

PwC Indonesia Legal Alert

June 2026 / No. 64



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New mandatory nutrition labels and health messages on ready to serve processed foods

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I. Background

On 14 April 2026, the Indonesian Ministry of Health (**MoH**) issued Decision No. HK.01.07/MENKES/301/2026 on Nutrition Labels and Health Messages on Ready-to-Serve Processed Foods (**MoH Decision 301/2026**). This regulation introduces a mandatory front-of-menu/front-of-display nutrition labelling system (**Nutri Level**) for ready-to-serve processed foods, with a particular focus on sugar-sweetened foods and beverages produced or sold by large-scale businesses.

The policy is part of the Government's broader strategy to reduce excessive consumption of sugar, salt, and fat (GGL) and to address the growing burden of non-communicable diseases (NCDs), including obesity, diabetes, cardiovascular disease, and stroke, as mandated under Law No. 17 of 2023 on Health.

MoH Decision 301/2026 was issued to implement Article 38(5) of Minister of Health Regulation No. 3 of 2026 on Disease Control. This decision does not amend National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan/BPOM*) labelling rules for packaged foods, which remain under the authority of BPOM. Instead, it fills a regulatory gap for ready-to-serve (non-packaged) foods.

II. Key revisions

a. Mandatory Nutri Level labelling

MoH Decision 301/2026 requires ready-to-serve processed foods to display a Nutri Level label indicating the relative content of sugar, salt, and

fat. The Nutri Level system consists of four categories, each represented by a letter and color code:

- Level A (dark green): lowest GGL content
- Level B (light green): low to moderate GGL content
- Level C (yellow): high GGL content
- Level D (red): highest GGL content

This labelling is intended to provide simple, easily understood guidance to consumers at the point of purchase or ordering.

b. Scope of application

The obligation applies primarily to large-scale ready-to-serve food and beverage businesses, including outlets selling products such as sweetened drinks (e.g. boba, flavoured coffee, tea-based drinks, and juices).

At the initial stage, the regulation does not target micro, small, and medium enterprises (MSMEs), such as street vendors, small food stalls, or small restaurants.

c. Placement and media requirements

Nutri Level labels and health messages must be displayed through consumer-facing media, including but not limited to:

- Physical menus and menu boards
- Product packaging (where applicable)
- Brochures, banners, or promotional materials
- Digital menus and commercial food delivery applications

The regulation emphasises visibility and accessibility of the information before consumption decisions are made.

d. Self-assessment with laboratory support

The assigned Nutri Level is based on a self-declaration by the business, supported by laboratory testing conducted by government laboratories or other accredited laboratories to determine GGL content.

III. Implications for businesses

a. Increased compliance and operational adjustments

Affected businesses must:

- Conduct **nutritional testing** of products
- Determine and document Nutri Level classifications
- Update **menus, packaging, and digital platforms**
- Implement **internal compliance controls** to ensure accuracy and consistency

Failure to prepare may expose businesses to **supervisory actions** under Indonesia's public health and food safety framework.

b. Reputational and commercial impact

Products with **Level C or D (yellow/red)** labels may attract increased consumer scrutiny, potentially influencing purchasing decisions.

IV. Conclusions

Clients operating in or entering Indonesia should proactively assess whether their businesses fall within the category of large-scale ready-to-serve food providers under prevailing Ministry of Health enforcement practices, undertake nutritional audits supported by accredited laboratory testing to substantiate GGL content, update all physical and digital consumer-facing media to ensure proper Nutri Level placement in line with MoH Decision No. 301/2026, align compliance approaches across MoH requirements for ready-to-serve foods and BPOM regulations for packaged foods, and adopt a forward-looking compliance strategy by monitoring potential regulatory expansion to MSMEs or additional food categories as part of Indonesia’s broader non-communicable disease control agenda.



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