

CONSUMER PROTECTION

Indonesia's New Beverage Labelling Rules: Voluntary Adoption and Consumer Protection Considerations



In April 2026, the Indonesian Minister of Health issued Minister of Health Decree No. HK.01.07/MENKES/301/2026 on Nutrition Labelling and Health Notice for Ready-to-Serve Processed Foods ("**Decree**"). While the Decree's title broadly refers to processed foods, it primarily focuses on ready-to-drink processed beverages and introduces a new nutrition labelling system, which classifies beverages into graded categories based on their nutritional content. This system is intended to present nutritional information in a clear and accessible manner for consumers across various sales and promotional channels. This aligns with one of the rights available to consumers under Law No. 8 of 1999 on Consumer Protection ("**Consumer Protection Law**"), namely the right to receive accurate, clear, and honest information.

At this stage, the nutrition labelling system remains voluntary, allowing businesses to familiarise themselves with the framework and its potential commercial implications. Any adoption of the labelling system should be carefully implemented to ensure that the information in the label is accurate, consistent, non-misleading, and in line with the Consumer Protection Law.

Who Is Affected by the Decree?

The Decree applies to business actors producing and/or distributing ready-to-drink processed beverages, with initial implementation directed at large-scale businesses. Covered products include commercially sold ready-to-drink beverages offered through various information media or channels, including retail, food and beverage outlets, and digital platforms. This includes manufacturers, importers, distributors, and businesses offering such beverages to end consumers.

Key Feature: The Nutrition Level Label System

The nutrition labelling system classifies beverages into four categories: A to D, based on sugar, salt, and saturated fat content per 100 ml. It uses a colour-coded scale ranging from dark green (Level A) to red (Level D). This nutrition level information must be displayed clearly and legibly across relevant media, including menus (physical or digital), retail packaging, promotional materials, and online menus in electronic commercial applications.

The Decree also sets out technical presentation requirements relating to font, colour, layout, logo orientation, and formatting, ensuring consistency while still allowing room for careful brand alignment.

Compliance Timeline

Although the Decree is already in force, the nutrition labelling system remains voluntary and will only become mandatory two years after implementing regulations on maximum sugar, salt, and saturated fat thresholds are issued. As of the date of this update, based on publicly available information, those implementing regulations have not yet been issued.

Why Voluntary Adoption Still Requires Careful Consideration

This development reflects Indonesia's broader alignment with public-health-oriented labelling regimes seen in other jurisdictions. While currently voluntary, the introduction of a nutrition labelling system signals a clear regulatory direction.

While the nutrition labelling regime is currently voluntary, businesses that choose to adopt it may wish to consider how it interacts with the Consumer Protection Law. In practice, once applied, a nutrition label forms a part of the

information and representations provided to end consumers. It is therefore important that such information is accurate, clear, and honest, and does not mislead or misrepresent the product. This is particularly relevant in light of the Consumer Protection Law, which prohibits businesses from producing or trading goods that are not in accordance with label information or applicable regulatory standards, with violations potentially subject to criminal sanctions. Accordingly, businesses may need to assess product formulations, labelling strategies, and marketing approaches in anticipation of future mandatory implementation, particularly where their products' nutritional contents may fall within lower classification categories. Early engagement with the framework may also support longer-term compliance with the Consumer Protection Law.

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