

*Research Article***Administrative Enforcement of Food Safety Regulation in Indonesia: Loopholes and Recommendations**

Stephanie Apsari Putri
School of Law, University of Wollongong, Australia
sap993@uowmail.edu.au

ABSTRACT

Food safety regulation requires adequate resources. Due to its complexity, food safety regulation needs multidisciplinary stakeholder intervention. The National Agency for Drug and Food Control (NADFC) as the appointed body encountered problems in law enforcement works with other food safety-related bodies. The discussion focuses on the administrative enforcement of food safety regulation in Indonesia and these shortcomings is followed with analysis of some possible solutions. However, their performances are hampered by several issues. This research is conducted with a desktop study of information obtained from primary and secondary sources. Also, to get some insights to improve the administrative enforcement in Indonesia, this study is carried out using comparative method. Therefore, the New South Wales (NSW) laws, regulations, policies, and principles are analysed. This study finds that the drawbacks of the administrative enforcement of food safety regulation in Indonesia is caused by limited enforcement funding; lack of community knowledge and awareness towards food safety; lack of competent food inspectors; and lack of coordination between food safety administrative bodies. Some recommendations have been proposed, namely applying industry funding; implementing food hygiene rating; establishing enforcement guidelines; and appointing a single coordinating body for food safety.

Keywords: Food safety; Regulation; Administrative; Enforcement

A. INTRODUCTION

Food is a basic human need the most important and its fulfillment is part of the human rights (Lestari, 2020) that guaranteed in The Constitution of the Republic of Indonesia 1945. The state is obliged to realize the availability, affordability, and fulfillment of food consumption that sufficient, safe, quality, and nutritionally balanced through food safety policy. Food safety policies are defined as objectives, rules and structures designed to ensure food quality and address the risk of food contamination to promote and protect human, animal and plant health

(Thomann, 2018). Food safety is widely recognized as essential for effective health protection (Ugland, & Veggeland, 2006).

National Agency for Drug and Food Control (NADFC) is an appointed body to regulate food safety (Food Safety Act and Health Act and their implementing regulations) in Indonesia. Food safety regulation (Food Safety Act No. 18 /2012) is complex, because it involves many aspects such as health, sanitation, trade, agriculture, and so on. Therefore, NADFC collaborates with multidisciplinary stakeholders. Some government

bodies were appointed to regulate food safety based on their respective tasks.

Unfortunately, the performances of those bodies-including NADFC in governing food safety are hampered with several issues. The present study explains the existing food safety administrative bodies of Indonesia focusing on their functions, composition, and effectiveness. The analysis in this study focuses more on NADFC, the appointed body to regulate food safety in Indonesia. While other administrative bodies are also analysed in relation to their coordination with NADFC.

In Indonesia, food usually becomes harmful because it is adulterated and contaminated. Both in food adulteration and food contamination, there is an involvement of substance that is not intended to be in a product. The difference is that contamination is unintentional (Lipp, 2011). Food adulteration is commonly done by using prohibited chemicals, artificial colouring, and rotten ingredients. It is also done by 'bulking up' using sub-standard and low-cost ingredients (Solaiman, & Ali, 2013). While food contamination refers to food that is spoiled because it contains microorganisms, bacteria, or germs that make it unfit for consumption (Sadiku, Ashaolu & , Musa 2020).

There were 61 food poisoning incidents during 2015 which were caused by adulterated food. The incidents resulted in 2,251 people injured and three deaths (National Agency for Drug and Food Control, 2016). In 2017, in just

three months, NADFC reported 30 incidents of food and beverage poisoning in Indonesia. The 30 poisoning incidents caused 848 people to suffer from nausea, dizziness and diarrhoea, while six people died (National Agency for Drug and Food Control, 2107). In the beginning of 2021, 93 residents in Desa Pawenang were hospitalised after consuming food from an event in their neighbourhood (Iman, 2020). Another example of food poisoning was experienced by residents of Cianjur after consuming contaminated beef gravel. A total of 29 residents including one pregnant woman became victims (Maharani, 2021). NADFC states that there are at least 20 million cases of poisoning each year in Indonesia (Ramadani, 2019). The number of food poisoning cases may be higher because many incidents of food poisoning remain unreported (National Agency for Drug and Food Control, 2015).

