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FOOD PRODUCER ACCOUNTABILITY AND LABELING STANDARDS FOR CONSUMER SAFETY RIGHTS

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Abstract- *This article examines the construction of food producers' responsibility for health risks arising from the use of chemicals and assesses how labeling standards serve as a tool to prevent violations of consumers' rights to safety and information. The research is normative in nature, examining the Food Law, Health Law, Consumer Protection Law, Government Regulations on Food Safety, and BPOM regulations on food additives and processed food labeling. The results of the study confirm that the responsibility of producers begins with the obligation to ensure that the ingredients used are included in the permitted list, used within limits, and proven through quality control, batch recording, and product recall readiness. Labeling is understood as a binding legal statement, as the composition, nutritional information, expiration date, warnings, and claims must be presented accurately, clearly, and without misleading information. Technical labeling standards reduce information asymmetry, reinforce safe consumption choices, and provide inspection parameters for supervisors. When there is a discrepancy between the label and the contents, administrative, civil, and criminal sanctions can be imposed in stages to recover losses and maintain market compliance. This article recommends strengthening label legibility, evidence-based claim verification, and continuous risk-based monitoring, accompanied by strict documentation requirements for all business actors. At the corporate level, compliance governance needs to be embedded in label approval procedures, supplier audits, and production personnel training. For consumers, the habit of reading labels and reporting findings to regulatory authorities accelerates product corrections in the market. These findings reinforce the function of labels as a means of prevention before consumption occurs and clarify the responsibilities of business actors.*

Keywords: food labeling; food safety; consumer information; food additives; BPOM; consumer protection; legal sanctions.

INTRODUCTION

The right to food security is a fundamental part of human rights guaranteed by the constitution and various national legal instruments. Every individual has the basic right to consume food and beverage products that do not threaten their mental and physical health in the short or long term. In the modern market structure, food availability is highly dependent on industrialization processes involving various complex supply chains from upstream to downstream. Food safety is the absolute responsibility of every business actor that distributes its products to the wider community. The state has an obligation to create a strict monitoring system so that every product in circulation has undergone valid feasibility tests in accordance with national and international health standards (Lestari, 2020). Without a guarantee of safety, public trust in the food trade system will collapse, resulting in extensive material and immaterial losses for the nation's survival.

The current transformation of the food industry has brought about major changes in the composition of products consumed by the public on a daily basis. The use of food additives such as preservatives, synthetic colors, artificial sweeteners, and flavor enhancers has become standard practice to increase production efficiency and the visual appeal of products. The use of these chemicals poses significant health risks if not controlled with the appropriate dosage within safe limits (Damayanti & Wahyati, 2019). The chemical risks can also arise from heavy metal contamination, pesticide residues, and the migration of hazardous chemicals from plastic packaging. The presence of these chemical elements is often invisible and cannot be detected directly by the senses of ordinary consumers The regulation of usage limits and monitoring of chemical residues are therefore crucial legal instruments in maintaining a balance between the interests of industrial profitability and public safety, which must be prioritized.

Information inequality or information asymmetry is a complex issue in the legal relationship between producers and consumers in the food sector. Producers have full knowledge of the chemical composition, processing, and hidden risks contained in the products they produce. Consumers, on the other hand, are generally in a weak position due to their limited technical knowledge and lack of access to conduct independent laboratory testing on every product they buy. This gap creates vulnerability for consumers to unknowingly consume products that pose a risk to their health. Business law must be present to bridge this imbalance by imposing an obligation of honest and accurate information transparency on producers (Sutrisno et al., 2020). This transparency includes the disclosure of all

ingredients used, including the potential risks of allergens and side effects of certain chemicals contained in food products so that consumers can make informed decisions.

The legal implications of chemical risks in food products cover a wide spectrum of liability in the national legal system. When a food product is found to contain hazardous chemicals that exceed the threshold, manufacturers cannot escape legal liability on the grounds of negligence or ignorance. The principle of precaution must be strictly applied from the product formulation stage to distribution to the public. Health risks arising from exposure to hazardous chemicals can be cumulative, meaning that the effects may only become apparent after years of regular consumption. This requires a legal framework that is capable of addressing long-term liability and protecting the rights of injured consumers. Legal certainty in regulating chemical risks will encourage businesses to be more innovative in finding safer and healthier alternatives to raw materials without compromising product quality.

Manufacturers' liability in food business law is based on the principle of strict liability or fault-based liability in accordance with the classification of violations committed. In many cases, manufacturers often argue that they have met administrative standards, but in fact their products still cause health problems for the wider community. Consumer protection laws require higher safety standards than mere compliance with licensing formalities. Manufacturers are obliged to ensure that every unit of product that leaves their production facilities is completely safe for consumption in accordance with its intended use. Failure to guarantee this safety can result in civil lawsuits for damages, administrative sanctions in the form of revocation of business licenses, and even criminal charges if there is evidence of intentional mixing of prohibited chemicals. Consistent law enforcement against negligent businesses will provide legal certainty and real protection for all citizens from the threat of poor-quality food products.

