

## Implementation of Front-of-Pack Labeling on Sugar-Sweetened Beverages: Comparative Analysis Between Indonesia and Singapore

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Article	Abstract
<p><b>Keywords:</b> Consumer Protection Law; Nutri Grade; Sugar-Sweetened Beverage.</p> <p><b>Article History</b> Received: Aug 01, 2025; Reviewed: Oct 20, 2025; Accepted: Jan 01, 2026; Published: Jan 20, 2026.</p>	<p>Indonesia ranks third in Southeast Asia in terms of the population consumption of sugar sweetened beverages (SSBs). The increasing consumption of such beverages has also contributed to a rise in the prevalence of non-communicable diseases (NCDs). The World Health Organization (WHO) recommends a daily sugar intake limit of 50 grams, equivalent to four tablespoons, which has been adopted by Indonesia Ministry of Health. Business actors are required to comply with obligations set out in the Consumer Protection Law. However, nutritional labels are often difficult for consumers to understand, creating an urgency to regulate simpler and more accessible labeling formats. One such simplified format is the Front of Pack Nutrition Labeling (FoPNL). Singapore has regulated and implemented FoPNL on packed products through the Nutri Grade labeling system. In Indonesia, one retail supermarket has started to apply FoPNL system Nutri Grade on sugar sweetened beverage products. There have also been efforts to impose taxes on sugar-sweetened beverages as a strategy to reduce consumption. This research employs a normative juridical method, relying on statutory regulations and</p>

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their derivatives, as well as literature from books, journal and printed media. The findings indicate that the implementation of Nutri Grade labeling by retailer businesses serves as a form of legal protection to customers.

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## Introduction

Sugar-sweetened beverages (SSBs) in packaging are defined by the Center for Indonesia's Strategic Development Initiatives (CISDI) as "Sugar-sweetened beverages are any liquids that are sweetened with various forms of added sugars such as brown sugar, corn sweetener, corn syrup, dextrose, fructose, glucose, high-fructose corn syrup, honey, lactose, malt syrup, maltose, molasses, raw sugar, and sucrose".<sup>1</sup> SSBs refers to all packaged sweetened beverages that contain sugar, whether derived from naturally sweet ingredients or added sugars in liquid or solid form.<sup>2</sup> According to the applicable law, sugar-sweetened beverages are regulated in Ministry of Health Regulation No. 63 of 2015, Article 1 point 2: "Ready-to-eat food is food and/or beverages that have been processed and are ready to be served directly at the place of business or outside the place of business upon order."<sup>3</sup> The increase in SSB consumption correlates with the rising prevalence of non-communicable diseases such as diabetes. In response to this, the Chair of the Indonesian Consumers Foundation, Thea, emphasized the need for supervision regarding transparency of sugar content labeling in food and beverage products to ensure consumer protection.<sup>4</sup>

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<sup>1</sup> Centers for Disease Control and Prevention. *Get the Facts: Sugar-Sweetened Beverages and Consumption*, 2022 <https://www.cdc.gov/nutrition/data-statistics/sugar-sweetened-beverages-intake.html>

<sup>2</sup> CISDI Secretariat. *Frequently Asked Questions: Sugar-Sweetened Beverages (SSBs)* (Jakarta: Center for Indonesia's Strategic Development Initiatives, 2022) <https://cdn.cisdi.org/documents/fnm-ENG---FAQ-Food-Policy-Projectpdf-1701747863405-fnm.pdf>.

<sup>3</sup> Republic of Indonesia, *Peraturan Menteri Kesehatan Republik Indonesia Nomor 63 Tahun 2015 tentang Penetapan Jenis Bahan Tambahan Pangan*, Pasal 1 Ayat (2).

<sup>4</sup> Tulus Abadi. "YLKI Anggap Produsen Sengaja "Sembunyikan" Label Peringatan Kesehatan", *detikhealth*, 2026. <https://health.detik.com/berita-detikhealth/d-4742745/ylnki-anggap-produsen-sengaja-sembunyikan-label-peringatan-kesehatan>.

Household consumption of SSBs in Indonesia has reached an average of 16 packaged units per month.<sup>5</sup>

The rising burden of non-communicable diseases (NCDs) in Indonesia reached 73 % of all deaths in 2018.<sup>6</sup> This increase is partly attributable to shifts in dietary patterns, notably higher consumption of foods and beverages rich in sugar, salt, and fat. Sugar-sweetened beverages have contributed to weight gain, increased risk of type 2 diabetes, heart disease, and other chronic conditions. Between 2013 and 2021, beverage consumption per capita in Indonesia grew by approximately 25 percent.<sup>7</sup> Indonesia ranks third in Southeast Asia for sugar-sweetened beverage (SSB) consumption, with an estimated average of 20.23 liters per person annually.<sup>8</sup> This high consumption is directly linked to the increasing mortality rate caused by non-communicable diseases (NCDs).<sup>9</sup> NCDs are known to be one of the primary health burdens on the state, particularly in the context of national health insurance (BPJS Kesehatan) expenditures. In 2017, the government spent IDR 14.4 trillion to address cases of NCDs.<sup>10</sup> The financial burden continued to rise, with the National Health Insurance (JKN) program reporting IDR 24.1 trillion spent on NCD

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<sup>5</sup> CISDI Secretariat, *Statistik Konsumsi Minuman Berpemanis Rumah Tangga Indonesia*, 2023, in Ramadaan Galih Utama, "Threat Analysis of the Rejection of the Policy on the Excise for Sweetened Beverages", *Social Issues and Taxation Journal*, 2.2 (2025), pp. 75–88 <https://sitjournal.com/sitj/article/download/53/40>.

<sup>6</sup> World Health Organization. *Noncommunicable Diseases Country Profiles: Indonesia*, 2018, indicating that NCDs accounted for circa 73 % of total deaths in Indonesia [https://en.wikipedia.org/wiki/Health\\_in\\_Indonesia](https://en.wikipedia.org/wiki/Health_in_Indonesia).

<sup>7</sup> UNICEF Indonesia. *Sugar-Sweetened Beverage Taxation Policy Brief* (April 2023), highlights that increased consumption of high-sugar beverages in Indonesia has been driven by diet shifts and affordability; per capita consumption rose by an estimated 25 % between 2013 and 2021 <https://www.unicef.org/indonesia/reports/sugar-sweetened-beverage-taxation>.

<sup>8</sup> Center for Health Policy and Management (CHPM). Policy Brief: *Tackling High Consumption of Sugar Sweetened Beverages (SSB) in Indonesia*. Jakarta: CISDI & CHPM-UGM, 2021. p. 41 <https://dask.kebijakankesehatanindonesia.net/wp-content/uploads/2021/08/2020-POLICY-BRIEF-Tackling-High-Consumption-of-Sugar-Sweetened-Beverages-SSB-in-Indonesia.pdf>

<sup>9</sup> *Ibid.*, p. 41. The brief outlines the connection between SSB consumption and increased mortality from non-communicable diseases (NCDs) such as cardiovascular disease and diabetes

<sup>10</sup> *Ibid.*, p. 9. The report notes that in 2017, BPJS Kesehatan spent over IDR 14.4 trillion on services related to catastrophic illnesses, most of which are NCDs.

treatment in 2022.<sup>11</sup> The impact of high SSB consumption and poor dietary habits has resulted in a sharp increase in metabolic diseases such as diabetes mellitus, which not only reduces the quality of life for individuals but also creates long-term financial strain on the healthcare system. According to the International Diabetes Federation (IDF), Indonesia ranks fifth globally in the number of people living with diabetes, reaching approximately 19.47 million individuals or a 10.6% prevalence rate.<sup>12</sup> These numbers highlight the urgent need for preventive public health strategies, including better regulation and clearer labeling of food and beverage products containing high levels of sugar.

Consumers have the right to information, creating a need for product transparency before deciding to purchase packaged goods. Sugar-sweetened beverages (SSBs), which are widely distributed to the public, are required to include labeling, as mandated by the Consumer Protection Law. Accordingly, the accuracy of product labels is the responsibility of business actors<sup>13</sup>. Labels function both as a source of product information and as a promotional tool. Violations related to labeling are subject to sanctions by the Indonesian Food and Drug Authority (BPOM), making it essential that labels be accurate and easily understandable.<sup>14</sup> On the consumer side, the Consumer Protection Law also imposes an obligation to read and follow the information provided on the product. Based on this provision, information delivered by business actors is expected to be accessible and understandable to consumers.<sup>15</sup> A study conducted by Purnama (2021) found that the habit of reading nutritional labels among

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<sup>11</sup> Purwowidhu. *National Health Insurance Expenditure Report*. Jakarta: Ministry of Health, 2024, p. 7. According to JKN data, IDR 24.1 trillion was spent in 2022 for handling NCD cases under BPJS Kesehatan.

