

Comparative Study on the Inclusion of Trans Fat Information in Processed Food Packaging between Indonesia and Singapore

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Abstract

Excessive consumption of trans fats can increase LDL and triglyceride levels and decrease HDL levels. Therefore, an instrument is needed to protect consumers when consuming processed foods by including information about trans fat content on processed food packaging. The main topic of this research examines the regulations regarding the inclusion of trans fat information on processed food packaging in Indonesia and Singapore and the government's responsibility to consumers to provide accurate information. The research methods applied are the normative juridical method with a legislative approach, a comparative approach, and a case approach. Library research was applied as a data collection technique. This study shows that regulations regarding the inclusion of trans fat information in Indonesia and Singapore already exist, but there are several differences regarding the limits of trans fat content that can be contained in food and provisions regarding sanctions. Therefore, Indonesia can immediately create regulations regarding sanctions for violations of the inclusion of trans fat information on processed food packaging and consider the implementation of front-of-pack labeling.

Keywords : Trans fat, Indonesia, Singapore.

A. Introduction

Trans fats, which are often found in various processed food products, are known to have a detrimental impact on health. Trans fats are formed through the process of hydrogenation of vegetable oils, which aim to convert liquid oil into solids with the aim of slowing down the shelf life of the product and improving its stability.¹ In 2023, WHO Indonesia conducted a study on the sources of trans fatty acids contained in food to measure the levels of trans fats in various foods made from fats or oils that are commonly consumed by the Indonesian people. The study aims to support government efforts to eliminate the use of trans fats. In 130 products from four food categories tested, high trans fat content was found in 8.46% or 11 out of 130 samples, which exceeded the WHO's

¹ Christine, F. M. "Lipida." *Essentials of Food Chemistry*. Unsrat Press, Manaso (2017): 197-253.

recommended threshold of 2 g/100 g of total fat. The findings of high trans fat content are found in sponges, wafers, *pastries*, maryam bread, and martabak.

In addition, components that are often included in the manufacture of cakes and bread, such as white butter, are found to contain high levels of trans fats. The study also identified that in every four samples of baked goods (25%) contained significant amounts of trans fats. The combination of margarine and butter has the highest levels of trans fat, at 22.68 g, which is ten times higher than the threshold recommended by the WHO.² High and prolonged consumption of trans fats increases a person's risk of heart attack because it can increase LDL and triglyceride levels and lower HDL levels.³ As a result, trans fats are responsible for about 500,000 deaths each year worldwide from coronary heart disease.⁴ Meanwhile, in Indonesia, according to data from the Ministry of Health, non-communicable diseases that should be avoided with a healthy and balanced diet actually account for around 75% of deaths in Indonesia. Nearly 800,000 people in Indonesia have died from cardiovascular diseases that include heart attacks and strokes.⁵ A study of 111 subjects with coronary artery disease found a correlation between increased trans fat consumption and the severity of their arterial lesions. In addition, trans fats also have an impact on breast, prostate cancer, and colorectal cancer.⁶

Considering the many negative impacts that can arise from consuming foods that contain trans fats by exceeding the limit, caution is needed for producers and considerations for consumers before choosing processed food products that they will consume. This is necessary because until now not all manufacturers have provided transparent information about the content of trans fats in their products, such as in Avena-Fit products that do not include trans fat content despite claims of low cholesterol in their packaging. This practice has the potential to violate consumers' rights to clear and accurate information, as stipulated in the Consumer Protection Law and BPOM Regulation on Nutritional Value Information on Processed Food Labels.

Consumers in Indonesia in running a business to meet their needs are protected by consumer protection laws with all their instruments. As contained in the five principles of consumer protection which include the principle of justice, the principle of benefit, the principle of legal certainty, the principle of consumer security and safety, and the principle

² "Study of the sources of trans fatty acids in food (English & Indonesian version)", https://cdn.who.int/media/docs/default-source/searo/indonesia/tfa-assessment-result---id---en.pdf?sfvrsn=e90f45a1_5, accessed September 1, 2025.

³ Micha, R., and D. Mozaffarian. "Trans fatty acids: effects on cardiometabolic health and implications for policy." *Prostaglandins, Leukotrienes and Essential Fatty Acids* 79, no. 3-5 (2008): 147-152.