Annual food poisoning outbreaks also result in economic loss both directly and indirectly (Rahayu et.al, 2006). Illness caused by adulterated food is likely to be a prevalent health problem which leads to economic loss (Kaferstein, 2003). Besides, due to deaths and health problems that caused by foodborne illness, economic costs must also be borne by everyone who suffers from the disease, including the victim's family and the health care system. These costs include loss of income due to absence from work, medical care costs, investigation costs for foodborne illness outbreaks, lost income due to

business closures, legal costs and fines. In 2013, the total estimated economic loss from food poisoning cases in Indonesia was US\$ 78 million (Rahayu et.al, 2006).

Food is a basic human need and the right to food is internationally acknowledged as a fundamental right of all humankind. Unfortunately, food safety issues have become an alarming food safety issue in Indonesia, so it requires immediate improvement in its regulation. The current legal, administrative and enforcement framework has not been able to ensure safe food for Indonesians. In addition, the performance of NADFC as the primary agency to regulate food adulteration in Indonesia is also hampered by several issues so that it does not run effectively.

This study intends to make a significant contribution by providing recommendations to improve the effectiveness of food safety regulation by NADFC in Indonesia. The analysis focuses on the administrative enforcement of food safety regulation in Indonesia. From the discussion, the drawbacks of the current administrative enforcement regime can be revealed. The discussion of these shortcomings is followed with analysis of some possible solutions. These recommendations are obtained from an in-depth analysis of the issues in the food safety regulation in Indonesia and the search for suitable solutions through research on the New South Wales (NSW) food safety system.

The rampant spread of contaminated and adulterated issues has negatively impacted

people's health and national economy. For this reason, the government needs to interfere through regulation. Pigou developed a theory called the public interest theory which assumes that government is capable to correct market failures through regulation (Hantke-Domas, 2003). According to this theory, governments intervene to minimise unfair practices and to improve the quality of goods and (services) as well as the quality of human life, to control prices and to enforce safety standards to prevent accidents, such as mass food poisoning (Shleifer, 2005). In the context of food safety, public interest includes easy access to safe, nutritious and affordable food, whereas potential market failure is the presence of unsafe food products which are likely to cause problems, such as foodborne illnesses as well as lessening competitiveness in global markets and creating economic disadvantages.

Several studies on food safety regulation have been carried out, however, a few small studies have been conducted demonstrating the weaknesses of the administrative enforcement regime. Those studies are conducted by Puspita, it aimed to describe the regulation of unsafe food in the city of Samarinda by NADFC (Puspitasari, 2016). Additionally, a study by Firganefi aimed to (1) analyse the enforcement of criminal law against food business actors who violate the law, and (2) identify the inhibiting factors in enforcing criminal law (Firganefi, 2006). Diana also conducted a study that evaluated the

performance of NADFC in Yogyakarta in handling the case of melamine-contaminated food by examining community satisfaction in this regard and to identify the gaps between expectations and reality (Diana, 2006). Yusuf Rian also investigated the performance of NADFC in Yogyakarta that aimed to evaluate the performance of NADFC in Yogyakarta in supervising drug and food products containing harmful materials (Rian, 2014).

The policies such as programs based on the Hazard Analysis and Critical Control Points (HACCP) could be effective strategies to prevent foodborne diseases from occurring in foodservice establishments at the end of the food supply chain (Levy, Hashiguchi, & Cecchini, 2022). Perspective highlights a set of specific causal pathways through which food safety and nutrition are interlinked in across health and physiology, consumer behavior, supply chains and markets, and policy and regulation (Nordhagen et.al, 2022). An overview of the purpose of the system, its governance arrangements and its functions of policy development, standards development, implementation and enforcement, and incident response and provided on engagement and partnerships, and how the system is being modernized to ensure it remains fit-for-purpose into the future (Witherspoon, & Donse, 2023).

Those studies lack the depth of analysis the present study intends to undertake. Therefore, this study has been carried out, because to the best of the author's knowledge there has been no

comprehensive research examining the effectiveness of food safety administrative enforcement in Indonesia. In addition, there is no research that looks at the NSW jurisdiction to obtain solutions to resolve the ineffectiveness.