<sup>12</sup> Adi Buyu Prakoso, Ady Irawan, and Azizah Sonia Hapsari. "Factors Related to the Compliance of Elderly Diabetes Mellitus Patients with Blood Glucose Control", *Indonesian Journal of Global Health Research* 7, no. 1 (2025): 685–92, doi:10.37287/ijghr.v7i1.5086.

<sup>13</sup> Celina Tri Siwi Kristiyanti. *Hukum Perlindungan Konsumen*. Jakarta: Sinar Grafika, 2008.

<sup>14</sup> Debora, Martono Anggusti, and Debora. "Perlindungan Hukum Bagi Konsumen Terhadap Pemberian Label Gizi Yang Tidak Sesuai Dengan Mutu Pada Produk Pangan Olahan", *PATIK: Jurnal Hukum* 07, no. 03 (2018), <https://ejournal.uhn.ac.id/index.php/patik/article/view/292>

<sup>15</sup> Kelik Wardiono. *Hukum Perlindungan Konsumen: Apek Substansi Hukum, Struktur Hukum, Dan Kultur Hukum Dalam UU Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen*. Yogyakarta: Pustaka Pelajar, 2014.

consumers remains low, with only 14.5% of respondents regularly comprehending nutritional labels. These findings indicate that consumers often face challenges in understanding product labeling. The global consumption of sugar-sweetened beverages has exceeded the sugar intake recommended by health authorities. The World Health Organization (WHO) recommends a daily sugar intake of no more than 50 grams per individual, which is equivalent to four tablespoons.<sup>16</sup> WHO also urges the inclusion of labeling on packaging to indicate high levels of sugar, sodium, and fat (commonly abbreviated as GGL). These WHO recommendations have been ratified by Indonesia's Ministry of Health through Ministerial Regulation (Permenkes) No. 30 of 2013, as amended by Permenkes No. 63 of 2015.<sup>17</sup>

The 2014 Indonesia Total Diet Study (TDS) reported that average consumption of sugar-sweetened beverages was 25 mL per person per day.<sup>18</sup> The market for sugar-sweetened beverages is closely linked to the food sweetener industry, which has been shifting its focus toward non-caloric alternatives. This shift stems from the rising prevalence of obesity and the increasing public awareness of healthy lifestyles. Consequently, industry is projected to grow at an annual rate of about 4.5%. The growing processed food and beverage industry in Indonesia has driven an increased demand for bulk sweeteners, particularly sucrose.<sup>19</sup> According to research by Ferretti and Mariani, in 2015 Indonesia ranked third in Southeast Asia for high sugar-sweetened beverage consumption.<sup>20</sup> One of the factors

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<sup>16</sup> Ari Sulistyani Purnama. "Hubungan Antara Kemampuan Membaca Label Informasi Nilai Gizi, Persepsi Terhadap Rasa Produk, Dan Faktor Lain Dengan Kepatuhan Membaca Label Informasi Nilai Gizi Pada Siswa/i SMK Mandalahayu, Bekasi Tahun 2012" (Universitas Indonesia, 2012), <https://lib.ui.ac.id>.

<sup>17</sup> Peraturan Menteri Kesehatan Republik Indonesia Nomor 30 Tahun 2013 tentang Pencantuman Informasi Kandungan Gula, Garam, dan Lemak pada Pangan Olahan, diubah dengan Permenkes Nomor 63 Tahun 2015.

<sup>18</sup> Indonesia's National Research and Development Agency. *Total Diet Study 2014* (Jakarta: BRIN, 2014), cited in Ratu Ayu D. Sartika *et al.*, "Consumption of Sugar-Sweetened Beverages and Its Potential Health Implications in Indonesia", *Danone NutriNDO International Journal* (2022), p. 4, and *Total Diet Study* section. <https://doi.org/10.21109/kesmas.v17i1.5532>

<sup>19</sup> Mordor Intelligence. *Indonesia Food Sweetener Market – Growth, Trends, and Forecast (2025–2030)*, <https://www.mordorintelligence.com/industry-reports/indonesia-food-sweetener-market>

<sup>20</sup> Fabrizio Ferretti and Michele Mariani. "Sugar-sweetened beverage affordability and the prevalence of overweight and obesity in a cross-section of countries",

contributing to this increasing intake in Indonesia is the weak regulatory framework governing these beverages.<sup>21</sup> Sweet drink consumption is considered an unhealthy dietary pattern, as high sugar intake contributes to the rise of non-communicable diseases.<sup>22</sup> The growing prevalence of such diseases has prompted the development of front-of-pack labels to help consumers make informed choices through easily accessible nutritional information. “Serge Hercberg, President of the French Nutrition and Health Programme (PNNS), explains the Nutri-Score system as a front-of-pack label indicating the nutritional quality of a product, based on a single overall score calculated per 100 g or 100 mL of the food product.”<sup>23</sup>

Sugar-sweetened beverages (SSBs) have also been shown to negatively affect public health in Singapore, which will be used in this paper as a comparative case study to illustrate how different regulatory approaches address similar problems. A journal article authored by Jing Yuan Tan and colleagues highlights based on qualitative data collected from participants such as lifestyle preferences, individual habits, and self-perceived health risks play a significant role in shaping consumers food and beverage choices. This conclusion is particularly relevant in the discussion of policy frameworks regarding SSB consumption in Singapore, especially in relation to government measures such as sugar taxes and labeling regulations, which some consider to be insufficiently restrictive. Additionally, the study reveals a common perception among the public that sugar-sweetened beverages possess addictive properties making it difficult for certain individuals to reduce or eliminate their consumption even when aware of the health risks.<sup>24</sup> A major contributor to the rising prevalence of

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*Globalization and Health* 15, no. 1 (2019), 30 <https://doi.org/10.1186/s12992-019-0474-x>.

<sup>21</sup> CHPM, *Op.cit.*, P. 1

<sup>22</sup> Lawrence N. Kazembe, Ndeyapo Nickanor, and Jonathan Crush. “Food Insecurity, Dietary Patterns, and Non-Communicable Diseases (NCDs) in Windhoek, Namibia”, *Journal of Hunger & Environmental Nutrition* 17, no. 3 (2022): 425–44, <https://doi.org/10.1080/19320248.2021.1901822>

<sup>23</sup> Manon Egnell et al., “The Impact of the Nutri-Score Front-of-Pack Nutrition Label on Purchasing Intentions of Unprocessed and Processed Foods”, *International Journal of Behavioral Nutrition and Physical Activity* 18, no. 38 (2021), <https://doi.org/10.1186/s12966-021-01108-9>.

<sup>24</sup> Jing Yuan Tan, Mei Jun Chan, Vanessa Tan, and Reuben Wong. “Perspectives on Policy Measures to Reduce Consumption of Sugar-Sweetened Beverages in Singapore”, *Nutrients* 13, no. 12 (2021), 4231 <https://doi.org/10.3390/nu13124231>

type 2 diabetes in the region is the increasing rate of obesity. Directly linked to excessive caloric intake and unbalanced dietary patterns among the population.<sup>25</sup> The trend of rising obesity in Singapore has become especially concerning in recent years. According to the National Nutrition Survey conducted in 2018–2019 by the Health Promotion Board, it was reported that the average daily sugar intake per person reached approximately 12 teaspoons which significantly exceeds the recommended limits set by the World Health Organization.<sup>26</sup> This data supports the urgency for stronger regulatory and public health interventions to curb the growing health burden posed by SSBs.

There is an increasing urgency to emphasize the regulation of sugar-sweetened beverages (SSBs), particularly those that are readily accessible and widely consumed by the public. It is well established that unhealthy dietary patterns, especially the frequent intake of beverages high in sugar can lead to adverse health effects on consumers. These health consequences in turn contribute to a growing public health burden, placing significant pressure on the state. Which bears the constitutional and ethical responsibility to protect its citizens in this context, acting as consumers. Given these concerns, government interventions are critical and can have a substantial influence on the behavior of business actors including manufacturers and retailers. Such interventions may not only shape how businesses operate but also compel them to reformulate their products to align with health standards, particularly regarding sugar content. Furthermore, retailers such as supermarkets also play an essential role in supporting public health. They serve as intermediaries between producers and consumers and therefore have a responsibility to ensure that accurate and accessible product information is made available. This can empower consumers to make more informed choices, especially when selecting food and beverage products. Consequently, the implementation of front-of-pack labeling (FOPL) specifically on sugar-sweetened beverages sold in retail environments is necessary. Such labeling mechanisms can guide consumers toward healthier purchasing decisions by clearly displaying information regarding sugar,

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<sup>25</sup> World Health Organization. *Guideline: Sugars Intake for Adults and Children* (Geneva: WHO, 2015), p. 5 <https://www.who.int/publications/i/item/9789241549028>

<sup>26</sup> Health Promotion Board Singapore. *National Nutrition Survey 2018–2019: Executive Summary* (Singapore: HPB, 2019), p. 6 <https://www.hpb.gov.sg/docs/default-source/pdf/nns-2018-2019-report.pdf>

fat, and calorie content. The need for transparent and readable labels is not merely a policy preference, but a regulatory imperative that supports consumer protection and public health goals.

