

A Comparative Study of Legal Regulations on the Distribution and Use of High-Sugar Packaged Beverages in Indonesia and Singapore to Protect Consumers

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Abstract:

The ease of purchasing packaged beverages can impact public health, especially when there is little information available about the health risks of high-sugar drinks. This study compares the laws regulating high-sugar beverages in Indonesia and Singapore to suggest improvements for Indonesian regulations. With growing awareness of health issues related to food and drink consumption, this research examines the effectiveness of existing regulations and aims to strengthen consumer protection. The study highlights the importance of clear and honest product information through an analysis of Indonesia's Consumer Protection Law and Health Law No. 17 of 2023. Suggestions include adopting measures like Singapore's Nutri-Grade system and sugar taxes to raise public awareness and reduce risks of non-communicable diseases. This research aims to provide recommendations for Indonesia's health policies to enhance the quality of life for its people.

Keywords: Nutri-Grade, High-sugar Packaged Beverages, Comparison of Laws, Health

Introduction

Health is highly valued by most people and is essential for daily activities. As such, countries focus on protecting public health, as stated in Indonesia's Health Law No. 17 of 2023. Consuming healthy food and drinks is important for everyone, as poor eating and drinking habits can lead to health problems. According to (Shin et al., 2023), low-quality diets are a major factor in health challenges. One factor impacting health is the consumption of high-sugar packaged drinks, which is a challenge faced by many countries, including Indonesia.

Sweetened beverages are high in calories but low in nutrients, often containing types of sugars like white sugar, brown sugar, or high fructose corn syrup. These sugars mainly provide calories from carbohydrates. If these drinks are consumed excessively, they can increase the risk of non-communicable diseases, such as type 2 diabetes and obesity. A 2018 health study in Indonesia showed that 56.4% of teenagers aged 15–19 consumed sweetened drinks at least once a day. In Jakarta, this consumption rate is even higher at 62.6%, compared to the national average. Studies also show that teenagers often consume these drinks, particularly packaged ones. In Indonesia, packaged drinks typically contain 37 to 54 grams of sugar, with 310–420 calories, which exceeds the World Health Organization (WHO) and American Heart Association (AHA) recommendations to limit added sugar intake (Kementerian Kesehatan RI, 2019). The long-term effects of consuming sweetened drinks include a higher risk of chronic kidney failure.

Chronic kidney disease can affect people of all ages, but it is especially concerning when it occurs in teenagers, as they are in their growth years and should be in good health. Chronic kidney disease is caused by several factors, including age, gender, and a history of diabetes, hypertension, or other metabolic conditions (Purwati, 2018). According to Indonesia's Ministry of Health data from 2018, 739,208 people in Indonesia, or 3.8% of the population, suffer from chronic kidney disease. Data from the Institute for Health Metrics and Evaluation's (IHME) Global Burden of Disease (GBD) in 2019 ranks chronic kidney disease among the top ten causes of death in Indonesia. The Ministry of Health reports over 42,000 deaths due to chronic kidney disease (CNBC Indonesia, 2024).

Chronic kidney disease in Indonesia is often linked to type 2 diabetes, which is largely caused by lifestyle factors, including the frequent consumption of high-sugar packaged drinks. According to the 2018 health study, the prevalence of diabetes in Indonesia, diagnosed by doctors across all ages, is 1.5%, amounting to 1,017,290 people. In 2013, the prevalence of diabetes among people under 15 years was 1.5%, which increased to 2% in 2018. The province with the lowest diabetes rate is East Nusa Tenggara at 0.6%, while Jakarta has the highest rate at 2.6%. In West Java, the diabetes incidence reached 1.74% in 2021, representing about 570,611 people with diabetes. In Bandung, the diabetes incidence was 45,430 cases in 2019 and 43,906 cases in 2020 (Kementrian Kesehatan RI, 2019).

Chronic kidney disease is a significant issue in Indonesia, particularly among teenagers and children. As of 2024, approximately 60 children are receiving kidney failure therapy (detikNews, 2024). This situation has drawn public attention, with reports from the Cipto Mangunkusumo Hospital (RSCM) in Central Jakarta showing that children are undergoing dialysis due to kidney failure, often caused by consuming high-sugar packaged drinks or foods. This raises concerns for the nation's future generation. Observations reveal that many packaged beverages lack important information on their labels, such as accurate sugar content, production date, expiration date, and the presence of artificial sweeteners. These details are crucial for consumer health.

