

# The Indonesian Creative Industry Strategy Model in The Era of 4.0 – A Case Study in the Covid-19 Era

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**ABSTRACT**— This research will examine the fashion-based creative industry. The fashion commodity creative industry sector contributes to Indonesia's exports of more than 50% of the total exports of the creative industry sector. Apart from the international market, the domestic market also shows a large transaction value on the e-commerce platform side. Since the Covid-19 outbreak in various countries in the world including Indonesia, the economy has shown sluggishness. Therefore, the creative industry sector, especially fashion, must be more creative to survive in this uncertain situation. Therefore, the aim of this study is to analyze how the creative industry in Indonesia, especially fashion, has adapted to the uncertain situation during the Covid-19 pandemic. This research method uses a mix method approach, which is based on quantitative data from the results of TBI calculations and qualitative data refers to secondary data.

**KEYWORDS:** Indonesian fashion, MSMEs, e-commerce, social commerce, covid-19

## 1. INTRODUCTION

The Indonesian economy is one of which is supported by the creative economy, where the creative economy is a new economic concept that intensifies information and creativity by relying on ideas and stock of knowledge from Human Resources (HR) as the main production factor in economic activities [47]. Where the creative economy is a development of the previous economic system, namely an economy based on agriculture and mining, an economy based on industrial activities, and an economy based on information technology [5]. The creative economy is an economic system supported by the creative industry, the creative industry itself plays an important role in creating added value through the existence of creative products or services, so that this creative industry can reflect the potential and productivity of local resources [18]. The creative economy generates income through international and domestic trade, intellectual property rights, and creates new jobs in knowledge-intensive positions in all types of companies. This is because the creative economy is no longer focused on its economic value, but has now shifted towards its social and cultural values [21]. Based on statistical data, in 2016 the export of creative economy commodities reached US \$ 19.9 billion. During the period 2010 - 2016, exports of creative economy commodities contributed 11.86% of total non- oil and gas exports [2]. Referring to the creative economy classification by the Indonesian Creative Economy Agency, there are 16 creative industry sub-sectors. Among the 16 sub-sectors of the creative industry, fashion commodity ranks first as the creative industry that contributes to exports. The contribution of fashion commodities is more than 50% of the total creative industry [2]. The role of the creative industry in the trade balance is increasingly visible when export growth has increased, this will also affect the value of exports in the non-oil and gas sector which can affect the trade balance. Based on data from Indonesia's Trade Balance for the period 2015-2020, Indonesia experienced a deficit in 2018-2019, deficits occurred in the oil and gas sector [26]. This means that the non-oil and gas sector can be maximized, especially in the creative industry sector as a support for the Indonesian economy.

**Table 1.** Indonesia Trade Balance Period 2015 – 2020

US \$ Million

Indonesia Trade Balance Period 2015 - 2020						
Description	2015	2016	2017	2018	2019	Jan-Jul 2020
Trading Total	293,061.1	280,839.0	325,813.7	368,724.0	338,958.7	171,457.8
Oil And Gas	43,187.5	31,844.7	40,060.3	47,040.1	33,673.7	13,135.8
Non Oil And Gas	249,873.5	248,994.3	285,753.4	321,683.9	305,285.1	158,322.0
Export	150,366.3	145,186.2	168,828.2	180,012.7	167,683.0	90,090.3
Oil And Gas	18,574.4	13,105.5	15,744.3	17,171.7	11,789.2	4,647.5
Non Oil And Gas	131,791.9	132,080.8	153,083.9	162,840.9	155,893.8	85,442.8
Import	142,694.8	135,652.8	156,985.6	188,711.4	171,275.7	81,367.5
Oil And Gas	24,613.2	18,739.2	24,316.0	29,868.4	21,884.4	8,488.3
Non Oil And Gas	118,081.6	116,913.6	132,669.5	158,842.9	149,391.3	72,879.2
Trade Balance	7,671.5	9,533.4	11,842.6	-8,698.7	-3,592.7	8,722.8
Oil And Gas	-6,038.8	-5,633.8	-8,571.7	-12,696.7	-10,095.2	-3,840.8
Non Oil And Gas	13,710.3	15,167.2	20,414.3	3,998.0	6,502.5	12,563.6