B. RESEARCH METHODS

This study is conducted using three approaches, namely desktop study, comparative, and doctrinal research. A desktop study is conducted to find information obtained from primary sources of law including legislation and case law, and secondary sources such as journal articles, books, newspapers, reports, videos, photographs, and institutional reports and papers such as those published by NADFC, other relevant government offices in Indonesia, and international organisations such as the World Health Organization (WHO). To get solutions to improve the effectiveness of the administrative framework for food safety in Indonesia, this study also involves the analysis of other jurisdiction-NSW in particular. NSW has been chosen because it is globally recognised as a jurisdiction that successfully ensures food safety for consumers (Ali, & Solaiman, 2014). The use of multiple methods in legal research does not avoid the need to identify, analyse and synthesise the law. This process is referred to in law academia as doctrinal research and analysis, the traditional legal research method (Hutchinson, & Duncan, 2012).

C. RESULTS AND DISCUSSION

This study finds out several factors that lead to ineffectiveness in administrative enforcement for food safety in Indonesia. Those issues are limited enforcement funding; lack of community knowledge and awareness towards food safety; lack of competent food inspectors; and lack of coordination between food safety administrative bodies.

1. Limited Enforcement Funding

a. Lack of Competent NADFC Personnel

NADFC is experiencing a lack of human resources in each of its divisions, including food inspectors. The number of NADFC personnel is insufficient compared to the scope of regulatory duties and workload (National Agency for Drug and Food Control, 2019). Reports submitted by NADFC in various cities stated that there was a shortage of human resources for food inspectors. For example, NADFC in Semarang City has a number of inspector personnel not proportional to its workload. NADFC's working area in Semarang City is the entire province of Central Java, which has a total area of about 3.3 million hectares or approximately 25.04% of the area of Java Island and 1.7% of the total area of Indonesia (National Agency for Drug and Food Control, 2018). With the wide area of supervision, NADFC Semarang City is only equipped with 35 inspectors, far from the ideal number of inspectors, which is 81 personnel (National Agency for Drug and Food Control, 2019).

Moreover, the challenges in conducting food control in Indonesia are quite heavy. Indonesia has a wide area, of nearly 2 million square kilometres which consists of 16,056 islands (Central Bureau of Statistics, 2018). In addition, the population of Indonesia is approximately 265 million (Central Bureau of Statistics, 2019), spread across 34 provinces. Several islands of Indonesia are adjacent to several countries such as Malaysia and Singapore and the lack of supervision increases the risk of crime, such as smuggling (Pratama, 2017). For example, Batam which is located on the side of the world's most crowded international trade route became the gateway and spearhead of the national economy. The location of the region adjacent to neighbouring Malaysia and Singapore makes Batam a very strategic place for services and trade, or even smuggling. Busy traffic at the port is used by the wrongdoers to import food products illegally. There are 64 illegal ports in Batam City that are the entrance to illegal food products that are not equipped with export-import documents and customs (Zaenuddin, 2012).

Insufficient number of NADFC personnel can be seen also in processed food registration. The timeliness of issuing registration decisions is only categorised as 'sufficient' with a realisation of 82.90% (National Agency for Drug and Food Control, 2018). The results of the 2015-2019 Directorate of Processed Food Registration Customer Satisfaction Survey show that the value

of business actors' satisfaction with the performance of the Directorate of Processed Food Registration in 2018 is not good enough (National Agency for Drug and Food Control, 2019). In fact, the absence of a guarantee regarding the certainty of the time and duration of the service can make service users uneasy. This in turn may also affect the compliance of business actors to register their processed food products.

The number of human resources owned by the Processed Food Registration Directorate to carry out the duties and functions of pre-market regulation until 2018 is 97 people (National Agency for Drug and Food Control, 2018). In the following year, NADFC through the Government Agency Performance Accountability Report 2019 reported the number of registration personnel was added with five staff and became 102 people. Unfortunately, this insignificant addition still put NADFC in the same problem because the number of personnel for food registration is not sufficient compared to the rapid increase of registration application (National Agency for Drug and Food Control, 2019).

