

Legal Protection for Beneficiaries and Providers of the Free Nutritious Meal Program

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ABSTRACT

Objective: The Free Nutritious Meal Program (Program Makan Bergizi Gratis/MBG) is a government policy aimed at improving the nutritional status of the community, particularly students, toddlers, pregnant women, and breastfeeding mothers, as part of the effort to develop healthy and high-quality human resources. In its implementation, the program continues to face several legal issues, including the absence of comprehensive legal protection for beneficiaries and the lack of clear legal provisions governing liability when losses occur, such as food poisoning incidents during the implementation of the program. This research examines the legal framework governing the protection of beneficiaries of the Free Nutritious Meal Program and the legal liability of service providers in implementing the program. The objective of this research is to analyze the legal framework, the forms of legal protection, and the effectiveness of legal protection for the beneficiaries of the Free Nutritious Meal Program in safeguarding their rights. **Method:** This study employs normative legal research using the statutory approach and conceptual approach. The legal materials consist of primary, secondary, and tertiary legal sources collected through library research and analyzed qualitatively using legal interpretation methods. **Results:** The results indicate that legal protection for beneficiaries of the Free Nutritious Meal Program has been regulated under various laws and regulations concerning food, health, consumer protection, and the National Nutrition Agency. Such protection is provided through preventive legal measures, including supervision of food safety, quality standards, and program implementation, as well as repressive legal protection through dispute resolution mechanisms and administrative, civil, and criminal liability in cases of legal violations. Legal liability in the implementation of the program is borne not only by the government as the organizer but also by service providers according to their respective duties, functions, and authorities. **Novelty:** Nevertheless, the existing legal framework still requires more comprehensive regulations to clearly define the allocation of responsibilities and legal accountability in order to ensure legal certainty, effective protection for beneficiaries, and accountable implementation of the Free Nutritious Meal Program.

INTRODUCTION

The continued provision of high-sugar snacks is inconsistent with the objectives of the Free Nutritional Meal Program (MBG), which is designed to improve the nutritional status of schoolchildren through the consumption of balanced, nutritious meals [1]. This practice has the potential to cause long-term health impacts, such as an increased risk of obesity, type 2 diabetes mellitus, metabolic disorders, and decreased concentration and endurance. The World Health Organization recommends that added sugar consumption should not exceed 10% of total daily energy [2], [3]. In reality, a number of processed food products, including packaged milk and biscuits, often contain sugars exceeding this limit [4], [5].

Analysis by the Center for Regional Studies and Information (PATTIRO) indicates that the MBG implementation was carried out without adequate preparation. Although

a legal basis exists through Presidential Regulation No. 83 of 2024 concerning the National Nutrition Agency, technical provisions, such as the Minimum Service Standards specifically for the MBG, have not been comprehensively established. This regulatory gap has the potential to be exploited by irresponsible parties.

The MBG program currently faces an implementation dilemma. Simultaneously, this program affirms the state's commitment to guaranteeing the right to nutrition for Indonesian children. However, the absence of a solid legal basis and cohesive governance mechanisms has created challenges in its effectiveness and legitimacy.

Over time, the MBG Program has faced numerous challenges. Among these are cases of poisoning among MBG Program beneficiaries. In addressing this issue, based on relevant legal principles, theories, and principles, the government and partnerships have an obligation to be accountable to the community or victims of poisoning as consumers of the MBG Program. However, the regulations applicable to the MBG Program do not specify the form and limits of legal accountability between the government and the partnerships. This creates a legal vacuum, resulting in a lack of legal certainty or legitimacy regarding the form and limits of legal accountability of the government and partnerships to victims of MBG Program poisoning.

RESEARCH METHOD

Normative legal research is conducted through the study of written legal norms in the form of laws and regulations and other legal materials.

1. Statute Approach

This approach is carried out by examining various laws and regulations related to legal protection, the right to food, and government policies in the field of social welfare.

2. Conceptual Approach

This approach is used to understand legal concepts such as legal protection, human rights, the welfare state, and the state's responsibility to society.

3. Case Approach

This approach is carried out by examining cases related to the implementation of social assistance programs or nutritional fulfillment programs, to observe the application of the law in practice.

This research uses a legal source collection technique, namely library research, which involves document studies of laws and regulations and other written literature.

a) Legal Material Processing Techniques

This research used the following legal material processing methods:

1. Legal Material Inventory

Collecting and identifying all legal materials relevant to the research problem, including primary, secondary, and tertiary legal materials related to legal protection for beneficiaries and providers of the Free Nutritional Meal Program.