Indonesia is not alone in facing this issue; Singapore also deals with similar challenges related to high-sugar packaged drinks and rising type 2 diabetes rates. Singapore has one of the highest diabetes rates globally, with around 14.2% of adults diagnosed with the condition in 2021 (Banten TV.com, 2024). A major contributing factor is the high consumption of sugary drinks, including sweetened tea, soda, and energy drinks. In response, the Singaporean government has introduced several strategic measures. They implemented a "Nutri-Grade" color-label system for packaged drinks, banned high-sugar drink advertising in mass media, and launched public awareness campaigns to highlight the dangers of excessive sugar consumption.

German philosopher Gustav Radbruch identified three fundamental values of law: justice, usefulness, and legal certainty (Fitrihabi & Kurniawan, 2021). Legal certainty is essential for achieving a stable and orderly life. To promote health, it is important to understand the function of law. Dutch legal scholar Van Kant described law as a set of rules that compel individuals in society to protect each other's interests (Laia, 2022).

Indonesia has regulations on the consumption of packaged foods and beverages with added sugar. Article 4, Section 2 of the Indonesian Health Minister's Regulation No. 30 of 2013 outlines guidelines for labeling sugar, salt, fat content, and health warnings on processed and ready-to-eat foods. This regulation recommends a maximum daily sugar intake of 50 grams. Exceeding this limit can lead to health issues, including diabetes.

Existing regulations in Indonesia, such as the Health Minister's Regulation No. 30 of 2013 on labeling sugar, salt, fat, and health warnings for processed and ready-to-eat foods, aim to support a healthy lifestyle. However, there is a concerning trend of young people under 15 needing regular dialysis, likely due to consuming high-sugar foods and drinks. According to the Ministry of Health in 2018, 739,208 people (or 3.8% of Indonesia's population) suffer from chronic kidney disease. This issue highlights the gap between the requirements set for manufacturers and consumers' understanding of product labels. While producers follow the regulations by providing nutritional information, many consumers do not check these details.

To address this issue, local and national governments should reassess existing policies to make nutritional information easier to understand. This study aims to compare the regulatory systems of Singapore and Malaysia regarding public consumption habits, the governing laws, and the regulatory agencies overseeing food and beverages in these countries. The results of this comparison could be useful in shaping policies to reduce the risk of chronic kidney disease in Indonesia.

Material

Problem

Existing regulations in Indonesia, such as the Health Minister's Regulation No. 30 of 2013 on labeling sugar, salt, fat, and health warnings for processed and ready-to-eat foods, aim to support a healthy lifestyle. However, there is a concerning trend of young people under 15 needing regular dialysis, likely due to consuming high-sugar foods and drinks. According to the Ministry of Health in 2018, 739,208 people (or 3.8% of Indonesia's population) suffer from chronic kidney disease. This issue highlights the gap between

the requirements set for manufacturers and consumers' understanding of product labels. While producers follow the regulations by providing nutritional information, many consumers do not check these details.

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Literatur Review

Legal Systems in General

A legal system is a structured chain of interconnected components that work together to provide justice, legal certainty, and public welfare. Franjić (2021) describes the legal system as a complex network of related legal phenomena aimed at regulating relationships within society. The components of a legal system include legal norms, concepts, institutions, branches of law, and general principles (Kerchove, 1994). Legal norms are agreements created by a group of people to reflect the cultural practices within each country, ensuring fairness.

Scholars have proposed various ways to understand legal systems. Some view it as a broad concept encompassing all legal phenomena, while others list specific components. These components—legal substance, structure, and culture—are the foundation for law's application in society (Ali, 2002). The legal system functions with its own rules and boundaries, defining its relationship to the surrounding environment (Nursadi, 2008).

Legal systems can be applied both nationally and internationally, though they differ in scope. Their primary role is to regulate laws that achieve justice, equality, freedom, and humanity. Studies of legal systems include comparative law, international law, and general theories of law and the state. Understanding legal systems is essential for grasping the complex interactions between law and society.

