

Legal approaches to consumer protection in packaged food regulation: A Comparative study of Indonesia and Malaysia

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Abstract

The increasing circulation of packaged food across ASEAN borders raises urgent concerns regarding consumer protection and regulatory consistency. Despite shared regional goals, Indonesia and Malaysia have adopted distinct legal approaches to governing food safety and labeling. This study investigates and compares the regulatory frameworks of both countries to assess their effectiveness in protecting consumers. Using a normative legal method and comparative method and comparative analysis, it examines key legislation, institutional roles, and enforcement mechanisms. The findings reveal fundamental differences in regulatory structure, coordination, and implementation, which may affect consumer rights and cross-border food trade. The study highlights the legal innovations and best practices found in each jurisdiction and process steps toward regulatory harmonization. By bridging these differences, the research contributes to ongoing discourse on ASEAN integration and the strengthening of legal standards for food safety and consumer protection in the region.

Keywords

Consumer Protection, Food Law, Legal Regulation, Comparative Study, ASEAN Integration

Introduction

Food is a basic human need that must be met to sustain life, maintain health, and support daily activities. In modern societies with high mobility and fast-paced lifestyles, this need is increasingly met through the consumption of practical and easily accessible packaged foods. This trend is driving significant growth in the packaged food market in ASEAN. According to Euromonitor data, the retail value of packaged food in Southeast Asia reached US\$109.9 billion in 2023, an increase of approximately 36.1% since 2019, and is projected to reach US\$162 billion by 2029 [1]. This growth not only reflects economic dynamics but also raises complex legal challenges related to health, food safety, and information disclosure to consumers.

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Consumer protection for packaged food products plays a crucial role in ensuring food health and safety. In Indonesia, the main challenge arises from the use of risky food additives, such as synthetic dyes or hazardous chemicals, which can threaten consumer safety. Protection efforts are implemented through strict regulations, including supervision by the Food and Drug Monitoring Agency (BPOM), BPOM Regulation No. 31 of 2018 concerning Processed Food Labels, and Government Regulation No. 68 of 1999 concerning Food Labels and Advertising. These regulations not only establish product safety and quality standards but also stipulate strict sanctions, ranging from criminal penalties to fines, for businesses that violate them [2].

In contrast to Indonesia, which emphasizes food safety supervision, Malaysia places strong emphasis on product information transparency. The Consumer Protection Act 1999 (Consumer Protection Act 1999) Protection The Nutrition Facts Act 1999 guarantees consumers the right to obtain accurate and understandable information, including through clear nutrition labels [3]. The inclusion of nutrition facts and ingredients on labels is intended to help consumers make safe and informed decisions, while protecting them from fraudulent practices or food safety violations [4].

Consumer protection in the food sector is a crucial instrument for ensuring health, safety, and consumers' right to transparent information. The state plays a central role in establishing a consumer protection system through comprehensive regulations. In Indonesia, consumer protection is regulated by Law Number 8 of 1999 concerning Consumer Protection and Law Number 18 of 2012 concerning Food, which is further strengthened by Government Regulation Number 86 of 2019 concerning Food Safety . Although the legal framework has been well-developed, its implementation still faces various obstacles, ranging from weak inter-agency coordination to inconsistencies in supervision [5]. Meanwhile, in Malaysia, consumer protection in the food sector has been systematically implemented since the establishment of the Food Quality Control Unit in 1974, then strengthened with food standards regulations and hygiene practices since 1985, as well as consumer education under the Malaysian Ministry of Health [5].

The role of the state in developing consumer protection systems in both countries is evident in their comprehensive legal frameworks. In Indonesia, consumer protection is regulated by Law No. 8 of 1999 concerning Consumer Protection and Law No. 18 of 2012 concerning Food, which is reinforced by Government Regulation No. 86 of 2019 concerning Food Safety. Although the legal framework is adequate, its implementation faces obstacles, ranging from inconsistent implementation to weak inter-agency coordination. Meanwhile, in Malaysia, food safety regulations have been systematically implemented since the establishment of the Food Quality Control Unit in 1974, followed by regulations on food standards and hygiene practices since 1985, and reinforced by consumer education under the Malaysian Ministry of Health.

