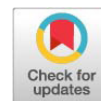


Research Article



Animal Welfare Certification in Indonesia: A Document Analysis of Ministry of Agriculture Regulation 32/2025

MUHAMMAD YASIN SYIHABUDDIN^{1*}, NISA MUFIDAH¹, HENGGI APEDRO¹, MUHAMMAD RIDO¹, AHMAD SHANTOSI²

¹Department of Animal Science, Faculty of Agriculture, Universitas Lambung Mangkurat, Banjarbaru 70714, Indonesia; ²Inspectorate General, Indonesian Ministry of Agriculture, Jl. Harsono RM No.3. Jakarta Selatan 12550, Jakarta, Indonesia.

Abstract | Ministry of Agriculture Regulation No. 32/2025 introduces a national animal welfare framework in Indonesia that links welfare compliance with value added and competitiveness through a formal certification and logo system. This study applies qualitative document analysis to examine how the regulation designs animal welfare certification as a competitiveness instrument and how it safeguards credibility after certification. The regulation sets a staged pathway from application to certification, with timed administrative validation, on-site assessment by a provincial team including trained animal welfare auditors and an authorised government veterinarian, and a corrective-action period before decisions. Certification is graded (Levels 1–3) and operationalised through explicit minor and major non-compliance thresholds. Credibility is reinforced through risk tiered surveillance during certificate validity, combining routine checks scheduled by certification level with complaint-triggered inspections, followed by an escalation pathway from mandated corrections to written warnings and certificate revocation. Implementation effectiveness remains uncertain and will depend on administrative capacity, particularly auditor availability, surveillance resources, and consistent classification of findings across provinces.

Keywords | Animal welfare, Certification, Document analysis, Livestock policy, Surveillance, Regulation

Received | January 05, 2026; **Accepted** | June 14, 2026; **Published** | September 05, 2026

***Correspondence** | Muhammad Yasin Syihabuddin, Department of Animal Science, Faculty of Agriculture, Universitas Lambung Mangkurat, Banjarbaru 70714, Indonesia; **Email:** yasinsyihab@ulm.ac.id

Citation | Syihabuddin MY, Mufidah N, Apedro H, Rido M, Shantosi A (2026). Animal welfare certification in Indonesia: A document analysis of ministry of agriculture regulation 32/2025. *J. Anim. Health Prod.* 14(4): 1337-1343.

DOI | <https://dx.doi.org/10.17582/journal.jahp/2026/14.4.1337.1343>

ISSN (Online) | 2308-2801



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INTRODUCTION

Animal welfare has become a central governance and market issue in livestock systems because it sits at the intersection of ethics, public trust, product quality expectations, and international trade (Aumüller and Coetzer, 2020; Brice *et al.*, 2022; Clark *et al.*, 2024; Del Campo *et al.*, 2024; Nkatekho, 2024). International standard-setters emphasise that good animal welfare requires appropriate health care, shelter, handling, nutrition, and humane killing, and that welfare is assessed as the state of the animal in

relation to its living and dying conditions (Fraser, 2014; Madzingira, 2018; Gobena and Kumsa, 2020; Nielsen *et al.*, 2020; De Jesús *et al.*, 2021). In many food chains, welfare is increasingly communicated through certification and labels, which aim to translate production practices into a credible signal for consumers (Chang and Chen, 2022; Ammann *et al.*, 2024). At the same time, the effectiveness of welfare claims depends on verification credibility and institutional capacity, because weak assurance undermines trust while overly demanding systems may discourage adoption. In this paper, “competitiveness” is used to mean a

potential market advantage arising from a credible welfare claim, rather than a guaranteed premium or automatic demand increase.

Over the last decade, peer-reviewed research has converged on three relevant insights. First, consumer response is real but conditional. Evidence syntheses show that consumers often report a willingness to pay a premium for higher-welfare products, yet effects are heterogeneous and context-dependent, suggesting that welfare premiums are not automatic and can be small in some markets (Clark *et al.*, 2017). Experimental and behavioural studies further indicate that consumer understanding and purchase intentions depend on how welfare information is presented, including the transparency and qualification of claims (Schütz *et al.*, 2023; Bech-Larsen *et al.*, 2024). Second, certification is as much about governance as it is about measurement. Reviews of quality assurance and welfare standards highlight persistent concerns that private or semi-private schemes do not necessarily deliver welfare improvements unless their objectives, auditing, incentives, and transparency are clearly designed and monitored (More *et al.*, 2017, 2021). Third, enforcement design and inspector practice shape real-world outcomes. Studies of official welfare inspections show that inspections can be perceived negatively by farmers and may have limited impact on compliance improvement if the system is viewed as punitive or inconsistent, underscoring the need for calibrated auditing and workable corrective pathways (Veissier *et al.*, 2021). These findings collectively suggest that a welfare certification instrument cannot be assessed only by its stated ethical goals or its checklist content; it must be evaluated as a policy mechanism that links incentives, compliance effort, verification, enforcement, and market signalling.

