

Bringing a robot into Southeast Asia

Five countries, five regulators, one path from a factory in Shenzhen to a robot at work. The classification, duty, tax, licensing, radio approval, safety, battery and data rules for each, with the number behind each line and where it comes from.

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A service robot leaving a factory in Guangdong is, to the five customs services of Southeast Asia, three things at once: a machine, a radio transmitter and a lithium battery. Each of those has its own rulebook in each country, and the rulebooks were written for other products. The robot borrows its tariff line from industrial machinery, its radio approval from phones and routers, its shipping rules from laptops, and its safety standard from wheelchairs and forklifts. Nobody has written the robot version down, so we did.

This brief follows one robot along the path in Fig 1. For each stop it gives the rule in each of the five countries, the number that matters, and the source. We use it ourselves to quote landed cost and lead time, and we publish it so that a maker in Shenzhen and a buyer in Jakarta read the same page.

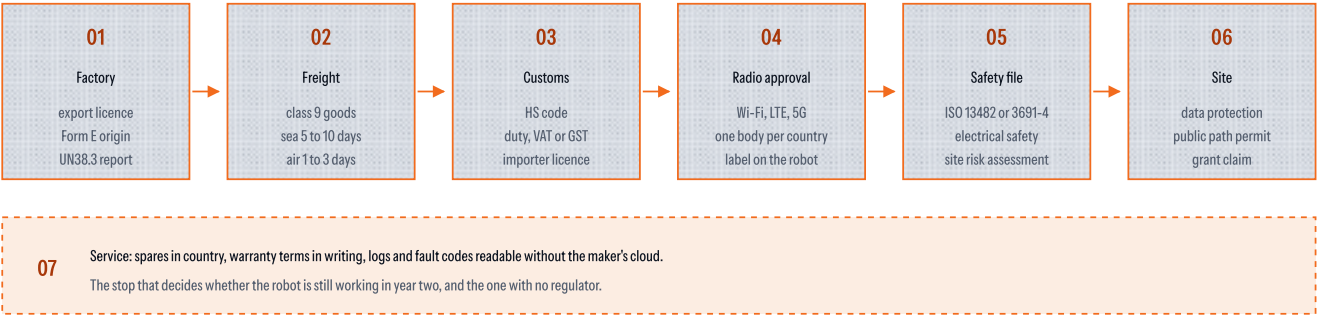


FIG 1 The seven stops. Stops 03 and 04 differ most between countries. Stop 07 is where most imported robots fail, and it is the one with no regulator.

01 Classification, duty and tax

Customs duty depends on the tariff line, and robots sit awkwardly between lines. The Harmonized System has one heading written for robots, 8479.50, "industrial robots, not elsewhere specified", meant for the arms on car lines. A cleaning robot or a delivery robot is usually entered as a machine with an individual function under 8479.89, or as handling equipment under 8428, and a humanoid has no settled line at all. Which line applies changes the duty, so the first document to settle with a customs broker is a classification ruling or at least a written opinion.

LINE	WHAT CUSTOMS MEANS BY IT	SG	MY	ID	VN	TH	CHINA ORIGIN WITH FORM E
8479.50	Industrial robots, not elsewhere specified. Written for arms on production lines.	0%	0%	5%	0%	0%	Indonesia 0% ● VERIFIED
8479.89	Other machines with an individual function. Where US Customs put AgiBot's humanoids and quadrupeds in ruling NY N356154, and where most service robots land. ³	0%	0%	5%	0%	0%	Indonesia 0%, Thailand 0% ● VERIFIED
8428.90	Other lifting and handling machinery. Argued for warehouse AMRs that carry goods. ⁴	0%	0 to 5%	5%	0%	0 to 5%	Indonesia 0%, Thailand 0%, Malaysia 0% ● VERIFIED
8508.11	Vacuum cleaners with a self-contained motor. Household robot vacuums, and the trap for a commercial cleaning robot described carelessly.	0%	20%	10%	25%	10%	Vietnam 5%, others 0% ● VERIFIED