A. Law and Legal Protection in Indonesia

According to (Martin, 1986) "Law as Tradition" views law as a systematic, evolving tradition that maintains social order. Law cannot be separated from societal development since it reflects cultural and traditional values. Cicero's principle *ubi societas ibi ius* and von Savigny's concept of *volkgeist* suggest that as society evolves, so does its legal system (Hadi, 2016). In colonial times, Dutch law influenced Indonesia, with European law applying to European residents in the Dutch East Indies (now Indonesia). Indonesia adopted the Continental European legal system, which features codified laws (Prodjodikoro, 2012).

Under Dutch rule, a dual legal system allowed customary law for native Indonesians and European law for Dutch settlers. This created legal pluralism, though Indonesians could choose to follow European law, especially in trade. Over time, Dutch colonial law shaped Indonesia's legal landscape, creating a dual system that leaned towards Western law (Daniel S. Lev, 1990). Today, Indonesia uses a civil law system, though post-1945 constitutional amendments led to the development of Indonesia's unique Pancasila legal system, based on the Pancasila philosophy

The regulation of legal regulations in Indonesia related to processed food standards containing sugar is regulated in the Regulation of the Minister of Health of the Republic of Indonesia Number 30 of 2013 concerning the inclusion of sugar content, salt, fat, and health messages for processed and ready-to-eat foods, in Article 4 Point (2) Permenkes RI No. 30 of 2013 explains the maximum limit of people consuming sugar in their daily food or drinks, then also in the regulation requires companies in Indonesia to include nutrition labels on these products and also ask the Minister, Head of the District / City Health Office to provide socialization of these health recommendations. However, in the field, there are many young people who perform dialysis caused by drinks and packaged foods that contain high sugar. Based on Law Number 17 of 2023 concerning Health in Article 18 Point (2) explains related preventive efforts which are prevention efforts, among others, these efforts are in the form of restrictions related to the consumption of cigarettes, salt and excess sugar. There needs to be a comparison to make people's habits in Indonesia better, starting from the rule of law or related to socialization and distribution.

The rise of bottled drinks that are increasingly circulating, the need for legal protection for the parties, both for consumers and producers, in order to obtain certainty for the parties. According to (Ekawati & Johan, 2021), a consumer is any person who uses goods/services available in the community, both for the benefit of themselves, their families, other people and other living things and not for trade. Consumers or called

consumers are literally defined as business actors or people who buy certain goods and use certain services or use a supply and or a number of goods (Barkatullah, 2011). The distinction between consumers as natural persons or natural persons and consumers as business actors or legal entities can be seen from the use of these goods used for personal or commercial purposes sale, production again (Wibowo, 1999).

Legal protection for consumers is regulated as Article 4 and Article 7 of Law Number 8 of 1999 concerning Consumer Protection which states the right of consumers to obtain correct, clear and honest information regarding the condition and guarantee of goods and the obligation of business actors not to mislead consumers. In addition to information that must be true, clear and honest, producers must also meet the standards regulated by Article 4 and Article 6 of Law Number 20 of 2014 concerning Standardization and Conformity Assessment which states that the purpose of standardization is to protect consumers and the public, as well as to increase product competitiveness and the need for products to affix SNI marks on products that already meet SNI. This is also accompanied by its implementation in Government Regulation of the Republic of Indonesia Number 102 of 2000 concerning National Standardization (Purwandi, 2021).

The implementation of this activity is inseparable from the mistakes of producers or consumers, therefore based on Article 62 of the Undang-Undang Perlindungan Konsumen provides arrangements related to administrative sanctions for business actors who violate consumer protection provisions up to business revocation. In conducting buying and selling activities, it is not only producers who pay attention to these products but consumers must also do research either on their own or provide education provided by the Government, consumers who are proactive about what they buy can protect themselves more, and also the Government is obliged to provide education related to consumer protection, this is regulated in Article 8 of the Undang-Undang Perlindungan Konsumen.

Consumer rights are also protected in Law No. 8/1999 on Consumer Protection, such as the right to legal certainty, clear information, protecting the interests of consumers & business actors, improving the quality of goods & services, and legal protection from deceptive and misleading business practices. This is in accordance with Article 27 paragraph (2) and Article 33 of the Constitution of the Republic of Indonesia, related to welfare. How important consumer rights are, which provides a point of view that consumer rights are the fourth generation of human rights, which is the key to the conception of human rights for future developments (Awulle, 2020).