## Method

This research employs a normative juridical method, which prioritizes legal norms as the foundation of the study. This method involves the use of books, academic journals, and both digital and printed information sources that are deemed authoritative in addressing research problems.<sup>27</sup> The initial step in this research is to identify a legal phenomenon that creates legal consequences for individuals or legal entities. Based on this method, the analysis is conducted by examining legal issues as they occur in society and comparing them with the applicable legal norms that are supposed to function as a legal safeguard.<sup>28</sup>

The approach used in this study is the statute approach, which involves analyzing cases based on the applicable statutory regulations. The primary legal materials in this research include: Law No. 8 of 1999 on Consumer Protection; Law No. 17 of 2023 on Health; BPOM Regulation No. 1 of 2020; BPOM Regulation No. 20 of 2021; BPOM Regulation No. 26 of 2021; and relevant provisions under Singapore's Food Regulations and the Sale of Food Act.<sup>29</sup> In addition, the study also uses secondary legal materials, such as legal textbooks, academic writing, and other sources relevant to the subject matter.<sup>30</sup> This study also employs a comparative approach between the legal provisions already implemented in developed countries and those in developing countries, where such regulations are not explicitly stipulated, focusing on Southeast Asian neighbors such as Singapore and Indonesia.<sup>31</sup>

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<sup>27</sup> Peter Mahmud Marzuki. *Penelitian Hukum*. Jakarta: Kencana, 2010, p. 35.

<sup>28</sup> Soerjono Soekanto and Sri Mamudji. *Penelitian Hukum Normatif*. Jakarta: Rajawali Pers, 2006, p. 13–15.

<sup>29</sup> Indonesia, *Law of the Republic Indonesia Number 8 Year 1999 concerning Consumer Protection, Undang-Undang No. 17 Tahun 2023 tentang Kesehatan*; Badan Pengawas Obat dan Makanan (BPOM), *Peraturan BPOM No. 1 Tahun 2020; No. 20 Tahun 2021; No. 26 Tahun 2021*; Singapore, *Sale of Food Act (Cap. 283)* and *Food Regulations (under the Act)*

<sup>30</sup> Satjipto Rahardjo. *Ilmu Hukum*. Bandung: Citra Aditya Bakti, 2000, p. 78.

<sup>31</sup> OECD. *Obesity Update 2017*. Paris: OECD Publishing, 2017, p. 19.

## Result and Discussion

Consumer protection is grounded in a set of principles and objectives that form the foundation Law of the Republic Indonesia Number 8 Year 1999 concerning Consumer Protection (Consumer Protection Law). This paper specifically focuses on one of the key principles outlined in Article 2 of the Consumer Protection Law, namely the principle of utility. The utility principle is intended to ensure that both consumers and business actors who are inherently interconnected receive mutual and balanced benefits from the enforcement of this law. The aim is to uphold the rights of both parties equally, where consumers are entitled to protection and information, and business actors are assured of fair treatment and legal clarity.<sup>32</sup> The explanatory section of the law clarifies that the principle of utility is designed so that consumers and business actors alike may derive the greatest possible benefit from the implementation of the Consumer Law. This benefit should be distributed equitably among all parties to ensure it reaches every layer of society, given that every individual is, in essence, a consumer. Moreover, this principle of utility also extends to business actors. By ensuring that business actors receive fair and legally recognized benefits, the law aims to foster a sense of legal security among producers and sellers. As a result, they are expected to improve the quality of their products and contribute to the development of healthy business competition.<sup>33</sup>

This discussion focuses specifically on end consumers, as defined under Article 1 Paragraph (2) of Indonesia's Consumer Protection Law, which states: "A consumer is any person who uses goods and/or services available in society for personal, family, other people's, or other living beings' benefit, and not for resale."<sup>34</sup> In contrast, the definition of business actors under the Consumer Law encompasses a broader scope than that of consumers, which is limited only to the final users of a product. Article 1 Paragraph (3) of the Consumer Law provides: "A business actor is any individual or business entity, whether incorporated or not, established and domiciled or conducting activities within the jurisdiction of the Republic of Indonesia, either individually or jointly, through the conduct of business in various economic sectors." In addressing the

<sup>32</sup> Kelik Wardiono, *Op.cit.*, p. 48.

<sup>33</sup> Kindly check the General Explanation of the Consumer Protection Law concerning the Principle of Utility.

<sup>34</sup> Kindly check the Consumer Protection Law Article 1 (2).

core issue regarding the role and responsibilities of supermarkets, it is evident that supermarkets fall within the scope of business actors as regulated by law. This conclusion is drawn by evaluating the characteristics of supermarkets against the legal elements outlined in the Consumer Law definition of business actors. The relevant elements include whether the entity is incorporated or not, whether it is domiciled in Indonesia, and whether it engages in economic activity. Furthermore, from the perspective of the product distribution chain, supermarkets are identified as business actors by virtue of their role as wholesalers or retailers.<sup>35</sup> Supermarkets such as Superindo meet all the criteria outlined in the legal definition of business actors under applicable Indonesian consumer protection law.<sup>36</sup>

Consumers are the subjects protected under Indonesia's Consumer Protection Law, while business actors are the subjects whose actions are regulated and restricted by the provisions of the Consumer Law. Consumers possess both rights and obligations, whereas business actors not only have rights and obligations as stipulated in the Consumer Law, but are also subject to specific limitations that are prohibited activities outlined in the law. Obligations for business actors is found in Article 7(b) Consumer Law, which states: "To provide accurate, clear, and honest information regarding the condition and guarantee of goods and/or services, and to offer explanations regarding their use, repair, and maintenance." In an effort to fulfill this obligation, business actors can utilize product labeling as a medium for delivering essential information to consumers.<sup>37</sup> Labeling serves as a strategic tool to inform consumers about product content, safety, and usage, thereby ensuring transparency and consumer protection in line with legal mandates.

A label is a form of product information that business actors are legally required to display on product packaging. This obligation is regulated both under the Consumer Protection Law and under Government Regulation No. 69 of 1999 concerning Food Labels and Advertisements. The purpose of labeling is to ensure that consumers have access to essential information regarding the benefits and

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<sup>35</sup> Warren J. Keegan and Mark C. Green. *Global Marketing*, 3rd edn. New Jersey: Prentice Hall, 2003, p. 324.

<sup>36</sup> Kindly check the Consumer Protection Law Article 1 (3).

<sup>37</sup> Ahimsa, Gede. "Urgensi Pencantuman Label Pangan dalam Perspektif Hukum Perlindungan Konsumen." *Jurnal Ilmu Hukum Legal Opinion* 10, no. 3 (2022), 12–22, <https://jurnal.undiksha.ac.id/index.php/LO/article/view/50799>

nutritional content of the product they intend to consume.<sup>38</sup> In this way, labeling plays a crucial role in enabling consumers to make informed decisions, especially when it comes to food products that directly impact health and well-being. The requirement to include labels on product packaging has been largely fulfilled by food producers and manufacturers. This practice is not only a matter of legal compliance but also serves as a strategic tool for communication between business actors and consumers. Through labels, producers convey key information about the product's identity, content, quality, usage instructions, and any associated warnings. This information is intended to reduce the risk of misinformation or misunderstanding that could potentially harm consumers. Furthermore, labeling is seen as a bridge between consumer rights and producer responsibility. It reflects the obligation of business actors to be transparent and accountable in their commercial practices.<sup>39</sup> By adhering to labelling regulations, businesses not only protect themselves from legal consequences but also enhance consumer trust and loyalty, thereby contributing to fair and sustainable market competition.

The implementation of the obligation by business actors to provide product information through labeling constitutes a tangible effort to fulfill consumers' rights. One of the fundamental rights of consumers as stipulated in Article 4 letter (c) of Law No. 8 of 1999 on Consumer Protection is the right to accurate, clear, and honest information regarding the condition and guarantee of goods and/or services. This right is actualized when business actors comply with the legal requirement to display comprehensive labeling on their product packaging. Fulfilling the consumer's right to information also contributes to the realization of other rights outlined in Article 4 of the Consumer Protection Law. When consumers are equipped with sufficient and truthful information, they are better positioned to make rational decisions, thereby enhancing their sense of comfort, security, and safety in the consumption process.<sup>40</sup> The presence of product labels helps consumers to evaluate potential health impacts, usage

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<sup>38</sup> Bahder Johan Nasution. *Hukum Perlindungan Konsumen*. Jakarta: Rajawali Pers, 2007, p. 94.