MFN rates are the 2023 applied rates in the World Bank's WITS tariff database, the latest year it holds for these countries; the China-origin rates are the ASEAN-China FTA rates WITS records, 2021 or earlier, so confirm the current schedule before quoting a landed cost.¹ All five countries use the ASEAN Harmonised Tariff Nomenclature on HS 2022, so the six-digit lines are common.²

Two naming traps. Describing a mobile robot as an "AGV" invites a vehicle heading with far higher duty, so the paperwork should say "autonomous mobile robot" or "machine with individual function".⁵ And "AMR" is marketing language with no definition in ISO 8373, which is why customs officers reach for the function of the machine instead.⁶

The ASEAN-China Free Trade Area removes duty on most machinery of Chinese origin when the shipment carries a Form E certificate of origin from a Chinese issuing body. The duty saving is the whole MFN rate, so a maker that cannot issue Form E is quoting a higher landed price whether it knows it or not. Value added tax or goods and services tax is charged at import in every country. In Singapore, Indonesia, Vietnam and Thailand a registered business claims it back, so it is a cash-flow

cost. Malaysia's sales tax is a single-stage tax with no credit, so there it is a real cost on the robot's price.

COUNTRY	DUTY ON A SERVICE ROBOT (8479.89)	TAX AT IMPORT	OTHER LEVIES	IS THE TAX A FINAL COST?
Singapore	0%. Only liquor, tobacco, vehicles and petroleum are dutiable. ⁷ ● VERIFIED	GST 9% on CIF value since 1 January 2024. ⁸	None. Import GST can be suspended under the Major Exporter and similar schemes. ⁹	No, for a GST-registered buyer.
Malaysia	0% MFN. ● VERIFIED	Sales tax. Industrial machinery moved from 0% to 5% on 1 July 2025; unlisted goods pay 10%. ¹⁰ The exact rate for each 8479 line after the 31 July 2026 amendment is unconfirmed. ● REPORTED	Manufacturers importing machinery for their own production are exempt under Sales Tax Policy 4/2025. ¹¹	Yes. Sales tax is single stage and is not credited back, so it is a real 5 to 10% on the robot's price.
Indonesia	5% MFN, 0% with Form E. ● VERIFIED	VAT 12% on a deemed base of eleven twelfths, an effective 11%. ¹²	Income tax prepayment PPh 22: 2.5% of import value with an importer identification number, 7.5% without. ¹³	No. VAT is credited and PPh 22 is a prepayment of the importer's own income tax.
Vietnam	0% under Decree 26/2023 for 8479.50 and most 8479.89 lines. ¹⁴ ● REPORTED	VAT 10% standard, cut to 8% for most goods from 1 July 2025 to 31 December 2026 by Resolution 204/2025. ¹⁵ Whether robots sit in an excluded group is unconfirmed.	Special consumption tax not checked.	No, for a VAT-registered buyer.
Thailand	0% MFN. ● VERIFIED	VAT 7%, extended to 30 September 2027 by Royal Decree 807; the statutory rate is 10%. ¹⁶ ● REPORTED	Excise not checked.	No, for a VAT-registered buyer.

A worked landed cost

A cleaning robot quoted at US\$12,000 FOB Shenzhen, with US\$400 of sea freight and insurance, arrives at a customs value of US\$12,400. Fig 2 shows what each government adds at the border, under the line 8479.89 and with Form E in hand. Singapore takes the most at the border and gives it all back to a GST-registered buyer. Malaysia takes the least and keeps it. Indonesia's stack looks large until you notice that two thirds of it comes back as a VAT credit and an income tax prepayment, and that without Form E and an importer number it would be US\$704 higher.