Against this international background, Indonesia has entered a new regulatory phase. Ministry of Agriculture Regulation No. 32/2025 (MoA Regulation 32/2025) was issued on 1 December 2025, and it enters into force on the date of promulgation (Ministry of Agriculture, 2025). This timing matters substantively because it provides a formal starting point for strengthening animal welfare governance through a national ministerial framework, including certification, surveillance, and roles for multiple actors across government and industry. Recent academic discussion in Indonesia has begun to address animal welfare claims and regulatory direction in comparative perspective, but systematic policy-mechanism analysis remains limited (Aprillian and Leucci, 2025).

This creates a clear research gap within the last-decade literature. Much of the Scopus-indexed evidence base focuses on European contexts, private standards, or consumer-side preferences, while fewer studies

examine how a newly issued public regulation in an emerging economy operationalises welfare certification as a competitiveness instrument and embeds credibility through surveillance and enforcement (More *et al.*, 2017; Lundmark *et al.*, 2018). Moreover, existing studies often treat labelling, auditing, and enforcement as separate topics, even though policy performance depends on their interaction, particularly when limited regulatory resources motivate risk based surveillance and prioritisation strategies (OECD, 2018; Tuytens *et al.*, 2025). For Indonesia, this gap is practically important because the early years following the issuance of a new regulation are typically the period when implementation pathways, interpretation norms, and institutional routines are formed, which can determine whether certification becomes a trusted market signal or a procedural formality.

Accordingly, this study aims to analyse how MoA Regulation 32/2025 constructs animal welfare certification as a competitiveness instrument, using qualitative document analysis. The analysis focuses on the internal coherence of the instrument design, including how certification requirements are linked to auditing arrangements, how credibility is maintained during certificate validity through routine and complaint-triggered surveillance, and how enforcement escalation protects the integrity of welfare claims. The study does not evaluate implementation performance or market outcomes, it examines the regulatory design and its internal governance logic as written in the regulation. In doing so, the study responds to international recommendations that assurance systems should align standards, verification, and governance, rather than relying on claims without credible institutional support (ISO, 2016; WOA, 2018).

This paper contributes in three ways. First, it provides an early, regulation-grounded account of Indonesia's new animal welfare governance framework by treating the regulation as a policy instrument rather than only as legal text, offering a transparent mapping of the pathway from compliance to market signalling. Second, it extends certification and QA scholarship by showing how a public regulation encodes credibility conditions that the literature repeatedly identifies as decisive, namely auditor competence, surveillance design, corrective action, and sanction pathways. Third, it generates practical implications for implementation readiness. International evidence indicates that inspection systems and labels succeed when they are trusted, consistent, and resourced, and when information is meaningful to market actors. By identifying where MoA Regulation 32/2025 places demands on organisational compliance and public oversight, the study offers a focused agenda for strengthening Indonesia's animal welfare certification as a credible competitiveness signal in the years following its issuance.

This study used a qualitative document analysis to examine how animal welfare certification is designed as a competitiveness instrument in Indonesia's Ministry of Agriculture Regulation No. 32/2025 (MoA Regulation 32/2025). The primary dataset was the full text of MoA Regulation 32/2025, including relevant annexes (formats and logo guidance) and relevant academic literature. The unit of analysis was each provision that defines: (i) certification purpose and eligibility, (ii) compliance requirements and grading, (iii) audit and surveillance processes, (iv) enforcement steps, and (v) market signaling through labeling.

ANALYTICAL FRAMEWORK AND CODING

We applied a logic model lens to structure extraction and interpretation. A directed coding scheme was used to map provisions into five categories: (a) policy incentive and intended competitiveness effect, (b) compliance effort and organisational requirements (including mandated roles), (c) Audit and certification mechanics (timelines, teams, decision rules), (d) Surveillance and enforcement pathway (warnings, revocation triggers), (e) Market signal (logo use, restrictions, information content).

VALIDITY AND INTERPRETATION

To strengthen interpretive validity, the extracted policy

logic was benchmarked against internationally recognised standards and peer reviewed evidence on welfare assurance, auditing, enforcement design, and consumer market response, including WOAHA guidance, ISO/TS 34700, and the OECD inspections toolkit (ISO, 2016; OECD, 2018; WOAHA, 2018).