The obligation to include labels on food product packaging is the most effective preventive measure in protecting consumers' right to information. Labels not only serve as brand identities, but also as legal documents containing official statements from producers regarding the contents and safety of their products. Information regarding chemical content, expiration date, usage instructions, and health warnings must be clearly stated, easy to read, and not misleading. Through accurate labels, consumers are given the right to choose and select products that are suitable for their individual health conditions. Violations of these labeling obligations constitute a serious violation of consumer rights, which are strictly regulated in food laws and consumer protection laws. With comprehensive labeling regulations, it is hoped that a healthy business climate will be created where competition is based on quality and honesty of information, not on manipulation that is detrimental to the health of consumers of food products throughout the region. Comprehensive labelling regulations are a key instrument for consumer protection and the creation of a healthy business competition climate (Purwanto et al., 2023; Romli et al., 2023).

The fundamental legal issue lies in the unclear boundaries of civil liability for manufacturers when chronic health damage occurs as a result of long-term accumulation of chemicals. The proof of causality between the consumption of certain food products and the onset of degenerative diseases or internal organ disorders is often very difficult to establish in court This is due to the nature of chemicals, whose effects do not appear immediately, making it easy for manufacturers to evade responsibility by blaming other factors such as the consumer's lifestyle or environment. The uncertainty surrounding the standard of proof weakens the bargaining position of consumers seeking justice for the damage to their health (Atsar & Apriani, 2019).

Another issue relates to the inconsistent enforcement of labeling regulations, which are often manipulative or conceal crucial information behind technical terms that are not understood by the general public. Many manufacturers use chemical names that are unfamiliar to the public to disguise the presence of food additives that pose certain health risks. The small font size and hidden placement of warning information on packaging indicate a lack of good faith in fulfilling consumers' right to complete information. The inability of regulations to enforce simple and easy-to-understand labeling standards creates loopholes for businesses to continue producing risky products without providing adequate warnings to users (Sutedi, 2008).

There are also obstacles in synchronizing food safety standards set by regulatory authorities with the reality of product distribution in traditional and online markets. Many food products containing hazardous chemicals or prohibited additives are still freely available due to weak post-market surveillance systems. This is exacerbated by differences in perception regarding the safe threshold for certain chemicals, which often lag behind the latest health research developments. As a result, products that are administratively declared legal domestically are found to contain substances that have been banned in other countries due to their carcinogenic potential. This legal protection gap places consumers at an unnecessarily high risk in a healthy trading system (Rudiatin et al., 2024). This risk is further complicated by the influx of imported products, which necessitates the strengthening of regulatory agencies such as BPOM and the implementation of comprehensive safety standards, including halal aspects as part of the producer's responsibility (Alfiyah et al., 2023; Mustika et al., 2023).

Research on the legal aspects of producer responsibility and labeling obligations is highly relevant given the increasing prevalence of diseases related to the consumption of processed foods containing various synthetic chemicals. The rapid development of food technology is often not accompanied by commensurate regulatory updates, creating a legal vacuum that can be exploited by unscrupulous business actors who prioritize financial gain over public safety. This

academic study is necessary to reformulate compliance standards that must be met by the food industry in order to be in line with the principles of fair consumer protection. Clarity regarding the accountability scheme will provide certainty for the business world as well as safety guarantees for the public in consuming products circulating in the domestic market.

Global market integration and the growth of e-commerce require more transparent labeling standards to protect consumers from imported products that may not meet national health standards. Knowledge about hazardous chemicals in food is no longer optional, but an urgent necessity for the public to maintain quality of life and the health of future generations. By examining the legal aspects of producer obligations, this research contributes to strengthening the legal foundation of ethical and responsible business in Indonesia. The restructuring of regulations on labeling and product liability will encourage the creation of a more competitive food industry ecosystem through healthy product innovations that are able to compete internationally without neglecting user safety. Harmonisation of safety standards, including halal aspects, is strategic in strengthening the position of national products in the global market and international trade (Rojak et al., 2021).

This research aims to conduct an in-depth analysis of the limitations and forms of legal liability that food and beverage producers must bear for the use of hazardous chemicals in order to provide certainty of protection for consumers. This research is expected to enrich the business law literature on the doctrine of product liability, specifically in relation to food chemical risks. In practical terms, the results of this study can be used as recommendations for policymakers in improving labeling regulations and food monitoring systems to be more responsive to industry dynamics and public health in Indonesia.

RESEARCH METHODS

This research uses a normative juridical method with qualitative literature study that focuses on primary and secondary legal materials. Primary legal materials include the Consumer Protection Law, Food Law, processed food labeling provisions, and implementing regulations governing food additives, maximum contamination limits, and supervision procedures. Secondary legal materials include academic books and journal articles discussing product liability, food safety, and labeling as a means of fulfilling the right to information. The analysis was conducted through repeated reading, comparison of norms, and the construction of arguments based on principles and doctrines, so that an understanding of the standards of producer obligations and forms of liability in the event of consumer loss could be drawn. A thematic synthesis framework was used to group the findings into themes, sub-themes, and propositions, so that the line of argument did not stop at the description of norms, but moved towards an assessment of coherence, regulatory gaps, and legal consequences in disputes (Braun & Clarke, 2006; Denyer & Tranfield, 2009).