As stated (Kusumadewi & Sharon, 2022), paying attention to consumer rights is an obligation that the state must do, related to the comfort, security, and safety of consumers is the main thing that must be protected. Furthermore, to ensure this, consumers are given the right to choose the desired goods / services based on the disclosure of correct, clear and honest information, if there are violations that harm consumers, consumers are entitled to advocacy, guidance, fair treatment, and if necessary compensation for compensation.

B. Law and Legal Protection in Singapore

Singapore has a common law legal system that has developed over the years, the source of Singapore's law comes from the constitution, additional laws, and laws made by judges. Singapore upholds the constitution which is the highest law in Singapore and has the same 3 organs as Indonesia, namely the Executive, Legislative and Judiciary.

In Singapore, the regulation of sugar-sweetened beverages (SSBs) is based on public health policies that aim to reduce sugar consumption and promote healthier dietary choices. One of the key initiatives is the Healthier Choice Symbol (HCS), which is managed by the Health Promotion Board (HPB). The program labels products that meet certain nutritional criteria, including lower sugar content. The legal basis for the HCS can be found in the Health Promotion Board Act, which authorizes the HPB to implement health promotion initiatives and set nutritional standards for food and beverage products.

In addition, the Ministry of Health (MOH) has conducted a public consultation on possible measures to reduce sugar intake from SSBs. In this consultation, various strategies have been explored, including the possibility of imposing a tax on high-sugar drinks or even a ban on their sale. Although a specific tax has not yet been implemented, these discussions reflect the growing recognition of the need for fiscal measures to influence consumer behavior and reduce the economic burden of diet-related diseases. The legal basis for such a tax could be established under the Goods and Services Tax Act or through new legislation specifically targeting sugary drinks, should the government decide to pursue this path.

Furthermore, the Government-wide Healthy Drinks Policy aims to create an environment that supports healthier choices by limiting the availability of SSBs in schools and public institutions. This policy is part of

a broader strategy to combat Singapore's rising obesity and diabetes rates, which have been linked to high sugar consumption. The legal basis for this policy can be found in various public health regulations and guidelines governing the sale of food and beverages in educational and public settings.

Along with these regulatory measures, the government is also prioritizing educational campaigns to raise awareness about the health risks associated with excessive sugar consumption. These campaigns are supported by the Health Promotion Board and are designed to inform the public about healthier dietary choices, thereby encouraging a culture of health awareness. The legal basis for these educational initiatives is enshrined in the Health Promotion Board Act, which requires the HPB to promote health and prevent disease through various means, including public education. Overall, Singapore's approach to regulating sugary drinks is multifaceted, combining legislative measures, public consultation and educational efforts to create a comprehensive framework aimed at reducing sugar consumption and improving public health outcomes. The ongoing discussions and potential future regulations reflect the government's commitment to addressing the health challenges posed by sugary drinks in a proactive and structured manner.

The rise of packaged beverages that are increasingly circulating, the need for protection for the parties. Consumer protection in Singapore is regulated under the Consumer Protection (Fair Trading) Act 2003 (CPFTA). The law has gone through several amendments, the latest of which occurred in 2020. Furthermore, this paper will describe consumer rights in the perspective of Singapore and Indonesian law. Regarding consumer rights, Singapore explains in Article 4 sub-article (1) that consumers have the right to claim compensation and in sub-article (2) regarding the procedure for filing claims, then Article 6 sub-article (1) consumers have the right to obtain honest information. To protect consumers, the CPFTA 2003 requires producers to provide truthful information, prohibits misrepresentation and the product information standards described in Article 5 of the CPFTA 2003. Sale of Food Act (Chapter 283). This regulation authorizes the Singapore Food Agency (SFA) to regulate the safety and quality of food and beverages sold in Singapore, including sugary drinks. In 2019, Singapore's Ministry of Health announced plans to require "High Sugar" labeling on packaged beverages with the highest sugar content. This policy, which comes into effect at the end of 2023, requires manufacturers to put a warning label on the front of the packaging of high-sugar beverages. The aim is to provide clear information to consumers and encourage informed choices. Manufacturers are given sufficient time to adjust their product formulations and change packaging designs. This approach takes into account business interests while still prioritizing public health. In addition, the Singapore Food Manufacturers' Association (SFMA) has worked closely with the government to ensure that manufacturers' interests are represented in the policy-making process. To further strengthen consumer protection, Singapore has also implemented a ban on advertising for beverages with very high sugar content across all media. This is set out in the Food (Advertisement and Sale) Regulations, which forms part of the Sale of Food Act. This ban aims to reduce the exposure and appeal of unhealthy drinks, especially to children and teenagers.

