rounding error.

Malaysia is the cleaner of the two

Duty free under both columns, one primary gate rather than two in parallel, and a Bahasa Malaysia labelling requirement that is straightforward once the halal position is settled. The halal decision is common to both markets, so entering Malaysia first does not let you defer it.

Shelf life and specification

Oats travel well, which makes it easy to under-specify them. Moisture at pack, flake thickness and declared shelf life at tropical ambient belong in the contract, not in a reference sample sent once. A distributor whose two lots behave differently in a humid warehouse calls that a quality failure whatever the specification said.

Not yet verified

Three things this assessment does not answer, and would in a full engagement:

- *Your current certifier, if you hold one, and whether its recognition covers the scope and runs past the dates you are planning against. Recognition is granted for a term and renewed.*
- *The registration category each regulator assigns to a retail-packed rolled oat, and the processing duration that follows from it.*
- *Named, licence-checked importers in each market. We do not publish a distributor list we have not qualified.*

Recommendation

Settle the certifier first, then enter Malaysia, then Indonesia. If your three-year view includes both markets, the list of Canadian bodies that serve both is one name long today, and that is a decision to take before an audit is booked rather than after one is passed. Once it is taken, Malaysia is the faster entry: no duty, one main approval, and a label that follows from a settled halal position.

Bring Indonesia in second, on the most-favoured-nation duty position, with the registration holding structure written into the distribution agreement before the first dossier is filed. The one thing that would change this order is a certification you already hold and do not want to replace. Whether recertifying is worth it at your volumes is a commercial question, and it is answerable in an afternoon rather than a project.

Sources

- Customs Tariff 2026, Chapter 11, Canada Border Services Agency, read 1 September 2026. HS classification. https://www.cbsa-asfc.gc.ca/trade-commerce/tariff-tarif/2026/html/00/ch11-eng.html
- Canada Tariff Finder, destination duties for 1104.12, read 1 September 2026. Malaysian and Indonesian rates. https://www.tariffinder.ca/en/search/export/MY/rolled-oats/110412
- CPTPP explained, Global Affairs Canada, read 1 September 2026. agreement in force with Malaysia. https://www.international.gc.ca/trade-commerce/trade-agreements-accords-commerciaux/agr-acc/cptpp-ptpgp/cptpp_explained-ptpgp_apercu.aspx?lang=eng
- Canada-Indonesia Comprehensive Economic Partnership Agreement, Global Affairs Canada, read 1 September 2026. signed 24 September 2025, not in force. https://www.international.gc.ca/trade-commerce/trade-agreements-accords-commerciaux/agr-acc/indonesia-indonesie/cepa-apeg/index.aspx?lang=eng
- Recognised foreign halal certification bodies effective 21 August 2026, JAKIM, read 6 September 2026. https://www.halal.gov.my/pdf/cb/FHCB21August2026.pdf
- Lembaga Halal Luar Negeri, foreign halal bodies with mutual recognition, BPJPH, read 6 September 2026. https://bpjph.halal.go.id/cari/lembaga-halal-luar-negeri
- List of recognised foreign halal certification bodies, MUIS, read 6 September 2026. https://halal.muis.gov.sg/fhcb

Boreal Trade · Illustrative worked example, not a client engagement. Assiniboine Mills Inc. is fictional. Halal recognition changes as bodies are added, scopes amended and terms renewed: confirm each value against its source before committing to a budget or an audit.