<sup>39</sup> Dea Dellyana Wahyutia Ady and Sri Sumarmi. "Kebiasaan Membaca Label Gizi Berhubungan Dengan Asupan Natrium Pada Wanita Dewasa", *LAGIKMI & Universitas Airlangga*, 2019, 158–63, <https://e-journal.unair.ac.id/AMNT/article/view/14088/8212>

<sup>40</sup> Bahder Johan Nasution. *Op.cit.*, p. 83–95.

methods, and nutritional content before making a purchase, which is especially critical in products such as packaged sugary drinks that pose public health risks. Ultimately, the dissemination of information via labels is not only a legal compliance issue but also an ethical obligation that strengthens consumer confidence and trust. By fulfilling this duty, business actors contribute to a more transparent, fair, and consumer-oriented marketplace.

The National Agency of Drug and Food Control (BPOM) serves as an independent regulatory body responsible directly to the executive branch of the Indonesian government. It plays a critical role in monitoring and supervising food and beverage labeling, especially in processed food products. Two key regulations enacted by BPOM in this regard are BPOM Regulation No. 1 of 2022 on the Supervision of Claims on Labels and Advertisements of Processed Foods and BPOM Regulation No. 26 of 2021 on Nutritional Information on Processed Food Labels. These regulations provide the legal basis for requiring processed food manufacturers and distributors to include Nutritional Information (Informasi Nilai Gizi or ING) on their product labels. Specifically, Article 2 of BPOM Regulation No. 26/2021 states that, “Business actors who produce and/or distribute processed food must include ING on the label.”<sup>41</sup> In addition to the mandatory nutritional information, BPOM also allows business actors to include Daily Intake Guide (DIG) using monochromatic colors, and a “Healthier Choice” logo to assist consumers in making informed dietary decisions.<sup>42</sup> However, because the inclusion of the “Healthier Choice” logo is not mandatory, many business actors do not feel compelled to reformulate or adjust the nutritional composition of their sugary beverages to meet the nutritional profile required for such endorsement. The presentation of nutritional information in the form of detailed tables and optional symbols can significantly enhance consumer safety and awareness, enabling individuals to assess and select products based on their health needs. While legal regulations regarding labeling do exist, they do not yet explicitly regulate a simplified front-of-pack labeling

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<sup>41</sup> Republic of Indonesia, *Peraturan Badan Pengawas Obat dan Makanan Nomor 26 Tahun 2021 tentang Informasi Nilai Gizi pada Label Pangan Olahan* (BPOM Regulation No. 26 of 2021 on Nutritional Information on Processed Food Labels), Art. 2

<sup>42</sup> Republic of Indonesia, *Peraturan Badan Pengawas Obat dan Makanan Nomor 1 Tahun 2022 tentang Pengawasan Klaim pada Label dan Iklan Pangan Olahan* (BPOM Regulation No. 1 of 2022 on Supervision of Claims on Labels and Ads), and *Health Promotion Board Singapore*, ‘Front-of-Pack Labelling: Healthier Choice Symbol’ (2019)

format that would further facilitate consumer understanding and comparison across products, such as color-coded warning labels or summary indicators used in other countries.

### A. Use of Labels to Convey Information

Under BPOM Regulation No. 6 of 2024, food and beverage products with high sugar, salt, or fat (GGL as *gula, garam, lemak*) content are now legally required to display health related warning labels. This regulation applies specifically to sugar-sweetened beverages (SSBs) with excessive sugar levels, making the labeling of such products mandatory. The excessive intake of food and drink containing high levels of GGL has been scientifically linked to an increased risk of non-communicable diseases (NCDs), such as diabetes, obesity, and cardiovascular diseases. Hence, the mandatory inclusion of health warnings aims to inform and protect consumers from these health risks. Article 45(1) of the Regulation explicitly states: "Labels on products containing sugar, salt, and/or fat that, when consumed in quantities that may increase the risk of non-communicable diseases, must include health warning messages."<sup>43</sup> This provision reflects a stronger public health stance by the Indonesian government in combating rising levels of diet-related chronic illnesses. The inclusion of such mandatory messages also aligns with broader global efforts, such as the WHO's sugar intake reduction guidelines, which encourage governments to adopt front-of-pack nutritional labeling policies as preventive health measures.

The information displayed on product labels particularly when expressed in numerical form, such as nutritional values often imposes an additional cognitive burden on consumers. Consumers are required to interpret and calculate the actual implications of the numeric data provided in order to make informed decisions. For many, especially those with limited nutritional literacy, this process can be confusing or even inaccessible. As a result, the practical utility of the label is diminished, despite its formal compliance with regulations. From the producers' side, there are documented instances of businesses failing to meet their legal obligation to label products transparently and in accordance with the stipulated requirements.

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<sup>43</sup> Republic of Indonesia, *Peraturan Badan Pengawas Obat dan Makanan Nomor 6 Tahun 2024 tentang Label Pangan Olahan* (BPOM Regulation No. 6 of 2024 on Processed Food Labeling), Art. 45(1)

This deliberate omission or manipulation of labeling information constitutes a direct violation of consumer rights, as consumers are thereby deprived of complete and truthful information. According to Article 8 (i) of Indonesia's Law No. 8 of 1999 on Consumer Protection businesses are prohibited from "failing to label or provide explanations on goods that include the product name, size, weight/net content, composition, usage instructions, date of manufacture, side effects, name and address of the business operator, and other necessary information required by regulations."<sup>44</sup>

The purpose of labeling is not merely to satisfy regulatory requirements but also to serve as a means of communication between producers and consumers, ensuring that consumers have adequate knowledge about a product before purchase or consumption. As Philip Kotler notes, labels function both as informational tools and as marketing instruments, delivering essential content regarding the product's ingredients, functions, and potential effects.<sup>45</sup> Furthermore, the labeling requirement aligns with the principle of utility as stated in Article 2 of the Consumer Law, which aims to ensure that both consumers and business actors derive mutual benefit from the enforcement of the law. Thus, accurate and accessible labeling represents not only a legal duty for producers but also a tangible expression of consumer rights, especially the right to information under Article 4 of the Consumer Law. The content of nutritional labels, which typically appear in the form of a Nutrition Information Panel (*Informasi Nilai Gizi/ING*), is predominantly presented in numerical form. This format poses a significant comprehension barrier for many consumers, particularly those who lack adequate numeracy skills or nutritional literacy.<sup>46</sup>

As a result, only consumers who possess sufficient knowledge and understanding of numeric values are able to fully interpret the information conveyed by the label.<sup>47</sup> This complexity in label

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<sup>44</sup> Kindly check the Consumer Protection Law Article 8(i).

<sup>45</sup> Philip Kotler. *Marketing Management: The Millennium Edition*. Upper Saddle River, NJ: Prentice Hall, 2000, p. 123.

<sup>46</sup> Nur Amalina Putri Adytia, Ilham Dwi Rafiqi, and Yaris Adhial Fajrin, "Fulfillment of the Right to Food During the Covid-19 Pandemic in Indonesia," in 2nd *International Conference on Law Reform (INCLAR 2021)*, (2021): 63–68. <https://doi.org/10.2991/assehr.k.211102.168>

<sup>47</sup> BPOM, *Peraturan Badan Pengawas Obat dan Makanan Republik Indonesia Nomor 26 Tahun 2021 tentang Informasi Nilai Gizi pada Label Pangan Olahan* [BPOM Regulation No. 26 of 2021 on Nutrition Information on Processed Food Labels], Art. 2.

presentation leads many consumers to disregard the information entirely, thereby undermining the very purpose of the label itself. The tendency to ignore such labeling information can also be interpreted as a failure to fulfill the consumer's legal obligations. Under Article 5(a) of Law No. 8 of 1999 on Consumer Protection, consumers are required to read information on the goods or services before making a purchase.<sup>48</sup> When consumers are unable or unwilling to understand the numeric information on the label, this obligation is not met, resulting in a situation where the consumer may be inadvertently disadvantaged. This highlights the dual-layered challenge in consumer protection: not only must businesses comply with regulations by providing accurate information, but the information must also be presented in a form that is accessible and comprehensible to the broader public. Therefore, regulatory efforts should consider alternative or supplementary forms of labeling such as color coded warning labels or front of pack summaries to enhance clarity and facilitate informed decision-making for all consumers, regardless of their educational or numeracy background.

