

Nutrition labelling for fortified foods in Indonesia

Mandatory fortification of: wheat flour with iron, zinc, folic acid, vitamins B1 and B2; salt with iodine; palm cooking oil with vitamin A or provitamin A. Rice can be voluntarily biofortified.

1. TAKEAWAYS

Labels on fortified foods must include a nutrient declaration if they are processed or include statements that the food contains vitamins or minerals or as required by fortification legislation (3). Where foods are fortified to meet regulations, foods can also make nutrition and health claims and state they are “fortified”, “enriched” or “supplemented” (4). No fortification logo exists, but an Indonesian National Standard (SNI) mark of conformity must be displayed on fortified foods and some foods may display a “Healthier Choice” logo (5). On page 2, wheat flour is provided as a pictorial case study product (6) as well as a summary of key regulations (7) and links to further information (8)

2. GENERAL

- Food products cannot be labelled in a false and/or misleading manner (e.g., to include B12 in the ingredients list when no B12 is present).
- Labels must be clearly visible and legible and in Indonesian language.
- All processed foods (with some exceptions) for trade require a Registration Approval Letter from Indonesia’s National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan, abbreviated to BPOM), after submitting the required registration form (detailed in the Regulation Concerning Processed Food Registration), inclusive of the label design, and results of analysis of finished product of substance to which a claim relates and the scientific reference that supports a claim, among other things. The approval is valid for five years and may be extended through re-registration six months before expiry. If the registration application is rejected, a review can be requested

3. NUTRIENT DECLARATION

Nutrient declarations are mandatory:

- On most processed foods, with some exceptions (e.g., tea, coffee, herbs, spices, seasoning and condiments – this may include iodised salt);
- If a label includes statements that the food contains vitamins, minerals and/or other added nutritional substances or is required by legislation mandating food fortification (“supplementation with vitamins, minerals or other kinds of nutrition”). I.e., where a claim is made;
- If the “Healthier Choice” logo is used.

Nutrient declarations are voluntary for other foods.

Where a nutrient declaration is included on a label, it must:

- Be presented in a standardised tabular (or table) format;
- Include a statement on a single serve’s mass of volume (serving size), and the number of serves per package;
- Express nutrition information in columns by amount and % Recommended Dietary Allowance (RDA) per serve. For fortified processed food, only the nutrients that must be

fortified must be listed per 100g or mL;

- Include minimum mandatory nutrition information: Total energy, Total fat, Saturated fat, Proteins, Total carbohydrates, Sugar, Salt (sodium), Dietary fibre if present in >0.5g per serve, Cholesterol if present in >2mg per serve and/or claims re fats or fatty acids or cholesterol are made; List vitamins and minerals if they are present in an amount of at least 2% of the RDA or if the label includes statements that the food contains vitamins, minerals and/or other added nutritional substances.
- [Fast foods containing sugar, salt and/or fat for trade] must include total sugar, total sodium and total fat contents on food labels based on an accredited laboratory’s test results.

Additional elements can be listed if they meet conditions in the regulations, e.g., the energy content of fat does not need to be listed for processed food intended for infants and children up to 3 years, but if it is included, it needs to comply with specifications.

4. NUTRITION AND HEALTH CLAIMS + FORTIFICATION CLAIMS

- You may include voluntary nutrition and health claims on a label provided they meet conditions and statements that a food has been fortified, enriched, or supplemented provided fortified in line with regulations.
- You may make health claims if supported by scientific evidence, with further requirements to be specified by the Minister of Health.
- You may make nutrition claims if the nutrient content is at least 10% higher than the RDA in a serve of food.
- You must include a health message on the label processed food and fast foods containing sugar, salt and/or fat that can be easily and clearly read by consumers: “Consuming more than 50 grams of sugar, 2,000 milligrams of sodium, or 67 grams of fat per person per day increases the risk of hypertension, stroke, diabetes, and heart attack”.
- Claims cannot be misleading (i.e., where the statement confers a health benefit that would not be achieved when a usual portion of the food is consumed) – this includes for fortified or enriched food where fortification does not actually benefit the consumer but just provides a commercial benefit.
- Claims that a food functions as a medicine, or names, logos or identities of institutes conducting analyses of relevant food products – are prohibited. Processed foods cannot claim they are “healthful”, increase IQ or include misleading or incorrect information or a picture of a health officer / person acting as one etc.

5. SUPPLEMENTARY NUTRITION INFORMATION

- While not a fortification logo, you must include the Indonesian National Standard (SNI) mark on fortified wheat flour, salt and palm oil to demonstrate conformity with the SNI. This is regulated by an institution accredited by the Minister for Industry and a specific SNI number and code issued on successful application to the institution. The mark is required on some unfortified foods.