Although both countries have relatively strong regulatory frameworks, comparative studies on legal approaches to consumer protection, particularly for packaged food products, are still limited. This study attempts to fill this gap by analyzing consumer

protection regulations for packaged food products in Indonesia and Malaysia, with a focus on aspects of health, safety, and transparency of information through labeling. The research questions are formulated as follows: (1) how consumer protection regulations for packaged food products are regulated in Indonesia and Malaysia; (2) what are the similarities and differences in the legal approaches used by the two countries to ensure food safety and consumer rights; and (3) what are the implications of these differences for the effectiveness of consumer protection in each country.

Method

This study uses a normative juridical approach with a comparative legal method to examine the legal approach to consumer protection in packaged food regulations in Indonesia and Malaysia. This study focuses on the analysis of legal materials, both in the form of relevant laws and regulations in both countries, as well as secondary legal materials in the form of literature, official documents, and opinions of legal experts. Data collection was conducted through a literature study, using descriptive - comparative analysis techniques to compare the substance of regulations, institutions, oversight mechanisms, and applicable legal sanctions. The purpose of this study is to identify similarities and differences in the legal systems of both countries and to formulate recommendations to strengthen legal protection for packaged food consumers.

Results and Discussion

Regulatory framework in Indonesia

Indonesia's regulatory framework for packaged food rests on three main pillars. First, Law No. 8 of 1999 concerning Consumer Protection (UUPA), which guarantees consumers' rights to accurate, clear, and honest information, while also establishing business responsibilities and a framework for resolving civil, administrative, and criminal disputes. UUPK defines consumer protection and mandates transparency of product information, including for packaged food. These provisions serve as the general foundation that underpins all food sectoral regulations.

Second, Law No. 18 of 2012 concerning Food specifically regulates the implementation of food from upstream to downstream, including food safety, labeling and advertising, supervision, community participation, and investigations. This law emphasizes that distributed food must be safe and labeled in accordance with regulations; labeling and advertising aspects are one of the explicit areas of regulation, thus strengthening consumers' rights to information on food products. The Food Law also provides the basis for the authority of the government, including the Food and Drug Monitoring Agency (BPOM), to conduct supervision and enforcement.

Third, derivative regulations that outline technical obligations. Government Regulation No. 86 of 2019 concerning Food Safety outlines the obligations of business actors to

ensure safety throughout the food chain and emphasizes the government's oversight role. This regulation binds all food business actors, including producers and importers, to distribute only food that meets safety, hygiene, and quality standards.

The most immediately noticeable area for consumers is labeling. BPOM Regulation No. 31 of 2018 concerning Processed Food Labels, which was later amended by BPOM Regulation No. 20 of 2021 and BPOM Regulation No. 6 of 2024, details the minimum information that must be included (product name, composition, net weight/content, name & address of manufacturer/importer, production date & code, expiration date, distribution permit number/MD-ML, origin of certain ingredients, storage/serving instructions, and allergen statements). This regulation also regulates readability (font size, contrast, placement) and prohibits misleading claims. The 2021–2024 amendments update technical provisions and align with developments in science and industry practices.

In addition, claim regulations have been tightened through BPOM policies that control claims on processed food labels and advertisements. The goal is to prevent health/nutrition claims that are unfounded or potentially misleading to consumers. The push toward front-of-pack nutrition labeling (FOPNL) and “healthier choice” initiatives are also beginning to be discussed in recent policy literature as part of a more concise nutrition information strategy for consumers [6].

From a law enforcement perspective, the sanctions regime is multi-layered: administrative (warnings, withdrawals, destruction, freezing/revocation of distribution permits), civil (compensation), and criminal for certain violations. Academic studies indicate that inappropriate labeling can lead to all three legal consequences for business actors. At the same time, research also highlights compliance challenges, particularly for MSMEs struggling to meet the technical details of labeling and licensing, making regulatory assistance and outreach crucial.

Recent legal studies emphasize the role of the Food and Drug Authority (BPOM) as the vanguard of consumer information protection through pre-market oversight (registration/marketing permit numbers, label assessments) and post-market oversight (inspections, sampling, and enforcement). In the MSME sector, weak understanding of labeling obligations and compliance costs are often barriers; therefore, BPOM's education and facilitation programs are seen as strategic in bridging the compliance gap.

In line with the transformation of digital commerce, the obligations of businesses marketing processed food online have been further clarified in legal literature. Businesses remain responsible for ensuring products have distribution permits, are properly labeled, and are not misleading, including when marketed through marketplaces. This closes a loophole often exploited to distribute repackaged or unlicensed products. Rulings and normative studies demand that sellers be held accountable for consumer losses resulting from products without distribution permits.