2. Legal Material Classification

The inventoried legal materials were then grouped based on their type and relevance, such as laws and regulations, legal literature, and expert opinions related to legal protection and public policy issues.

3. Legal Material Systematization

The classified legal materials were systematically arranged according to the research problem, facilitating the analysis process.

4. Initial Interpretation

Conducting an initial interpretation of the legal materials, particularly the laws and regulations, to understand their meaning, purpose, and scope.

b) Legal Material Analysis

The legal material analysis in this research used qualitative analysis, namely by reviewing and interpreting the relevant laws and regulations, legal principles, and legal doctrines.

RESULTS AND DISCUSSION

Results

Preventive Legal Protection for Beneficiaries of the Free Nutritious Meal Program

Preventive legal protection, which is essentially preventative, is defined as prevention. Preventive legal protection is crucial for government actions based on freedom of action because it encourages the government to be cautious in making decisions. Preventive legal protection is found in laws and regulations to prevent violations and to provide limitations in fulfilling obligations [6], [7], [8].

In preventive legal protection, legal subjects are given the opportunity to raise objections or express opinions before a government decision becomes final. Thus, preventive protection aims to prevent disputes. Preventive legal protection is crucial for government actions based on freedom of action because it encourages the government to be cautious in making decisions based on discretion.

According to Law of the Republic of Indonesia No. According to Law No. 18 of 2012 concerning Food, food safety is defined as the conditions and efforts necessary to prevent food from potential biological, chemical, and other contaminants that could disrupt, harm, or endanger human health, and ensure that it is safe for consumption [9], [10], [11].

Preventive legal protection for participants in the Free Nutritional Meal Program (MBG) is an essential legal instrument to ensure the effective and sustainable achievement of the program's objectives, namely the fulfillment of the right to adequate health and nutrition, especially for children and vulnerable groups. The MBG program cannot be reduced to a mere social assistance policy but must be understood as a manifestation of the state's constitutional obligation to guarantee citizens' basic rights to safe, quality, and nutritious food. From the perspective of legal protection theory, the state is obligated to guarantee citizens' rights through both preventive and repressive mechanisms. As stated by Philipus M. Hadjon, preventive legal protection provides citizens with the opportunity to obtain guarantees before violations occur, while repressive legal protection functions to resolve disputes after violations occur.

Repressive Legal Protection for Beneficiaries of the Free Nutritious Meal Program

The repressive legal protection framework for MBG participants stems from various legal instruments, including the Civil Code, Law Number 18 of 2012 concerning Food, Law Number 8 of 1999 concerning Consumer Protection, Law Number 17 of 2023 concerning Health, and Presidential Regulation Number 115 of 2025 concerning Governance of the Free Nutritious Meal Program. The existence of these various instruments reflects a systemic approach to legal protection, as civil, administrative, and criminal norms complement each other in ensuring the effective protection of citizens' rights. The rule of law theory positions repressive protection as an indicator that the law has coercive power and does not stop at the normative level.

Repressively, if a violation occurs that results in health harm, the state is obligated to prosecute the perpetrator and provide reparation to the victim. Legal responsibility for health encompasses three aspects: 1) administrative, 2) criminal, and 3) civil. Administrative sanctions can include revocation of the MBG kitchen's operating permit or a warning to the food provider. Criminal sanctions apply if there is evidence of gross negligence or deliberate intent in providing unsafe food, as stipulated in Article 204 of the Criminal Code and Article 360 of the Criminal Code. Civil sanctions can be imposed in the form of compensation to victims for losses suffered, based on Article 1365 of the Civil Code. In the context of human rights, the state is also bound by Article 28H paragraph (1) of the 1945 Constitution and Article 9 of Law No. 39 of 1999 concerning Human Rights, which guarantee the right to a healthy environment and health services.

Based on the provisions of Article 8 paragraph (1) letter a of the Consumer Protection Law, business actors are expressly prohibited from producing or trading goods that do not meet or do not comply with standards established by laws and regulations. In this context, standards related to nutritious and safe food refer to guidelines established by the Food and Drug Monitoring Agency (BPOM) and technical regulations issued by the Ministry of Health. So in MBG management, this is important so that consumers can know in real time.