● ESTIMATE

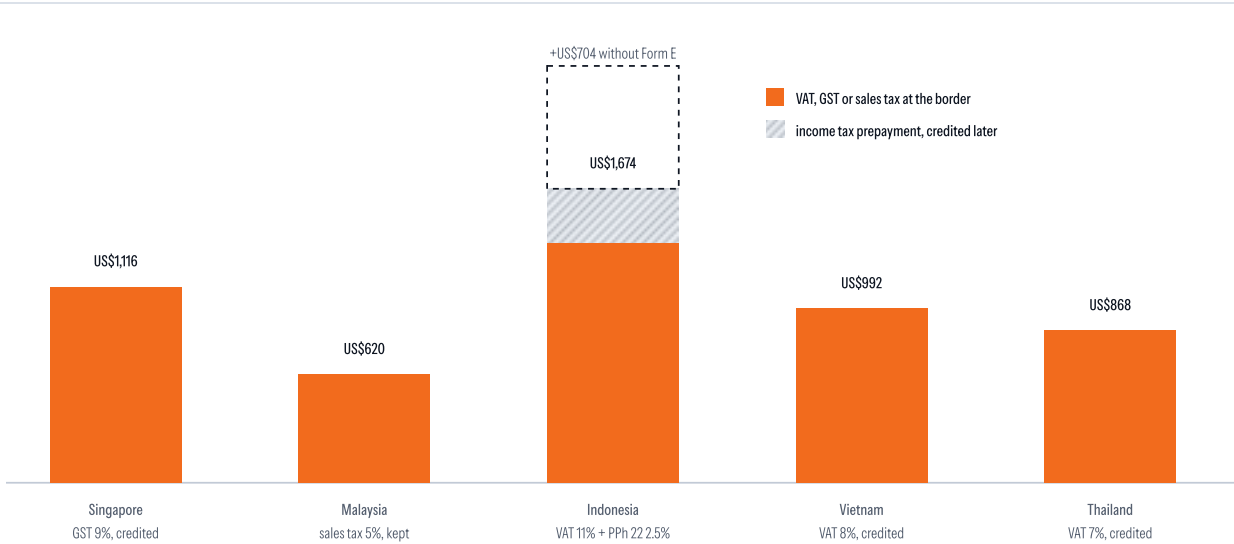


FIG 2 Border taxes on a service robot with a customs value of US\$12,400, entered under 8479.89 with Form E. Duty is zero in all five with Form E. Only Malaysia's sales tax stays a cost for a company buyer. ● ESTIMATE from the rates in the table.

02 Who can import

The importer of record has to be a company in the destination country in every case. The requirements range from a free online registration in Singapore to a licensing system in Indonesia that decides, by product, who may import at all.

COUNTRY	IMPORTER OF RECORD	WHAT THE IMPORT NEEDS	ROBOT-SPECIFIC CATCH
Singapore	Any company with a UEN that activates a Customs Account, free, online. ¹⁷ ● VERIFIED	A customs permit through TradeNet for every shipment, filed by the importer or a declaring agent. ¹⁸	Radio equipment needs an IMDA dealer's licence on the importer's side, which TradeNet checks.
Malaysia	A Malaysian company.	Communications equipment is a restricted import under the Customs (Prohibition of Imports) Order 2023: the SIRIM QAS certificate of approval is applied for through ePermit before the goods clear. ¹⁹ ● REPORTED	Electrical equipment on the Energy Commission's list also needs a certificate of approval or an exemption letter. ²⁰
Indonesia	An Indonesian company with a business identification number (NIB) and the right importer type: API-U to import for resale, API-P to import inputs for its own production. ²¹ ● REPORTED	Goods must be new; used capital goods need separate approval under Permendag 24/2025. ²² Electronics listed in Permendag 21/2025 need an import approval and a surveyor report. ²³	Whether the robot tariff lines are on the 21/2025 list is the open question; the annex could not be read.
Vietnam	A Vietnamese company, including a foreign-invested one whose registration includes import rights. ²⁴ ● REPORTED	No general machinery licence. Used machinery only if under ten years old, under Decision 18/2019. ²⁵	Radio approval through a local applicant, see section 03.
Thailand	A company registered with Thai Customs for e-Customs, with a digital certificate. ²⁶ ● REPORTED	No general machinery licence.	Importers of certified radio equipment reportedly also hold an NBTC seller licence. ²⁷

No country lists robots, humanoids or quadrupeds as a restricted import as such. The controls reach the robot through its radio module, its charger, its battery and, in Indonesia, possibly through the electronics list. ● **UNVERIFIED** as an absence.