Source: [26]

One of Indonesia's mainstay creative industries in the international market is the fashion industry, seen from the 2015-2029 trade balance it is always a surplus with an average value of US \$ 3,351,823 billion for HS Code 61, namely Articles of apparel and clothing accessories, knitted or crocheted [48]. However, as is currently happening, the world economy is faced with a major dilemma since the corona virus pandemic has spread to almost all countries in the world. This condition not only affects health issues, but also has a major impact on the economy. Where several countries have implemented export restriction policies for certain commodities, one of which is commodities related to health [24]. The world's economic dilemma has also triggered a domestic economic dilemma, where the PSBB (Large-Scale Social Restriction) policy requires people to stay at home, especially for areas with high covid cases or in the red zone [44]. As a result, the offline market experiences an economic downturn, due to limited offline transactions, as well as for exports because factories or production houses have to limit working time to prevent crowds [38]. This non-ideal condition requires entrepreneurs to design strategies that are adaptable to current conditions, one of which is through the online market. Today, the rapid exchange of information is getting easier in the 4.0 era, such as the development of electronic commerce or e-commerce, where business activities involving digital platforms lead to automation of transactions and company workflows [18]. The presence of e-commerce has helped online marketing develop into a strategic management instrument, the approach has virtually evolved according to consumer demand [40]. The advantages of using e-commerce include being able to cut costs and time, but it can increase productivity, expand markets, and increase customer loyalty [43].

This non-ideal condition attracts the attention of researchers to be analyzed more deeply, how entrepreneurs can adapt in the midst of economic uncertainty, so that it is hoped that this research can formulate a strategic business adaptation model for the creative industry, especially in the Indonesian fashion industry, both for the international market and the domestic market, and can be a literature recommendation for further research.

## 2. LITERATURE

### 2.1 Fashion and e-commerce industry

In 2019, internet users in Indonesia are projected to be more than 65% of the total population in Indonesia. This is predicted based on the results of a survey by the Indonesian Internet Network Providers Association

(APJII) in 2018, that the penetration of internet use in Indonesia in that year reached 64.8% or more than 171.17 million people are accustomed to the internet. The increase in internet users is mainly supported by the widespread use of smartphones and the completion of the Palapa Ring fiber optic cable project that connects internet networks in Indonesia [1], [42]. The survey results show that active internet users in Indonesia are the younger generation with an age range of 10-44 years. Where the needs vary, apart from being a communication medium, the use of the internet is also used as a work medium for entrepreneurs who involve e-commerce / social commerce technology (social media as e-commerce) [1]. The great potential of e-commerce in Indonesia can be seen from the growth of e-commerce platforms in the form of marketplaces and social commerce which are increasingly stretching every year. In 2018, the value of e-commerce transactions reached Rp. 77.766 trillion. This figure skyrocketed 151% compared to the previous year which reached IDR 30.942 trillion, where the largest value was inscribed by the fashion sector, namely IDR 12.125 trillion, followed by Gadgets & accessories (IDR 16.823 trillion); Computer & accessories (Rp 7,814 trillion); Personal care & cosmetic (Rp. 7,443 trillion); Electronic (Rp. 5.255 trillion); HH & Office Supplies (Rp 4.909 trillion); Automotive & Accessories (Rp. 3.739 trillion); Food and beverages (Rp 2.289 trillion); Photography (IDR 2.49 trillion); Sport Apparel (Rp 2.49 trillion); Book & Stationary (IDR 689.39 billion); Music and film (IDR 453.32 billion); and Others (Rp. 11,377 trillion) [19]. The 2018 data shows that the fashion sector is one of the mainstay sectors in the e-commerce market [9].

