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Revisiting front-of-pack nutrition labeling policies in Indonesia

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Policy Brief No. 25

Revisiting Front-of-Pack Nutrition Labeling Policies in Indonesia

by Muhammad Nidhal and Ibnu Budiman



Key Messages

- Effective implementation of Government Regulation (GR) No. 28/2024 on addressing excessive sugar, salt, and fats (SSF) consumption requires robust front-of-pack nutrition labeling (FoPNL) technical guidelines that prioritize public health while incorporating phased implementation.
- Interpretive warning labels are suggested as these have been proven effective from a public health perspective in middle-income countries like Chile, Mexico, Peru, and Uruguay.
- The FoPNL technical guidelines should also consider advancing a co-regulatory approach when transitioning to a mandatory scheme, enhancing consumer nutritional literacy, and strengthening the governance arrangements among key food regulators.

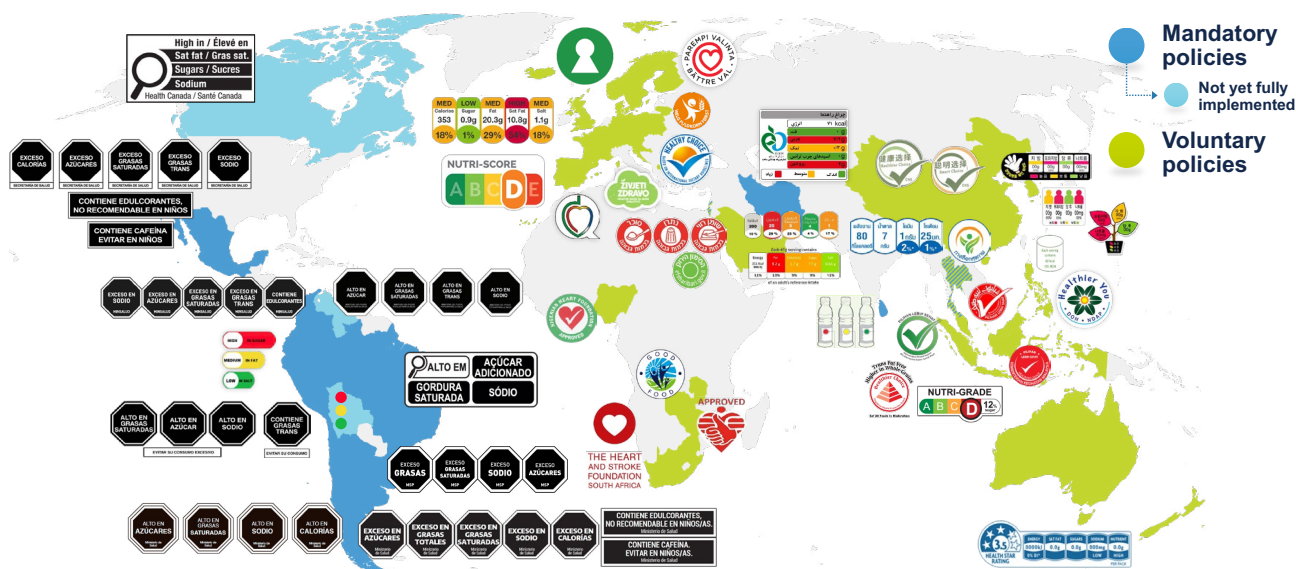
Introduction

Recently, the Indonesian government issued Government Regulation (GR) 28/2024—an implementing regulation of Law 17/2023 on Health (Health Omnibus Law)—which establishes a clearer requirement for food products to comply with the maximum sugar, salt, and (saturated) fats (SSF) content limits, including sanctions for non-compliance. This move was taken to strengthen Ministry of Health (MoH) Regulation 30/2013 on mandatory SSF content information and maximum SSF daily limits recommended per person capped at 50 g/day for sugar, 5 g/day for salt, and 67 g/day for total fat in processed and ready-to-eat foods and beverages (“*pangan olahan siap saji*”). While GR 28 introduces new measures to control the consumption of products with excessive amounts of SSF, many aspects will only be clarified once the implementing regulations are issued.