- You may include the voluntary “Healthier Choice” logo if the food meets nutrient profiling criteria and has a nutrient declaration. The logo format is prescribed (e.g., a circle with a tick sign, “Healthier Choices” listed on the top outside circle in capital letters, the statement “Compared to Similar Products When Consumed in Reasonable [Amount]” listed at the bottom outside of the circle, Arial font, white background, tick and writing in green, logo proportionate and clearly legible, plus the logo size should not be >5% of the main part of the label’s area).



Healthier Choice logo



6. PICTORIAL CASE STUDY PRODUCT – WHEAT FLOUR

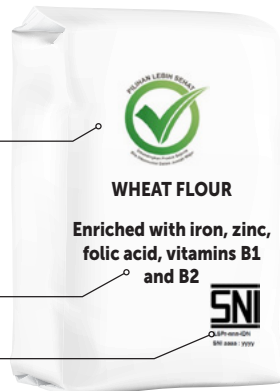
This case study product only details the three nutrition label types outlined in this fact sheet – nutrient declaration, fortification claim and “Healthier Choice” logo – along with a product name and the Indonesian National Standard (SNI) mark of conformity. Figures used are provided as an example only and may not be accurate. Other details are also required on food labels (e.g., ingredient list and weight) but not shown here.

Front of pack

“Healthier Choice” logo

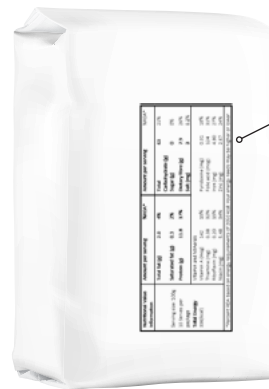
Fortification claim

SNI mark of conformity



Back of pack

Nutrient declaration



7. MORE DETAIL ON THE LABELLING REGULATIONS

Law No 18 of 2012 on Food sets out requirements for general food labelling (e.g., product name, ingredients list) and for labelling processed food for trade. It prohibits trading food with non-compliant labelling and false and/or misleading labelling, along with forming “a Government institution ...to handle the food sector that is under and responsible to the President” to be established by a Presidential Regulation and which administers government affairs in the food sector.

- Regulations of the President of the Republic of Indonesia No. 80 of 2017** About Body that Supervises Drug and Food overtakes earlier legislation on the same and establishes BPOM, responsible to the President through the Minister for Health. BPOM is tasked the supervising food and drugs in accordance with regulations. The regulations also specify BPOM’s functions and powers.

Government Regulation No 69 of 1999 Food labels and Advertisements mandates nutrient declarations (“information on content of nutrition of food”) on labels that include statements that the food is fortified or that is required by fortification legislation. It also allows health and nutrition claims, including fortification and enrichment statements, and sets out requirements for general food labelling, such as prohibiting false and/or misleading labelling and mandating inclusion of ingredients, expiry date etc. The labelling and advertisement provisions in this regulation are not applicable to foods whose package is too small, foods sold in bulk, or directly sold and packaged before buyers in small numbers.

Regulation of Head of Drug and Food Control Agency of the Republic of Indonesia No 09955 of 2011 Concerning Processed Food Registration (as amended by **Regulation No. 42/2013** dated June 28, 2013) sets out requirements to register processed foods (including labelling) and minimum requirements, such as nutrient content and ingredients list.

Ministry of Health Regulation No 30 of 2013 on the inclusion of sugar, salt, and fat contents as well as health message on processed foods and fast foods. The US Department of Agriculture’s reporting indicates that this Regulation was amended by BPOM Reg No 63/2015 which could not be located.

Regulation of the Drug and Food Control Agency No 22 of 2019 About Nutritional Value Information on Processed Food Labels expands mandatory nutrient declarations to most all processed foods and introduces the ‘Healthier Choice’ logo.

As an ASEAN Member State, a set of non-binding regional guidelines, principles and standards are applicable to Indonesia’s labelling laws and/or fortification largely to strengthen regional cooperation and coordination in nutrition, but none directly affect the regulatory environment described in this fact sheet.

8. REGULATORS, USEFUL CONTACTS AND WHERE TO GET MORE INFORMATION

Badan Pengawas Obat dan Makanan (BPOM) is largely responsible for implementing the regulations above, alongside Heads of Provincial Health Offices and Heads of Regency / Municipal Health Offices as relevant.

Indonesian Government regulations can be searched at <https://jdih.pom.go.id/> or <https://peraturan.go.id/>

The US Department of Agriculture’s (USDA) Foreign Agricultural Service issues a Food and Agricultural Import Regulations and Standards Country Report for Indonesia on a regular basis. See their **Indonesia page** to access the latest report.

The Global Fortification Data Exchange’s **Indonesia Fortification dashboard** provides more detail about food fortification in the country.