⁴ "WHO and Ministry of Health call for the elimination of trans fats for a healthier and more productive Indonesia", <https://kemkes.go.id/id/who-dan-kementerian-kesehatan-menyatakan-eliminasi-lemak-trans-untuk-indonesia-lebih-sehat-dan-produktif>, accessed on May 10, 2025.

⁵ "Indonesia strengthens efforts to overcome the risk of excessive consumption of salt and trans fats", <https://kemkes.go.id/id/indonesia-perkuat-upaya-dalam-mengatasi-risiko-konsumsi-garam-dan-lemak-trans-berlebih>, accessed on September 1, 2025.

⁶ "What Are Trans Fats, and Are They Bad for You?", <https://www.healthline.com/nutrition/why-trans-fats-are-bad#blood-vessels-cancer>, diakses pada tanggal 10 Mei 2025.

of balance.⁷ In addition to these principles, consumer protection law also presents theories as a basis for formulating and implementing various regulations related to consumer protection. One of the most prominent theories is the theory of repressive legal protection, which is legal protection which is sought by the application of sanctions against perpetrators and the theory of preventive legal protection, which is legal protection which is manifested by measures to prevent the occurrence of a case, both of which were put forward by Piliphus M Hadjon.⁸

Previous literature that discusses the regulation of the inclusion of information on trans fat content is difficult to find in Indonesia, on average more focused on the importance of including Nutritional Value Information (ING) in the context of consumer protection and the relationship between ING and consumption behavior, one of which is a study conducted by Dwi Dimas which highlighted the gap in access to information and the low practice of health messages on packaging.⁹ Studies that examine comparatively related to the regulatory aspects of trans fat labeling, especially between Indonesia and Singapore, are still limited. The main shortcomings are that existing research more often focuses on nutrition techniques or health policies without an in-depth juridical analysis of the legal obligations of business actors and their enforcement mechanisms,¹⁰ the lack of comparative studies that link legal norms with supervisory practices, and the lack of empirical case studies on the implementation of rules on the inclusion of trans fat information in processed food products. As in a study by Al Rivan Marsyah in 2025 titled Consumer Guide in Food Selection. The research focuses on the gap between the availability of nutritional value information on food products and the ability of the community to access and utilize it optimally. Meanwhile, this study focuses on the regulation of the inclusion of trans fat information on the packaging of processed food products in Indonesia and Singapore and the role of the government in ensuring the certainty of this information.¹¹

This research will answer the academic and practical gap with normative juridical analysis to identify and compare the legal framework regarding the inclusion of trans fat information in Indonesia and in Singapore, including aspects of consumers' rights to information and producer obligations. The selection of Singapore as a comparative country was based on several backgrounds, one of which is because there are strict and binding regulations implemented by Singapore through the Singapore Food Agency regarding food. The Singapore Food Agency carries out its function to set standards for production, distribution, labeling, inspection, and sanctions through its various legal products such as

⁷ Hasanal Mulkan, S. H. *Introduction to Business Law*. Prenada Media, 2024.

⁸ Sihombing, Agustinus. *Consumer Protection Law*. CV. Azka Pustaka, 2023.

⁹ Septya, Dwi Dimas refused. "The Relationship of Knowledge and Ability to Read Nutritional Value Information with Consumption Behavior of Packaged Beverages in Nutrition Students." Phd Diss., *Sultan Syarif Kasim State Islamic University, Riau*, 2024.

¹⁰ Simanjuntak, Megawati, and Anna Maria Tri Anggraini. "Consumer Protection Efforts through the Inclusion of Sugar, Salt, and Fat (GGL) Information on Food Packaging Labels." *Policy Brief Tropical Agriculture, Marine and Biosciences* 5, no. 2 (2023): 573-577.