From a broader consumer protection law perspective, the Consumer Protection (Fair Trading) Act provides additional protection by prohibiting unfair trade practices. While it does not specifically regulate sugary drinks, this law can be applied if there are misleading claims about the health benefits or sugar content in packaged drinks. Singapore has also implemented the Nutri-Grade system, a mandatory nutrition grading system for packaged beverages that comes into effect in December 2022. This system requires manufacturers to list the nutritional grade (A, B, C, or D) on beverage packaging based on their sugar and saturated fat content. This provides greater transparency to consumers and encourages manufacturers to reformulate their products to be healthier.

Singapore's comprehensive approach to regulating sugary drinks strikes a balance between consumer protection and producer interests. Through a combination of regulation, education and cooperation with industry, Singapore seeks to create an environment that encourages healthier food and beverage choices without unduly restricting consumer freedom or disproportionately burdening producers. However, the long-term effectiveness of these policies in reducing sugar consumption and improving public health will need to be evaluated over time.

Methods

Research Type

This research is a normative legal study focused on examining legal ambiguities. According to Peter Mahmud Marzuki, legal issues in the context of normative studies arise under three main conditions. First, when parties involved in a case interpret legal texts differently due to unclear language. Second, when there

is a legal gap or absence of a law. Third, when different interpretations arise from the facts. This study aims to analyze and resolve legal issues that emerge from one or a combination of these situations.

Data Analyst

A thorough analysis was conducted by reviewing related regulations in relevant legislation. These legal norms were then systematically organized and interpreted to form a complete understanding of the law. Different types of legal interpretation were used to understand the context and full meaning of each legal norm.

Result

According to what has been established, legal comparison is a simple method. Comparison is defined as an activity to identify the similarities and/or differences between two or more specific phenomena. Some experts view legal comparison as both a method and a science of law. Therefore, when choosing legal comparison, we must consider the available options. Legal comparison theory, or "comparative law," is based on general comparison and analysis of many comparisons that can be applied in the field of law (Soekanto, 1979). If legal comparison is seen as a method, then Soerjono Soekanto's opinion will be influential. More seriously, comparison is described as a method for identifying similarities and/or differences between two existing or new phenomena. Furthermore, according to Kamba, the comparison process consists of "descriptive, identification, and explanation stages," while Hug's approach states that "comparative law" refers to the comparison of foreign legal systems with domestic legal systems to identify similarities and differences.

Indonesia already has regulations related to the use and distribution of high-sugar packaged beverages, but these regulations are not yet comprehensive. The closest regulations related to this matter are the Head of the Food and Drug Supervisory Agency Regulation No. 26 of 2021 on Nutritional Information on Processed Food Labels, which requires businesses producing and/or distributing processed food to include nutritional information on labels, and Law No. 20 of 2014 on Standardization and Conformity Assessment, which helps protect consumers from consuming beverages that do not meet Indonesian National Standards (SNI). There is also the Ministry of Health Regulation No. 30 of 2013 on the Inclusion of Sugar, Salt, Fat Content, and Health Messages for Processed and Ready-to-Eat Foods. Article 4, paragraph (2) of Permenkes No. 30 of 2013 explains the limits on the maximum sugar consumption for the public. However, this has not fully addressed the phenomena in Indonesia. In comparison, Singapore has regulations regarding the Nutri-Grade System and the banning of advertisements for beverages deemed to have high sugar content. According to Singapore's standards, beverages that receive a Nutri-Grade D rating are regulated under the Food (Advertisement and Sale) Regulations, which is part of the Sale of Food Act.