03 Radio type approval

Every service robot carries at least one radio: Wi-Fi, Bluetooth, usually an LTE or 5G modem, often a 2.4 GHz remote. Each transmitter needs approval from the telecoms regulator of each country

before the robot is sold, imported or in some countries even switched on. The approval attaches to a model, so a maker that changes its Wi-Fi module between production batches has created a new product in five regulators' eyes. This is the step that most often delays a first shipment, because it is the one that makers who sell in China do not meet at home.

COUNTRY	REGULATOR AND ROUTE	WHO MAY APPLY	WI-FI AND BLUETOOTH	LTE AND 5G MODEM	VALIDITY, FEE, TIME
Singapore	IMDA equipment registration. ²⁸ ● VERIFIED	Only a holder of an IMDA telecommunication dealer's licence (individual licence S\$250 for five years). ²⁹ A foreign maker cannot register directly.	ESER, a free online self-declaration for short-range devices.	SER, a self-declaration for mobile terminals, S\$100 plus S\$50 per family.	Five years. GER, for high-interference kit, S\$350 to S\$500. Label "Complies with IMDA Standards" plus the dealer licence number. ³⁰
Malaysia	MCMC, certified through SIRIM QAS. ³¹ ● VERIFIED	A Malaysian-registered company; a foreign maker only through a local representative. ³²	Compliance approval for sale, or a Special Approval for trials, demonstrations and exhibitions that may not be sold locally. ³³		Five years on a certificate we read for a Wi-Fi and Bluetooth board. ³⁴ Fees and times not published.
Indonesia	Komdigi (formerly Kominfo, SDPPI) under Permenkominfo 3/2024. ³⁵ ● VERIFIED	An Indonesian business with an NIB; a foreign brand appoints an Indonesian representative and files the appointment letter. ³⁶	Test reports from a designated domestic lab or a recognised foreign lab; Komdigi announced in June 2025 that most testing moves into Indonesia by end 2026. ³⁷		Three years. ³⁸ ● REPORTED Fees set as state revenue; current amounts not found.
Vietnam	Ministry of Science and Technology, which absorbed the information ministry on 1 March 2025; product list in Circular 29/2025. ³⁹ ● REPORTED	A Vietnamese-registered importer, distributor, subsidiary or compliance agent. ⁴⁰	Certification plus a declaration of conformity for radio transmitters; the CR conformity mark replaced the ICT mark on 31 December 2024.		Three years with a valid ISO 9001; about seven to eight weeks from a complete file. ⁴⁰
Thailand	NBTC. ⁴¹ ● REPORTED, all from test labs	A Thai person or company, or a Thai representative with power of attorney. ²⁷	Class B or a self-declaration for low-power short-	Class A for cellular.	No expiry; about eight weeks; foreign ISO 17025 reports to RED or FCC rules

COUNTRY	REGULATOR AND ROUTE	WHO MAY APPLY	WI-FI AND BLUETOOTH	LTE AND 5G MODEM	VALIDITY, FEE, TIME
			range devices.		accepted, sometimes with Thai frequency tests.

The practical sequence is to get the module-level approvals first, because a robot that uses an already-certified Wi-Fi or cellular module can often reuse the module's test reports, then apply for the robot as a host product. We ask every maker for the module part numbers and their existing certificates before we quote a lead time.

04 Product safety and batteries

Electrical safety rules in the region are written for consumer appliances. A robot is rarely on the list of controlled products, which means it is rarely required to carry a national safety mark, and also that the buyer, not the regulator, has to ask for the test report. We ask for IEC 62368-1 or IEC 60335-1 test reports on the charger and dock, and for the battery pack's IEC 62133-2 report.