Based on the literature, most fashion companies sell in a broad market, the role of globalization represents a fundamental opportunity to offset market saturation, where conditions are mature and traditional. The presence of e-commerce offers to international sales by providing wide brand visibility without geographical restrictions [33]. The fashion market is a highly competitive market, where adaptability and rapid responsiveness are required, especially for customer-brand relationships. Especially with various interactive media like today, it allows fashion brands to talk to each other with customers without limitations of time, place, and substance, so that communication turns into direct, creative and intuitive two-way communication [7]. The current economic situation with existing technological developments makes the use of e-commerce technology not only implemented by large companies, but Small and Medium Enterprises also participate in e-commerce market competition, especially the excess flexibility in organization makes it easier to participate in the e-commerce market [13]. Much literature states that the application of internet adoption to marketing capabilities can provide the ability to target specific customers using communication. Internet adoption is also the key to improving the process of developing new products or adapting products based on market demand [45].

When entrepreneurs are sensitive to involving their business in the digital market, they are increasingly active in creating interesting marketing content. Content marketing is the art of creating and distributing content that is authentic and relevant to brands, or as an attraction to be closer to consumers. Where content is consistently aimed at influencing consumers to buy their products, in addition to traditional advertising [8]. E-commerce is growing faster due to active marketing through public figures, as well as the specialization of business models, ease of transactions, special contracts with certain products both domestic and foreign, making e-commerce platforms in demand for online shopping transactions [22].

E-commerce is now paying attention to how their content is shared with consumers, especially for e-commerce or social commerce for fashion products. Aesthetic elements are considered so that consumers are interested in buying. An easy indicator to measure the success of content marketing is to look at marketing network traffic such as websites, Instagram, Facebook, and YouTube, in the form of the number of visitors on the site, the number of followers, the number of viewers on the YouTube account or live Instagram account [8].

## 2.2 Fashion industry in pandemic era

The creative industry is an industry that maximizes local potential, this potential can be a foundation for recovery for local communities and economies affected by COVID-19 [37]. The economic impact of Covid-19 in various countries, shows that it is not only the direct and indirect channels into the real economy that are relevant, psychological effects on the demand side can play a strong role in the current epidemic. Various world economic scenarios show a large number of possible negative real GDP, including a major international recession [51]. September 16 data shows this virus has infected more than 29 million worldwide, of which more than 900 thousand people have died due to this virus [52].

The apparel industry, and fast fashion in particular, can be characterized by short life cycles, high demand volatility, low predictability and high impulsive buying. Before the Covid-19 outbreak, the fashion industry itself was an industry full of uncertainty and unpredictability. The Covid-19 outbreak forced several countries to lock or limit exports, which resulted in production restrictions affecting supply chain management [35].