Discuss

Comparison of Legal Arrangements Between Singapore and Indonesia on High-Sugar Beverages

TYPE	SINGAPORE	INDONESIA
Legal Framework	<ul style="list-style-type: none"> - Sale of Food Act (Chapter 283), which governs the sale and advertisement of food products. - Food (Advertisement and Sale) Regulations, which control advertising practices to ensure they do not promote unhealthy food or beverages. - Healthier Choice Symbol (HCS) and Nutri-Grade System, which provide consumers with easy-to-understand labels for 	<ul style="list-style-type: none"> - Consumer Protection Law (UUPK), which provides fundamental protection against harmful products. - Standardization and Conformity Assessment Law (UURI No. 20/2014), which ensures that food products meet national standards, including nutritional labeling. - Regulation No. 102/2000 on National Standardization and

	<p>healthier food choices, particularly for sugar content in beverages.</p> <ul style="list-style-type: none"> - Government-Wide Healthier Beverage Policy, aiming to reduce the consumption of sugary drinks. 	<p>Ministry of Health Regulation No. 30/2013 on Nutritional Labeling, which specifically addresses sugar, salt, and fat content in processed foods.</p>
Scope of Regulations	<ul style="list-style-type: none"> - Public Health Policy, focusing on reducing the consumption of unhealthy food and beverages. - Advertising Regulation, which limits the marketing of unhealthy products. - Nutritional Rating System, the Nutri-Grade system categorizes beverages based on sugar content. - Public Education and Awareness, promoting healthier food choices and encouraging consumer awareness. - Consumer Protection, ensuring that consumers are not misled by marketing and labeling. 	<ul style="list-style-type: none"> - Nutritional Information Labeling, particularly for packaged foods. - Sugar Consumption Limits, with regulations such as the 50 grams per day limit for sugar intake. - Supervision and Monitoring, focusing on ensuring compliance with food safety standards. - Disease Prevention, with an emphasis on early detection of non-communicable diseases linked to poor diets. - Consumer Protection, ensuring that food products meet quality standards.
Classification of Beverages	<p>The Nutri-Grade system classifies beverages based on their sugar content:</p> <ul style="list-style-type: none"> - Grade A: Beverages with 0% sugar. - Grade B: Beverages with 1-4% sugar. - Grade C: Beverages with 5-8% sugar. - Grade D: Beverages with 9-12% sugar. <p>This system provides consumers with clear and accessible information to make healthier choices.</p>	<ul style="list-style-type: none"> - Indonesia does not have a similar classification system for beverages based on sugar content, but it does regulate sugar consumption limits through laws like the Ministry of Health Regulation No. 30/2013. The government has set a guideline of 50 grams of sugar per day for consumers, but there is no direct equivalent to Singapore's Nutri-Grade system.
Enforcement Agencies	<ul style="list-style-type: none"> - Ministry of Health (MOH) and Health Sciences Authority (HSA) oversee public 	<ul style="list-style-type: none"> - Ministry of Health handles health-related policies. - Food and Drug

	<p>health policies and food safety.</p> <ul style="list-style-type: none"> - Consumers Association of Singapore (CASE) protects consumer rights. - Competition and Consumer Commission of Singapore (CCCS) ensures fair market practices. - Advertising Standards Authority of Singapore (ASAS) regulates advertising. - Infocomm Media Development Authority (IMDA) manages media-related aspects of advertising. 	<p>Monitoring Agency (BPOM) oversees food safety.</p> <ul style="list-style-type: none"> - Local Health Offices (Dinas Kesehatan Kabupaten/Kota) manage health regulations at the regional level. - National Consumer Protection Agency ensures consumer rights and safety. - Indonesian Consumers Foundation (YLKI) advocates for consumer interests.
Conditions and Requirements	<p>Singapore has stringent requirements for beverages based on their sugar content:</p> <ul style="list-style-type: none"> - Grade A: No sugar content, with the strictest regulation on sales. - Grade B: Beverages with up to 5 grams of sugar per 100 ml, still relatively restricted. - Grade C: Beverages with 5-10 grams of sugar per 100 ml. - Grade D: Beverages with more than 10 grams of sugar per 100 ml, the highest restriction. <p>(detikFood, 2023)</p>	<ul style="list-style-type: none"> - In Indonesia, the primary focus is on limiting daily sugar consumption, with a guideline of 50 grams per day. - However, there is no direct categorization of beverages based on sugar content like Singapore's Nutri-Grade system. Instead, regulations focus on nutritional labeling, public health education, and consumer protection.