Discussion

Administrative Responsibilities of Program Providers in Implementing the Free Nutritional Meal Program

The Free Nutritional Meal Program (MBG) is a strategic government initiative to address nutritional challenges and improve the quality of human resources from an early age. This program serves as a concrete instrument for the state in fulfilling the right to adequate nutrition, as stipulated in various laws and regulations, including Law Number 36 of 2009 concerning Health, Law Number 18 of 2012 concerning Food, and Law Number 8 of 1999 concerning Consumer Protection. In practice, the MBG program is implemented through government collaboration with the Nutrition Fulfillment Service Unit (SPPG). As stipulated in Article 1 of Presidential Regulation Number 19 of 2025, the SPPG is a non-structural organizational unit that is subordinate to and responsible to the Head of the Nutrition Program Implementation Command (KPPG). The SPPG is tasked

with preparing, processing, and distributing nutritious food in accordance with government-established nutritional standards and ensuring food safety during program implementation. However, the implementation of this national-scale program is vulnerable to the risk of food poisoning, which could potentially violate children's basic rights to a healthy and protected life. This situation makes strengthening the accountability system through enforcing legal accountability mechanisms for negligent parties imperative. Systematically, this legal accountability framework can be implemented through three forms of sanctions: administrative, civil, and criminal. These three forms of sanctions are applied in a phased and integrated manner to organizers of the Free Nutritional Meals Program (MBG). The goal is to address and reduce the risk of food poisoning that could endanger the health and safety of children, the program's primary beneficiaries. A review of the forms of legal accountability through aspects (administrative, civil, or criminal sanctions) against negligent organizers is crucial.

The implementation of the Free Nutritional Meals Program (MBG), including legal accountability for negligent organizers, is a critical issue, particularly through the administrative aspects aimed at enforcing food safety standards. Violations can be subject to gradual administrative sanctions, ranging from verbal or written warnings, temporary suspension of activities, to permanent revocation of business permits. These sanctions, as stipulated in Government Regulation Number 86 of 2019 concerning Food Safety, are preventative and more efficient in preventing new victims than lengthy civil or criminal litigation processes. Therefore, administrative accountability aims not only to punish violations but also to restore public trust in the MBG as a social program that supports children's nutritional well-being. However, problems arise because the primary legal basis for the MBG, namely Presidential Regulation 7 Number 83 of 2024, only regulates institutional governance and distribution without detailing compensation mechanisms or specific sanctions for negligent vendors. Law enforcement must be balanced, considering fairness for compliant service providers while restoring public trust. Administrative sanctions serve not only as punishment but also as a policy control instrument. This instrument aims to ensure the accountability of service providers, restore public trust, and support the social objectives of the Free Nutritional Meal Program (MBG). This program is designed to improve the nutritional quality of students. The essence of administrative accountability lies in its prevention function and ongoing development.

Administrative violations in the implementation of food safety certification at Nutrition Fulfillment Service Units (SPPG) are a fundamental issue in the Free Nutritional Meal Program (MBG). This problem is evident in the discrepancy between regulatory provisions and implementation practices in the field. National Nutrition Agency Regulation Number 4 of 2026 stipulates that each SPPG is given three months from the date of enactment to fulfill its Hygiene Sanitation Certificate (SLHS) requirement. However, problems arose because thousands of SPPGs had been operating since early 2025 before the regulation was ratified in March 2026. This situation indicates a gap in oversight of food safety standards in the early phase of the MBG Program's

implementation. This situation raises serious questions about the quality and safety of food products produced and distributed to beneficiaries before the formal requirement to fulfill the SLHS was in place. The regulation, which should serve as a preventative instrument to ensure food safety, was instead implemented after thousands of SPPG kitchens were already operational. This situation reflects a reactive rather than preventative approach to administrative aspects of food safety certification. However, the primary principle of a food safety system prioritizes preventing contamination risks before food production begins. Presidential Regulation Number 19 of 2025 affirms the obligation of SPPGs to ensure nutritional quality and food safety. Article 2 regulates the SPPG's responsibility to ensure the quality and safety of menus served to beneficiaries. Operational standards include cleanliness, raw material quality, and nutritional compliance with balanced nutrition guidelines. Article 23 mandates the implementation of a food safety and quality assurance system throughout the program's supply chain, which is assessed by authorized ministries or institutions and reported to the Head of the National Nutrition Agency. Article 24 regulates integrated, sustainable, and risk-based food safety and quality monitoring of raw materials, production processes, distribution facilities, and distributed food.