From a public policy perspective, Indonesia's regulatory trajectory demonstrates a consistent trend toward information transparency and strengthened oversight. The Consumer Protection Law provides the foundation for consumer rights; the Food Law reduces them to sectoral obligations; the Food Safety Regulation (PP) binds cross-chain implementation; and the BPOM Regulation on Labels (PerBPOM) provides a technical operational instrument on packaging. Continuous updates—including the 2021 and 2024 amendments—demonstrate the regulator's responsiveness to industry dynamics, consumer preferences, and international practices. However, the literature also emphasizes the importance of consistent enforcement and compliance assistance, particularly for MSMEs, to ensure consumer protection objectives are truly achieved at the point of sale.

Finally, from a regional comparative perspective, Indonesia's regulatory architecture is relatively aligned with modern regulatory practices: a strong right to information system, detailed labeling obligations, claims controls, and post-distribution surveillance. Key challenges remain the dissemination of regulations, business literacy, and enforcement effectiveness, particularly in the online and small-scale product sectors. Strengthening coordination between authorities, increasing labeling literacy at the consumer level, and consistent, proportionate sanctions will be key to addressing regulatory challenges. enforcement gap and ensuring safe, licensed, and informative packaged food for the public.

Regulatory framework in Malaysia

Malaysia's regulatory framework for packaged foods is built on a combination of complementary food-specific laws, implementing regulations, and consumer protection legislation. The primary foundations are the Food Act 1983 and the Food Regulations 1985, which govern food definitions, safety requirements, and labeling requirements (including mandatory listing of ingredients, dates, and certain nutritional claims). In addition, other instruments such as the Consumer Protection Act 1999, Sale of Goods Act 1957, and Trade Descriptions Act 2011 provides a legal basis for trader liability, prohibition of misleading information, and criminal/administrative sanctions against dishonest business practices [7,8].

In the practice of labeling packaged foods, the Ministry of Health Malaysia (Through Food Safety and Quality Division, FSQD) plays a central role: in addition to implementing the provisions of the Food Regulations 1985, the FSQD continues to revise labeling requirements to adapt to evolving scientific evidence and consumer needs. A concrete example is the revised labeling requirements announced and implemented on January 1, 2024, which expand nutrient declaration requirements and clarify ingredient/proportion declaration requirements for certain products, demonstrating the country's efforts to strengthen the information available to consumers [9].

The issue Front-of-package labeling (FOPL), a concise label that allows consumers to assess nutritional quality, has become a hot policy focus in Southeast Asia, including

Malaysia. Systematic reviews and regional reviews show that while the WHO recommends FOPL to encourage healthier food choices, implementation in ASEAN countries varies and is often hampered by food industry influence, the need for inter-ministerial coordination, and technical issues with label design. For Malaysia, FOPL policy discussions run parallel to efforts to strengthen existing nutrition labeling, but the adoption of interpretive systems (e.g. , warning labels or summary scores) faces political and technical challenges that need to be addressed through leadership, local evidence, and accountability mechanisms [10].

In terms of implementation effectiveness, academic literature indicates two key issues: (1) manufacturers' compliance with labeling requirements and (2) the credibility of information on nutrition labels. Empirical research in Malaysia found that some pre - packaged products do not always accurately declare nutrition information, and that technical tolerances and testing standards need to be standardized to ensure consistency. This gap reduces consumers' ability to make informed decisions and calls for strengthening laboratory oversight and enforcement capacity [11].

Enforcement mechanisms in Malaysia combine administrative inspections, sample testing by authorities, administrative measures (product recalls, fines), and criminal prosecution if serious violations such as false information or food safety threats are found. Furthermore, consumer protection laws provide scope for civil claims and collective action against businesses. However, the literature emphasizes the need for inter-agency coordination (e.g. , between the Ministry of Health, Ministry of Trade, and standards bodies) and transparency in the monitoring process to improve compliance and public trust [8].