An addition of significant number of food registration staff needs to be recruited. The proposal for additional human resources for processed food registration can be submitted to the NADFC General Affairs Bureau and Human Resources. Unfortunately, due to the NADFC limitation on budget, a massive staff recruitment is not an easy thing to realised.

b. Lack of NADFC Testing Laboratories

The other proof which shows that NADFC lacks of sufficient funding can be seen in the lack of food testing laboratories. NADFC laboratories still do not meet laboratory standards due to limited equipment, facilities and infrastructure, limited testing scope, and limited human resources. Due to the limited resources mentioned above, not all commodities under NADFC regulation can be laboratory tested by the laboratories owned by NADFC (National Agency for Drug and Food Control, 2017). The need for a qualified laboratory soars at certain moments (National Agency for Drug and Food Control 2018). For example, in the holy month of Ramadan, the high demand for food is often used by fraudulent business actors to reap more profits, by conducting food adulterations (National Agency for Drug and Food Control, 2019). During Ramadan 2019, food adulteration cases increased by 53.3% compared to the previous year (Yogatama, 2019).

The laboratory is an important infrastructure that will support the quality of food testing. The results of NADFC laboratory testing determine the next regulatory process, namely, the enforcement of food adulteration laws and regulations. Therefore, infrastructure of laboratories must be strengthened immediately.

c. Applying Industry Funding to Pay Regulatory Cost

In Australia, there is an innovative model to earn funding for a regulator. The Australian

Securities and Investments Commission (ASIC) developed a funding model called *industry funding*. It is a funding model whereby those who create the need for and benefit from ASIC's regulation bear the costs. Entities pay a share of the costs to regulate their subsector through industry levies based on a range of business activity metrics (Australian Securities and Investments Commission, 2020). Starting from 1st of July 2017, the industry funding became law and ASIC recovered most of its regulatory costs from regulated industries (Australian Securities and Investments Commission, 2020).

ASIC publishes its regulatory costs as part of an annual Cost Recovery Implementation Statement (CRIS). The CRIS outlines ASIC's forecast regulatory costs and activities by subsector for each financial year and provides details on how ASIC allocated its costs in the previous year. The CRIS will also provide industry with indicative levies for the following year to help them plan (Australian Securities and Investments Commission, 2020). With this model, around 90% of ASIC's regulatory activities is recovered in the form of industry funding levies, the remaining 10% is recovered via fees for service.

This solution is possible to be applied to overcome NADFC funding problems such as in staff recruitment, human resources development, and to overcome the issues of lack of facilities. However, to be able to implement industry funding in Indonesia, there are several things that must be adjusted. In Indonesia, the processing

business (including the food business) is divided into four groups, namely large business (100 workers or more), medium business (20-99 workers), small business (5-19 workers), and households (having 1-4 workers). Based on this classification, in 2016, 4.737 million of the 4.41 million processing businesses in Indonesia were small-scale industries (99.04 per cent), and the rest (42,468) are large-scale businesses (Agustinus, 2017).

The business funding model cannot simply be applied to all food business in Indonesia, especially in small and medium enterprises, which have significantly different characteristics from large businesses in terms of their finances, expertise and staffing capabilities (Yapp, & Robyn, 2006). In fact, there is the term *infant industry*, which means an industry that is still new and in its early stages of development and, thus, is not yet capable of competing against established industry competitors. They are deemed worthy of protection or get exceptions to a rule.

Therefore, small, medium and household food businesses can be exempted from this funding obligation or get a remission to pay the levy. In Australia, the small scale business or infant business is not obliged to pay this levy; however, they still contribute by paying an increased amount of their Annual Review Fee.

This solution can be applied to small, medium and household business in Indonesia, but there should not be any discrimination in the

obligation to pay for industry funding. Discriminatory behaviour must be avoided by issuing a regulation that contains industry categories that are required to pay their contributions. In NSW, the organisations that are required to pay a levy are those regulated by ASIC and the classification is defined under the ASIC Supervisory Cost Recovery Levy Act 2017.

This regulation also provides a method for calculating the amount of levy. For Indonesia, the determination of the company category can use a classification based on the International Standard Industrial Classification of all Economic Activities (ISIC) (4th revision), which has been adapted to conditions in Indonesia under the name Indonesian Standard Industrial Classification 2009.