Literature searches were conducted systematically through academic databases and publisher catalogs. Inclusion criteria included (a) reputable journal articles or academic books discussing literature review methods, qualitative analysis, product liability, labeling, or consumer protection; (b) availability of a traceable DOI or ISBN; (c) direct relevance to the issue of manufacturer liability for chemical risks and labeling obligations. Exclusion criteria included popular writings without academic apparatus, documents without clear publisher identification, and publications whose DOI or ISBN could not be verified. The selection process was carried out in stages, beginning with screening titles and abstracts, followed by examination of the full text to ensure focus and quality of argumentation. This approach followed the principles of systematic review to reduce bias in reference selection and maintain traceability of selection decisions (Petticrew & Roberts, 2006; Booth et al., 2016).

Data coding was performed by extracting units of information from each source, then assigning analytical labels referring to specific legal concepts, such as the manufacturer's standard of care, the duty to provide accurate information, the doctrine of product defects, and causality in health damage claims. These labels are then organized into a theme matrix to compare the suitability of academic doctrines with normative regulations and law enforcement practices. Quality assurance is carried out through a work trace audit that records the reasons for inclusion and exclusion, cross-checking between sources to avoid misinterpretation, and testing the consistency of themes by reviewing quotes and preliminary conclusions. This technique is in line with qualitative data analysis practices that emphasize process transparency, categorization coherence, and the interconnection between data, interpretation, and conclusions (Miles et al., 2014; Creswell, 2014).

RESULTS AND DISCUSSIONS

Construction of Legal Liability of Producers for Chemical Risks in Food Products

Manufacturers' responsibility for the health risks of using chemicals in food products is established through a set of norms that prioritize human safety as an objective that must be achieved through obligations before goods are distributed, obligations during distribution, and obligations after harmful incidents occur. This framework stems from the idea that food is a basic necessity whose daily consumption involves public trust, thereby positioning producers as subjects who must uphold high standards of caution. In positive law, this construction does not stand on a single law, but on the

relationship between provisions regarding food safety, health, consumer protection, licensing governance, supervision, and corporate accountability (Hasmin et al., 2021). From a normative legal perspective, producer responsibility can be read in three layers. The first layer is the substantive obligation regarding what may and may not be used and how safety standards are set. The second layer is procedural obligations in the form of distribution permits, fulfillment of production requirements, quality assurance, and evidence-based control. The third layer is the legal consequences of violations, namely administrative, civil, and criminal sanctions, with different levels of proof and categories of fault. This structure creates a clear relationship between technical compliance obligations and liability for compensation to consumers.

Law No. 18 of 2012 on Food is the main normative basis that requires producers to guarantee the safety, quality, and nutrition of food at every stage of business activities. The norms in this law serve as "minimum standards" that must be met, which are then further elaborated through implementing regulations that govern standards, supervision procedures, and enforcement. Article 69 of the Food Law prohibits the use of food additives that are harmful to health (Nurjanah & Paulus, 2022). This prohibition has two implications. First, producers have an obligation to select ingredients from the formulation stage, including the obligation to ensure the status of the chemicals used, their intended use, and their usage limits. Second, producers are required to establish an internal control system to prevent violations of this prohibition due to human error, inaccurate weighing, cross-contamination, or the use of raw materials that do not meet specifications. Violations of Article 69 are therefore not merely considered administrative failures, but failures to fulfill substantive safety obligations. In terms of accountability, the Food Law provides for enforcement measures ranging from administrative actions and product safety measures to criminal penalties if the elements of the sanction article are met.

Still within the Food Law, the construction of producer responsibility is formed through the obligation to meet food safety standards, production requirements, and traceability required in product recalls. The Food Law presupposes the existence of a risk assessment and risk management mechanism, although the technical terms are derived in the implementing regulations. This means that the obligations of producers do not stop at the statement "this ingredient is commonly used," but must be measured against standards set by the government or regulatory authorities. In normative practice, safety standards include maximum limits for the use of food additives, contamination limits, and provisions regarding packaging that comes into contact with food (Lewoleba et al., 2018). When the Food Law stipulates the obligation to guarantee safety, producers are obliged to prepare proof of compliance. This proof is preventive in nature, in the form of raw material specification documents, standard operating procedures, production records, quality test results, and distribution documents. These documents are not merely business documents, but evidence of compliance with legal obligations in the event of consumer claims. With this design, the Food Law locks in the responsibility of producers to demonstrate a compliant process, not merely a final product that happens to be safe in a single test. The supervision of food additive use is a key element in this construct, where its effectiveness greatly determines the level of consumer health protection (Kahfi et al., 2023).