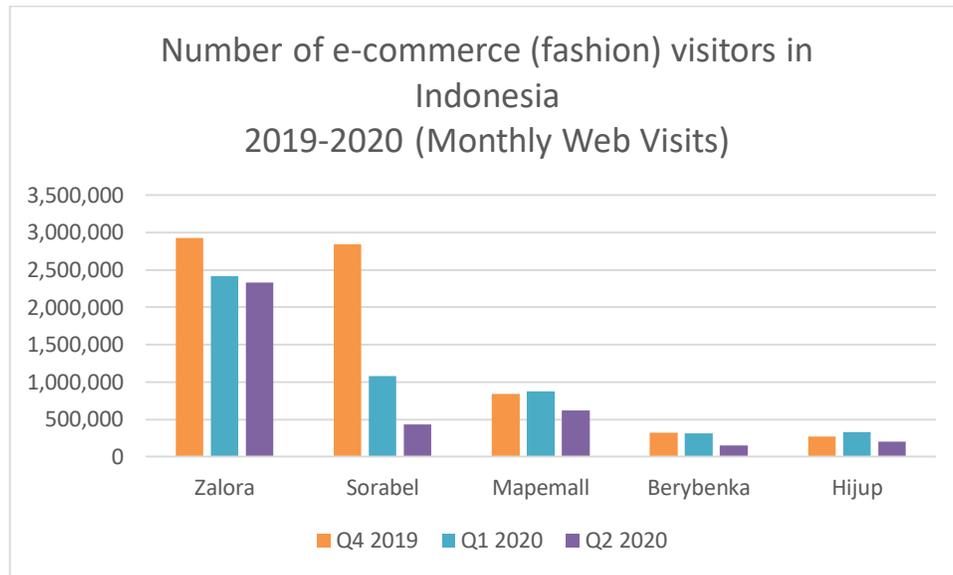
Before the Covid Outbreak happened, the use of e-commerce for digital transactions was slowly but massively growing, especially in most traditional businesses, they began to expand the reach of their target customers online. When the Covid Outbreak occurred, circumstances indirectly forced us to be accustomed to new conditions, namely conditions where transactions were carried out online to minimize direct contact. The development of e-commerce technology and convenience in terms of logistics delivery, have also contributed to increasing the number of visitors in major marketplaces in Indonesia. Data for the second quarter of 2020 shows that there has been a fairly high increase in e-commerce for Shopee and Tokopedia compared to the fourth quarter of 2019 and the first quarter of 2020, while for the other two e-commerce such as Bukalapak and Lazada there was a slight decrease, while for Blibli there was a slight decrease. decreased in the first quarter of 2020 but then began to increase in the second quarter of 2020. These five e-commerce sites are major e-commerce in Indonesia, selling almost all types of commodities, both trade and non-trade, chart conditions from the fourth quarter of 2019 to the second quarter In 2020, which is the quarter of the Covid 19 epidemic, it can be analyzed that the condition of Covid-19 does not really affect transactions in e-commerce, but instead increases supported by the #dirumahaja or #stayathome campaign.



Source: [23]

**Figure 1.** Number of e-commerce visitors in Indonesia 2019-2020

In e-commerce that specifically sells fashion products, there is a decrease in visitors for E-commerce Sorabel and Lazada, while for e-commerce Mapemall, Berrybenka, and Hijup there is an increase in the 1st quarter of 2020 then decreased in the 2nd quarter of 2020. Graphs 1 and 2 describes the number of visitors visiting e-commerce; not a turnover graph obtained, but can describe how business activities, especially during the Covid-19 pandemic.



Source: [23]

**Figure 2.** Number of e-commerce visitors (fashion) in Indonesia 2019-2020

The impact of Covid-19 on the Indonesian economy can be seen based on statistical data from the Indonesian Central Bureau of Statistics, that the Indonesian economy in the second quarter of 2020 against the second quarter of 2019 experienced a growth contraction or minus 5.32 percent (y-on-y). From the production side, the Transportation and Warehousing Business Field experienced the highest growth contraction of 30.84 percent. From the expenditure side, the components of goods and services exports and imports of goods and services experienced a growth contraction of 11.66 percent and 16.96 percent respectively [4]. This data shows that Indonesia is experiencing an economic downturn as well as most countries in the world during this global pandemic. One of the steps to face the crisis caused by this pandemic is to take advantage of an e-commerce platform. The e-commerce business is the main need for the public in transactions during this pandemic, considering that health protocols must be applied in every aspect [25].

### 3. METHODOLOGY

This research was conducted using a mix-method approach [14], namely a combination of quantitative data with qualitative data. Quantitative data comes from the calculation of the Trade Balance Index in the 2016-2019 period, through a formula;

$TBI = \text{Net trade} / \text{Total trade}$ ; The TBI value is  $-1 \geq 1$ , where the minus condition indicates that the product is not a superior product, either for export or import. The Trade Balance Index in this study is to measure the potential for export commodities, especially in HS Code 62, namely Articles of apparel and clothing accessories, not knitted or crocheted in the international market.

Qualitative data were obtained from a desk research approach based on data from various media, journals, reports, and other secondary data. As according to [16] that qualitative research can bring up surprising facts and findings. According to [15] there are at least four types of qualitative data information, namely observation

(participant and non-participant), interviews (closed and open), documents (private to public), and audiovisual material (photography, videography etc). As previously explained, the global pandemic, namely Covid-19, has also affected the economic sector besides health. The purpose of this study is to analyze how the creative industry in Indonesia, especially fashion, has adapted to the uncertain situation during the Covid-19 pandemic.