From a public policy perspective, the studies suggest several improvements to strengthen Malaysia's regulatory framework for packaged foods: (1) accelerating the adoption of evidence-based and locally appropriate FOPL systems; (2) aligning labeling requirements with clear measurement standards and tolerances so that laboratory testing produces reliable results; (3) strengthening oversight capacity and imposing proportionate sanctions for labeling violations; and (4) increasing the involvement of non-industry stakeholders (public health organizations, academia, consumers) to balance industry influence. Implementation of these recommendations is considered crucial for regulations to be more than mere textual but truly effective in protecting consumers' rights to information and food safety [9].

In summary: Malaysia's regulatory framework is relatively comprehensive formally combining the Food Act, Food Regulations , and consumer protection laws but its effectiveness depends on harmonization of technical requirements, oversight capacity, and political courage to overcome industry barriers and implement policy innovations like the FOPL. Improvements in these areas would enhance the Malaysian legal system's ability to ensure transparency, safety, and consumer rights in the packaged food market.

Key difference and comparative analysis

A comparison of consumer protection for packaged food products in Indonesia and Malaysia reveals significant differences in nutrition labeling regulations, halal assurance, and law enforcement mechanisms. Malaysia has mandated nutrition labeling since 2003, although implementation has not been fully optimized. Indonesia still faces limitations in labeling regulations, particularly regarding sugar, salt, and fat [4]. In terms of halal certification, Indonesia, through BPJPH, and Malaysia, through JAKIM, both have official institutions, but in practice, challenges remain, including weak oversight and potential label misuse [12]. Meanwhile, weak coordination between institutions in Indonesia often creates legal uncertainty, while Malaysia is relatively more structured, although transparency and independent oversight are still needed [13]. These differences have a direct impact on legal certainty for businesses and the level of protection felt by consumers in both countries. Table 1 shows the key difference and comparative analysis between Indonesia and Malaysia regarding consumer protection for packaged food products.

Table 1. Comparative analysis between Indonesia and Malaysia regarding consumer protection for packaged food products

Aspect	Indonesia	Malaysia
Legal Tradition	Civil Law	Common Law
Regulatory Body	BPOM, MUI, Local Health Offices	MOH – FSQD
Enforcement Structure	Decentralized	Centralized
Progress from Policy Tracking		
Progress from Policy Use		
Halal Certification	Mandatory (Law No. 33/2014)	Voluntary, but widely practiced
Labeling Standards	National Standards, some overlaps/confusion	Aligned with Codex more consistent
ASEAN Harmonization Effort	In progress, fragmented	More proactive and internationally oriented

Architecture and locus of authority. Indonesia positions the Food and Drug Monitoring Agency (BPOM) as the central authority for overseeing the safety and labeling of processed foods, based on Law No. 18 of 2012 concerning Food and its derivative regulations, such as Government Regulation No. 86 of 2019 and Regulation of the Head of BPOM No. 12 of 2016 concerning the registration of processed foods. Legal studies show that processed food safety supervision also involves several ministries, but BPOM remains the primary node in the integration of standardization, pre-market control (registration), and post-market control (sampling and enforcement). In contrast, Malaysia positions the Food Safety and Quality Division (FSQD) under the Ministry of Health as the main technical regulator under the Food Act 1983 and Food Regulations 1985, which establishes a centralized framework to prevent food hazards and food fraud (food fraud), including the authority to confiscate, take samples, and impose criminal sanctions or fines. The literature shows that the FSQD is tasked with planning, implementing, monitoring, and evaluating food safety and quality programs at the national and local levels, with a mandate as a technical food regulator.

Front-of-pack (FoP) nutrition labeling and public nutrition policy. In 2024–2025, the policy trajectories of the two countries appeared to be in opposite directions. Malaysia has long mandated rear-panel nutrition labeling (since 2003) and implemented voluntary FoP schemes such as the Guidelines Daily Amounts (GDA) and Healthier Choice Logo (HCL) since 2017. Studies show that HCL is effective in driving industrial reformulation, although its coexistence with GDA is considered less than optimal according to the WHO perspective which recommends the use of a single national scheme. Meanwhile, Indonesia is in a transition phase towards a stronger FoP. The government issued Government Regulation No. 28 of 2024 as a framework for controlling sugar, salt, and fat. The Food and Drug Authority (BPOM) is finalizing implementing regulations on front-of-package nutrition warnings (nutri -levels) for products high in sugar, salt, and fat, but these have not been fully established until implementing regulations and a transition period are in place for each category. The USDA/FAS report and the 2024–2025 legal review emphasize the gradual nature of this regulation, while industry has even requested a delay in implementation due to the economic impact. Globally, interpretive labels such as warnings or traffic light has proven to be the most effective in directing healthy consumer choices.