RESULTS

MoA Regulation 32/2025 positions animal welfare certification as a policy instrument intended to increase value added and competitiveness of animal based products while ensuring welfare compliance at business-unit level (Art. 72(2)). The document analysis identifies a complete mechanism chain that links a market-facing incentive (certificate and logo) to internal compliance capacity, structured verification, post-certification control, and signal protection. Table 1 summarises how these elements connect as a single instrument design. To emphasise instrument logic rather than a provision-by-provision summary, the Results are reported as a linked design chain: incentive (certificate and logo), compliance effort (organisational roles and graded performance rules), verification (audit and corrective action), credibility maintenance (risk tiered surveillance), and signal protection (escalation and logo restrictions).

Table 1: Mapping the certification mechanism in MoA Regulation 32/2025 (document analysis results).

Mechanism component	What the regulation specifies	Immediate regulatory output
Policy positioning	Certification authenticates compliant units to increase value added/competitiveness (Art. 72(2))	Welfare becomes a market-relevant compliance attribute.
Market-facing claim (logo)	Logo allowed on meat/milk/egg packaging; technical rules in Annex III (Art. 93)	Public-facing welfare claim for buyers/consumers.
Signal differentiation (grading)	Certificate records welfare level 1–3; validity 5 years (Arts. 80–81)	Differentiated status (not only pass–fail).
Internal compliance capacity Animal Welfare Officer (AWO)	AWO must hold training cert; minimum duties specified (Art. 92)	Continuous internal control and accountability.
Measurable performance rules	Level based on minor/major deviations with thresholds.	Standardised grading decision rule.
Administrative entry and validation	Validation ≤3 working days; correction window 5 working days (Art. 74)	Predictable entry gate before assessment.
Team-based audit	Provincial team odd-numbered; ≥3 trained auditors; includes authorised veterinarian (Art. 75(2))	Formal, multi-person verification.
Corrective-action pathway	Corrective actions reported within ≤2 months (Art. 77(2))	Improvement route prior to certification outcome.
Surveillance during validity	Routine + incidental (complaint-based); routine tiered by level (Art. 85)	Ongoing, risk-tiered post-certification control.
Escalation and revocation	Written warnings (10 and 20 working days) then revocation (Art. 86(5)–(7))	Enforceable consequences for persistent non-compliance.
Protection of the signal	Logo prohibited after revocation (Art. 94)	Prevents invalid claims; protects label integrity

Note: MoA Regulation 32/2025. This table summarises only the certification mechanism as written in the regulation (instrument components and outputs). Interpretation and implications can be addressed in the discussion section.

First, the regulation operationalises competitiveness through a recognised welfare claim: Certified units are permitted to display an official animal welfare logo on packaging for meat, milk, and eggs, and the annex indicates that the signal is differentiated through graded certification levels (Level 1-3) (Arts. 80-81; Art. 93; Annex III). Second, compliance is embedded through organisational requirements and measurable performance. Certification is linked to the presence of an Animal Welfare Officer (AWO) with defined responsibilities, and welfare performance is assessed through a deviation based grading logic that distinguishes minor and major deviations with explicit thresholds (Art. 92; Annex I).

Third, the regulation specifies an operational pathway from application to certification. It includes administrative screening with defined timelines, and a team based assessment arrangement at provincial level that involves trained animal welfare auditors and an authorised veterinarian (Arts. 74-75). Importantly, certification decisions incorporate an improvement pathway through a corrective-action window when requirements are not fully met (Art. 77(2)). Fourth, credibility is maintained after certification through surveillance during certificate validity, combining routine and complaint-triggered checks, where routine surveillance frequency is risk tiered by certification level (Art. 85). Finally, the regulation defines an escalation pathway for deterioration from required corrective actions to written warnings and certificate revocation, and it explicitly prohibits logo use after revocation, thereby protecting the integrity of the market signal (Art. 86(5)-(7); Art. 94).

DISCUSSION

This policy design aligns with international discussions that welfare assurance schemes only create market value when they provide clear claims supported by credible governance and verification. A widely cited framework for welfare certification emphasises scheme governance, measurement, transparency, and continuous improvement to maintain credibility over time (Main *et al.*, 2014). In this sense, MoA Regulation 32/2025 goes beyond aspirational statements by combining a market-facing claim (logo and levels) with defined organisational roles (AWO), structured verification (team based audits and checklists), and post-certification controls (surveillance and escalation).