Moreover, BPOM¹ is currently preparing draft regulation (The Draft²) for a phased rollout of the Nutri-Level³ labeling system, which is under pilot testing aimed specifically at ready-to-consume beverages containing SSF categorized as level C and D (BPOM, 2024a). The draft also stipulates mandatory inclusion of Nutri-Level and healthier choice logos or HCL⁴ on product packaging, reflecting a growing international shift toward mandatory front-of-pack nutrition labeling (FoPNL).

This policy brief provides a set of recommendations for implementing guidelines for FoPNL in Indonesia, following GR 28/2024 and the BPOM regulations, while drawing on the experience of other countries (Figure 1).

Figure 1.
Front-of-Pack Nutrition Labelling Around the World



Source: The Food Marketing Institute (2023)

¹ Badan Pengawas Obat dan Makanan (BPOM) is the Indonesian Food and Drug Authority.

² If ultimately enforced, the Draft Regulation on Nutritional Value Information on Processed Food Labelings will simultaneously repeal and replace three existing frameworks that address the mandatory inclusion of nutritional value information on product labeling, including: BPOM Regulation No. 9/2016 on Nutritional Labeling References; BPOM Regulation No. 16/2020; and BPOM Regulation No. 26/2021 (which bears the same title as the Draft Regulation).


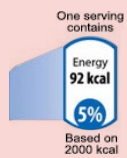




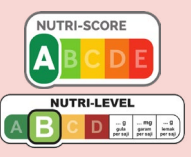



³ Indonesia's Nutri-level labeling system resembles Nutri-Grade (Singapore) and Nutri-Score (Europe) models and consists of 4 levels: A, B, C, and D, with A containing the lowest SSF content and Level D containing the highest content.

⁴ Healthier choice logo is a symbol of recognition for food and beverage products that meet a set of nutrition criteria by the national health authority and/or food regulator.

Lessons Learned from Worldwide Applications of Front-of-Pack Nutrition Labeling

Non-communicable diseases (NCDs)—including cardiovascular diseases (35%), chronic respiratory diseases (5.25%), cancer (3.60%), and diabetes (2.83%)—are rising in Indonesia, and the leading cause of death worldwide (Institute for Health Metrics and Evaluation, 2021). Poor dietary habits, notably excessive consumption of sugar, salt, and (saturated) fats (SSF), are significant contributors to this rise in NCDs. The World Health Organization (WHO) and other health agencies—such as the Pan American Health Organization (PAHO) and the European Food Safety Authority (EFSA)—consider FoPNL systems as part of an effective NCD-prevention strategy. FoPNL allows consumers to quickly view essential nutrition details, either by summarizing key facts from the nutrition declaration (e.g., energy, fat, sugar, and salt content) or providing overall nutritional quality using symbols, letters, or color codes, based on authoritative scientific evidence (WHO, 2019).

Table 1.
Front-of-pack Nutrition Labeling Uptake Worldwide,
with Mandatory Policies Predominated by Middle-Income Countries