Law No. 36 of 2009 on Health reinforces this construct by positioning safe and nutritious food as part of the right to health. Article 111 of the Health Law states that the use of food additives must meet safety and quality requirements. This norm has the consequence that the use of chemicals in food is a legally justified activity only if the requirements are met. Producers cannot use the logic that "as long as there are no direct victims, it is legal," because the legal requirements are inherent from the outset. The Health Law adds a dimension of public health protection that is often used to assess the seriousness of violations. If a product contains chemicals that exceed the limits, the violation can be interpreted as a violation of the obligation to protect public health, not merely a violation of product quality standards. At the level of accountability, the Health Law provides a basis for supervision, guidance, and administrative enforcement, as well as providing a basis for criminal prosecution under certain conditions. Because the Health Law regulates the rights of the community and the obligations of actors, its normative legal analysis places producers as "safety guarantors" who are required to proactively ensure the safety and quality of additives, including the obligation to ensure that the ingredients used have a basis for safety assessment.

Food and Drug Administration Regulation No. 11 of 2019 concerning Food Additives operationalizes the obligations in the Food Law and Health Law by stipulating a list of permitted food additives, their types of use, and maximum usage limits. From a normative perspective, this regulation transforms general obligations in the law into measurable obligations, allowing for objective verification of producer compliance. For producers, this BPOM regulation creates concrete technical obligations: ensuring that every chemical added is on the permitted list, used for the appropriate function, and within the maximum limits according to the food category. Violations of maximum limits are not a trivial matter, as maximum limits are thresholds considered safe based on scientific assessments and health protection policies. This regulation also requires compliance with proper labeling and usage to avoid misleading consumers. In terms of accountability, BPOM Regulation No. 11 of 2019 serves as a benchmark for evidence in supervision and disputes. When BPOM conducts sample tests and finds non-compliance, the measure of "right or wrong" refers to this regulation, and the legal consequences are in accordance with the Food Law and Health Law, including product recalls and license suspensions.

The construction of producer liability is made more comprehensive through Law No. 8 of 1999 on Consumer Protection, particularly Article 8, which prohibits business actors from producing and trading goods that do not meet or

comply with the required standards. In consumer protection law, violations of food safety standards are positioned as violations that result in the infringement of consumers' rights to security, comfort, and safety. This is where the civil dimension becomes acute. When consumers suffer losses due to food products containing hazardous chemicals or the use of additives that exceed the limits, producers can be held liable for compensation. The claim mechanism can be pursued through the courts or consumer dispute resolution forums in accordance with applicable regulations. The strength of the Consumer Protection Law lies in its design of business actors' responsibility for consumer losses, which focuses on the consequences arising from the goods traded. The consumer is not burdened with excessive technical requirements to "expose the production process," as long as they can demonstrate the existence of losses and their relationship to the goods consumed, while the producer is required to demonstrate that the product has met the standards. In a normative legal analysis, this law serves as a bridge from technical norm violations to enforceable compensation obligations. This protection is relevant not only for chemical risks, but also in other cases such as the distribution of expired food products that directly threaten consumers' basic rights (Prasetyo et al., 2023; Sumito et al., 2024).

The relationship between the Food Law, Health Law, BPOM Regulations, and Consumer Protection Law forms a structure of accountability that moves from prevention to recovery. At the prevention stage, producers are required to ensure that the chemicals used are legal and safe, obtain distribution permits when required, and produce in accordance with standards. At the supervision stage, BPOM and related agencies conduct testing, inspections, and administrative enforcement. At the recovery stage, consumers have grounds to claim compensation when losses occur. This structure shows that producer responsibility is direct, as compliance obligations are attached to those who produce and distribute. The transfer of responsibility to raw material suppliers or production service providers does not eliminate the manufacturer's obligations to consumers and regulators. Normatively, manufacturers are still required to exercise due diligence on suppliers, verify analysis certificates, and conduct adequate internal testing. If manufacturers choose a business model with third parties, business contracts can regulate recourse, but the obligation to the public remains with the manufacturer that lists the brand and distributes the product. This is why the construction of producer liability cannot be understood solely as a private contractual relationship, but rather as a public obligation that can result in sanctions and claims for damages.

The criminal dimension of producer liability mainly arises when the use of hazardous chemicals is intentional or negligent and meets the elements of the sanction clause. Article 135 of the Food Law provides criminal penalties for anyone who intentionally uses prohibited food additives. This norm distinguishes administrative violations from acts that are considered serious because they involve intent. In normative analysis, the element of "intent" requires proof of the producer's knowledge, willingness to use prohibited substances, or awareness of the risks involved. The enforcement practice, however, may use a series of facts such as the purchase of prohibited ingredients, production instructions, or concealment of information as evidence. The Food Law is not the only law that imposes criminal sanctions for violations that endanger public health. The Health Law also has provisions on criminal sanctions for such violations, thus creating the possibility of applying the provisions based on lex specialist or cumulative application as long as the requirements are met. These criminal consequences emphasize that producer liability does not end with product recalls or compensation, but can extend to the personal freedom of responsible managers or perpetrators and significant fines for corporations in accordance with the applicable criminal framework.