¹¹ Al Rivan Marsyah Dzikri, S. T. "Labeling and Nutrition Information: A Consumer Guide in Food Selection." *Book Chapter of Culinary Nutrition* (2025).

the Sale of Food Act and Food Regulation. In addition, since 2013 Singapore has banned the content of trans fats in fats and oils in foods sold in Singapore and in 2021 Singapore has banned artificial trans fats in all foods circulating in the country. This regulation shows the success of implementation based on the statement issued by the Ministry of Health Singapore, they stated that since the regulation was implemented, there has been no non-compliance at least until the statement was issued, namely in March 2022.¹²

This research will also assess the effectiveness of regulatory implementation through case studies. The two countries, both Indonesia and Singapore, both have legal and regulatory bases regarding the inclusion of information related to the content of trans fats in the packaging of processed food products, but in practice not all manufacturers comply with these regulations. A clear administrative sanction mechanism and proactive monitoring system will improve business compliance and consumer protection effectiveness. Based on the above explanation, the formulation of the problem that will be studied in this study is how to regulate the inclusion of trans fat information on processed food product packaging in protecting consumers in Indonesia and Singapore and how the role of the Indonesian government in ensuring the certainty of information related to the content of trans fats in processed food product packaging.

B. Research Methods

This research uses a normative juridical method that is applied by paying attention to relevant theories, concepts, legal principles, and laws and regulations as the main material.¹³ The approach applied in this study consists of legislative, comparative, and case approaches. A legislative approach was used to analyze the regulation of trans fat labels in Indonesia and Singapore. The comparative approach with normative comparative legal analysis techniques is used to assess the differences, similarities, and advantages and disadvantages of the regulations of the two countries. The case approach is used to look at the application of the rules through real examples in society. The legal materials used include primary legal materials such as Law Number 17 of 2023 concerning Health, Law Number 8 of 1999 concerning Consumer Protection, Regulation of the Food and Drug Supervisory Agency Number 26 of 2021, as well as the Consumer Protection (Fair Trading) Act 2003 and the Sale of Food Act 1973 from Singapore, secondary legal materials including articles, journals, relevant news, and tertiary legal materials include legal dictionaries to understand the terms contained in Singapore regulations. The data and information contained in this study were obtained through literature studies and studied descriptively to present the results systematically and objectively.

¹² "Ban On Trans Fat In Foods Sold In Singapore", <https://www.moh.gov.sg/newsroom/ban-on-trans-fat-in-foods-sold-in-singapore/>, accessed November 1, 2025.

¹³ Muhammad Syahrur, S. T. *Introduction to legal research methodology: Normative and empirical research studies, proposal writing, thesis and thesis reports*. CV. Dotplus Publisher, 2022.

C. Results and Discussion

a. Regulation on the Inclusion of Trans Fat Information on Processed Food Product Packaging in Protecting Consumers in Indonesia and Singapore.

Regulations regarding the inclusion of nutritional value information, including trans fats, in the packaging of processed food products is an important part of consumer protection policies as well as efforts to protect public health. This regulation not only provides a legal basis for manufacturers' obligations to provide accurate information, but also a means for consumers to better consider every decision and be responsible for every product they will consume. In Indonesia, this regulation is layered starting from general regulations to implementing rules which will be described as follows:

1) Law No. 17 of 2023 concerning Health

The Health Law facilitates regulations related to trans fats in Article 146 Paragraph (1) which reads that anyone who produces, processes, and distributes food and beverages must comply with safety, quality, and nutrition standards in accordance with the provisions of applicable laws and regulations. In the explanation of the paragraph, it is explained that the diction of food and beverages includes processed foods in accordance with applicable regulations, in this case including standards and/or requirements for safety, quality, and nutrition including the delivery of information on the nutritional value contained in the food such as sugar, salt, and fat.

As previously described and as implied by the naming of trans fats themselves, trans fats fall into the category of fats that have significant implications for public health. Therefore, based on this article, a conclusion can be drawn that every business actor involved in the production, processing, and distribution of food and beverages is required to include information about the content of trans fats in the nutritional value information label. This obligation is in line with the obligation to include other nutritional components such as sugar, salt, protein, and other essential nutritional content as stipulated in the implementing regulations.