Table 1. The following describes the comparison of legal arrangements, scope of rules, types, enforcement agencies and conditions between Indonesia and Singapore.

Comparison of Regulations and Substance

According to Lawrence M. Friedman, *The Legal System* is a legal unit consisting of several parts including legal structure, legal substance and legal culture, in simple terms the legal structure is the law implementing institutions or also called law enforcement. Then the legal substance is the whole principles of law, legal norms and legal rules both written and unwritten. As stated by (Raharjo, 1986) legal culture exists in law enforcement and society, in fact the legal culture of a nation is proportional to the progress achieved by the nation, because the law of a nation reflects the social life concerned. Thus, in analyzing the need to see a legal system based on this unity. Furthermore, it is necessary to discuss more clearly related to legal structure, legal substance, and legal culture both in Indonesia and Singapore.

A comparative analysis of the regulation of high-sugar packaged beverages between Singapore and Indonesia shows significant differences in approach, implementation, and potential impact on public health. Singapore implements a more specific and comprehensive legal framework, with laws such as the Sale of Food Act and structured nutrition grading systems such as the Healthier Choice Symbol and Nutri-Grade

System. This approach reflects a “nudge” strategy in public policy, where consumers are encouraged to make healthier choices through clear and easy-to-understand information. Indonesia, on the other hand, adopts a more general approach through its Consumer Protection Law and Standardization and Conformity Assessment Law, complemented by specific regulations from the Ministry of Health regarding the inclusion of nutritional content.

Both countries focus on consumer protection and food supervision, but with different emphases. Singapore emphasizes advertising regulations and nutrition rating systems, while Indonesia covers a wider range of aspects including guidance and early detection of non-communicable diseases. A significant difference is seen in the beverage classification system, where Singapore uses A-D labeling based on sugar content with detailed ranges (0%, 1-4%, 5-8%, 9-12%), while the data for Indonesia only shows the daily sugar consumption limit (50 grams/day) with no specific classification for beverages.

Singaporean culture has its own characteristics in responding to regulations made by the Government, so that every regulation issued by the Government can be implemented properly. The legal culture of Singaporean society has a strong approach to law enforcement and the formation of shared values, this is the key to maintaining the stability of social life. The characteristics of Singaporean society are obedient to the law, which is driven by a strict legal system and strict law enforcement. This is accompanied by constitutionally guaranteed judicial independence, whereby judicial decisions cannot be influenced by the Government or the legislature. This demonstrates the integrity and fairness of the legal process (Tan, 2012). The Singapore government conducts activities related to public awareness of values through legal education and social campaigns, thereby increasing understanding of compliance and obedience to the law and maintaining social order. This culture of society in Singapore can make public health better because it obeys regulations related to the Nutri-Grade system and manufacturers comply with this and advertising bans because they comply with existing regulations.

Comparison of related institutions

In terms of institutions, both countries have similar structures with a health ministry and a food regulatory agency, but Singapore appears to have more specialized agencies such as the Health Sciences Authority and the Advertising Standards Authority of Singapore. In terms of terms of sale, Singapore applies the Nutri-Grade system with clear sugar content limits for each category, this makes it easier for consumers to choose or buy beverages that will be consumed while Indonesia only shows the daily sugar consumption limit in general, not specifically which results in a lack of public literacy.

Approach comparison

Singapore's stricter and more specific approach is likely to have a more significant impact on the beverage industry, prompting manufacturers to reformulate their products and change marketing strategies. Singapore's clear and detailed labeling system is also likely to be more effective in influencing consumers' purchasing decisions, which could contribute to an overall reduction in sugar consumption. Indonesia, with its more generalized regulations, provides more flexibility to the beverage industry, but also means that the onus of making healthy choices falls more heavily on consumers.

Implementation challenges are also different in the two countries. Singapore, as a city-state with a smaller population and high average education levels, may face fewer challenges in the implementation and enforcement of its regulations. Indonesia, with a much larger and dispersed population, and diversity in education levels and access to information, may face greater challenges in implementing and enforcing regulations consistently across the country.