Halal assurance and consumer protection. In Indonesia, Law No. 33 of 2014 concerning Halal Product Assurance (JPH) and its derivatives mandates gradual halal certification. Starting October 17, 2024, the government began conducting retail inspections to ensure halal label compliance, signaling a shift from a voluntary to a mandatory regime. Legal literature highlights that JPH is an instrument for Muslim consumer protection, while media reports indicate intensified enforcement ahead of the deadline. In Malaysia, the halal regime is more legally mature through Trade Descriptions (Definition of Halal) Order 2011 and Trade Descriptions (Certification and Marking of Halal) Order 2011, which legally defines halal and assigns JAKIM/MAIN as the certification and enforcement authority alongside KPDN through a trade description regime. Studies have demonstrated the effectiveness of the 2011 TDA in curbing halal fraud and affirming JAKIM's position as the sole issuer of the national halal mark.

Enforcement, sanctions, and compliance pathways. In Malaysia, the Food Act 1983 empowers the Food Safety Authority (FSQD) with the authority to conduct inspections, confiscate, and impose criminal action or fines for food safety or labeling violations. A 2016–2023 review revealed compliance challenges, particularly among SMEs, related to certification costs and language barriers, despite a consistent and long-standing legal framework. In Indonesia, BPOM regulations continue to be updated (food categories, composition, label claims) and post-market supervision is strengthened, but the FoP transition period and JPH phase-in require adaptive enforcement design to avoid triggering regulatory shock for business actors.

Access to consumer redress. Malaysia has a Tribunal for Consumer Claims (TCC) under Consumer Protection Act 1999, a simple, low-cost, and binding forum—which the literature recognizes as an established redress mechanism. Indonesia relies on the

Consumer Dispute Resolution Agency (BPSK) under Law No. 8 of 1999 as a non-litigation ADR system . Recent research commends its function but notes challenges such as limited resources, the quality of decisions, and follow-up enforcement in general courts. As a result, Malaysian consumers enjoy a more accessible and efficient forum, while Indonesian consumers rely on the performance of the local BPSK and coordination with general courts.

Health claims and misleading information. Malaysia restricts health claims through the Food Regulations 1985 and FSQD guidelines; research on herbal/food product labels highlights the need for improved compliance and clarity of information (Rahim et al. , 2023). Indonesia, through the BPOM Regulation on claims and supervisory updates, is tightening claims to prevent misleading claims. The literature demonstrates the importance of stronger enforcement against unsubstantiated claims. Practically, Malaysia has a long-standing claims framework and list of standards, while Indonesia is still updating its claims list and technical guidelines in line with its nutrition labeling and FoP reform agenda.

Policy effectiveness and scientific evidence. A global meta- review concluded that interpretive FoP schemes (warning or traffic-light) are easier to understand and influence purchase intentions for unhealthy products across social groups—a key reason Indonesia is moving toward mandatory interpretive labeling. Malaysia, through its voluntary HCL and GDA, achieved a nudge effect in some categories, but the population-wide effect depends on the scale of adoption and public understanding. Regional studies have noted that the public sometimes misinterprets HCL as " healthy " rather than " healthier ".

Various international literature shows that the nutritional label on the front of the packaging (Front- of - Pack) Labeling (FoPL) has the potential to increase consumer engagement in choosing healthier products. Meta-analysis by Ikonen et al. 2020 demonstrated the positive effects of FoPL across various systems. Cross-country experimental studies also demonstrated that labels such as Nutri-Score , Traffic Light, and Warning Labels are more understandable and effective in guiding consumer choices than purely numerical labels [14]. A study in Mexico found that Multiple Traffic Light and Warning Labels increase the intention to purchase healthier products, although the effect is modest , but has the potential to be significant if applied to a wide population [15].

Toward ASEAN harmonization

The push for harmonization of packaged food regulations in the ASEAN region has grown stronger over the past decade. Two key regional instruments, namely the ASEAN Food Safety Policy (AFSP) and ASEAN Food Safety Regulatory The ASEAN Food and Agriculture Framework (AFSRF) serves as a strategic guideline for strengthening cross-sectoral food control systems, encompassing health, trade, and agriculture. The AFSP emphasizes a risk-based approach to the food chain, while the AFSRF operationalizes

the ten key principles of the AFSP by linking the roles of ASEAN sectoral institutions, thus providing a reference for member states in aligning their national policies [16].