2. Lack of Community Knowledge and Awareness towards Food Safety

The analysis is divided into two parts, namely (a) Lack of Food Safety Knowledge and Awareness of Business Actors; and (b) Lack of Consumer Knowledge and Awareness towards Food Safety.

a) Lack of Food Safety Knowledge and Awareness of Business Actors

Training is one of the way to educate business actors. However, NADFC does not provide sufficient information for the need of the business actors. For example, NADFC has been focusing on food registration and holds numerous trainings on this topic. In fact, other training materials are not less important than food

registration. It can be seen in the lack of knowledge of business actors regarding food additives.

For this reason, NADFC needs to enrich training materials to be more varied and must be in accordance with the needs of business actors. For example, in many cases it was found that business actors misused formaldehyde to be used as a food preservative. To solve this problem, NADFC can provide training to business actors regarding alternative food additives such as Chitosan. Chitosan can inhibit growth damaging microorganisms and at the same time coating the preserved product so that it occurs with minimal interaction between the product and its environment. Chitosan has also been tested and used to preserve various food products in Indonesia including tofu, salted fish, wet noodles, sausages, meatballs, and fruits. The use of Chitosan as a food additive and preservative not only produces durable food products but also prevents consumers from the possibility of contracting typhus and inhibits the multiplication of human gastric cancer cells (Hardjito, 2006).

In the future, NADFC can find out more about the needs of business actors by conducting further research. It can be done by asking the participants of the training to provide feedback. Buckley suggests that the relationship between food business and food inspectors requires time, flexibility, and interpersonal skills to develop. Through conversations, both food business and food inspector will understand each other's

respective approaches, priorities, and challenges. Buckley also added that interactions between processors and inspectors will shape regulatory outcomes and determined how written requirements were interpreted and implemented (Buckley, 2015).

b) Lack of Consumer Knowledge and Awareness towards Food Safety

Due to limited knowledge and ability to obtain information, consumers often assume that high quality food must also have a high price. For the economically weak, they will choose a cheap price that they can afford. This consumer class focuses more on affordable prices than other considerations. They have bought food at low prices, even though the product is of low quality and its safety is not guaranteed. Finally, consumers unconsciously consume these food products because, for example, they have an attractive appearance at a lower price.

NADFC has made efforts to educate the public through training, public service announcements on television stations, radio, print media, as well as at airports, cinemas and train stations (National Agency for Drug and Food Control, 2017). However, these efforts have not been carried out consistently and evenly, so the results are not too significant as shown by the increasing instances of injury from food adulteration and contamination. There are still many consumers whose knowledge and awareness of food safety is low. For example, research conducted by Rahmatunisa et. al around

the Muhammadiyah University of Purwokerto campus shows that 90 per cent of street food consumers around the campus have a low level of knowledge, 10 per cent of consumers have moderate knowledge, and no consumer has a high level of knowledge. The low level of food safety knowledge is caused by the lack of information obtained about food safety, especially regarding food additives (Rahmatunisa, Wijonarko, & Haryati, 2018).

NSW has a strategic program called Scores on Doors which is designed to reduce foodborne illness in NSW by improving food safety in the retail sector through public display of food safety inspection results. This program aims to help the public know how good local restaurants, takeaway shops, bakeries, pub bistros and cafes are complying with NSW hygiene and food safety requirements. Scores on Doors can also make business actors competitive and improve consumer confidence in choosing their food.

The NSWFA Annual Report 2018-2019 claims that there is positive growth for the Scores on Doors program. On 30 June 2019, there were 59 councils participating in the program, consistent with the previous financial year. These 59 councils represent 25,065 eligible food businesses, capturing 64% of all eligible retail food businesses in NSW (New South Wales Food Authority, 2019). However, it was identified that public awareness of the scheme is limited, business participation was low, businesses

understanding of the scheme and its purpose is mixed, and promotion has been variable. These limitations on uptake are in part due to its voluntary nature and reluctance by business to display low ratings.

In UK, has made the Food Hygiene Rating Scheme (FHRS) mandatory starting from 2019 after being voluntary for 14 years (New South Wales Food Authority, 2012). There is robust evidence that these systems have a positive impact on food safety compliance. In some instances, a reduction in reported foodborne illness has also been demonstrated coinciding with the introduction of mandatory food hygiene rating systems (New South Wales Food Authority, 2013).