COUNTRY	MANDATORY PRODUCT SAFETY SCHEME	DOES IT CATCH A SERVICE ROBOT?
Singapore	Consumer Protection (Safety Requirements) Registration Scheme: 33 categories of household electrical, electronic and gas appliances must be tested, registered and carry the SAFETY Mark. ⁴² ● VERIFIED	The scheme is for goods supplied to consumers. A commercial robot sold to a business sits outside it; its adapter or charger may not, and a product with a controlled and a non-controlled function is treated as controlled as a whole. ⁴³ We did not check the 33-item list line by line. ● UNVERIFIED
Malaysia	Energy Commission certificate of approval and the ST-SIRIM label for regulated electrical equipment under the Electricity Regulations 1994; the list includes household appliances, adapters, chargers and vacuum cleaners. ⁴⁴ ● REPORTED	The charger, and a cleaning robot that customs calls a vacuum cleaner.
Indonesia	Mandatory SNI standards; vacuum cleaners must meet SNI IEC 60335-2-2. ⁴⁵ ● REPORTED	No mandatory SNI for robots, humanoids or mobile robots found. ● UNVERIFIED
Vietnam	The amended Law on Product and Goods Quality in force from 1 January 2026 with three risk tiers; high-risk goods need certification against a national technical regulation. ⁴⁶ ● REPORTED	No robot-specific technical regulation found.
Thailand	TISI mandatory standards, about 136 categories in 2025, including lithium batteries and charging equipment. ⁴⁷ ● REPORTED	The battery and the charger, possibly, which is reason to ask the maker for TISI status before shipping.

Shipping the battery

A robot's battery decides how it travels. Lithium-ion cells need a UN 38.3 test summary, which the maker must produce, before any carrier accepts them. A battery installed in the robot ships as UN 3481 ("lithium ion batteries contained in equipment") under dangerous goods class 9; loose spare packs ship as UN 3480. By air, the IATA packing instructions cap what passengers and cargo may carry, and packs above 100 Wh cannot go in passenger baggage at all without airline approval, which matters when an engineer wants to carry a demonstration unit. The numbers from the IATA 2026 guidance: up to 100 Wh per battery for the lighter Section II rules, full class 9 above that; a battery packed with equipment, and from 1 January 2026 a robot shipped as a battery-powered vehicle, travels at no more than 30% state of charge; passengers may carry up to 100 Wh freely, 100 to 160 Wh with airline approval and at most two spares, and nothing above 160 Wh.⁴⁸ ● VERIFIED A

humanoid's pack is several hundred watt-hours, so it never flies as baggage. By sea the same packs travel under the IMDG Code with a dangerous goods declaration. A maker that cannot hand over a UN 38.3 summary and a safety data sheet has not shipped internationally before.

05 Robots in use: safety standards and public space

No country in the region licenses a service robot the way it licenses a lift or a vehicle. The rules that apply are the general workplace safety law, the building code, and, for robots on public paths, the road or active mobility law. Buyers fill the gap with international standards: ISO 13482 for personal care robots, ISO 3691-4 for driverless industrial trucks and the mobile robots that behave like them, ISO 10218 for industrial arms, and ISO/TS 15066 for collaborative robots. Singapore adopts these as Singapore Standards and adds its own.