Civil Liability for Program Providers in Implementing the Free Nutritious Meal Program

Civil liability serves as a mechanism for redress and legal protection for victims who suffer losses due to negligence in providing food that does not meet safety standards. Legally, the basis for this liability refers to Article 1365 of the Civil Code (KUH Perdata), which stipulates that any unlawful act that results in losses requires the perpetrator to provide compensation. This liability is not only imposed on individual food providers but can also be imposed on institutions such as schools, local governments, and the central government if proven negligent in their supervision. Affected communities can even file class action lawsuits to protect the public interest. Civil sanctions in the implementation of the MBG Program not only aim to redress the victims' losses but also serve as an oversight instrument for public policy implementation. Its application serves a preventive function to prevent negligence, a curative function to restore victims' rights, and a repressive function to provide a deterrent effect. Through this mechanism, the MBG program is expected to operate by prioritizing the principles of prudence, consumer protection, and the fulfillment of the right to safe, nutritious, and adequate food for students.

In the context of civil law, legal liability arises from unlawful acts and breach of contract. Unlawful acts are regulated by Article 1365 of the Civil Code (KUH Perdata), which essentially stipulates that anyone who commits an act that causes harm to another person is obligated to compensate the party at fault for the loss. A breach of contract, on the other hand, is an act or omission by one party that results in failure to fulfill a contractual obligation, delays in fulfilling a contractual obligation, or fails to comply with the provisions stipulated in the agreement, as stipulated in Article 1243 of the Civil Code.

Food poisoning incidents in the Free Nutritional Meal Program (MBG) not only result in criminal and administrative consequences but also open up civil liability for negligent parties. This civil liability is based on two primary legal bases: breach of contract and unlawful acts (PMH), as stipulated in Article 1365 of the Civil Code (KUHPperdata). In the MBG context, victims who suffer losses due to consuming unsafe food have the right to seek compensation from the catering provider and/or the government responsible for the program. Article 1365 of the Civil Code states: "Every unlawful act that results in loss to another person requires the person whose fault caused the loss to compensate for that loss."

Civil liability in the MBG context can be analyzed through the doctrine of liability based on fault. This doctrine requires an element of error or negligence on the part of the organizer, including the Nutrition Fulfillment Service Unit (SPPG), in carrying out its obligations. Negligence can include failure to check the quality of food ingredients, unhygienic storage, substandard processing, or the distribution of contaminated food. The element of error is proven through internal audits, monitoring reports, or laboratory test results that indicate non-compliance with food safety and quality standards. If these elements are met, the organizer can be held accountable under Article 1365 of the Civil Code concerning unlawful acts. Article 19 of the Consumer Protection Law stipulates that business actors are required to provide compensation for damage or loss resulting from the use of goods and/or services. This provision also contains a reverse burden of proof mechanism so that the organizer must prove that the food provided meets nutritional standards and is safe for consumption. Article 19 paragraph (3) stipulates that compensation must be provided no later than seven days after the transaction or after the complaint is declared proven. Dispute resolution can be reached through the Consumer Dispute Resolution Agency (BPSK) through mediation, conciliation, or arbitration mechanisms. Civil lawsuits can also be filed with the District Court under Article 1365 of the Civil Code and Article 19 of the Consumer Protection Law if an out-of-court settlement is not reached. Article 67 of Law Number 18 of 2012 concerning Food reinforces the obligation of organizers to meet sanitation requirements and guarantee food safety and quality. This series of provisions emphasizes that civil liability in MBG aims to restore the rights of participants while ensuring the accountability of organizers in a fair and proportional manner. Article 19 of the Consumer Protection Law stipulates that business actors are obliged to provide compensation for damage or loss resulting from the use of goods and/or services. This provision also contains a reverse burden of proof mechanism so that organizers must prove that the food provided meets nutritional standards and is safe for consumption. Article 19 paragraph (3) emphasizes that compensation must be provided no later than seven days after the transaction or after the complaint is declared proven.