2) Law No. 8 of 1999 concerning Consumer Protection 1999

Law Number 8 of 1999 concerning Consumer Protection or UUPK is present as a strong normative foundation to ensure the fulfillment of consumer rights. The urgency of the birth of the UUPK is rooted in the need to provide legal guarantees for the position of consumers who tend to be weak in trade transactions of goods and services. Consumers are basically in a subordinate position due to limited access to information, low bargaining positions, and lack of legal protection before the birth of special regulations.¹⁴ Through the UUPK, the state is present to protect consumers by affirming their basic rights. This protection is crucial, especially in the food, medicine, and other consumer products sectors that are directly related to consumer health and safety.¹⁵

¹⁴ Wohon, Ernesta Uba, Laura Berenika Apriliani Tija, Louise Mariano Ngiso Artono Siwemole, Giovanni Lucianus M. Donpiera, and Imanuel Markutoja Wallep. "FACTORS THAT CAUSE THE WEAK POSITION OF CONSUMERS COMPARED TO BUSINESS ACTORS IN INDONESIA." *Bussman Journal: Indonesian Journal of Business and Management* 5, no. 2 (2025): 855-863.

¹⁵ Atsar, Abdul, and Rani Apriani. *Consumer Protection Law Textbook*. Deepublish, 2019.

In Article 4 which discusses consumer rights, it is stated that consumer rights include the right to safety and security when consuming goods and the right to transparent, precise, and accurate information about the condition of goods. This article mandates that consumers have the right to safety and security in consuming goods, meaning that food products must be produced according to health standards so as not to pose dangerous risks. The article also states that consumers have the right to transparent, precise, and accurate information about the state of a product. In the case of food, this right is directly related to the company's obligation to include nutritional value information labels, including trans fats and other nutrients. Consumers cannot make judgments and decisions based on their needs if there is no clear information.¹⁶

Consumer protection not only creates obligations for business actors, but also provides responsibility for consumers. In article 5, it is stated that consumers have obligations, including to read information on the use of goods for safety and security. This means that with the regulation of these obligations, business actors are also increasingly required to include information about the content and use of the goods they produce in order to create a reciprocal relationship between the rights and obligations of business actors and consumers.

Furthermore, Article 7 explains more deeply about the obligations of business actors, including that business actors are obliged to include open, accurate, and honest information. If applied in a case, then every business actor is obliged to include transparent nutritional value information on the packaging of its products in accordance with applicable laws. Regarding food, regulations that can be used as a reference are regulations of the Food and Drug Supervisory Agency (BPOM) and Indonesian National Standards (SNI).

In addition, as mentioned in Article 8 paragraph (1), business actors are prohibited from carrying out a number of production and distribution activities of goods that are of poor quality or that violate the requirements of laws and regulations. Letter I of this article, requires business actors to contain important information on their product packaging, such as product name, size, net weight or content, composition, instructions for use, date of manufacture, side effects, identity of the manufacturer, and other related information, providing a more complete explanation of this article. This label requirement is important for food products because it serves as the primary way for consumers to assess the safety and quality of the product. The absence of labels or incorrect information can be qualified as a violation of the law that can have implications for administrative and criminal sanctions.

Thus, the series of provisions in Articles 4, 5, 7, and 8 of the UUPK form a complete consumer protection framework. Consumers' rights to security, safety, and correct information are guaranteed by law, while the obligation of business actors to

¹⁶ Tarina, Dwi Desi Yayi, Sylvana Murni Deborah Hutabarat, and Muthia Sakti. "Implementation of labeling standars for food packaging products in Indonesia." *International Journals of Multicultural and Multireligious Understanding* 6, no. 7 (2019).

strengthen protection mechanisms through information disclosure and quality assurance. On the other hand, consumers are also required to be active in understanding the information provided. This balance between rights and obligations is the main pillar in creating an effective consumer protection system, especially in the food sector that is directly related to public health and safety.

3) PerBPOM No. 26 of 2021 concerning Nutritional Value Information on Processed Food Labels

BPOM Regulation No. 26 of 2021 concerning Nutritional Value Information on Processed Food Labels is based on the need for consumer protection through transparency of nutritional information. In the context of increasing processed food consumption in the community, the existence of accurate nutrition labels is an important instrument as an effort to ensure consumers' rights to true, clear, and honest information as mandated in the UUPK.¹⁷ This regulation specifically emphasizes the inclusion of key nutrients such as energy, total saturated fats, trans fats, cholesterol, sodium, and sugar to prevent misinformation and protect the public from health risks, especially non-communicable diseases whose prevalence is increasing in Indonesia.