The principle of liability without proof of fault is often understood through the concept of strict liability in consumer protection law, although its implementation still depends on the wording of the article and the interpretation of the judge. The Consumer Protection Law contains provisions on the liability of business actors for consumer losses resulting from traded goods, which are designed to reduce the burden of proof on consumers. The logic used is that businesses control the production process and information, so it's only fair that they bear the risks associated with goods released to the market. This principle is relevant to the issue of hazardous chemicals because health damage often requires complex scientific proof. Although consumers still have to show that there was damage and a reasonable connection to the product, manufacturers can't just refute this with general statements. Manufacturers need to demonstrate that quality control systems, additive selection, and compliance with maximum limits have been strictly implemented. Strict liability serves as a corrective tool for information asymmetry, shifting the incentive for compliance to manufacturers. In terms of legal policy, placing the risk on manufacturers encourages investment in testing, documentation, batch tracking, and rapid recalls when violations are found.

The BPOM's verification and monitoring mechanisms give concrete form to the legal obligations of manufacturers. Within the regulatory structure, the BPOM conducts pre-market and post-market monitoring through document evaluation, facility inspections, sampling, and laboratory testing. At this point, the obligation of manufacturers to keep records of safety and quality tests for the chemicals used becomes crucial. The documents should include material specifications, certificates of analysis from suppliers, material receipt records, formulation records, production records, finished product testing records, and distribution records. If an adverse event occurs, these documents are used to assess whether the violation was due to product design, process errors, or deviations. The product recall and public notification obligations, if mandated, are part of the responsibility to mitigate further harm. Compliance assessments in oversight are often risk-based, so products with higher chemical exposure potential or a history of violations may be prioritized. For

manufacturers, this means that compliance cannot be treated as a one-time activity during licensing, but rather as an ongoing obligation that must be retested through sampling and audits whenever necessary.

Manufacturer accountability also intersects with corporate governance through Law No. 40 of 2007 on Limited Liability Companies, specifically Article 74 on social and environmental responsibility. This provision requires companies that conduct business activities in or related to natural resources to implement social and environmental responsibility. For the food industry, the issue of relevance arises when production activities use agricultural raw materials and supply chains related to natural resources, and when production activities generate waste and risks to public health. Normatively, fulfilling social and environmental responsibility obligations can be understood as a governance obligation that encourages companies to internalize social risks, including consumer health risks resulting from chemical formulation policies. If companies ignore food safety standards and take shortcuts by using hazardous chemicals, such actions are contrary to the spirit of CSR, which requires companies to maintain the social sustainability of their operations. The direct consequences are more often seen in the realm of corporate administration and reputation, but in business law analysis, CSR influences the assessment of director suitability and risk management prudence. This means that producer responsibility has a governance dimension that requires compliance policies as part of corporate risk management.

The Codex Alimentarius international standards developed by the FAO and WHO broaden the scope of compliance for producers, especially for businesses targeting exports or adopting best practices to maintain market confidence. The Food Law provides a reference to international standards for the development of food safety standards. The legal implication is that when national standards are developed with reference to Codex, producers who want to compete globally must ensure that the use of food additives, contamination limits, and claims on labels are in line with widely recognized standards. Although Codex is not national law, it serves as an important reference in the formation of technical standards and can be a measure of the reasonableness of producers' actions in assessing safety. For producers, compliance with globally recognized standards reduces the risk of rejection at ports of destination, product recalls in trading partner countries, and contractual losses. For regulators, reference to Codex helps ensure that domestic standards do not lag behind scientific developments. The construct of producer responsibility thus extends from the obligation to comply with domestic rules to the obligation to manage trade risks arising from differences in standards between countries, especially when products contain additives and chemicals that are subject to highly detailed regulations.

Ultimately, the legal framework governing manufacturers' liability for health risks arising from the use of chemicals in food products is multidimensional and multi-layered. It includes administrative obligations to ensure the legality of ingredients, compliance with production requirements, and distribution permits through mechanisms supervised by the Indonesian Food and Drug Administration (BPOM). It also includes civil obligations to compensate consumers if it is proven that they have suffered losses due to the goods being traded. It includes criminal penalties if the use of prohibited chemicals is intentional or if certain violations meet the elements of criminalization. It also includes corporate governance obligations through Article 74 of the Limited Liability Company Law, which requires companies to manage compliance and risk as part of their social and environmental responsibilities. Operationally, all these layers converge at one point, namely the ability of producers to control the use of chemicals through quality systems and verifiable written evidence. With this design, positive law directs producers to implement the principles of prudence, product information transparency, and compliance discipline, so that when violations occur, legal consequences can be enforced from supervision, enforcement, recovery, to criminal prosecution in accordance with the severity of the offense. This comprehensive legal framework also needs to be accompanied by awareness and compliance among business actors, including SMEs, regarding applicable certification and standard aspects to ensure product safety and halal status for all segments of society (Hakiky et al., 2023).

Standardization of Labeling as a Preventive Instrument for the Protection of Consumer Safety Rights

Standardization of labeling requirements on food and beverage products can be understood as a means of disclosure that transforms production information into knowledge that consumers can use before making purchases and consumption. In normative legal analysis, labels are positioned as a preventive measure because they work at the pre-transaction stage, when consumers still have the freedom to choose, delay, or reject products (Pambudi & Ekawati, 2021). This system is built on the assumption that food risks often arise from asymmetric information, where producers know the ingredients, processes, and potential risks, while consumers only see the finished product. With labeling standards, the state requires producers to transfer some key information to the public sphere through packaging or information media accompanying the product (Sood et al., 2014). Labels thus become a tool to prevent violations of the right to safety and the right to information, as consumers can make basic assessments regarding ingredients, composition, warnings, and consumption limits. In terms of business law, labels shift the debate from the realm of promotion to that of compliance, as statements on labels can be tested, verified, and compared with the product's contents. From this point, prevention occurs through two channels: preventing health risks due to consumption that does not meet needs, and preventing economic losses due to product misrepresentation.