#### 4. ANALYSIS AND DISCUSSION

One of the HS Code for fashion commodities is the HS Code with code 62, which is 62 Articles of apparel and clothing accessories, not knitted or crocheted. Indonesia's exports represent 1.9% of world exports for this product, its ranking in world exports is 13. The average distance of importing countries is 11750 km and the export concentration is 0.27 [48]. Based on statistical data, the 2016-2019 period shows that the Trade Balance Index that is in the HS Code 62 group which is exported by Indonesia, the majority is above 0.6 with changes every year tend to be stable as in table 2. There are only 4 sub HS Code 62 which TBI growth is minus, namely HS Code 6213, HS Code 6214, HS Code 6215, and HS Code 6217. Based on TBI data in 2019, the highest TBI scores are in HS Code 6207 and 6208, where TBI scores reach 0.96. Where HS Code 6207 is Men's or boys 'singlets and other vests, underpants, briefs, nightshirts, pajamas, bathrobes, ... and HS Code 6208 is Women's or girls' singlets and other vests, slips, petticoats, briefs, panties, nightdresses, ...

This means that these products have a large market in terms of exports, because their export value is much greater than the value of imports. Table 2 shows that the fashion sector in HS Code 62 is a stable export commodity.

**Table 2.** Indonesian total export - HS Code 62 Articles of apparel and clothing accessories, not knitted or crocheted

Unit: US Dollar thousand

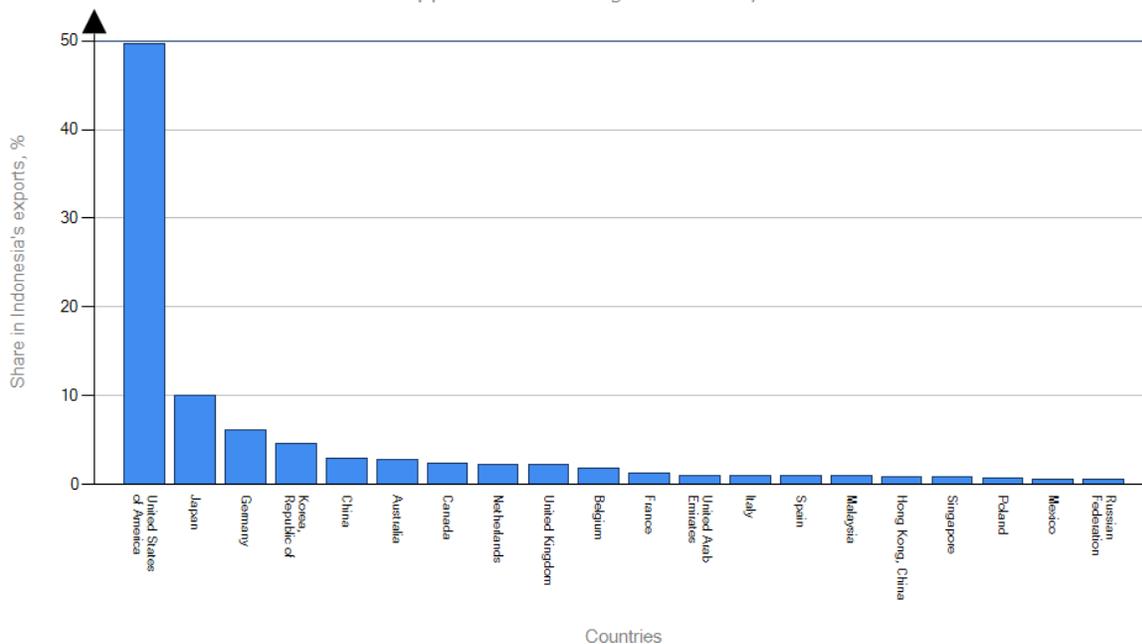
Code	Product label	TBI in 2016	TBI in 2017	TBI in 2018	TBI in 2019
'6201	Men's or boys' overcoats, car coats, capes, cloaks, anoraks, incl. ski jackets, windcheaters, ...	0.96	0.95	0.94	0.94
'6202	Women's or girls' overcoats, car coats, capes, cloaks, anoraks, incl. ski jackets, windcheaters, ...	0.82	0.80	0.81	0.83
'6203	Men's or boys' suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches ...	0.90	0.88	0.86	0.87
'6204	Women's or girls' suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, ...	0.89	0.87	0.86	0.81
'6205	Men's or boys' shirts (excluding knitted or crocheted, nightshirts, singlets and other vests)	0.92	0.92	0.90	0.89
'6206	Women's or girls' blouses, shirts and shirt-blouses (excluding knitted or crocheted and vests)	0.92	0.89	0.90	0.86
'6207	Men's or boys' singlets and other vests, underpants, briefs, nightshirts, pajamas, bathrobes, ...	0.99	0.98	0.96	0.96
'6208	Women's or girls' singlets and other vests, slips, petticoats, briefs, panties, nightdresses, ...	0.98	0.96	0.94	0.96
'6209	Babies' garments and clothing accessories of textile materials (excluding knitted or crocheted ...	0.93	0.91	0.86	0.78
'6210	Garments made up of felt or nonwovens, whether or not impregnated, coated, covered or laminated; ...	0.89	0.86	0.87	0.88
'6211	Tracksuits, ski suits, swimwear and other garments, n.e.s. (excluding knitted or crocheted)	0.90	0.90	0.90	0.82