| | Nutrient-Specific | | Endorsement Logos | Summary Indicators | Warning Labels |
|---|---|---|---|---|--|
| Rating system | Using numerical information to quantify nutrients as a proportion of recommended daily intake without making evaluations. | Using color, words, and/or symbols to evaluate nutrient levels in food products and drinks. | Using symbols, words, and color to evaluate overall healthier options within certain categories | Using a customizable continuum (varied use of words and colors) to evaluate overall healthiness across food, drink, oils, & dairy products | Using symbols, words, and/or colors to alert consumers about high levels of critical nutrients (e.g., sugar, salt, saturated fat) in food products. |
| Illustrative examples |  <p>Reference Intakes (European Union)</p>  <p>Energy Icon (Malaysia)</p> |  <p>Traffic Light Label (Ecuador)</p>  <p>Multiple Traffic Light Label (United Kingdom)</p> |  <p>Nordic Keyhole (Denmark, Lithuania, Norway, Sweden)</p>  <p>Healthier Choices Logo (Czechia, Poland, Indonesia)</p> |  <p>Nutri-Score (Belgium, France, Germany, Spain) and Nutri-Level (Indonesia)</p>  <p>Health Star Rating (Australia, New Zealand)</p> |  <p>Stop-sign Warnings (Chile)</p>  <p>Magnifying glass (Brazil)</p> |
| Governments endorsing mandatory legislation | Thailand | Ecuador, Finland, Islamic Republic of Iran, Mexico, Sri Lanka | - | - | Chile, Peru, Uruguay, Mexico, Argentina |
| Governments endorsing voluntary framework | European Union, Malaysia, the Philippines | Republic of Korea, United Kingdom | Belgium, Brunei Darussalam, Croatia, Czechia, Denmark, Finland, Iceland, Indonesia, Lithuania, Malaysia, Nigeria, Norway, Poland, Singapore, Slovenia, Sweden, Thailand, United Arab Emirates, Zambia | Australia, Belgium, France, Germany, Indonesia, Luxembourg, New Zealand, the Netherlands, Spain | Canada, Colombia, Brazil Venezuela |

Source: Compiled from UNICEF (2022b) and World Obesity Federation (2019), modified by author.

Following their public health needs and regulatory environments, 32 countries have adopted four types of FoPNL: nutrient-specific, summary indicators, endorsement logos, and nutrient-based warning labels (UNICEF, 2022a) (Table 1). In middle-income countries, mandatory nutrient-based warning labels were found to perform better in influencing consumers' preferences and awareness.

Most policy innovations in this area in 2021 focused on nutrient-based warning labels, such as the “high in” stop-sign style warnings and summary indicators like interpretive spectrum ratings, particularly Nutri-Score (Table 1). Cross-country evidence has demonstrated that warning labels performed better at helping consumers identify products with high content of unhealthy nutrients than the Traffic Light Labels (TLLs), GDAs, Nutri-Score, and Health Star Ratings (HSRs) (Arrúa et al., 2017; UNC, 2020; Peters & Verhagen, 2024). Warning labels have also been proven to be highly effective in Chile, Mexico, Peru, and Uruguay from a public health perspective (PAHO, 2020).

As the first country to implement mandatory FoP warning labels, Chile⁵ has conducted extensive evaluations of nutrient-specific warning labels. These labels require packaged foods and drinks that do not meet specific nutrition criteria to carry warning labels on the front of the package. Unlike other FoPNL systems, which rate foods on a scale from unhealthy to healthy, warning labels are placed only on products that pose the highest nutritional risk (Taillie et al., 2020). Warning labels also avoid the potential “health halo”⁶ effect, where products with positive high-scoring labels might be overconsumed, despite being ultra-processed (UNC, 2020; UNICEF, 2021).

In Indonesia, although BPOM's Nutri-Level system is a step forward for the country's FoPNL framework, concerns remain about its effectiveness. The Nutri-Level system, modeled after Singapore's Nutri-Grade and EU's Nutri-Score, has delivered mixed results. Research indicates that while such grading systems can raise awareness, they do not necessarily lead to significant consumer behavioral change, as consumers may find the label's color-coded grading system too complex to prompt immediate caution (Bramante, 2023; Paganini, 2023; Peters & Verhagen, 2024; Skretkwoicz & Perret, 2023; Shin et al., 2023).