In the long run, Singapore's more aggressive approach could potentially result in faster changes in people's consumption patterns and could have a positive impact on public health, especially in reducing the risk of diet-related non-communicable diseases. Indonesia, with its more generalized approach, may take longer to see significant changes, but this approach may be more sustainable in Indonesia's more diverse socio-economic context.

As such, the different approaches between Singapore and Indonesia reflect the different social, economic and political contexts in the two countries. While Singapore's approach may be more effective in the short term, Indonesia's approach may be better suited to the country's complex realities. Both countries can learn from each other, with Singapore perhaps considering aspects of flexibility in its regulations, while Indonesia could adopt elements of a more structured labeling and public education system. Continuous evaluation and

policy adaptation will be key in improving regulatory effectiveness in both countries to achieve the ultimate goal of improving public health through regulating the consumption of sugary drinks.

Conclusion

Final Thoughts

Differences in regulatory approaches between Indonesia and Singapore in controlling the consumption of high-sugar packaged beverages, which has a direct impact on public health. Singapore has developed a comprehensive and structured regulatory system, including the implementation of the Nutri-Grade system that came into effect in December 2022. This system requires manufacturers to list the Nutri-Grade (A, B, C or D) on beverage packaging based on sugar and saturated fat content, providing greater transparency to consumers. This approach not only encourages manufacturers to reformulate their products to be healthier, but also facilitates consumers in making better choices, potentially reducing overall sugar consumption. In contrast, Indonesia, despite having several regulations such as the Head of BPOM Regulation No. 26 of 2021 and Law No. 17 of 2023, still faces challenges in implementation and enforcement. Existing regulations tend to be general in nature and do not provide clear guidance for consumers on sugar consumption limits. This results in a lack of public literacy on the importance of choosing healthier products, as well as difficulties in understanding nutritional information provided on packaging. With a larger and more diverse population, Indonesia also faces challenges in disseminating information and education to the public evenly.

Therefore, it is important for Indonesia to learn from the good practices implemented in Singapore. One step that can be taken is to adopt elements of a more structured and clear labeling system, as well as increase public education efforts on the importance of healthy food and beverage consumption. For example, Indonesia could consider implementing a labeling system similar to Nutri-Grade, which not only provides information on sugar content, but also educates consumers on recommended consumption limits. In addition, collaboration between government, industry and civil society in health education campaigns can help raise public awareness about the health risks associated with excessive sugar consumption.

The culture of Indonesian society also needs to be built like Singapore, regarding obedience and compliance with existing regulations, so that all good policies made by the Government can be implemented properly, and producers in Indonesia must follow all regulations made by the Government.

Continuous evaluation of existing policies is also key to enhancing the effectiveness of regulations in Indonesia. By conducting thorough research and analysis on the impact of implemented regulations, the government can adjust policies to better align with the needs of society and prevailing socio-economic conditions. Consequently, these measures are expected to contribute to overall public health improvement, reduce the risk of non-communicable diseases associated with poor dietary habits, and foster an environment that supports healthier food and beverage choices.

Advice

Based on the analysis of this study, the author suggests maximizing preventive efforts to ensure that the consumption of sugar-sweetened packaged beverages does not exacerbate health issues among the public/consumers. It would be beneficial for Indonesia to implement regulations prohibiting advertisements for high-sugar packaged beverages. Furthermore, producers or business operators who fail to disclose information on sugar, salt, and fat content or neglect to include health warnings on their products should face administrative sanctions. This aligns with the Ministry of Health Regulation No. 30 of 2013, Article 9, which outlines sanctions for misleading information that could lead to long-term negative health effects. Additionally, the government could draft regulations imposing administrative penalties on producers manufacturing high-sugar packaged beverages, reinforcing accountability and promoting public health..

In mass media, consumers are frequently exposed to advertisements for high-sugar packaged beverages, which are easily accessible. Therefore, it is essential to implement restrictions on advertisements for such products. Indonesia could adopt a Nutri-Grade system to help consumers read and understand the nutritional content of these beverages more easily. Additionally, nutritional labels should be clear and enlarged to ensure better visibility for consumers. The government should also consider drafting regulations related to a sugar tax to reduce the circulation of high-sugar sweetened beverages in the market. When determining the tax rate, it is crucial to strike a balance that does not unduly harm producers but focuses on reducing sugar usage in packaged beverages. This approach would encourage healthier consumption habits while addressing public health concerns..

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