In addition, this regulation also has a strategic function in creating legal certainty and encouraging food industry compliance. With the existence of standard standards in the inclusion of nutrition labels, business actors are required to be honest and accurate in providing information, so as to create healthy business competition and effective protection for consumers. This regulation is also in line with international standards as set by the Codex Alimentarius which aims to protect consumer health and ensure honest international trade so as to strengthen the competitiveness of Indonesian processed food products in the global market.¹⁸ Therefore, PerBPOM No. 26/2021 is very important for public health and sustainable national economic development, in addition to being important for the protection of domestic consumers.

The discussion of trans fats in this regulation is divided into several articles. First, the trans fat content must not exceed 120% of the amount stated in the ING table, in accordance with Article 14 Paragraph 1 point b. Based on this article, if the ING table of a processed food product lists the amount of trans fat, the tolerance level for the accuracy of the results of the laboratory test of the nutrients must not exceed 120% of the amount stated in the ING. Second, in Article 14 paragraph (2) letter c which states that if the processed food packaging contains claims of "less", "low", "free", or other claims with the same meaning, then the tolerance limit of the results of laboratory tests for trans fatty nutrients must not exceed the value listed in the ING table. This means

¹⁷ YUSUF, MUH. "CONSUMER LEGAL PROTECTION AGAINST UNLABELED COOKING OIL ON PACKAGING CIRCULATING IN THE MARKET." PhD diss., *Sultan Agung Islamic University Semarang*, 2025.

¹⁸ Soesilo, Nining I. "Cooperative Partnerships with Dairy Companies Based on Codex Alimentarius in Realizing Food Sovereignty in Indonesia." *Journal of Agricultural Research and Development* Vol 40, no. 1 (2021): 71-87.

that if a processed food product writes "trans fat 0 grams" or "low saturated fat" on its label, the results of the laboratory analysis must not show a number that differs from what is contained in the ING table. This provision shows that there is serious concern from lawmakers to the dangers of trans fats to health.

Furthermore, in the Procedures for Inclusion of Nutritional Value Information, in part II Concerning the Provisions for the Inclusion of Nutritional and Non-Nutritional Substances, it is written that the content of trans fats must be included if they are contained in an amount of more than 0.5 grams per serving. In addition, the inclusion obligation also applies if the manufacturer makes a claim about saturated fat and/or cholesterol. This means that even though trans fats are present in small quantities, regulations still ensure that consumers can know about their existence, especially if manufacturers try to advertise their products with "healthy" or "low-fat" claims. The provision also refers to international practices, such as the FDA standard in the United States, which requires the inclusion of trans fats in nutrition labels to increase public awareness of its risks.

4) Consumer Protection (Fair Trading) Act 2003

The Consumer Protection (Fair Trading) Act 2003 is a legal instrument issued by Singapore that comes as a law to protect consumers from unfair practices and to provide additional rights to consumers in respect of goods that are not in conformity with the contract and for matters related thereto. In *Part 2 of Unfair Practices Article 4* it is stated that "*it is an unfair practice for a supplier, in relation to a consumer transaction to do or say anything, or omit to do or say anything, if as a result a consumer might reasonably be deceived or misled*". This article confirms that a practice is considered unfair if the supplier, in a consumer transaction, acts or words, or intentionally does not do or does not say something, which as a result may mislead or deceive the consumer. This norm functions as an ethical and juridical standard that binds business actors to act transparently, honestly, and not misleadingly in the entire transaction process, from advertising, product offerings, to sales.

These provisions show the urgency of consumer protection from the dimension of information substance. This means that business actors are not only prohibited from providing false information, but also prohibited from omitting important information (*misleading omission*) that has the potential to mislead consumers. For example, a processed food product may be considered to be engaging in unfair practices under Article 4 of the CPFTA if it claims to be "low in trans fats" but does not disclose the amount of trans fats in its ingredient list. Therefore, this rule emphasizes the status of consumers as legal subjects who need to be protected from manipulative techniques, while remaining in line with the ideals of accountability and transparency in trade. In addition, by addressing commercial tactics that can exploit consumer ignorance, this article illustrates how Singapore's legal system prioritizes preventive protection.