The nutrient-specific labels such as Reference Intake or Guideline Daily Amount (GDA) have been found less effective at generating consumer awareness (UNICEF, 2022a). These labels are typically monochrome and use numbers and percentages without making any judgment on the healthiness of foods. Despite their disadvantages, these labels are still widely used and often preferred by the industry as they allow for more flexibility in marketing. Marketers can make a product appear healthier if it contains beneficial nutrients (i.e. fiber or protein), and choose to place less emphasis on negative factors (i.e. sugar or fat).

A report from the Health Evidence Network, which analyzed data from 15 countries within the WHO European Region, concluded that an effective FoPNL system should be (1) mandatory, (2) offer negative evaluative judgments, and (3) be consistent, government-led, and applied widely across all products. This approach is deemed more effective in helping consumers make healthier choices (Kelly & Jewell, 2018). Conversely, voluntary labeling systems can lead to multiple types of logos and labels, which increase consumer confusion and decrease the usefulness of the logo. Voluntary labels are also often used in combination with other claims on food packaging, such as nutrient or health claims, further confusing consumers (Advocacy Incubator, 2024). Recent trends show a shift toward mandatory FoPNL policies, with at least ten jurisdictions—starting with Chile in 2012 and more recently Argentina in 2021—adopting such measures. Pursuing mandatory FoPNL would ensure that labels are designed to benefit consumers rather than just serving the interests of food companies (UNICEF, 2021).

⁵ Chile's 2016 Food Labeling and Advertising Law mandates warning labels on unhealthy products, restricts marketing to children under 14, and bans unhealthy foods in schools and nurseries. One year after implementation, purchases of targeted products decreased, along with reductions in energy, sugar, and sodium content due to industry reformulation efforts.

⁶ Health halo refers to the phenomenon where consumers perceive a product as healthier than it actually is due to certain positive attributes or marketing claims. For instance, a food item may be labeled as “organic,” “high in calcium,” “low-fat,” or “gluten-free,” leading consumers to believe it is inherently healthy, even if it contains high levels of sugar, sodium, or other less desirable ingredients. This can often mislead consumers into making less informed dietary choices.

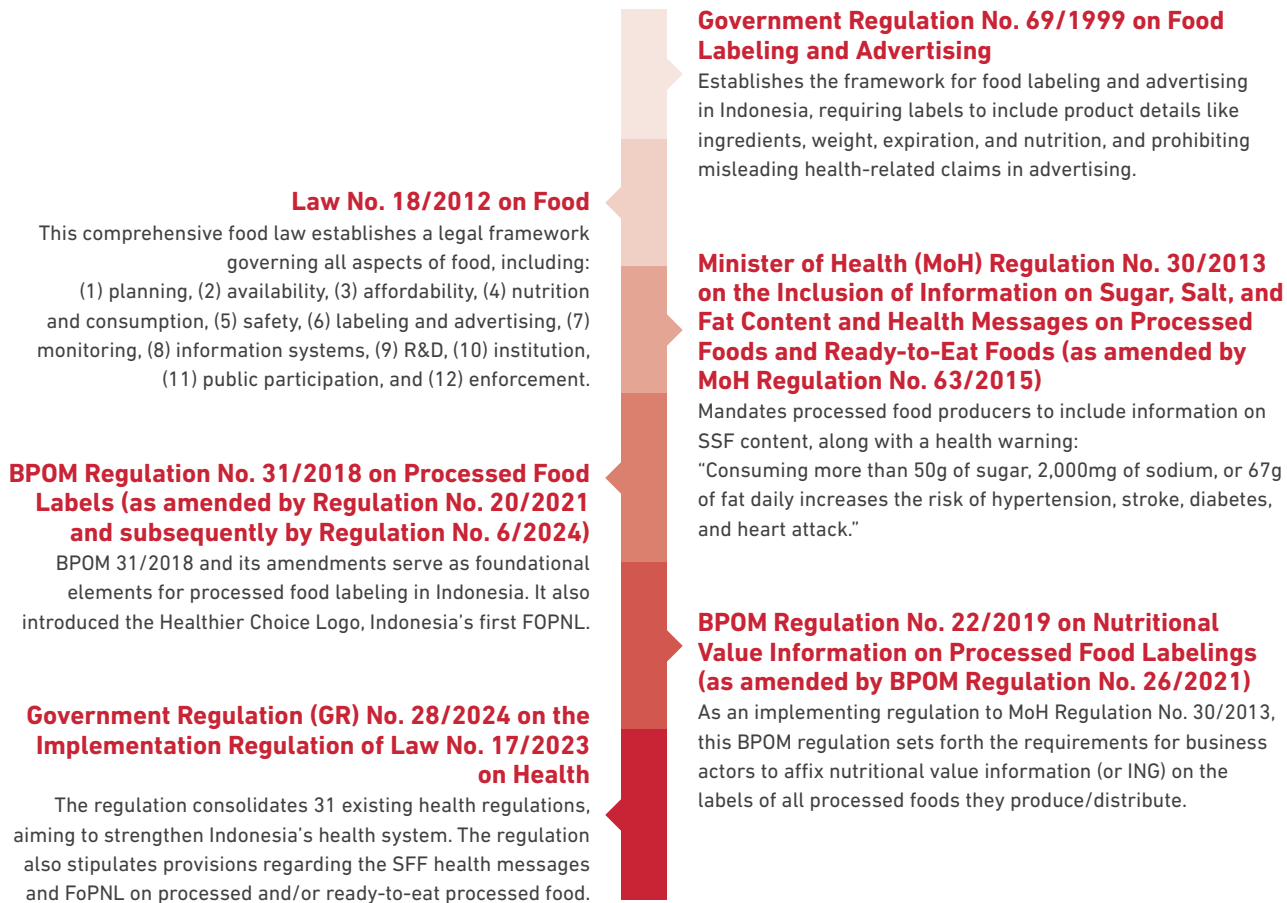
Challenges in Implementing Effective FoPNL in Indonesia