The habit of reading food packaging labels has been consistently promoted as a general recommendation in the *Balanced Nutrition Guidelines* issued by Indonesia's Ministry of Health.<sup>49</sup> The core intention behind food labeling is to ensure that consumers are fully informed about the contents and nutritional value of the products they purchase or consume. The information provided by business actors is comprehensively conveyed through the packaging label, serving as a direct means of communication to convey key details such as nutritional composition and expiry dates. In light of this, consumers are strongly encouraged to read product labels carefully before making purchasing decisions or consuming food products. Such diligence is not only an act of consumer responsibility but also a form of preventive behavior, helping to ensure food safety, nutritional adequacy, and informed choice. However, empirical findings and public health research indicate that a significant portion of consumers still do not take advantage of the information displayed on food labels. One of the main reasons for this is the perceived scientific or overly technical nature of nutritional information, which many consumers find difficult to interpret. The use of complex or academic language,

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<sup>48</sup> Consumer Protection Law Article 5(a).

<sup>49</sup> Kementerian Kesehatan Republik Indonesia, *Pedoman Gizi Seimbang*. Jakarta: Kemenkes RI, 2014.

numerical values, and chemical terminology in Nutrition Facts labels can act as barriers to comprehension, thereby undermining the effectiveness of labeling as a tool for consumer protection. This situation illustrates the gap between regulatory intent and consumer behavior, suggesting the need for labeling systems that are not only legally compliant but also cognitively accessible to the general population.

Although consumers are legally and ethically expected to read food product labels—particularly those that contain nutritional information the reality in Indonesia reflects a markedly low level of compliance. According to data published by the National Consumer Protection Agency (*Badan Perlindungan Konsumen Nasional*, BPKN), only 6.7% of Indonesian consumers actually pay attention to the nutrition labels on packaged food products.<sup>50</sup> This statistic indicates a significant gap between consumer responsibilities and actual behavior, raising concerns over the effectiveness of food labeling regulations in achieving public health goals. In support of this, another study revealed that 61.4% of respondents admitted to not consistently reading nutrition labels or ingredient lists. The primary reason cited was a perception that such labels were unimportant, suggesting a broader issue of low health literacy or a lack of awareness regarding the relevance of nutritional information in everyday decision-making.<sup>51</sup> Moreover, various academic studies have explored factors influencing consumer compliance with food labeling. One such study conducted by Devi indicates a strong positive correlation between consumer knowledge of nutrition labeling and the selection of healthier packaged food products.<sup>52</sup> This implies that consumer education and awareness-raising campaigns could play a significant role in improving label-reading habits and ultimately advancing public health outcomes.

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<sup>50</sup> Badan Perlindungan Konsumen Nasional (BPKN). *Hasil Survei Nasional Perlindungan Konsumen*. Jakarta: BPKN, 2020.

<sup>51</sup> Widia Oktaviana, *Hubungan antara Karakteristik Individu dan Pengetahuan Label Gizi dengan Membaca Label Gizi Produk Pangan Kemasan pada Konsumen di 9 Supermarket Wilayah Kota Tangerang Selatan Tahun 2016*, Skripsi, Universitas Islam Negeri Syarif Hidayatullah Jakarta, 2017, <https://repository.uinjkt.ac.id/dspace/handle/123456789/35895>.

<sup>52</sup> Danu Prasetyo Trijaya Putra, Suci Ferdinand, and Nurul Hidayati. “Pengetahuan Dan Sikap Membaca Label Informasi Nilai Gizi Dengan Perilaku Pemilihan Pangan Kemasan Pada Generasi Milenial”, *Infokes: Info Kesehatan* 11, no. 2 (2021), <https://jurnal.ikbis.ac.id/index.php/infokes/article/view/440/291>.

## B. Using FoP as Label to Informs Customers

A lack of understanding of nutrition labels has created the need for the addition of front-of-pack (FoP) labeling to improve consumer comprehension of product information. This format helps individuals with limited literacy or difficulty interpreting standard nutrition tables to make healthier dietary choices by allowing easier comparison of nutritional content between products.<sup>53</sup> FoP nutrition labeling is seen as an effective tool to simplify nutritional communication, enabling consumers to assess food quality more quickly and accurately. Research shows that FoP labels are preferred by many consumers due to their clear and simple presentation. For consumers with limited nutritional literacy, this labeling format is an important step toward promoting informed food choices and encouraging healthier consumption patterns.<sup>54</sup> Legally, nutrition labeling is part of a business actor's obligations as regulated under Article 7(b) of the Indonesian Law No. 8 of 1999 on Consumer Protection, which states that business actors must "provide correct, clear, and honest information regarding the condition and guarantee of goods and/or services." At the same time, FoP labeling also supports the consumer's right under Article 4(c) of the Consumer Law: the right to receive "correct, clear, and honest information regarding the condition and guarantee of goods and/or services." Providing this form of labeling fulfills the principle of benefit in the Consumer Law and helps balance the relationship between business actors and consumers.<sup>55</sup> Importantly, FoP labeling enables consumers to practice the principle of "let the buyer beware," which emphasizes caution and awareness when selecting products. With better access to understandable information, consumers are better equipped to exercise their rights and responsibilities.

There is a labeling system known as Front-of-Pack (FoP) that aims to enhance consumer understanding by providing quick, accessible information on the nutritional quality of food products. Unlike traditional nutrition labels that rely heavily on numeric and technical data placed on the back of packages, FoP labels are designed

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<sup>53</sup> Manon Egnell *et al.*, "Objective Understanding of Front-of-Package Nutrition Labels: An International Comparative Experimental Study across 12 Countries", *Nutrients* 10, no. 10 (2018): 1542, <https://doi.org/10.3390/nu10101542>

<sup>54</sup> Anita Shrestha *et al.*, "Impact of Front-of-Pack Nutrition Labelling in Consumer Understanding and Use across Socio-economic Status: A Systematic Review", *Appetite* 187, no. 1 (2023), <https://doi.org/10.1016/j.appet.2023.106587>

<sup>55</sup> Debora, Martono Anggusti, and Debora. *Op., cit.*,

to be more visible and consumer friendly. These labels are typically displayed prominently on the front of food packaging and use simplified visual formats, such as color coding or letter grades, to help consumers make healthier food choices quickly and accurately. One of the most widely recognized and recently developed FoP schemes is the Nutri-Score. Nutri-Score presents the nutritional value of food products using a five-color coded system combined with letters from A to E. The letter A (in dark green) represents the most nutritious option, while the letter E (in red) indicates the least healthy choice. This simplified visual scheme is based on a scientific algorithm that considers the content of nutrients such as sugar, saturated fat, sodium, protein, fiber, fruits, vegetables, legumes, and nuts.<sup>56</sup> By summarizing complex nutrition information into an intuitive format, Nutri-Score helps bridge the knowledge gap for consumers who may struggle to interpret numerical nutrition data, particularly those with limited health literacy or numeracy skills.

The Nutri-Score system was first launched in France in 2017 as part of a public health initiative to combat increasing rates of obesity and non-communicable diseases (NCDs). Since its launch, Nutri-Score has been adopted voluntarily in several European countries, including Germany, Belgium, Spain, Luxembourg, and the Netherlands. However, its implementation in each country often involves adjustments or harmonization with existing national food labeling regulations. For instance, some countries may require changes in the algorithm to reflect local dietary patterns or nutrient priorities. As a result, while the core concept of Nutri-Score remains consistent, its expression and legal framework can vary between jurisdictions, leading to the emergence of different versions or interpretations of the label.<sup>57</sup>

This flexibility in adaptation reflects the broader debate around harmonizing FoP labeling systems at the international level. While Nutri-Score is praised for its simplicity and positive impact on consumer choices, its adoption also faces resistance from food industries concerned about product stigmatization and market

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<sup>56</sup> Serge Hercberg, Mathilde Touvier, and Jordi Salas-Salvado. "The Nutri-Score Nutrition Label", *International Journal for Vitamin and Nutrition Research* 92, no. 3–4 (2022), 147–57, doi:10.1024/0300-9831/a000722, <https://doi.org/10.1024/0300-9831/a000722>.