5) Sale of Food Act 1973- Food Regulations

Food Regulations are regulations issued by the Singapore government as a tool to regulate food safety, quality, and labeling standards specifically. This regulation is a guideline for technical provisions related to anything that can and cannot be contained in a food product. The Food Regulations also contain the tolerance limits of additives in food and the requirements for the nutritional labeling of a food. This regulation is present as an instrument of strict supervision of food products circulating in Singapore to ensure consumer protection and public health. It affirms the principles of *safety, quality, and accurate labelling*, to ensure that all products produced or imported by Singapore meet applicable standards, including the obligation to include nutritional information correctly and the prohibition of misleading claims.

In the *fourteenth schedule criteria for permitted claims*, it is stated that *free of trans fatty acids (less than 0.5g trans fatty acids per 100g)*. This means that a food product may only use the claim of "trans fat-free" if the trans fat content in it is below the threshold of 0.5 grams per 100 grams of product. In other words, the product is not completely zero trans fat, but the amount is so small that it is considered insignificant in health and can be categorized as trans fat-free according to international nutrition labeling standards.

Based on the explanation above, the regulations between Indonesia and Singapore can be compared through the following table:

Subject	Indonesian Regulations	Singapore Regulation
Rights and obligations of consumers and business actors	Law No. 8 of 1999 concerning Consumer Protection 1999 <ol style="list-style-type: none"> 1. Consumers have the right to security, safety, true, clear, and honest information about the condition of goods (Article 4). 2. Consumers are required to read information on the use of goods for security and safety (Article 5). 3. Business actors are obliged to provide true, clear, and honest information about the 	Consumer Protection (Fair Trading) Act 2003 <ol style="list-style-type: none"> 1. It is an unfair practice for suppliers to do or say something, or not to do or say something, which results in consumers being deceived or misled (Section 2 of Unfair Practices Section 4).

	<p>condition of the product (Article 7).</p> <p>4. Business actors are prohibited from producing and distributing goods that do not meet standards or are contrary to the provisions of laws and regulations (Article 8 Paragraph (1)).</p>	
<p>Guidelines for the inclusion of trans fats in the packaging of processed food products</p>	<p>PerBPOM No. 26 of 2021 concerning Nutritional Value Information on Processed Food Labels</p> <p>1. If the processed food packaging contains "low", "free", "less", or similar claims, the tolerance limit of the trans fat analysis results must not exceed the value listed in the ING table (Article 14 Paragraph (2) point c).</p> <p>2. The content of trans fats must be included if the amount is more than 0.5 grams per serving and if the manufacturer includes claims regarding saturated fat and/or cholesterol (part II Concerning Provisions for the Inclusion of Nutritional and Non-Nutritional Substances).</p>	<p>Sale of Food Act 1973 - Food Regulations</p> <p>1. Claims of "trans fat-free" are allowed to be included when the content is less than 0.5 g of trans fat per 100g (Fourteenth Schedule).</p>

Tolerance limits for trans fat analysis results	PerBPOM No. 26 of 2021 concerning Nutritional Value Information on Processed Food Labels 1. The results of the trans fat analysis must not exceed 120% of the value listed in the ING table (Article 14 Paragraph (1) point b).	Labeling And Advertising Requirements For Nutri-Grade Beverages Sold In Singapore 1. The actual value of trans fats based on nutritional analysis should not exceed 20% more than the value stated on the packaging (Section 4.3 (37)).
Sanctions	1. There are no regulations on sanctions.	Sale of Food Act 1973 - Food Regulations 2. Threatened with a fine of up to \$1,000 (one thousand dollars) if found guilty and a fine of up to \$2,000 (two thousand dollars) if found guilty a second time (Section 5 of Penalties Section 261).

