

THE GOVERNMENT OF INDONESIA ISSUES GUIDELINES ON THE INCLUSION OF NUTRI-LEVEL ON READY-TO-EAT PROCESSED BEVERAGES

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01. Introduction

Through Government Regulation No. 28 of 2024 on the Implementing Regulation of Law No. 17 of 2023 on Health ("**GR 28/2024**"), the Government of Indonesia requires business actors that produce, import, and/or distribute processed food, including ready-to-eat processed food, to provide nutritional information on the packaging and/or other information media.

Although GR 28/2024 has been in force since 26 July 2024, the implementation of the requirement to include nutrition labels and health messages on ready-to-eat processed food currently applies only to beverages. In this regard, the Minister of Health of the Republic of Indonesia has issued Minister of Health Decree No. HK.01.07/MENKES/301/2026 on the Display of Nutrition Labels and Health Warnings on Ready-to-Eat Processed Food (the "**MOH Decree**"), which stipulates that the obligation to include nutrition labels and health messages on ready-to-eat processed beverages will only **take effect 2 (two) years from the date on which the Government of Indonesia determines the maximum limits for sugar, salt, and fat content.**

It is important to note that, as of this date, the Government of Indonesia has not yet determined the maximum limits for sugar, salt, and fat content in ready-to-eat processed food, including beverages. Accordingly, the inclusion of nutrition labels and health messages on ready-to-eat processed beverages **remains voluntary.**

02. Inclusion of Nutrition Labels and Health Messages through Nutri-Level

The MOH Decree stipulates that the inclusion of nutrition labels and health messages on ready-to-eat processed beverages is carried out through the nutri-level concept. The determination of the nutri-level is based on the business actor's self-declaration regarding the sugar, salt, and fat content of the product, supported by test results from government laboratory or another accredited laboratory.

The nutri-level consists of 4 (four) level categories which are determined based on the sugar, salt, and saturated fat content per 100 (one hundred) ml of ready-to-eat processed beverages.

The nutri-level may be displayed through various information media, including menus, retail packaging, brochures, banners, flyers, menus displayed on commercial electronic applications, leaflets, and/or other forms of information media.

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03. Business Actors Subject to the Regulation

The MOH Decree provides that the implementation of nutrition labels and health messages begins with **large-scale business actors** that produce and/or distribute ready-to-eat processed beverages. Large-scale business actors, as referred to in Minister of Investment and Downstream/Head of the Indonesia Investment Coordinating Board Regulation No. 5 of 2025, are business actors with business capital exceeding **Rp10,000,000,000 (ten billion Rupiah)**, excluding the value of land and buildings used for business activities.

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04. Conclusions

PP 28/2024 explicitly requires the inclusion of nutrition labels and health messages on ready-to-serve processed food, including beverages. However, such requirement cannot yet be effectively implemented because the prerequisite for its implementation has not yet been established, namely, the determination of maximum limits for sugar, salt, and fat content in ready-to-serve processed food products. Under the MOH Decree, the requirement to include nutrition labels and health messages on ready-to-serve processed beverages will only take effect 2 (two) years after such maximum limits are determined. Accordingly, until the relevant maximum limits are determined and the 2 (two)-year period has elapsed, the inclusion of nutrition labels and health messages on ready-to-serve processed beverages remains voluntary. Nevertheless, business actors may begin preparing compliance measures, including conducting laboratory testing and adjusting the information media used.