Law No. 8 of 1999 on Consumer Protection places the right to information as an independent, operational right that serves to reinforce the right to safety. Consumers' right to accurate, clear, and honest information about the condition

and warranty of goods compels businesses to develop accountable product communications. In a normative reading, labeling standards are not merely a graphic formality, but a substantive obligation to convey facts that are relevant to consumption decisions. When this norm is linked to the obligations of business actors and the prohibition of misleading practices, labels become a preventive instrument because they reduce the scope for exaggerated claims, the use of deceptive terms, or the concealment of product characteristics that are important for safety (Tarina et al., 2019). The Consumer Protection Law also links labels to product conformity, meaning that the product's contents must be consistent with the information provided. The label thus forms a “legal promise” that binds businesses from the moment the product is offered. Prevention of violations of the right to safety arises because accurate information allows consumers to avoid products with certain compositions, for example, consumers with allergies, sugar restrictions, or special dietary needs. Prevention of violations of the right to information occurs because labeling honesty standards close the door to communication distortions that could lead consumers to make the wrong choices.

Law No. 18 of 2012 on Food strengthens the foundation of labeling by requiring everyone who produces food for trade to include labels in accordance with the provisions. This norm places labeling as part of food safety governance, not merely a marketing issue. Article 97 of the Food Law, which requires special attention, emphasizes that food labels must provide information that is not misleading. The prohibition on misleading information is broad in scope, covering product names that could mislead consumers about the main ingredients, inaccurate presentation of composition, concealment of the use of certain ingredients that are relevant to health, and claims that are not in line with the actual situation. The Food Law also emphasizes key information elements such as product name, ingredient list, expiration date, and nutritional information. These elements are preventive measures because each is related to safe consumption decisions (Fitriana, 2023). The ingredient list helps consumers assess exposure to additives and allergens, the expiration date prevents consumption of products whose quality and safety have deteriorated, and nutritional information guides consumers toward choices appropriate for their physical condition. With this structure, Article 97 sets a minimum standard prohibiting manufacturers from using labels to obscure risks that consumers should be aware of.

Government Regulation No. 86 of 2019 concerning Food Safety provides technical specifications that bridge the gap between legal norms and the daily compliance practices of producers. This regulation is important because the law provides a general framework, while prevention requires details on what to include, how to include it, and how to ensure that the information is understandable. In Government Regulation No. 86 of 2019, the emphasis on food additive information and warnings for certain groups demonstrates a risk-based prevention approach. Products with food additives or certain characteristics can have different effects on individuals with specific health conditions, so the warning requirement on labels acts as an initial barrier to prevent inappropriate consumption. This PP also reinforces the understanding that food safety covers the stages of production, storage, distribution, and serving, so that labels serve as a link between stages. When consumers receive a product, the label provides a summary of information accompanying the item, including instructions for proper storage and use. In this way, labeling standards reduce risks that arise not from hazardous materials, but from incorrect consumption, such as products that must be stored cold or consumed within a certain period after opening. This regulation ultimately transforms labels into a preventive tool that regulates consumption behavior in a legal and rational manner.

BPOM Regulation No. 31 of 2018 concerning Processed Food Labels is a highly operational regulation in label standardization, as it breaks down general obligations into a list of obligations that can be checked line by line. From a normative legal perspective, this BPOM Regulation establishes minimum standards for the readability and verifiability of information, including composition, nutritional value information, and claim provisions. The composition provisions do not merely require a list of ingredients, but also demand accurate presentation in accordance with proportions and correct naming, so that there is no room to obscure certain ingredients through ambiguous terms. Nutritional value information is positioned as a means of preventing diet-related diseases, as consumers can assess the content of sugar, salt, fat, energy, or other nutrients. The regulation of claims on labels, including health claims, is a crucial point of prevention, as claims can influence consumption behavior, such as excessive consumption due to the perception that a product is “healthy.” Strict claim standards prevent businesses from using labels as a means of persuasion that goes beyond evidence. When this obligation is linked to BPOM supervision, labeling becomes a compliance-based preventive measure, as producers are encouraged to prepare scientific justifications and documentation before including statements that guide consumer decisions.

