



日本貿易振興機構(ジェトロ)

ASEAN 貿易枠組みの近代化：改定 ATIGA に署名 ASEAN Trade Framework Modernization: ATIGA Upgrade Signed

【要約】

2025年10月、ASEAN諸国はASEAN物品貿易協定(ATIGA)の第2改正議定書に署名した。2010年以来の最も包括的な近代化で、全加盟国の署名から18カ月後(2027年半ば頃)の発効が見込まれる。

主な変更点に、458品目の品目別規則(PSR)の緩和、ATIGAの原産地証明書(CO)であるフォームD/電子フォームの要件緩和、システム故障時におけるハードコピーCOやスキャンしたPDFCOの受け入れなど運用の柔軟化、および輸入後の関税還付制度の導入が挙げられる。また、中小企業、サプライチェーン、環境など7つの新たな章が追加され、透明性や規制の予測可能性も強化される見込み。

新たに設けられた再製造品に関する規定により、域内における再製造品の定義が明確化されることで、再製造業者が域内のネットワークを活用できる環境が整備される見込み。ATIGAの改正により、ASEANが統合された生産拠点としてさらに強化されることが期待される。

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Title: ASEAN Trade Framework Modernization: ATIGA Upgrade Signed

Country/Region: ASEAN, Indonesia

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Overview

On 25 October 2025, ASEAN member states [started the signing](#) of the Second Protocol to Amend the ASEAN Trade in Goods Agreement (ATIGA Upgrade), representing the most comprehensive modernization of the regional trade framework since 2010. The upgrade introduces seven new chapters, substantially liberalizes rules of origin, and exceeds RCEP commitments in several areas including transparency and digital customs procedures. The detailed provisions described in this report are based on informed sources and analysis, as the full official text of the ATIGA Upgrade has not been publicly released.

The agreement enters into force 18 months after all ten members complete signing. As of November 2025, [six countries have signed](#) (Malaysia, Indonesia, Brunei, the Philippines, Singapore, Thailand), [two signed ad referendum](#) pending ratification (Cambodia, Laos), and [two are expected to sign in December 2025](#) (Myanmar, Vietnam). Entry into force is projected for mid-2027.

For Japanese manufacturers with ASEAN operations, the upgrade delivers immediate cost reduction opportunities through liberalized Product Specific Rules for 458 tariff lines spanning textiles, electronics, chemicals, fisheries, and precision instruments. Full e-Form D implementation eliminates paper documentation, while post-importation claims provisions allow tariff refunds even after customs clearance—reducing compliance risk. Seven new chapters address trade remedies, MSMEs, supply chain connectivity, humanitarian crisis management, environmental cooperation, and transparency.

Details and Analysis

Rules of Origin and Tariff Savings. Liberalized PSRs for 458 tariff lines enable Japanese manufacturers to source more inputs from Japan or third countries while maintaining ASEAN preferential tariff eligibility. Textile/garment rules (HS 61-63) now allow greater sourcing flexibility, benefiting Japanese apparel operations in Vietnam and Indonesia. Electronics (HS 85) and chemicals (HS 28-29) have reduced regional value content requirements. Simplified Certificate of Origins (CO) procedures eliminate FOB price declarations and "Issued Retroactively" markings. The post-importation claims mechanism—first in intra-ASEAN trade—allows companies to claim duty refunds after clearance if initial preferential treatment was denied, eliminating penalty for documentation errors.

Digital Customs Infrastructure. Mandatory e-Form D eliminates paper certificates except during system failures. Member states must accept electronic trade administration documents—stronger than RCEP's "endeavour" language. Reference to ASEAN AEO Mutual Recognition Arrangement guarantees expedited clearance for certified Japanese companies across all member states. Adoption of UNCITRAL Model Law on Electronic Transferable Records enables electronic bills of lading and trade finance documents. Japanese companies must upgrade ERP systems and train staff on digital documentation before 2027 implementation.

Transparency and Regulatory Predictability. Member states are encouraged to publish import/export procedures, forms, and rules of origin in English—unprecedented in ASEAN FTAs. Technical consultations

on non-tariff measures allow formal complaints with 60-day response and 180-day resolution timelines. Sectoral initiatives enable industry-specific discussions through the ATIGA Joint Committee. Enhanced notification requires 60-day advance notice of new measures, providing businesses time to prepare and comment. These provisions reduce regulatory uncertainty for Japanese companies managing multi-country operations.

SPS and Technical Standards. Digital technology provisions for SPS certification and notification—unique among ASEAN FTAs—streamline food and pharmaceutical exports. Strengthened regional condition recognition (pest/disease-free areas) with detailed equivalence, risk analysis, and audit procedures benefit Japanese agricultural and medical device exporters. STRACAP chapter establishes technical discussion mechanisms with expedited timelines for urgent matters. Both chapters align with international standards which improve compatibility with Japanese domestic regulations.

New Operational Frameworks. The Trade Remedies chapter provides transparency for safeguard and anti-dumping investigations. MSME chapter explicitly covers micro enterprises, facilitating Japanese SME participation through information sharing. Supply Chain Connectivity chapter formalizes logistics cooperation. Trade in Humanitarian Crisis Situations—ASEAN's first such provision—ensures WTO-compliant crisis measures that avoid supply chain disruptions. The Trade and Environment chapter commits to green/circular economy cooperation. Alternative Dispute Resolution through Good Offices, Conciliation, or Mediation offers non-binding, low-cost dispute resolution—first in ASEAN FTAs.

Immediate Priority Actions

Supply Chain Optimization (Q1-Q2 2026): Conduct origin qualification assessments for products currently excluded from ATIGA preferences. Model sourcing scenarios quantifying tariff savings against restructuring costs. Focus on textiles, electronics, and chemicals where PSR liberalization is substantial. Test new configurations using post-importation claims to minimize risk.

Digital Infrastructure Investment (Starting Now): Transition from paper-based processes to electronic systems. Upgrade ERP systems for digital documentation. Train procurement and logistics teams on e-Form D requirements. Establish connections with ASEAN customs electronic platforms. Pursue or upgrade AEO certifications in Japan and key ASEAN markets to maximize expedited clearance benefits.

Compliance Monitoring Systems (Q1 2026): Establish dedicated resources to track ATIGA implementation across ten jurisdictions. Subscribe to official notifications from each member state. Engage local legal and customs advisors in priority markets. Participate in association forums. Develop internal alert systems for regulatory changes with 60-day notification windows.

Implementation Timeline and Critical Considerations

With entry into force projected for mid-2027, Japanese companies have an 18-month preparation window. However, the timeline covers entry into force only—individual provisions may have staggered implementation, particularly in less developed member states. Companies must monitor country-specific timelines rather than assuming uniform regional implementation. Less developed members may require extended transitions. Enhanced transparency provisions, while beneficial, create compliance obligations requiring systematic tracking across jurisdictions. Companies need dedicated trade compliance resources or external advisory support to manage regulatory changes across ten different legal systems.

Strategic Positioning

The ATIGA Upgrade reinforces ASEAN as an integrated production hub. For Japanese companies with regional commitments, early preparation creates competitive advantages in leveraging liberalized

rules, digital systems, and transparency mechanisms. The question is not whether to engage, but how quickly companies can position themselves to capture cost savings and efficiency gains available from mid-2027.