WHERE	RULE OR STANDARD	WHAT IT DOES FOR A ROBOT
International	ISO 10218-1 and -2, revised 2025, with the collaborative robot content of ISO/TS 15066 folded in. ⁴⁹ ● REPORTED	Industrial arms and cells. The reference for a humanoid working beside people in a factory until a humanoid standard exists.
International	ISO 13482, personal care robots, being replaced by a wider service robot safety standard at FDIS stage; publication by October 2026 unconfirmed. ⁵⁰ ● UNVERIFIED	The standard most service robot makers cite. Ask which edition the test report is against.
International	ISO 3691-4:2023, driverless industrial trucks, which names autonomous mobile robots in scope. ⁵¹ ● REPORTED	Warehouse and factory mobile robots.
Singapore	SS 713:2025 robot-to-lift and robot-to-door data exchange, promoted from TR 93:2021; TR 104:2022 safe use of mobile robots in warehouses; TR 130:2025 fleet interoperability; SS ISO 18646-2:2025 navigation performance. ⁵² ● VERIFIED	SS 713 is the one to ask a maker about: it is how the robot rides a lift without a human pressing buttons.
Singapore	Active Mobility Act: autonomous mobile robots count as motor vehicles and may not use public paths without an exemption order from the Minister for Transport through LTA; footpath limit 10 km/h; trials request by form to LTA. ⁵³ ● VERIFIED	Any delivery robot on a public footpath. Private premises are outside the Act. Punggol Digital District runs under a precinct-wide exemption, and an AV Act is planned for Parliament in 2027. ⁵⁴
Singapore	Workplace Safety and Health Act, with the WSH guidelines on safe use of machinery as the basis for a risk assessment. ⁵⁵ ● REPORTED	The site's duty, which the robot's safety file has to support.
Malaysia	Occupational Safety and Health (Amendment) Act 2022 in force 1 June 2024; the Factories and Machinery Act repealed; certificates of fitness remain for boilers, pressure vessels and lifting machinery. ⁵⁶ ● REPORTED	No robot-specific DOSH guideline found.
Indonesia, Vietnam, Thailand	No robot-specific deployment or public-path rule found. ● UNVERIFIED	General workplace law and the building owner's rules apply.

06 Data: cameras, microphones and where the video goes

Every service robot records. Cameras for navigation, microphones for voice, logs that place a robot and the people around it at a time. All five countries now have a general data protection law that treats images of identifiable people as personal data, and three of them restrict sending that data abroad. A robot that streams camera frames to a maker's servers in China for "remote support" is, in each country, a cross-border transfer that the operator has to be able to justify.

COUNTRY	LAW	SENDING ROBOT VIDEO ABROAD	BREACH NOTICE AND CEILING FINE
Singapore	PDPA. A video image of an individual is personal data; CCTV and recordings are covered in the Selected Topics guidelines revised May 2024. ⁵⁷ ● VERIFIED	Allowed when the overseas recipient is bound, usually by contract, to a comparable standard. ⁵⁸	Mandatory notification regime; fines up to 10% of Singapore turnover in the Act (not re-checked this pass).
Malaysia	PDPA as amended in 2024, phased in through 1 June 2025: data protection officer, breach notification, portability. ⁵⁹ ● REPORTED	Whitelist removed; allowed where the destination has a substantially similar law or under listed exceptions, with cross-border guidelines issued in 2025. ⁶⁰	72 hours; up to RM1,000,000 and three years' jail. ⁶¹
Indonesia	PDP Law 27/2022, with implementing regulation GR 33/2026 enacted 16 July 2026 and a compliance deadline of 16 January 2027. ⁶² ● REPORTED	Adequacy, then binding safeguards, then consent for limited transfers; the supervisory agency that would approve the first two does not exist yet, so consent is the working route.	72 hours; up to 2% of annual gross revenue.
Vietnam	Law 91/2025/QH15 in force 1 January 2026 with Decree 356/2025. ⁶³ ● REPORTED	Storing Vietnam-collected data abroad, or using a platform outside Vietnam to process it, is a cross-border transfer; a transfer impact assessment goes to the authority within 60 days of the first transfer.	Up to 5% of prior-year revenue for cross-border violations. ⁶⁴
Thailand	PDPA 2019, with cross-border notifications under sections 28 and 29 in force 24 March 2024. ⁶⁵ ● REPORTED	Adequate countries, otherwise binding corporate rules, standard clauses or certification; no adequacy list published.	Administrative fines up to THB 3 million, THB 5 million for sensitive data sent abroad. ⁶⁶

None of the five has a blanket rule that robot video must stay in the country. Vietnam comes closest, with a filing duty and the largest fine, and Indonesia's missing agency means a Chinese maker's standard remote-support clause rests on consent there.