In relation to Law No. 36 of 2009 concerning Health, labeling is legitimized as a means of fulfilling the right to safe and nutritious food. The Health Law establishes health as a right of citizens and an obligation of the state to realize it through regulation and supervision. Within this framework, labels become risk communication instruments oriented towards health protection. The information on labels enables consumers to take primary preventive measures, such as avoiding certain ingredients, reducing sugar intake, or adjusting portions. This prevention is important because many health disorders are related to consumption patterns that are formed from daily choices. Standardized labeling thus functions as a “legal intervention” that influences behavior without direct coercion, as consumers are given information to regulate themselves. The Health Law also provides a basis that food that is harmful to health is contrary to citizens' rights, so labeling should not manipulate perceptions of safety. When labels present accurate nutritional information and

display relevant warnings, they help consumers avoid incidents that can trigger health problems, such as allergic reactions or inappropriate intake for people with metabolic diseases. In this way, label standardization can be understood as part of the public health protection obligation that works through information disclosure.

Labeling is closely related to the principle of trade transparency because labels contain statements that can be used as a benchmark for product conformity. The Consumer Protection Law prohibits the production or trade of goods that do not conform to the labels attached to them. This norm transforms labels into a control tool that can be used by consumers, supervisors, and third parties. Preventively, manufacturers who understand that their labels can be used as a basis for claims of conformity will tend to refrain from making statements that are difficult to prove. This reduces the risk of misrepresentation from the outset. In civil relations, the conformity of labels with product content is central because consumers can assess that they are purchasing products based on the information promised. If the label states "preservative-free" or "low sugar," for example, that statement becomes a factual statement that must be proven. Standardizing labels through technical regulations clarifies their meaning and presentation, thereby reducing debate about whether a statement is fair promotion or a deceptive statement. Civil disputes are prevented because clear standards reduce uncertainty, minimize room for wild interpretation, and force businesses to align their production with the statements on the label. When this compliance is in place, consumers' rights to information and safety are protected through a more honest and monitorable market mechanism.

In the criminal sphere, labeling standardization has a preventive function because the threat of sanctions changes the risk calculation of business actors. The Food Law contains provisions on sanctions relevant to labeling, and Article 135 A of the Food Law stipulates criminal penalties for parties who deliberately include labels that do not match the product content. This norm is important because labeling violations often pose health risks, such as concealing certain ingredients or making claims that encourage inappropriate consumption. From a normative perspective, the element of "deliberately" indicates that criminalization is directed at conscious and intentional acts, such as falsifying composition, manipulating nutritional information, or making statements that contradict the reality of production. The Consumer Protection Law also has criminal provisions related to misleading information, making labeling a point of convergence between consumer protection and food safety. Its preventive function arises because rational business actors will avoid actions that could potentially trigger criminal proceedings, including the risk of seizure of goods, product recalls, and further impacts on business continuity The labeling standards thus serve as a normative barrier that reduces the likelihood of violations, as business actors know that labeling irregularities are not minor offenses but can enter the realm of criminality when done knowingly.

The role of BPOM in labeling supervision should be viewed as a compliance assurance mechanism that strengthens preventive functions. In regulatory design, BPOM regulations on processed food labels provide parameters that can be tested by supervisors, such as the completeness of label elements, the accuracy of composition, the suitability of nutritional information, and rules regarding claims. When BPOM conducts supervision, the object of supervision is not merely the physical product, but rather the conformity between the statements on the label and the condition of the product. The administrative sanctions mentioned in your description, such as warnings, administrative fines, freezing, and revocation of distribution permits, form a ladder of enforcement that allows for quick corrections before consumer losses spread. In the preventive realm, administrative sanctions are important because they are faster and more flexible than civil or criminal proceedings (Adismana, 2023). Manufacturers are encouraged to establish internal approval systems for labels, involving legal checks, quality checks, and compliance checks before packaging is mass-produced. Labeling errors in practice often incur high costs due to product recalls and packaging replacements, so labeling standards encourage compliant behavior through economic incentives that are in line with legal obligations. With this pattern, BPOM and BPOM Regulation 31 of 2018 form a prevention system based on certainty of parameters, measurability, and tangible administrative consequences.

The international dimension through Codex Alimentarius places labeling as an acceptable standard of food communication across jurisdictions. Indonesia, as a member of the Codex Alimentarius Commission, has adopted many Codex principles in the formulation of national standards, particularly those related to the presentation of non-misleading information, ingredient lists, the labeling of certain additives, and claims principles. Normatively, reference to Codex provides two preventive benefits. First, it helps harmonize domestic standards with widely accepted practices, thereby reducing standard gaps that could be exploited to market products with more lenient information. Second, it provides a measure of reasonableness in assessing whether labels meet acceptable risk communication standards. For producers targeting export markets, compliance with labeling standards in line with Codex is a preventive measure against product rejection in the destination country, returns, and costly contractual consequences. For domestic consumers, standards aligned with Codex strengthen the quality of information received, as these standards are developed from cross-country experience and a safety orientation. Codex thus expands the preventive function of labeling from national consumer protection to the protection of the reputation of the food control system and the competitiveness of products in the global market.