Criminal Liability for Program Providers in Implementing the Free Nutritional Meal Program

Criminal liability is a concept that leads to the imposition of a penalty on an individual with the aim of assessing whether that individual can be held accountable for

a criminal act that has occurred. An act can only be held criminally responsible if it meets all the elements of a crime as defined by law. According to Van Hamel, criminal liability refers to a normal psychological condition and skills that produce three types of abilities: first, the ability to deeply understand the meaning and real consequences of one's actions; second, the ability to recognize that these actions are contrary to the social order of society; and third, the ability to determine one's will in carrying out the act. The concept of criminal liability is defined as imposing responsibility on an individual for the consequences of actions (or omissions) undertaken voluntarily, with full awareness of their intentions and the implications arising from them. The same applies to those who commit unlawful acts voluntarily, but without understanding the substance of those actions. Criminal liability arises when there is an element of error or negligence that poses a serious risk to the safety and health of participants in the Free Nutritional Meal Program (MBG). MBG organizers, including the Nutrition Fulfillment Service Unit (SPPG) and third-party food providers, are legally obligated to ensure that every stage of the program, from menu planning and food procurement to processing and distribution, is carried out in accordance with nutritional, sanitation, and food safety standards. Failure to comply with these obligations can result in criminal consequences if it results in real harm to participants, especially children as a vulnerable group. Law Number 18 of 2012 concerning Food stipulates criminal sanctions for parties trading food that does not meet safety, quality, and nutritional requirements. Article 140 of the Food Law stipulates criminal penalties for anyone who intentionally or through negligence provides food that has the potential to cause poisoning or health problems. This provision confirms that violations of food safety standards that have a real health impact can be prosecuted. Law Number 17 of 2023 concerning Health also provides a basis for criminal liability for negligence in the provision of services that result in health problems. The application of criminal law serves as the *ultimum remedium* and is implemented when violations are serious, massive, or result in victims. The law enforcement process is carried out through investigation, prosecution, and court proceedings in accordance with criminal procedure law.

Criminal liability for negligence in food provision resulting in child victims remains general and has not been effectively implemented. The absence of strict oversight and weak coordination between the central and regional governments and catering service providers creates legal uncertainty regarding who should bear criminal responsibility in the event of mass poisoning. This creates a normative vacuum and makes law enforcement difficult, especially when the affected victims are children, a group that should receive the highest level of legal protection. This situation demonstrates a disparity between normative child protection principles and their implementation in the field, potentially weakening the accountability of state law in guaranteeing children's right to safe and healthy food. The role of the National Nutrition Agency (BGN) in the MBG Program in fulfilling Nutrition is related to Law Number 18 of 2012 concerning Food, becoming the main legal umbrella that supports the implementation of the Free Nutritional Meal Program (MBG), by emphasizing the fulfillment of the community's

right to safe, nutritious, diverse, balanced, and halal food as part of national food security. Food itself is defined as all materials that can be used as food [12], [13], [14]. Food is defined as all materials, other than medicines, that contain nutrients and chemical elements that can be converted by the body into nutrients, thus playing an important role in the process of human growth and development [15].

CONCLUSION

Fundamental Finding: Legal protection for beneficiaries of the Free Nutritional Meal Program (MBG) is primarily governed by laws and regulations related to food safety, health, and the protection of beneficiaries. This legal protection consists of preventive and repressive legal protection. Preventive legal protection is implemented through efforts to prevent potential losses to beneficiaries, including through monitoring food safety standards, food quality, and program implementation in accordance with applicable regulations. Repressive legal protection is implemented through legal resolution mechanisms in the event of violations or losses suffered by beneficiaries, including administrative, civil, or criminal liability in accordance with applicable laws and regulations. Legal liability for beneficiaries in the implementation of the Free Nutritional Meal Program is the legal consequence arising from actions or omissions that cause losses to beneficiaries. This liability is not solely borne by one party but is tailored to the duties, functions, and authority of each party involved in the implementation of the Free Nutritional Meal Program. **Implication :** The government is responsible for policy, oversight, and evaluation of the program, while food providers are responsible for the quality, safety, and suitability of the food distributed to beneficiaries. Violations of these obligations may result in administrative, civil, or criminal liability, depending on the severity of the violation. **Limitation :** However, the existing regulations require more detailed clarification to provide legal certainty regarding the limits of each party's responsibility in implementing the Free Nutritious Meal Program. **Future Research :** Future research should examine the practical implementation of legal protection for MBG beneficiaries, including cases of food safety violations and compensation mechanisms. Further studies may also evaluate the effectiveness of existing regulations and develop a clearer model of legal responsibility among government agencies and food service providers.

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