Indonesia’s emerging approach to nutrition labeling is facing four main challenges, that is dual labeling schemes, dynamics of governance arrangements, compliance for MSMEs and household industries, and industry pushback.

Dual labelling schemes

First, the existing FoPNL regulation remains ambiguous with dual labeling schemes in place. In 2019, the Government of Indonesia (GoI) launched its first front-of-pack labeling Healthier Choice Logo (HCL⁷), an optional FoPNL initiative designed to assist consumers in identifying healthier food options within specific categories. This initiative, introduced by the BPOM, was further expanded in 2021 to cover 20 types of processed foods, including bakery products and ready-to-eat snacks (BPOM, 2019). In mid-2024, BPOM introduced a draft regulation for FoPNL that proposes an interpretive Nutri-Level scoring system, which is currently undergoing pilot testing (BPOM, 2024b). This new system will require mandatory compliance for affected beverage products within 18 months (around mid-2026) following the regulation’s enactment (USDA, 2024). Upon full enactment, this regulation will amend three major BPOM regulations⁸ and a mandatory inclusion of FoPNL will be enforced within the food industry (Figure 2). Having two applicable FoPNL may lead to further ambiguity and challenges to its effective implementation.

Figure 2.
Policy Developments Related to Food Labeling and FoPNL in Indonesia



Source: Compiled from Indonesia’s Audit Board (BPK).

⁷ Despite its positive reception, a study by the Global Alliance for Improved Nutrition (GAIN) revealed that foods and drinks eligible for the HCL are not always scored similarly well by other profiling systems, such as the Australian Healthy Star Rating (AHSR), UK Multiple Traffic Light, South-East Asia Regional Office (SEARO), and PAHO (see Annex).

⁸ Regulation No. 9/2016 on Nutritional Labeling References; Regulation No. 16/2020 on the Inclusion of Nutritional Value Information on Processed Foods Manufactured by Micro- and Small-Scale Enterprises; and Regulation No. 26/2021 on Nutritional Value Information on Processed Food Labels (Hukum Online, 2024).