However, the competitiveness effect will only materialise under specific conditions. A key market reality is that willingness to pay for higher welfare products exists but tends to be heterogeneous and often modest on average, which can limit adoption if compliance costs are high or if buyers do not reward the signal consistently. Meta analyses show variation across populations and study contexts, and

they warn against assuming a large uniform price premium (Clark *et al.*, 2017). This means the “competitiveness” effect will likely be strongest in channels where procurement standards, brand strategy, or export requirements convert welfare compliance into tangible demand.

Internationally, the combination of internal management responsibility and auditable requirements fits the logic of management system-oriented welfare standards such as ISO/TS 34700, which provides guidance for implementing welfare principles across organisations in the food supply chain (ISO, 2016). It also connects with measurement traditions that combine resource based and outcome oriented indicators, for example, Welfare Quality assessment protocols (Welfare Quality Consortium, 2009). In practical terms, this suggests that the AWO role can help transform certification from an external inspection event into a routine internal governance practice, which is often necessary for sustained welfare improvements. In addition, empowering AWOs to conduct structured pre-audit self-checks using the same checklist logic as formal assessments could help identify and address minor and major non-compliances earlier, improving audit readiness and potentially increasing certification uptake.

The corrective action window described in the certification flow is consistent with the “continuous improvement” philosophy in certification scholarship, where schemes should not only verify but also drive improvement among participants. At the same time, a practical risk is capacity: the system relies on trained auditors, and the regulation further restricts auditor eligibility to civil servants who are veterinarians or animal science engineers and who hold specific auditor training certification. This can strengthen impartiality and procedural control, but it can also become a bottleneck if auditor numbers are limited relative to the number of business units seeking certification, especially if competitiveness goals encourage rapid uptake.

The surveillance approach resembles risk based inspection principles promoted by the OECD, which emphasise targeting and planning inspections to maximise compliance impact while managing limited resources. Evidence from official inspection contexts suggests that inspection outcomes depend not only on rules but also on inspector practice, consistency, and the relationship dynamics with regulated actors. Notably, the regulation specifies team composition and auditor eligibility, but it does not explicitly articulate conflict-of-interest risks during inspection (for example, prior relationships with regulated units) or formal mitigation measures such as disclosure requirements, rotation rules, or independent review procedures, which could be considered in future implementation guidance. Studies of animal welfare inspections report that inspections may be perceived

negatively by farmers and that compliance improvement effects can be limited without shared understanding and workable corrective pathways. This is where the AWO requirement can be strategically important: it creates an internal bridge between daily practice and external expectations, potentially reducing friction and improving readiness for surveillance (Veissier *et al.*, 2021; Lundmark *et al.*, 2025).

The escalation approach is consistent with well-known enforcement theory that recommends combining persuasion and graduated sanctions, often described as an enforcement pyramid (Drahos, 2017). The policy relevance is straightforward: if certification is supposed to increase competitiveness, the market signal must be trusted, and trust requires that revocation is real and procedurally clear.

From a market governance perspective, private standards and labels function as coordination mechanisms that structure relationships, manage reputational risks, and create differentiation across supply chains. Retailers and brand owners increasingly use these instruments not only for compliance and quality assurance but also to align value chain actors and signal trust to consumers (Fulponi, 2006; Banterle and Stranieri, 2013; Carbone, 2017; Giovannini *et al.* 2017). But MoA Regulation 32/2025 is distinctive because it combines a public legal basis with a consumer facing signal, effectively creating a bridge between regulatory compliance and market differentiation.

MoA Regulation 32/2025 sets out a coherent assurance chain, but its real-world performance will depend heavily on administrative capacity and the availability of trained personnel. Because audits must be conducted by trained auditors and an authorised government veterinarian, the model can strengthen procedural control, yet it may also concentrate delivery capacity within government structures. In the early phase, uneven auditor availability across provinces could translate into unequal access to certification and slower or inconsistent follow-up, which may undermine perceived fairness and consistency. Feasibility and comparability are also sensitive to scaling: if demand grows faster than the supply of qualified auditors, bottlenecks may shift attention toward completing administrative steps rather than supporting substantive welfare improvements. At the same time, if audit teams classify minor versus major findings differently, Levels 1–3 become less comparable across units, weakening the grading system as a market-facing signal.

Taken together, the regulation provides a well-specified instrument chain that can translate animal welfare into a competitiveness-oriented tool. Verification is operationalised through team based assessment with defined membership requirements and standardised

checklists, while credibility is reinforced through post-certification surveillance scheduled by certification level and complemented by complaint-triggered checks. The integrity of the signal is protected through a clear escalation pathway, from corrective obligations to written warnings and, when necessary, certificate revocation, coupled with restrictions on logo use after revocation. In this context, credibility is the core asset: if audits are applied inconsistently, surveillance is irregular, or sanctions are rarely enforced, logos can quickly be treated as weak signals, limiting their influence on procurement decisions and consumer trust. Evidence from sustainability labels, food safety assurance, and ethical trade similarly shows that certification value depends less on the logo itself than on the institutional features behind it, particularly transparency, procedural integrity, and enforcement capacity (Wilson *et al.*, 2017; Moruzzo *et al.*, 2020; Lindley *et al.*, 2023; Aminravan *et al.*, 2025; Molist *et al.*, 2025).