Our contract requirement is simple: video and audio stay in the deployment country unless the site agrees in writing, the maker's remote access is logged, and the operator can switch it off. A maker that cannot agree to that cannot sell into a hospital, a school or a government building here.

07 Money on the table

Governments in the region subsidise automation, and the grants are large enough to change a buyer's decision. The grant goes to the local buyer, so a maker's local partner is the one who can use it in a sale.

COUNTRY	SCHEME	WHAT IT GIVES
Singapore	EDGE grant, open since 30 September 2026, replacing PSG, EDG and MRA. ⁶⁷ ● VERIFIED	Up to 70% of cost for SMEs and 50% for others, capped at S\$100,000 per company per year, within which S\$30,000 for single-function digital solutions and selected automation; the buyer must be Singapore-registered with at least 30% local ownership. ⁶⁸ Separately, a 400% tax deduction on up to S\$50,000 of AI spending a year for YA2027 and YA2028. ⁶⁹
Malaysia	Automation capital allowance. ⁷⁰ ● REPORTED	200% allowance on the first RM10 million of qualifying automation spend, YA2023 to YA2027, for companies operating at least 36 months; Budget 2026 adds accelerated allowances on plant, machinery and ICT bought from 11 October 2025 to 31 December 2026. ⁷¹
Indonesia	Investment incentives. ⁷² ● REPORTED	Import duty and VAT exemption on machinery for promoted investments, a tax holiday for pioneer industries that reportedly name robotics, and an R&D super deduction up to 300%. Robot eligibility not confirmed on a regulator site.
Vietnam	Law 71/2025 on the digital technology industry, incentives from 1 July 2025. ⁷³ ● REPORTED	Import duty exemption on goods that form fixed assets and preferential corporate tax for digital technology producers; whether a robot buyer qualifies is unconfirmed.
Thailand	BOI Notification 4/2569, gazetted 31 March 2026, applications 2026 to 2027. ⁷⁴ ● REPORTED	Import duty exemption on machinery and a three-year corporate tax exemption worth 50% of automation and robotics investment, rising to 100% when at least 30% of machinery value comes from Thai automation makers.

08 The paperwork, in order

What we collect from a maker before the first unit ships. A maker that can produce all of this in a week is ready to export; one that cannot is not, whatever the price.

1. **Commercial invoice and packing list** with the HS code the maker proposes, the robot's model number as it appears on its label, and the battery's watt-hours.
2. **Form E certificate of origin** from a Chinese issuing body, so the ASEAN-China preferential rate applies.
3. **UN 38.3 test summary** and a safety data sheet for the battery, and the dangerous goods declaration for the carrier.
4. **Radio module list**: every transmitter in the robot with its part number, bands, output power and any existing certificates in any market.
5. **Radio approval application** in the destination country through a local holder, started before the ship leaves.
6. **Electrical safety reports** on the charger, dock and battery pack to IEC standards, from an accredited lab.
7. **Robot safety file**: the standard the robot was designed to, the risk assessment, and the maker's safety manual.
8. **Data map**: what the robot records, where it sends it, who at the maker can reach it, and how to turn remote access off.
9. **Warranty and spares terms in writing**: warranty period by subsystem, what voids it, whether an authorised third party may repair, the spare parts price list, and the location of in-country stock.
10. **Service manual, fault code table and diagnostic access** for the operator, so the robot can be kept running without a ticket to Shenzhen.

WHAT WE COULD NOT PIN DOWN

No ASEAN customs ruling on a humanoid or quadruped has been published; the 8479.89 reading rests on US rulings. Malaysia's sales tax at the eight-digit level after July 2026, Indonesia's electronics import annex, radio fees and official processing times in Indonesia, Malaysia and Vietnam, every Thai radio fact from the regulator's own pages, the publication status of the new ISO 13482, excise on robots in Thailand and Vietnam, and the 2026 ACFTA line rates are all open. We will update this page as each closes.

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