Dynamics of governance arrangements

Second is the governance challenge. The regulatory landscape in Indonesia reveals potential overlaps among several key agencies involved in food and nutrition policies. The recently established National Nutrition Agency (NNA) aims to improve nutrition for public health, yet its regulatory functions may intersect with those of the BPOM, the National Food Agency (NFA), and the Ministry of Health (MoH)—all of which have roles related to food safety, nutrition, and public health. For instance, while BPOM regulates food safety standards and labeling, the MoH sets nutritional guidelines, potentially leading to inconsistencies in FoPNL criteria. Furthermore, the NFA oversees food distribution and security, which might prioritize different policy objectives from those focused-on consumer health.

Under the new government, structural changes—particularly in the NFA and with the formation of the newly established Coordinating Ministry for Food Affairs (CMFA) to lead food systems transformation—could add further challenges to the implementation of FoPNL. Although the technical regulations and key authorities (BPOM and MoH) for food labeling are somewhat clear, there may be strategic and/or systemic ambiguity, particularly in identifying food-insecure areas and determining actionable policies to address food insecurity and poor nutrition.

Compliance for MSMEs and household industries

Third is compliance cost for micro, small, and medium enterprises (MSMEs) and household food industries. MSMEs are essential to Indonesia's economy, contributing 60.5% of GDP and employing 96.9% of the national workforce, with food MSMEs making up half of the 65 million MSMEs (ASEAN Secretariat, 2022). A large portion of Indonesia's dietary intake comes from packaged and ready-to-serve food provided by MSMEs (Andriyani et al., 2024; Ministry of Industry, 2024). While the inclusion of nutritional facts and FoPNL in ready-to-serve foods is explorable, imposing mandatory requirements without accounting for the size and scale of businesses could place significant compliance costs and undue burdens on small businesses. The current regulation requires the inclusion of nutritional facts for processed food produced by MSMEs, as outlined in BPOM Regulation No. 16/2020. A 2019 study revealed most MSMEs in Jakarta (91.6%) and Semarang (85.7%) struggled to comply with food labeling regulations largely due to inadequate government support for regulatory awareness, resource allocation, and monitoring (Farida & Ayuningtyas, 2019).

Industry pushbacks

Fourth is the extensive lobbying efforts of the food industry. Pushbacks and lobbies from the food industry, which have been observed globally, should be made more open and transparent throughout the regulatory process and managed effectively by policymakers. Studies show that industry players may attempt to influence policy by promoting voluntary labeling schemes or negotiating for lower compliance standards, which could be perceived as attempts to align policies with their interests (Pettigrew et al., 2022). However, if these efforts are integrated into a co-regulatory⁹ and collaborative framework, industry stakeholders can meaningfully contribute to the shared responsibility of achieving national health objectives.

⁹ A co-regulatory approach refers to a collaborative partnership between government (regulatory authorities) and industry stakeholders (such as businesses, relevant associations, and consumers) to establish and enforce health-related policies and regulations. This approach blends regulatory oversight with self-regulation, allowing both parties to share responsibility for achieving public health goals (Martinez, 2007).

Recommendations for Implementing Guidelines of Front-of-Pack Nutrition Labeling

To this end, the following recommendations should be considered by key food regulators in Indonesia to improve the effectiveness of its FoPNL system:

Transitioning to a single, standardized FoPNL scheme: Stop-sign Warning

Indonesia currently operates two FoPNL systems: the voluntary HCL and the proposed mandatory Nutri-Level scheme. This dual framework may create confusion for consumers and businesses when fully enforced. To maximize FoPNL benefits and avoid trade barriers, the WHO and FAO recommend one FoPNL system in each jurisdiction (FAO & WHO, 2019). Therefore, BPOM and the MoH as the key food regulators should consider transitioning to a single FoPNL system, preferably by adopting the stop-sign warning label. Evidence from middle-income countries like Chile, Mexico, Peru, and Uruguay show that FoP warning labels offer clear, direct information that alerts consumers to product healthiness at a glance. Warning labels could empower consumers, drive healthier food reformulation, and contribute to reducing the nation's NCD burden. On top of that, FoP label placement should be easily visible on the front of packages. Sizing and placement specifications should be made clear in the existing BPOM regulation (No. 26/2021). This is particularly important in Indonesia, where nutritional literacy is still developing.