'6212	Brassieres, girdles, corsets, braces, suspenders, garters and similar articles and parts thereof, ...	0.78	0.75	0.58	0.69
'6213	Handkerchiefs, of which no side exceeds 60 cm (excluding knitted or crocheted)	-0.46	-0.94	-0.93	-0.98
'6214	Shawls, scarves, mufflers, mantillas, veils and similar articles (excluding knitted or crocheted)	-0.65	-0.85	-0.94	-0.90
'6215	Ties, bow ties and cravats of textile materials (excluding knitted or crocheted)	-0.87	-0.91	-0.97	-0.91
'6216	Gloves, mittens and mitts, of all types of textile materials (excluding knitted or crocheted ...	0.97	0.95	0.96	0.95
'6217	Made-up clothing accessories and parts of garments or clothing accessories, of all types of ...	-0.55	-0.65	-0.71	-0.59

Source: [48], [49] (calculated by the author)

Based on the 2019 market share chart, the United States is Indonesia's largest market share, nearly 50% of the total fashion products with HS Code 62 are exported to the United States, followed by Japan, Germany, South Korea, and other countries as illustrated in graph 3. In 2020 as it is today, the world is experiencing an economic downturn due to the global pandemic, namely Covid-19. This is the government's concern on how to continue to be creative in facing uncertain situations. The Ministry of Trade of the Republic of Indonesia, together with the Consulate General of the Republic of Indonesia (KJRI) in Los Angeles and the Indonesia Trade Promotion Center (ITPC) Los Angeles in the United States, held Virtual Business Coaching which was attended by approximately 108 participants, most of whom were Indonesian business actors via the platform. video conference. The Virtual Business Coaching is a government step to prepare and maximize export potential to the United States. The next stage after Virtual Business Coaching is Virtual Business Matching. VBM is a meeting between buyers (importers from the United States) and suppliers (Indonesian MSMEs) to mutually adjust demand and supply according to the needs of buyers in the United States while still meeting the requirements and regulations in the United States. Therefore, in VBM, participants are expected to present their products as best and as possible, considering that the presentation is delivered virtually via a video conference platform [39].