On a technical level, Prepared Foodstuffs Product Working Group (PFPWG) under the ASEAN Consultative Committee on Standards and Quality (ACCSQ) has revised the ASEAN General Standard for the Labeling of Prepackaged Food, which adopts Codex STAN 1-1985 with several modifications. This document is one of the ASEAN Common Food Control Requirements (ACFCR), which serves as the basis for harmonization of food labeling elements in the region, although its implementation remains dependent on the national legal framework. Academic literature confirms that the harmonization of food standards in ASEAN contributes to trade facilitation and the reduction of non-tariff barriers, but the process is not uniform due to differences in institutional capacity and the diversity of legal systems among member countries [17].

The experiences of Indonesia and Malaysia in regulating packaged food represent both the dynamics of progress and the challenges of harmonization. Malaysia was the first to align its nutrition labeling provisions with international standards through the Food Regulations 1985, making it a pioneer in the implementation of mandatory nutrition labeling in Southeast Asia with high consistency with Codex. Guidelines on Nutrition Labeling. Furthermore, Malaysia has a national halal standard, MS 1500:2019, which is used as a reference by industry and certification bodies (JAKIM), although it is not a law. This standard provides detailed technical parameters regarding halal supply chain management, hygiene, and documentation [18].

Meanwhile, Indonesia is strengthening its food labeling policy through BPOM Regulation No. 31/2018 concerning processed food labels and BPOM Regulation No. 22/2019 as an implementation of Minister of Health Regulation No. 30/2013. The current policy direction emphasizes the implementation of front-of-pack labels. nutrition labeling (FoPNL), which is currently under development for the sugar, salt, and fat categories, following regional trends and public health agendas. In the halal aspect, Indonesia is implementing the Halal Product Guarantee obligation in stages according to Law No. 33/2014 with a transition period until 2034, thus changing the regulatory landscape for both domestic and imported food products [19].

In Malaysia, early indicators show that consumers are quite aware and understand FOP energy. icon, especially among highly educated, young, and female groups—suggests a foundation for higher labeling effectiveness [20]. However, studies of the policy process reveal barriers to the implementation of mandatory nutrition labeling—from industry positions to governance—that need to be addressed to achieve maximum results [20]. Conversely, in Indonesia, no similar local data has been found on consumer understanding or the effectiveness of FoPL. This indicates a gap between the regulations in place and consumer readiness to use them optimally.

Conclusion

This study shows that both Indonesia and Malaysia have legal frameworks aimed at protecting consumers regarding packaged foods, but the legal approach taken by each country has its own characteristics. In Indonesia, consumer protection is generally regulated through Law No. 8 of 1999 concerning Consumer Protection, as well as sectoral regulations such as the BPOM Regulation and National Standards (SNI). Meanwhile, Malaysia implements a more integrated legal system through the Food Act 1983, the Food Regulations 1985, and oversight by the Malaysian Ministry of Health.

The comparison shows that Malaysia is more advanced in terms of harmonization of regulations and law enforcement, including the existence of product mechanisms, recalls, stricter labeling, and the active involvement of regulatory agencies. Conversely, although Indonesia has sufficient legal instruments, their implementation and enforcement still face various challenges, including a lack of inter-agency coordination and weak oversight at the field level.

Thus, Indonesia can learn from Malaysia's best practices, particularly in strengthening oversight, enforcement against violations, and consumer education. Regional collaboration and harmonization of food safety standards also need to be strengthened to enhance consumer protection more effectively and comprehensively in the era of globalization.

The differences in regulatory architecture between Indonesia and Malaysia have direct implications for the effectiveness of consumer protection. Malaysia, with its centralized system, more consistent regulations, and higher levels of consumer awareness, demonstrates the potential for greater effectiveness in implementing nutrition labeling and overall consumer protection. In contrast, Indonesia faces challenges such as institutional coordination, MSME compliance, and limited consumer literacy, often resulting in suboptimal regulatory effectiveness. Therefore, to improve the effectiveness of consumer protection, Indonesia needs to strengthen public education, ensure consistent law enforcement, and accelerate the integration of nutrition labeling policies into market practices. These recommendations are also relevant to supporting the harmonization of packaged food regulations in ASEAN.

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