Advancing co-regulatory approaches for the transition to mandatory FoPNL & supporting small businesses

Mandatory labeling should be pursued as an end goal to be achieved through staged implementation, for example by issuing a grace period for all or certain segments of the industry, and by starting with products that expose the most risk to health. It can start with products that contain the highest SSF. For instance, BPOM can start applying mandatory labeling¹⁰ for beverage products as the GoI already has a sugar excise policy to support it. A government-led co-regulatory approach could help ensure a smoother transition from (existing) voluntary to mandatory FoPNL schemes. Relevant stakeholders—including businesses, industry associations, and civil society groups—must be engaged in meaningful consultation, to support the development of effective FoPNL solutions that balance the industry's ability to comply with public health objectives. Additionally, the GR 28 implementing regulation should also be expanded to encompass ready-to-eat and processed household food industries, which is instrumental in promoting lower-SSF products. To prevent undue burdens, particularly for small businesses, mandatory FoPNL should prioritize public health while incorporating flexibility, incentive mechanisms, and phased implementation.

Improving cross-ministerial coordination and governance arrangements

A robust, continuous monitoring and evaluation framework is essential to regularly assess the impact of existing FoPNL systems and regulations, including MoH Regulation No. 30/2013 and GR No. 28/2024, making iterative adjustments as needed. Additionally, clarifying roles among BPOM, the MoH, NFA, NNA, and the CMFA would prevent overlapping responsibilities, ensuring consistent and coherent governance. Regular industry consultation and clear incentives for product reformulation should also be integrated, minimizing industry pushback while aligning public health goals with achievable compliance standards.

¹⁰ At the time of writing, BPOM is formulating a draft regulation to support the aforementioned goals; however, the final form and details are yet to be determined.

Enhancing consumer education and nutritional literacy, especially among adolescents

Consumer awareness and nutritional literacy are crucial for the effective implementation of FoPNL, where careful label reading is still limited in Indonesia, especially among adolescents (Imansari & Dini, 2023; Hajijah & Retnaningsih, 2024; Dinisari, 2024). Businesses must provide transparent and accurate product information, as mandated by Indonesia's Consumer Protection Law (Law No. 8/1999). Article 4 of this law emphasizes consumers' rights to receive reliable nutritional details, ensuring they can make informed choices. Strengthening FoPNL effectiveness will thus require targeted education and awareness initiatives, particularly in schools. Targeted education initiatives, such as the Students for Nutrition (*Pelajar Peduli Gizi*) program, I am Courageous (*Saya Pemberani*), and the Health Heroes Nutrihunt app, can be scaled up to help equip young people with the knowledge and awareness to understand the foodscape around them and to make informed decisions, particularly in the consumption of processed foods that form a big part in the Indonesian diet. A combined approach of effective labeling and targeted educational campaigns through TV, posters, and social media can maximize Nutri-Level's effectiveness in promoting healthier choices and improving public health.