Second, the compliance effort required from firms must be economically manageable. International evidence shows that willingness-to-pay for higher welfare attributes exists but is heterogeneous, and premiums are not guaranteed across markets or product categories (Gorton *et al.*, 2023). This implies that many businesses will adopt certification only when they can reasonably expect tangible returns, such as improved access to modern retail channels, preferred supplier status, reduced reputational risk, or alignment with export requirements. From a regulator's perspective, one option to reduce uncertainty is to support clearer market signalling by encouraging retail price differentiation across welfare grades, so producers can better anticipate the costs and benefits of moving between certification levels. Such price or category guidance is not specified in MoA Regulation 32/2025, but it could be considered in future implementing guidelines or complementary policies to strengthen uptake.

Market uptake, however, is likely to remain uneven if welfare premiums are weak or channel-specific. The regulation provides the legal foundation for a welfare claim, but businesses are more likely to invest in compliance when benefits are concrete, such as meeting procurement requirements, securing preferred supplier status, reducing reputational risk, or strengthening export positioning. Competitiveness should therefore be understood as a potential advantage that depends on credible governance and buyer response, not as a guaranteed market outcome. In practical terms, MoA Regulation 32/2025 offers a strong legal and procedural foundation, but outcomes will depend on whether implementation capacity (auditors, surveillance resources, and consistent grading) can sustain the credibility of the signal and whether supply-chain actors translate that signal into consistent incentives for compliant businesses.

MoA Regulation 32/2025 marks a new phase of animal welfare governance in Indonesia by translating welfare principles into a structured certification system that is measurable and can be communicated to the market through certification levels and an official logo. This document analysis shows that the regulation provides an integrated pathway from entry requirements and assessment procedures to risk tiered surveillance and an escalation process that protects the integrity of welfare claims. Going forward, the effectiveness of certification as a competitiveness tool will depend on implementation capacity, particularly the availability of trained auditors, consistent classification of findings, and reliable surveillance across provinces. Therefore, the most strategic priority is not only expanding the number of certified units, but ensuring verification and monitoring quality so that certification functions as a trusted signal for market actors and stakeholders.

ACKNOWLEDGEMENT

The authors would like to express their gratitude to the Ministry of Agriculture of the Republic of Indonesia for its continued commitment to strengthening animal welfare governance and promoting the implementation of animal welfare standards in Indonesia.

NOVELTY STATEMENT

This study provides an early regulation-grounded analysis of Indonesia's Ministry of Agriculture Regulation No. 32/2025 as an integrated animal welfare certification and competitiveness instrument.

AUTHOR'S CONTRIBUTION

MYS: conceptualisation, methodology, document analysis, writing - original draft, and project administration. NM, HA, MR and AS: validation, writing - review and editing. All authors read and approved the final manuscript.

LIMITATION OF THE STUDY

This study has several limitations that should be considered when interpreting the findings. First, the analysis is based on a single primary document (MoA Regulation 32/2025 and its annexes), so it assesses the written design of the certification instrument rather than its real-world implementation or impacts. Second, because the regulation is newly issued, the study does not evaluate outcomes such as compliance behaviour, audit consistency across provinces, enforcement practice, or market responses to the logo. Third, the benchmarking literature was used to contextualise key design features, but it was

not intended as a full systematic review. Future research should triangulate this document based assessment with stakeholder interviews, field observations of audits and surveillance, and supply-chain or consumer evidence to test how certification functions in practice.

DECLARATION OF GENERATIVE AI AND AI-ASSISTED TECHNOLOGIES IN THE WRITING PROCESS

During the preparation of this work, the author(s) used DeepL and ChatGPT for language polishing. After using this tool/service, the author(s) reviewed and edited the content as needed and take full responsibility for the content of the publication.

CONFLICT OF INTEREST

The authors declare no financial or personal relationships that could be perceived as influencing the work reported in this manuscript. One author is employed by the Indonesian Ministry of Agriculture (Inspectorate General). This manuscript reflects the authors' academic analysis and does not represent an official institutional position or policy stance of the Ministry. The Ministry had no role in the study design, analysis, interpretation, or the decision to submit the manuscript.

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