Table 1. Comparison of Indonesian and Singapore Regulations

b. The Role of the Government of Indonesia in Efforts to Ensure the Certainty of Information related to Trans Fat Content in Processed Food Product Packaging

The government as the main stakeholder in the surveillance and protection of public health holds a very important constitutional responsibility to ensure the fulfillment of the right of every citizen to accurate, honest, and transparent food information. In the context of processed food products, this includes the obligation to ensure that each packaging label contains clear information about the content of trans fats.¹⁹ These provisions are in line with the mandate of the 1945 Constitution of the Republic of Indonesia, especially Article 28H paragraph (1) which guarantees the right to health, as well as derivative regulations such as Law Number 8 of 1999 concerning Consumer Protection.

Through these regulations, the government not only plays a role as a policy maker, but also as a supervisor and enforcer of food health standards. This oversight is

¹⁹ Nurdin, Melinda, and Muthia Sakti. "The urgency of halal labeling of over-the-counter drug products in an effort to protect consumers." *USM Law Review* 7, no. 1 (2024): 314-332.

important to prevent the industry's fraudulent practices that can harm consumers. The government's involvement in ensuring correct nutritional information also serves as a form of indirect education to the public. With complete and reliable information, consumers have the ability to make wiser decisions in choosing healthy food products. In the long term, this step contributes to improving the quality of public health, reducing the burden of national health costs, and achieving sustainable development goals.²⁰

The Indonesian government through the WHO on February 19, 2025 together with the Ministry of Health, and civil society organizations gathered to discuss a food strategy on the elimination of trans fats. This discussion was carried out as an effort to respond to cardiovascular disease as the main contributor to death in Indonesia and takes nearly 800,000 lives every year. Policies related to trans fat control are not just an effort to improve public health that can control risk factors, but also a method that has been tested and proven to be successful in reducing the rate of increase in the cost of the national health system.

Based on observations by the Ministry of Health, a number of countries that have implemented trans fat restriction regulations have succeeded in significantly reducing cardiovascular disease deaths and reducing the financial burden on their national health care systems. So if Indonesia can do the same, people can live a better life and the country can slow the surge in spending in the health sector, which has currently increased by 7.8% per year over the past ten years. These observations are also supported by the results of research by Dr. Marklund. The study found that controlling trans fat consumption could save more than 115,000 lives and save health care costs up to \$213 million over the first ten years.²¹

The government's role in ensuring the certainty of information related to the content of trans fats in processed food product packaging can be seen so far based on the existence of regulations that regulate this matter, its implementation in daily life, and law enforcement or sanctions. One of the cases that the author encountered is found in the Avena-Fit product. Avena-Fit is a healthy drink made from natural ingredients consisting of a combination of goat's milk and oats that are efficacious for maintaining heart health and lowering high cholesterol. In the packaging, this product includes the claim of "low cholesterol" but in the Nutritional Value Information it does not list the content of trans fats contained in the product. This is not in line with the Procedure for Including Nutritional Value Information, in part II of the Provisions for the Inclusion of Nutritional and Non-Nutritional Substances, which states that the content of trans fats must be included if the manufacturer makes a claim about cholesterol. Although there is a discrepancy between the product and PerBPOM, until now there is no one who criticizes it and this product continues to circulate freely in

²⁰ Kusumadewi, Yessy, and Grace Sharon. *Consumer Protection Law*. (2022).

²¹ "Indonesia strengthens efforts to overcome the risk of excessive consumption of salt and trans fats", <https://kemkes.go.id/id/indonesia-perkuat-upaya-dalam-mengatasi-risiko-konsumsi-garam-dan-lemak-trans-berlebih>, accessed on September 1, 2025.

the market. In addition to violating PerBPOM No. 26 of 2021 concerning Nutritional Value Information on Processed Food Labels, this case also violates the legal responsibility aspect of producers and has the potential to violate article 8 paragraph (1) letter I of the UUPK which mandates that every product produced by business actors must contain a label about an explanation of what content is contained in the product in accordance with applicable regulations. In contrast to what happened in Singapore, in 2017 a news portal called The Straits Times published a report on a case where 4 products with trans-fat-free labels were found to contain trans fats.²²

Based on the elaboration of the two cases, it can be seen that Singaporeans have a higher level of awareness and sensitivity to the presence of trans fats in food products because they are supported by strict regulations and a consistent monitoring system from authorities such as the Health Promotion Board and the Singapore Food Agency. The Singapore government not only sets maximum trans fat content, but also requires transparent labeling and sanctions for violators, thereby encouraging industry compliance while increasing consumer awareness of food safety. On the other hand, Indonesia does not yet have regulations that specifically regulate sanctions for business actors who do not include information on trans fat content on processed food labels.