<sup>57</sup> Daphne L. M. van der Bend *et.al.*, "The Nutri-Score Algorithm: Evaluation of Its Validation Process", *Frontiers in Nutrition*, 9 (2022), <https://doi.org/10.3389/fnut.2022.974003>.

competitiveness. Despite these challenges, the growing popularity of Nutri-Score underscores a global demand for more transparent, accessible, and standardized nutritional labeling tools that empower consumers to make informed food choices.<sup>58</sup> The introduction of FoP labeling systems like Nutri-Score also supports the principle of consumer protection, particularly the consumer's right to receive clear, accurate, and comprehensible information as outlined in Article 4(c) of Indonesia's Consumer Protection Law. Moreover, such labeling systems reinforce the philosophy of "let the buyer beware", where consumers are expected to exercise due diligence in evaluating the products they purchase an expectation that can only be fulfilled when the information provided is understandable and accessible.<sup>59</sup>

Singapore also has a regulatory authority that serves a similar function to Indonesia's BPOM, namely the Singapore Food Agency (SFA). The SFA is responsible for ensuring food safety and standards, including the enforcement of food labeling laws under the Food Regulations. This includes conducting inspections, overseeing compliance with national food safety standards, and implementing regulatory amendments when necessary.<sup>60</sup> In recent years, Singapore has taken proactive steps in promoting healthier dietary practices through regulatory interventions. One key development is the introduction of the Nutri-Grade labeling system, which mandates the declaration of sugar and saturated fat levels on the front of packaged beverages. This system is legally grounded in the Food (Amendment No. 2) Regulations 2021, an amendment to the broader Food Regulations under the Sale of Food Act.<sup>61</sup> The amendment was enacted as part of Singapore's broader strategy to combat rising levels of obesity and non-communicable diseases, aligning with the War on Diabetes campaign launched by the Ministry of Health.<sup>62</sup>

The Nutri-Grade system requires packaged beverages to be labeled with a grade ranging from A to D, based on their sugar and

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<sup>58</sup> Hercberg *et.al.*, *op.cit.*, p. 26–28.

<sup>59</sup> Iftita Rakhma Ikrima, Puspo Edi Giriwono, and Winiati Pudji Rahayu, "Pemahaman dan Penerimaan Label Gizi Front of Pack Produk Snack oleh Siswa SMA di Depok", *Jurnal Mutu Pangan: Indonesian Journal of Food Quality* 10, no. 1 (2023), <https://doi.org/10.29244/jmp.2023.10.1.42>.

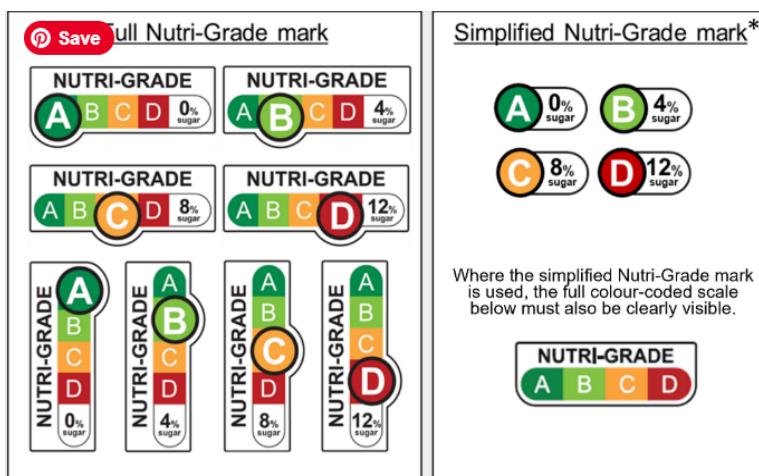
<sup>60</sup> Singapore Food Agency, *About SFA* <https://www.sfa.gov.sg/about-us>

<sup>61</sup> Singapore, *Food (Amendment No. 2) Regulations 2021*, in *Food Regulations* (S 812/2021), effective 30 December 2021.

<sup>62</sup> Singapore Ministry of Health, *War on Diabetes* <https://www.healthhub.sg/live-healthy/1007/war-on-diabetes>

saturated fat content. Grade A represents the healthiest option (low in sugar and saturated fat), while Grade D denotes beverages that are high in these substances.<sup>63</sup> Beverages that receive a Grade C or D are required to display the Nutri-Grade label on the front-of-pack (FoP), and advertisements for these products must also carry health warning messages. This approach reflects a shift from voluntary to mandatory FoP labeling, emphasizing public health over commercial discretion. This system is significant in that it provides legal clarity and enforces consistency in how nutrition information is conveyed to consumers. It also demonstrates how regulatory authorities can mandate simplified labeling formats to enhance consumer understanding, especially among populations with lower nutritional literacy.<sup>64</sup> Moreover, by integrating the Nutri-Grade scheme within existing food laws, Singapore ensures that manufacturers are legally bound to comply, thereby reducing the opportunity for deceptive marketing or omission of important nutritional details.<sup>65</sup> To help illustrate how this system is applied in practice, the following image shows an example of the Nutri-Grade label ranging from Grade A to D as used in Singapore.

**FIGURE 1.** Illustration of Nutri-Grade mark variants for Nutri-Grade beverages and Sugar Declaration Mark for Toppings<sup>66</sup>



<sup>63</sup> Singapore Food Agency, *Nutri-Grade Beverages* <https://www.sfa.gov.sg/food-information/labelling-nutrition/nutri-grade>

<sup>64</sup> World Health Organization. *Healthy Diet*, WHO Fact Sheet, April 29, 2020, <https://www.who.int/news-room/fact-sheets/detail/healthy-diet>

<sup>65</sup> Singapore, *Sale of Food Act* (Cap. 283, 2002 Rev Ed), ss. 56–58

<sup>66</sup> Health Promotion Board, Measures for Nutri-Grade, <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>

**FIGURE 2.** Implementation of Nutri-Grade Labeling in Indonesian Supermarkets<sup>67</sup>



In contrast to Indonesia, where FoP labeling is still under development and often voluntary, Singapore's Nutri-Grade label represents a compulsory, standardized, and legally enforceable system that enhances transparency and promotes healthier choices. This regulatory structure not only empowers consumers but also imposes a duty on producers to improve the nutritional quality of their products to achieve a higher Nutri-Grade rating.<sup>68</sup> The Difference between Indonesia and Singapore law for the use of label such as FoP as shown below:

**TABLE 1.** Regulation for Label on Sweet Beverage

Singapore law	Information	Indonesia Law	Information
Food (Amandement No. 2)	Regulates the provisions on Nutri-Grade	PBPOM No 26/2021	Regulation on including the Nutrition

<sup>67</sup> Eko, Saputro, "Perlukah Indikator Nutri-Grade Kandungan Gula pada Setiap Rak Produk Makanan dan Minuman di Swalayan?" *Kompasiana*, [https://www.kompasiana.com/saputroeko/6693c1d034777c3c47442a13/perlukah-indikator-nutri-grade-kandungan-gula-pada-setiap-rak-produk-makanan-dan-minuman-di-swalayan?page=3&page\\_images=4](https://www.kompasiana.com/saputroeko/6693c1d034777c3c47442a13/perlukah-indikator-nutri-grade-kandungan-gula-pada-setiap-rak-produk-makanan-dan-minuman-di-swalayan?page=3&page_images=4)

<sup>68</sup> Chia-Wen Wang et al., "Influences of Nutri-Grade Front-of-Pack Labels on the Consumption of Sugar-Sweetened and Artificially Sweetened Beverages: Moderating Roles of the Food Environment and Age", *MedRxiv*, (2025) doi:10.64898/2025.12.14.25342245.

Regulation 2021			Information Panel (NIP)
Article 184 A	Nutri Grade Beverage Definition	Article 5	Mandatory inclusion of the Nutrition Information Panel (NIP)
Article 184 B	Sellers must determine the Nutri-Grade.	Article 17	Addition of the "Healthier Choice" logo
Article 184 C	Mandatory labeling of the Nutrition Information Panel (NIP)	Annex 1	nutritional and non-nutritional sugar, rounding of sugar values.
Article 184 D	Display specifications for the Nutri-Grade label	PBPOM No 1 /2022 Annex 1	claims stating of low or free from sugar component.
Article 184 E	Mandatory display of the Nutri-Grade mark on menus, dispensers, or packaging	PBPOM No 6/2024 Article 45	Concerning health message information

Singapore has taken proactive measures to curb the consumption of sugar, salt, and fat (commonly referred to as GGL: *gula, garam, lemak*) by issuing clear regulations under the authority of its Ministry of Health. These regulations mandate the implementation of the Nutri-Grade labeling system by both manufacturers and major retailers for sugar-sweetened beverages (SSBs) and other relevant products sold in the market.<sup>69</sup> This policy aims not only to provide consumers with transparent nutritional information but also to nudge food and beverage producers toward healthier formulations. Since the announcement of the Nutri-Grade label in 2019, many manufacturers have responded by reformulating their beverage compositions to meet the criteria for better Nutri-Grade ratings, thereby encouraging healthier choices among consumers.<sup>70</sup> The label, which appears prominently on the front of product packaging, indicates the sugar and saturated fat levels using a letter-grade system (A to D), which helps consumers make more informed and health-conscious decisions when purchasing beverages. This move is part of a broader national strategy

<sup>69</sup> Ade Indra Kusuma. "Singapura Heboh Label Nutri Grade Minuman Kemasan, Indonesia Segera Ikuti dengan Terapkan Cukai," *Kompas TV*, February 1, 2024, <https://www.kompas.tv/lifestyle/481668/singapura-heboh-label-nutri-grade-minuman-kemasan-indonesia-segera-ikuti-dengan-terapkan-cukai>