Labeling as a consumer education tool works through two channels, namely the provision of factual information and the formation of habits of reading information. PP 86 of 2019 and BPOM Regulation 31 of 2018 require the

presentation of nutritional information and certain warnings, so that consumers gradually become accustomed to associating consumption with health consequences. Within the framework of the Health Law, this habit is valuable as a form of prevention based on conscious choices. Manufacturers are forced to present information in a more structured form, so that consumers can compare products, for example, comparing sugar, salt, or energy content. At a certain point, labels function as a "measuring tool" that allows consumers to choose more suitable products. The prevention of violations of the right to information occurs because the information is presented in a standardized and comparable manner, thereby narrowing the scope for narrative manipulation. The prevention of violations of the right to safety occurs because consumers can avoid excessive consumption, avoid products with certain ingredients, and follow storage and serving instructions. From a normative legal perspective, education through labeling is not a voluntary activity undertaken by businesses, but rather a result of legal obligations. Because these obligations are universal, education is carried out uniformly across all products on the market, so that the benefits of prevention can reach a wide range of consumers without requiring special intervention in each transaction (Hawkes et al., 2015).

The legal consequences of labeling violations form a comprehensive prevention ecosystem because there are complementary administrative, civil, and criminal channels. The administrative channel allows for quick corrections through warnings, label adjustments, or product recalls based on the parameters of BPOM Regulations and PP 86 of 2019. The civil route is open through the Consumer Protection Law when consumers suffer losses due to incorrect label information, such as health losses due to undisclosed ingredients or economic losses due to misleading claims. The criminal route is available through the Food Law and the Consumer Protection Law when violations are committed knowingly and put the public at risk. Within the framework of prevention, the existence of these three paths encourages compliance from the label design stage, as businesses face a spectrum of different consequences. Compliance-oriented manufacturers will incorporate the legal review of labels into their production process, including verification of nutritional data, verification of claims, and verification of ingredient and additive lists. Because labels are public, violations are easily detected through market surveillance, consumer complaints, and compliance testing, resulting in a high risk of violation. The certainty that label violations can lead to concrete action makes labeling standards an effective deterrent, as they discourage businesses from taking advantage of misleading information.

Overall, standardizing labeling requirements builds protection of rights to safety and information through a layered, measurable, and monitorable regulatory structure. The Consumer Protection Law guarantees the right to accurate, clear, and honest information, and emphasizes the conformity of goods with labels as an obligation of business actors (Anggraini et al., 2023). The Food Law, through Article 97, mandates non-misleading labeling and stipulates core information elements relevant to consumption safety, while Article 135 provides criminal penalties for labeling that deliberately deviates from the content. Government Regulation No. 86 of 2019 outlines food safety standards and emphasizes information related to additives and specific warnings, while BPOM Regulation No. 31 of 2018 details the procedures for labeling processed foods, regulating nutritional information, and controlling claims to ensure accuracy. The Health Law provides the basis for the right to safe and nutritious food, so that labels become a means of realizing the right to health through more informed consumption choices. The Codex Alimentarius enriches the quality of standards and helps harmonize them with international practices. With this structure, labels become a binding preventive instrument, as they guide consumer choices, limit room for manipulation by producers, and provide a basis for action when deviations occur. The dimensions of completeness and accuracy of information are not only relevant to general security, but also important for specific certification aspects such as halal certification, which requires a clear structure of supervision and sanctions to protect consumer rights, especially in online transactions that are vulnerable to counterfeiting (Aziz et al., 2023; Amin et al., 2023). Labelling standards ultimately also serve as instruments for improving ethical business practices, where honest and accurate information builds trust and market sustainability (Mardikaningsih & Chasanah, 2024).

CONCLUSIONS

Manufacturers' responsibility for the health risks of chemicals in food and beverages is established through verifiable compliance obligations, ranging from the selection of permitted ingredients, compliance with usage limits, quality assurance, to product recall readiness in the event of non-compliance. At the same time, labeling standards place information as an element of protection, because the composition, nutritional information, expiration date, warnings, and claims must be presented correctly, clearly, and not misleadingly, so that consumers can make informed consumption decisions. The two are interlocked: compliant production obligations reduce risks upstream, while compliant labels prevent incorrect consumption and close the space for information manipulation. In the event of a violation, a system of administrative, civil, and criminal sanctions provides a tiered response to stop distribution, recover losses, and enforce business compliance.

Standardization of labeling requirements makes labels a verifiable "legal promise," requiring businesses to link label designs to production data, test results, and material specifications. The practical implication is an increased need for internal compliance management in the form of label approval procedures, evidence-based claim verification, and control of formulation changes to ensure they are always consistent with the information on the packaging. For regulators,

measurable standards provide clear inspection parameters for assessing the conformity of contents with descriptions, including during sampling and enforcement. For consumers, mandatory information on labels strengthens their bargaining position because purchasing decisions can be based on information whose accuracy can be verified in the event of loss, including through compensation mechanisms under the consumer protection framework.

Regulators and supervisors need to clarify the parameters for the legibility and traceability of label information, especially regarding composition, warnings, and claims, and ensure that administrative enforcement is swift when non-compliance is found. Businesses need to standardize labeling workflows that require verification of composition and nutritional data, supplier control, neat batch documentation, and periodic evaluation of claims to ensure they remain consistent with evidence and regulations. Consumers need to be accustomed to reading the composition, nutritional information, and warnings before consumption, as well as reporting suspected label non-compliance through official complaint channels so that product corrections can be made immediately and health risks can be prevented from the outset.

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