The absence of these sanctions is based on several reasons, as a developing country, business actors are still seen by the government as a development partner which causes the emphasis of its regulatory products to be directive-based compliance rather than sanction-based compliance. In addition, the large number of business actors on the MSME scale makes them not fully educated and have the capacity to conduct accurate trans fat content testing in their products. Although BPOM has regulated the obligation to include trans fats in nutritional value information, the provisions regarding the legal consequences of violations have not been clearly regulated. This legal vacuum causes weak enforcement of rules and low compliance of producers in providing complete nutritional information, so that consumers lose the right to know the content of products transparently.²³

Indonesia can apply a national nutrition labeling law enforcement model on trans fats as a framework that regulates how the government ensures the compliance of business actors in the obligation to include information related to trans fats. This law enforcement model can be applied by combining legal approaches, public education, and supervision by utilizing technology such as e-monitoring of products through an application. E-monitoring can be collaborated with *the Front-of-pack labeling* (FOPL)

²² "4 products labelled 'zero trans fat' found to contain trans fat: Case", <https://www.straitstimes.com/singapore/four-products-labelled-zero-trans-fat-found-to-contain-trans-fat-case>, diakses pada tanggal 1 September 2025.

²³ Amadya, Maritsa Adnina Luvy. "A COMPARATIVE STUDY ON THE IMPLEMENTATION OF HALAL LABELS ON GRABFOOD IN INDONESIA AND MALAYSIA." PhD diss., *Veteran National Development University Jakarta*, 2023.

system as it has been implemented in 44 countries in the world including Singapore.²⁴ *Front-of-pack labeling* (FOPL) can be included in food packaging along with a *Quick Response Code* (QR Code). With this integration, the QR Code can be scanned through a special application located on the consumer's phone that will display test results information through the laboratory regarding the trans fat content contained in the processed food. With this, consumers can obtain more comprehensive information and scientifically based details.

Without a clear legal umbrella, Indonesia risks becoming an escape market for high-fat food products that are banned in other countries. Global manufacturers tend to shift their products to countries with looser regulations, thus worsening people's exposure to these ingredients. This condition can have a long-term impact on public health, increase mortality from cardiovascular diseases, and increase the country's economic burden due to the increasing cost of treatment and handling of non-communicable diseases. Therefore, the implementation of comprehensive national regulations and consistent law enforcement are important steps so that Indonesia not only becomes a consumer of global food products, but also the main protector of the health of its people.

D. Conclusions and Recommendations

Based on the description above, it can be concluded that Indonesia and Singapore both already have regulations related to information on the inclusion of trans fat information on the packaging of processed food products produced by their respective countries. Regulations in Singapore focus more on the actual content threshold in the claim, while in Indonesia there is an obligation to excise trans fats if the amount is more than 0.5 grams per serving. Compared to Indonesia, the Singapore government plays a more active role in ensuring the certainty of information related to the content of trans fats in processed food product packaging, as evidenced by the existence of regulations related to sanctions if there are non-compliant parties. Singaporeans are also more aware of the impact of consuming trans fats excessively compared to Indonesians. Indonesia can immediately issue regulations related to sanctions and consider the implementation of *Front-of-pack labeling* integrated with QR Code to strengthen the transparency of food information received by consumers. The government through the Ministry of Health can also increase education to consumers regarding knowledge about trans fats so that good consumption behavior is created.

²⁴ Afroza, Ummay, Ahmad Khairul Abrar, Abira Nowar, Sheikh Mohammad Mahubus Sobhan, Nicole Ide, and Sohel Reza Choudhury. "Global Overview of Government-Endorsed Nutrition Labeling Policies of Packaged Foods: A Document Review." *Frontiers in Public Health* 12 (November 8, 2024).

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