<sup>70</sup> *Labelling And Advertising Requirements For Nutri-Grade Beverages Sold In Singapore Guidance Document Health Promotion Board Revised June 2023 Version 2.1.*

to combat the rising prevalence of obesity, diabetes, and other non-communicable diseases. Moreover, large-scale retailers in Singapore are also required to display Nutri-Grade labels and organize beverage products based on their respective grades, further reinforcing consumer awareness through point-of-sale visibility. This comprehensive approach not only impacts product manufacturing but also transforms retail environments into health-promoting spaces.<sup>71</sup>

Additionally, several international food and beverage brands have joined the effort to support front-of-pack (FoP) nutrition labeling schemes. Global corporations such as Nestlé have publicly committed to improving the nutritional profiles of their products by reformulating existing lines and aligning with government-led initiatives like Nutri-Grade. According to Nestlé Indonesia, these reformulation efforts are part of a global nutrition strategy that supports clearer labeling and the development of healthier food choices in line with government nutrition profiling systems.<sup>72</sup>

A supermarket chain in Indonesia, *Super Indo*, has initiated the implementation of a Nutri-Grade nutrition labeling system on packaged sugar-sweetened beverages (SSBs) since January 2023. This action, voluntarily undertaken by the retailer, aims to support consumers in making healthier product choices. The initiative is not only directed toward consumer awareness but also reflects the supermarket's commitment to offering healthier, more sustainable, and affordable product options, as emphasized by Johan Boeijenga, President Director of Super Indo. The labeling strategy adopted by Super Indo is based on applicable regulations, particularly the Regulation of the Minister of Health No. 30 of 2013, as amended by Regulation of the Minister of Health No. 63 of 2015, which recommends that daily sugar intake should not exceed 50 grams per person, equivalent to about four tablespoons.<sup>73</sup> The categorization system in the Nutri-Grade labeling is visually represented through four distinct color codes: yellow, light orange, orange, and dark orange. The darker the shade of the label, the higher the sugar content of the

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<sup>71</sup> Singapore Food Agency, "Food Regulations: Amendment No. 2/2022", under the Sale of Food Act (Cap. 283), Regulation 184.

<sup>72</sup> Nestlé Indonesia, "Mendukung Profil Gizi Sehat Lewat Reformulasi Produk", 2024, <https://www.nestle.co.id>

<sup>73</sup> Ministry of Health of the Republic of Indonesia, Regulation No. 30 of 2013 on Inclusion of Information on Sugar, Salt, and Fat Content and Health Messages for Processed and Ready-to-Eat Foods, as amended by Regulation No. 63 of 2015, Article 2

beverage.<sup>74</sup> These color-coded indicators were formulated using parameters aligned with the recommended sugar intake levels by both the World Health Organization (WHO) and Indonesia's Ministry of Health, and were also informed by the BPOM Regulation No. 1 of 2022 on Claims Supervision in Processed Food Labels and Advertisements, and BPOM Regulation No. 26 of 2021 on Nutritional Information on Processed Food Labels.<sup>75</sup>

Super Indo, as a commercial entity, qualifies as a business actor under the provisions of Article 1 (3) of Indonesia's Consumer Protection Law. As a supermarket operator, Super Indo participates in the indirect distribution chain and thus acts in the capacity of a wholesaler. In such arrangements, wholesalers typically acquire goods from producers and subsequently sell them to retailers or, in some cases, directly to consumers.<sup>76</sup> Given this role, supermarket operators are also bound by the obligation to provide relevant product information to consumers. In principle, however, supermarket retailers are limited in their ability to provide detailed disclosures regarding the composition of a product, as producers possess greater knowledge of their own product formulations and nutritional content. Accordingly, it is the producers who bear the primary responsibility to include readable and transparent labeling on the product's packaging. Nonetheless, in this context, Super Indo as a wholesaler has taken the initiative to provide accessible nutritional information by implementing a Front-of-Pack (FoP) labeling scheme through the Nutri-Grade system for sugar-sweetened beverages. This action reflects the supermarket's active role in fulfilling its obligation to inform and empower consumers in making healthier dietary decisions. By voluntarily applying nutritional indicators to packaged drinks, Super Indo not only reinforces its commitment to consumer rights but also demonstrates that even large-scale retailers can contribute meaningfully to public health education.

The supermarket has implemented the Nutri-Grade labeling system on packaged sugar-sweetened beverages (SSBs) as an initiative to provide consumers with nutritional information that is easier to

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<sup>74</sup> Super Indo. "Implementation of Nutri-Grade Labeling as Sugar Content Indicator on Beverages", 2023 <https://www.superindo.co.id>

<sup>75</sup> Indonesian Food and Drug Authority (BPOM), *Regulation No. 1 of 2022 on Supervision of Claims on Processed Food Labels and Advertisements; Regulation No. 26 of 2021 on Nutrition Information on Processed Food Labels.*

<sup>76</sup> Bahder Johan Nasution. *Op.cit.*,

read and understand. This system aims to help consumers make more informed and healthier product choices. More importantly, this labeling serves as a form of legal protection for consumers prior to consumption by offering clear warnings through front-of-pack information.<sup>77</sup> Such action by the retailer is intended to ensure preventive legal protection for consumers, which is one of the fundamental objectives of consumer protection law. Preventive legal protection refers to a legal safeguard provided in advance to prevent potential violations or harm to consumers, rather than addressing the consequences after the fact. This type of protection is proactive in nature, aiming to set boundaries and clarify obligations to avoid infringements before they occur. According to Hetty Hasana, preventive legal protection includes all efforts to guarantee legal certainty in order to safeguard the parties engaged in legal relations.<sup>78</sup> By providing label-based nutritional indicators like Nutri-Grade, supermarkets not only promote public health awareness but also demonstrate their compliance with consumer rights and responsibilities under the law. The form of legal protection specifically provided to consumers by the supermarket aligns with the broader concept of consumer protection. In essence, the goal of legal protection is to realize the purpose and effectiveness of legal provisions in safeguarding consumer rights. According to Article 1 paragraph (1) of Indonesia's Consumer Protection Law, "Consumer protection is all efforts that ensure legal certainty in order to provide protection to consumers." The supermarket's initiative to implement Nutri-Grade labeling reflects a practical manifestation of this principle, offering consumers a clear and reliable means of obtaining important information about the products they purchase. By doing so, the retailer contributes to the realization of legal certainty, which is a fundamental aim of consumer protection law. This certainty ensures that consumers are not only informed but also empowered to make safe and healthy choices, reinforcing their legal rights in the marketplace.

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<sup>77</sup> Nabilla Farah Quraisya and Ilham Dwi Rafiqi, "Legal Protection for Persons with Disabilities Due to Work Accidents After the Job Creation Law", *Hang Tuah Law Journal* 7, no. 2 (2025):189–205. <https://doi.org/10.30649/htlj.v7i2.162>

<sup>78</sup> Ahmad Suhadi and Ira Alia Maerani, "Legal Analysis of Criminal Sanctions as a Means of Creating a Deterrent Effect for Perpetrators of Violent Theft (Case Study of Decision Number 40/Pid.B/2023/PN Cbn)", *Ratio Legis Journal* 4, no. 2 (2025), <https://jurnal.unissula.ac.id/index.php/rlj/article/view/45972>.

The regulatory foundation used by Super Indo to classify products based on their nutritional content through the Nutri-Grade system is rooted in existing legal provisions, even though such regulations do not explicitly govern the application of Front-of-Pack (FoP) labeling or the Nutri-Grade system itself. The basis for the use of claims is regulated under the Indonesian Food and Drug Authority (BPOM) Regulation No. 1 of 2022, in which Article 1(2) defines a claim as: "any form of statement that declares, suggests, or indirectly describes particular characteristics of a food regarding its origin, nutritional content, nature, production, processing, composition, or other quality factors."<sup>79</sup> Super Indo applies Nutri-Grade as a form of nutrient content claim, as stated under Article 1(9) of the same regulation: "A nutrient content claim is a claim that describes the nutrient content in food." In doing so, the supermarket references sugar content thresholds based on the daily sugar intake recommendation as regulated by Ministry of Health Regulation No. 63 of 2015, which sets the daily limit at 50 grams per person.<sup>80</sup>

This action aligns with Article 3(a) of BPOM Regulation No. 1 of 2022, which regulates the types, quantities, and functions of both nutrient and non-nutrient substances in food. Furthermore, the formulation of indicator categories for sugar-sweetened beverages (SSBs) conducted by Super Indo is based on the guidance found in Annex I of BPOM Regulation No. 1 of 2022, which governs claims for foods that are low in or free from certain nutrients, including sugar.<sup>81</sup> Super Indo also considers Annex I of BPOM Regulation No. 26 of 2021, which elaborates the technical requirements for declaring nutrient and non-nutrient contents such as sugar, including rules for rounding values.<sup>82</sup> However, despite these efforts, the implementation of Nutri-Grade labeling by the supermarket has not yet met the labeling criteria stipulated in BPOM Regulation No. 6 of 2024, Article 1(3), which defines a label as information that is placed inside, affixed

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<sup>79</sup> Badan Pengawas Obat dan Makanan (BPOM), *Peraturan BPOM No. 1 Tahun 2022 tentang Klaim pada Label dan Iklan Pangan Olahan*, Pasal 1 ayat (2) <https://peraturan.bpom.go.id>

<sup>80</sup> Kementerian Kesehatan Republik Indonesia, *Peraturan Menteri Kesehatan No. 63 Tahun 2015 tentang Perubahan atas Peraturan Menteri Kesehatan No. 30 Tahun 2013 tentang Pencantuman Informasi Kandungan Gula, Garam, dan Lemak serta Pesan Kesehatan untuk Pangan Olahan dan Siap Saji*, Pasal 2 <https://peraturan.go.id>

<sup>81</sup> BPOM, *Peraturan BPOM No. 1 Tahun 2022*, Lampiran I.