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Annex

Annex 1.
Selected products eligible for the Healthier Choice Logo score under other nutrient profiling systems

| Product | UK ¹¹ | SEARO ¹² | AHSR ¹³ | PAHO ¹⁴ |
|--|------------------|---------------------|--------------------|--------------------|
| Ready-to-drink Beverages | | | | |
| Frisian Flag Purefarm UHT Swiss Chocolate Flavoured Milk 459mL | LLML | 0 | 0.5 Stars | 3 (FS, SF, TF) |
| Nestle Bear Brand Sterilized Milk 189mL | MHML | 0 | 0.5 Stars | 4 (FS, F, SF, TF) |
| Nestle Dancow Forti Gro Chocolate Flavoured Milk 110mL | LLML | 0 | 0.5 Stars | 4 (S, FS, F, SF) |
| Instant Pasta and Noodles | | | | |
| Indofood Supermi Nutrimi Instant Noodle Chicken Steak Flavoured 80gr | HHMH | 3 (F, SF, S) | 0.5 Stars | 3 (F, SF, S) |
| Lemonilo Instant Noodle Spicy Korean Flavoured 85gr | MMLH | 1 (S) | 0.5 Stars | 2 (TF, S) |
| Lemonilo Instant Noodle 80gr | MMMH | 3 (F, SF, S) | 0.5 Stars | 2 (TF, S) |
| Bakery goods | | | | |
| Mayora Roma Marie Gold Biscuit 240gr | HHMM | 4 (F, TS, S, E) | 1.5 Stars | 3 (FS, F, SF) |
| Nabati Nextar Brownies coco delight 42gr | HHMM | 3 (F, TS, E) | 0.5 Stars | 3 (FS, F, SF) |
| Ready-to-eat Snacks | | | | |
| Jack n Jill Piattos Seaweed Flavour 11gr | HMLM | 3 (F, S, E) | 3 Stars | 3 (S, F, SF) |
| Oishi Pillows Extrudate Snack Chocolate Cream 110gr | HHHM | 2 (F, E) | 0.5 Stars | 3 (FS, F, SF) |

Source: Rimbawan et al. (2022).

Most drinks and ice cream products scored well under the UK Multiple Traffic Light and SEARO systems but poorly under PAHO and AHSR due to high sugar and fat content. The UK system applies higher thresholds for sugar and fat, while SEARO only considers fat and added sugar. Biscuit products exceeded thresholds under SEARO and PAHO, scoring poorly under AHSR and high in fat and saturated fat under the UK system. Similar results were found for snack products, which exceeded fat and sugar thresholds. The data shows that most sweetened products exceed sugar thresholds. Instant noodles and snacks categories did not have comparable scores due to higher sodium thresholds in Indonesian guidelines, creating public health concerns as high sodium consumption is linked to hypertension (Rimbawan et al., 2022).

¹¹ L = Low, M = Medium, H = high applied for fat, saturated fat, total sugar, and salt, consecutively (e.g., LLLL is the best score); translated into a "traffic light" logo using red, orange, and green colours.

¹² A number between 0 and 6 indicating excessive nutrients for total fat (F), saturated fat (SF), total sugars (TS), added sugars (AS), sodium (S), and energy (E). Not all 18 food categories have a threshold for each of the five nutrients and energy. Fewer excessive nutrients indicates a healthier product.

¹³ Awards between 0 and 5 stars based on levels of energy, saturated fat, sodium, and total sugars. More stars indicates a healthier product.

¹⁴ A number between 0 and 5 indicating excessive nutrients for sodium (S), free sugars (FS), total fat (F), saturated fat (SF), and trans-fat (TF). PAHO only uses one threshold of each nutrient, applied for all products. A lower number indicates a healthier product.

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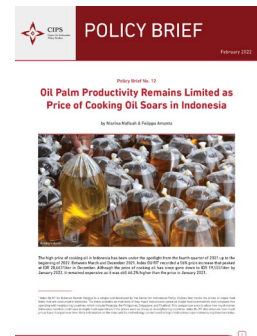
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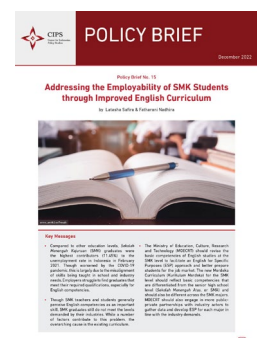
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