List of importing markets for a product exported by Indonesia in 2019  
Product : 62 Articles of apparel and clothing accessories, not knitted or crocheted



Source: [48]

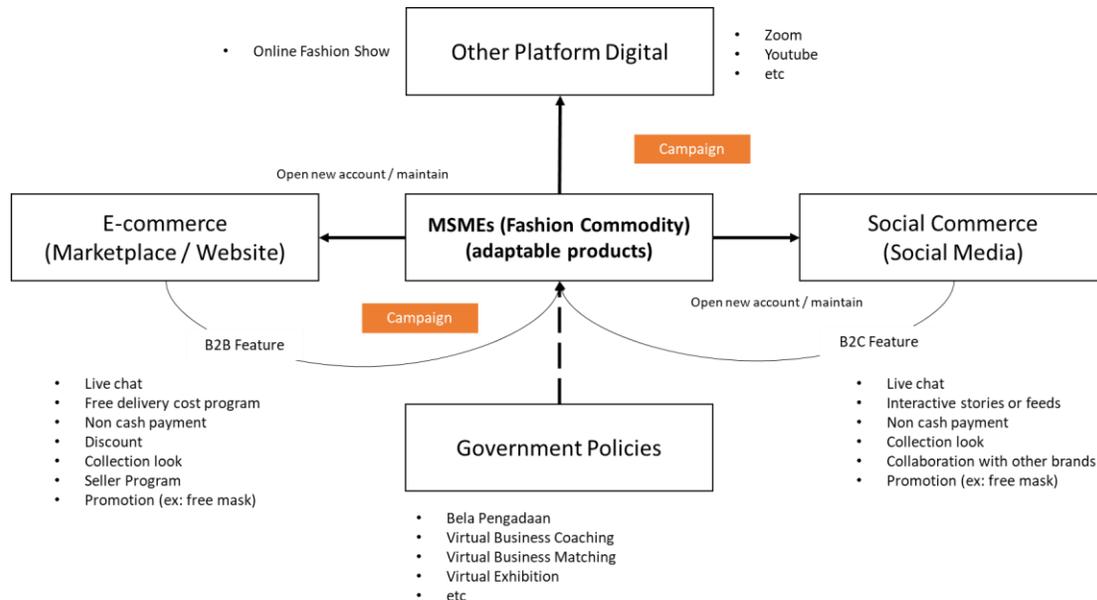
**Figure 3.** List of importing markets for a product exported by Indonesia in 2019, HS Code 62

This pandemic condition has created a work from home policy for jobs that can be done remotely or remotely. The concept of Work From Home (WFH) has basically been sparked when the 4.0 industrial revolution began where sophisticated machines and technology with the concept of automation were relied on in the process of producing goods and all needs can be met through digitization [20]. On the one hand, the WFH policy has triggered decreased productivity for several types of businesses, but on the other hand, the WFH policy has actually increased business activities in the e-commerce sector [32]. Where the WFH policy or the #dirumahaja campaign slightly forces people to get used to doing activities virtually. Bank Indonesia noted that e-commerce transactions jumped to US \$ 2.4 billion, an increase of 26% from the second quarter of 2019. As of April 2020, daily transactions increased by 4.8 million transactions compared to the average in the second quarter of 2019. It was a new consumer shopping online for the first time when PSBB was recorded to have increased by 51% [10]. This condition is as shown by the graph of e-commerce visitors in the second quarter of 2020, that e-commerce visitors increased compared to the 1st quarter of 2020 and the 4th quarter of 2019. Where the Covid-19 virus has appeared in the 4th quarter of 2019 in Wuhan China, whereas in Indonesia this pandemic only appeared at the end of the first quarter [3]. This condition is increasing for e-commerce with complete sales variants, but in contrast to e-commerce which specifically sells fashion products, which is seen from visitor activity, tends to decline every quarter [23]. The condition of the Indonesian economy in the second quarter of 2020 showed minus growth compared to the second quarter of 2009 (year on year) [50]. Hence, various strategies were carried out by entrepreneurs in the fashion industry to survive the economic downturn. The following is a strategic model for the fashion industry in facing the Covid-19 pandemic, by involving digital platforms:

Strategy	Tools	Source
Campaign	#dirumahaja; #belanjadarirumah	[6], [19], [41]
Promotion	Free shipping, discount, optimization live chat feature	[29], [53]
Payment	Non-cash	[28]
Adaptable	Covid 19 kit: gloves, masks, jackets, non-medical personal protective equipment	[27], [30], [46]
Government	Bela Pengadaan Virtual Business Coaching Virtual Business Matching Virtual Business Exhibition	[31], [36], [39]
Collection look	Online Fashion Show	[11], [34]

As previously discussed, the fashion industry is one of the mainstays of commodities for both the export market and the domestic market. This can be seen from the growth in exports from 2016-2019 based on TBI [48], and the total value of e-commerce transactions in the domestic market [17]. Since the Covid-19 outbreak the impact has been felt on the Indonesian economy, where several destination countries have implemented regional quarantine or restrictions on export and import activities, which have also influenced Indonesia's export performance, even though exports related to textiles still show a positive trend, one of which is because of the existence of adaptation to meet market demand in the form of Personal Protective Equipment and Masks

[12]. Thus, adaptability is needed in dealing with situations like today. The development of the 4.0 era is one of the saviors for the economy, where now all transactions are done digitally to maximize the Health protocol to reduce the spread of the Covid-19 Virus.



**Figure 4.** Strategic model for the fashion industry in the Covid-19 pandemic era

Figure 4 depicts a strategic model for the fashion industry in Indonesia to survive this pandemic era. It can be seen that the fashion industry in Indonesia, which is the majority of SMEs, has begun to utilize and maximize commercial technology in the form of e-commerce and social commerce. Where this combination by maximizing existing features can maximize market potential with products that adapt to current conditions, such as masks, non-medical personal protective equipment, jackets, and so on. Where the product's adaptability on the fashion side has turned into a major necessity, in order to minimize the risk of contracting it. How the style can still follow trends with current conditions. Of course, the role of campaigns, such as #dirumahaja and the assurance that the products made have followed the Health protocol, show that they are very serious about presenting products that are safe, innovative, and good in terms of design. Even though now the situation is completely uncertainty and it is difficult to carry out business activities offline, the presence of a digital platform that can facilitate online activities is the answer. Where, the fashion industry can still promote its collections, through online fashion shows, or through live chat features on the marketplace and social commerce platforms. The adaptability of products and markets is the key to surviving a pandemic. The government has also taken part in all policies to stimulate the economy affected by this pandemic, such as through the procurement platform program, called Bela Pengadaan. Bela Pengadaan encourages Micro and Small Businesses to be able to participate in the process of procuring goods / services carried out by Ministries / Institutions / Local Governments [31]. The government is also collaborating with agencies related to export activities abroad or in export destination countries, by holding Virtual Business Coaching and Virtual Business Matching, this program has been implemented, in collaboration with the Consulate General of the Republic of Indonesia (KJRI) in Los Angeles and Indonesia Trade Promotion Center (ITPC) Los Angeles, United States [39]. Figure 1 shows that maximizing the features of e-commerce, social commerce, digital platforms, and government policies is an art in developing their business.

## 5. CONCLUSION

Based on the results of the analysis and discussion, it can be concluded that the fashion industry can adapt

even in the midst of uncertain conditions, namely through product adaptation and market adaptation. The campaign carried out is inseparable from current conditions, such as supporting #dirumahaja activities, which also encourage shopping activities virtually. From this research, many fashion industries have adapted in order to survive and thrive in facing uncertain market situations. Various marketing strategies were carried out, such as providing discounts, free shipping, direct product explanation through the live chat feature, collaboration with other MSMEs, maximizing non-cash payment features, and conducting online fashion shows. Online fashion shows are also carried out by well-known brands, where this step is to keep fashion followers looking up to date. The government as a policy maker also takes part in encouraging MSMEs to participate in the Bela Pengadaan application, where MSMEs can participate in government spending activities, which will directly drive the country's economy. Both the central and local governments are trying to drive the country's economy, such as ordering non-medical masks or masks made of cloth, which are produced by MSMEs, the majority of which have not previously produced non-medical masks.

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