<sup>82</sup> BPOM, *Peraturan BPOM No. 26 Tahun 2021 tentang Informasi Nilai Gizi pada Label Pangan Olahan*, Lampiran I.

to, or forms part of a food package.<sup>83</sup> In contrast, the Nutri-Grade label applied by Super Indo is not displayed on the product's packaging but rather placed externally on in-store product displays. This divergence is due to the legal restriction that only producers not retailers like supermarkets, are authorized to place nutritional labels directly on the packaging of food products.

The implementation of the Nutri-Grade labeling by the supermarket aligns with the principle of benefit as stipulated in Article 2 of the Indonesian Consumer Protection Act. According to the explanatory notes of the Consumer Law, this principle states that 'all efforts in the implementation of consumer protection must provide the greatest possible benefit to the interests of both consumers and business actors'.<sup>84</sup> From the consumer's perspective, one of the main benefits offered by the Consumer Law is the protection of their rights. By providing front-of-pack nutritional information clearly and easy to understand, the supermarket has fulfilled one of the consumers' essential rights: the right to information. The fulfillment of this right indicates that consumers have benefited from both the labeling itself and the application of consumer protection law. From the business perspective, the supermarket—as a large-scale retailer—has met its obligation to provide information to consumers, thereby avoiding any prohibited actions as set out in the Consumer Law.<sup>85</sup> This initiative ultimately yields benefits for both parties: consumers are empowered to make healthier choices, and businesses fulfill legal obligations while promoting responsible practices in food retail.

### C. Implications of Taxation on High-Sugar Products

Taxation is one of the measures that governments employ to reduce the consumption of sugar-sweetened beverages (SSBs). The rising consumption of such drinks has been strongly linked to increased risks of obesity and other non-communicable diseases (NCDs). In Indonesia, despite the growing prevalence of obesity, there has not yet been a specific tax policy targeting sugary drinks. A study conducted by Agus Widarjono using data from the 2021 National Socioeconomic Survey (SUSENAS) estimated the price elasticity of

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<sup>83</sup> BPOM, *Peraturan BPOM No. 6 Tahun 2024 tentang Label Pangan Olahan*, Pasal 1 ayat (3).

<sup>84</sup> Consumer Protection Law Article 2, Explanation of Principles.

<sup>85</sup> Consumer Protection Law Article 7 and Article 8, outlining business obligations and prohibited conduct.

demand to project the impact of a sugar-sweetened beverage tax. The study found that a 20% price increase in SSBs could reduce their consumption by approximately 17.5%, while still generating an estimated IDR 3.6 billion in additional state revenue annually.<sup>86</sup> The consideration of taxation for sugary beverages is based not only on health concerns but also on economic implications of high consumption. Several other countries have already implemented sugar taxes, demonstrating the potential of such policies to curb lifestyle-related risk factors and promote healthier living patterns. The literature consistently highlights that sugar taxes are effective in reducing consumption and encouraging healthier dietary behaviors. Moreover, these taxes may contribute to reducing national healthcare spending by lowering the incidence of NCDs linked to excessive sugar intake.<sup>87</sup>

Based on data presented by the World Health Organization (WHO), several countries in Asia have implemented taxes on sugar-sweetened beverages (SSBs), including China, India, and Thailand. However, Singapore's Ministry of Health has stated that it does not impose a sugar tax. As explained by the Ministry, "We have been very reluctant to look into a tax like that. The principle is not wrong – that sin tax is a policy of this Government." The decision not to impose a tax is rooted in the fact that sugar is a widely used and essential commodity. Instead of taxation, Singapore focuses on promoting healthier choices through the implementation of front-of-pack labeling to help consumers make more informed decisions.<sup>88</sup>

In addition to considering taxation, it is also crucial to strengthen inter-ministerial collaboration in addressing the rising consumption of sugar-sweetened beverages in Indonesia. Regulations concerning nutritional labeling and marketing of SSBs have yet to be strictly enforced, indicating the need for a coordinated approach between the Ministry of Health, the National Agency of Drug and Food Control (BPOM), and other key ministries. A policy brief highlights that Indonesia's regulatory framework for SSBs remains

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<sup>86</sup> Agus Widarjono *et al.*, "Taxing Sugar Sweetened Beverages in Indonesia: Projections of Demand Change and Fiscal Revenue," *PLOS ONE* 18, no. 12 (2023): e0293913, <https://doi.org/10.1371/journal.pone.0293913>

<sup>87</sup> Widi Astutty Casimira Daeli and Atik Nurwahyuni, "Efektivitas Menggunakan Pajak Minuman Manis untuk Mengurangi Obesitas: Tinjauan Sistematis," *Berita Kedokteran Masyarakat* 35, no. 4 (2019), <https://doi.org/10.22146/bkm.43459>.

<sup>88</sup> Salma Khalik, "Singapore hesitant to introduce sugar tax despite health concerns", *The Straits Times*, 2024 <https://www.straitstimes.com>

weak, as there is no unified legal definition or clear standard for these products. Moreover, efforts to control their high consumption are hindered by limited multi-sectoral collaboration among government institutions.<sup>89</sup> This implies that tackling the problem requires a collective effort involving the Ministry of Trade, the Ministry of Finance, and the Ministry of Industry, ensuring that health, fiscal, and industrial policies are aligned to achieve sustainable outcomes.

## Conclusion

Based on the analysis conducted regarding the supermarket's implementation of nutrient claim labeling on packaged sugar-sweetened beverages (SSBs) as a legal protection effort for consumers, it can be concluded as follows: The inclusion of a nutritional indicator claim label Nutri-Grade on SSBs by the supermarket constitutes a form of legal protection for consumers by simplifying information in a way that is more accessible and understandable. This protection falls under the category of preventive legal protection, where the use of such labels allows consumers to identify and choose healthier products. In doing so, consumers are encouraged to exercise greater prudence in their purchasing decisions. The supermarket's action aligns with the legal objective of consumer protection as defined in Indonesian law: to ensure that the application of legal provisions achieves its intended outcomes. Specifically, the supermarket as a large-scale retailer has fulfilled the principle of benefit enshrined in Article 2 of the Consumer Protection Law, which states that all efforts in consumer protection should maximize benefits for both consumers and businesses. By presenting simpler front-of-pack information, consumers can better understand the nutritional composition of the products, thereby gaining tangible benefits from the product itself and from the regulatory framework. This empowers consumers to avoid products with high sugar content, helping to reduce the risk of non-communicable diseases (NCDs). In contrast to Indonesia, Singapore's approach has proven more effective in curbing SSB consumption. This success stems from the fact that Nutri-Grade labeling is explicitly governed by enforceable legislation, giving it greater legal force and public compliance.<sup>90</sup> The implementation of front-of-pack (FoP)

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<sup>89</sup> CHPM, *Op.cit.*, p. 4.

<sup>90</sup> Singapore Food Agency (SFA), *Food (Amendment No. 2) Regulations 2021* under the Sale of Food Act, which formally mandates Nutri-Grade labeling for beverages.

labeling places the responsibility on businesses to provide clear nutritional information, thereby assisting consumers in making healthier choices and promoting better lifestyle habits. In contrast, the use of taxation shifts the burden onto consumers by increasing the prices of sugar-sweetened beverages (SSBs) to directly reduce consumption levels. Another measure that could be undertaken is the implementation of a tax on sugar-sweetened beverages, accompanied by stronger inter-ministerial coordination in regulating nutrition labeling and product monitoring. Such an integrated approach is essential to ensure that SSB-related policies are not carried out in isolation but are harmonized across the health, trade, and industry sectors for greater policy effectiveness.

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