In Indonesia, there is actually a similar program carried out by NADFC, which is called the Food Star Charter. This program is voluntary with the aim of encouraging the food industry to apply food safety principles and to gain recognition for its efforts to meet food safety requirements. Food Star Charter gives recognition to food businesses which have implemented food safety principles. However, this program is prioritised to be implemented in school canteens (National Agency for Drug and Food Control, 2007). Following the FHRS in the UK, Indonesia can apply the food hygiene rating program on a mandatory basis to get better results and impacts.

3. Lack of Competent Food Inspectors

In law enforcement, food inspectors often find it difficult to determine suitable punishment.

The penalties imposed were often too light, so that it did not provide a deterrent effect, so that business actors tend to commit these violations again. For example, in Klender Market in East Jakarta, there are sellers who sell chicken carcasses even though they have previously been caught in the act and sentenced to a fine. This happened because the fines imposed were too light compared to their profit and did not deter them (Putra, 2015). Government Regulation 86/2019 on Food Safety regulates the stages of administrative sanctions ranging from the lightest to the most severe depending on the seriousness of the food safety breach. However, this regulation does not contain further explanation to help food inspectors impose appropriate sanctions.

This problem can be resolved by establishing an enforcement guideline. The NSW Food Authority provides its inspectors with an enforcement guideline which is called the *NSW Food Authority Compliance and Enforcement Policy*. This policy summarises the Food Authority's general approach to compliance and enforcement; explains how the Food Authority undertakes activities that reduce food safety risks and enhance compliance with established standards for food production and labelling; and guides decision-making to ensure that compliance actions are consistent, fair and based on best practice.

With this guideline, it can help the food safety inspector to determine what is appropriate,

including application of multiple enforcement tools under appropriate circumstances. In addition, this guideline can help business actors to understand what sanctions will be imposed if they violate the rules (and if they commit these violations again), so that compliance can be improved.

4. Lack of Coordination between Food Safety Administrative Bodies

The Indonesian government appoints several government bodies from various sectoral departments, namely National Agency for Drug and Food Control (NADFC), Ministry of Health, Ministry of Agriculture, Ministry of Marine Affairs and Fisheries, Ministry of Trade, Ministry of Industry, and local government. Along with the other food safety stakeholders, these government agencies carry out three main risk analysis activities which are grouped in three different networks, namely Food Intelligence Network (Risk Assessment), Food Control Network (Risk Management), and Food Promotion Networks (Risk Communication) (FAO, 2004).

One party may enter into more than one network, according to their duties and fields. The members of the networks work as equal partners by sharing information, discussing existing problems, and deciding the best way to improve the performance of each institution in order to improve the quality and safety of national food. Further, the functions and powers of these government agencies are regulated in *Government Regulation 86/2019 on Food Safety* (GR 86/2019) based on food business types

(fresh food, processed food, retail, home-industry, and ready-to-eat).

Omojokun argued that whatever system is in place, adequate communication and coordination among different institutions are crucial. The system that would facilitate regulatory action for food safety should be based on the principle of transparency, inclusiveness, integrity, clarity of roles and rules, accountability, risk-based approach and equivalence as the benchmarks against which it would be measured (Omojokun, 2003).

Hariyadi considered that the IFSS is very complex and the coordination model was unclear. In fact, coordination was a critical point for a successful IFSS (Hariyadi, 2008). Moreover, the division of power between bodies often creates confusion. For example, due to the advancement in production, packaging, and technology, it is increasingly difficult to distinguish the types of food (Lukman, 2017). In addition, the fragmented regulation for food often creates confusion on which body should act, especially in the event of food safety incidents (Susyanty et.al, 2014).

In NSW, most of the food adulteration administrative framework is maintained by the NSW Food Authority (NSWFA). It coordinates the local government bodies, Food Standards Australia New Zealand (FSANZ), Department of Primary Industry, NSW Department of Health and other bodies necessary for maintaining the safety across the whole food area. NSWFA Annual Report 2018–2019 claims that NSWFA monitors

the safety of food in every food chain, from paddock to plate (New South Wales Food Authority, 2019). Ali suggests that the NSWFA can help cut the cost of food regulation; thus the cost of compliance can be reduced (Ali, 2013). It provides a well-structured regulatory mechanism for the food industry by administering and enforcing state and Commonwealth food legislation (New South Wales Food Authority, 2010).

In the context of Indonesia, NADFC can be appointed to be the highest agency which will be coordinating the whole food safety regulatory framework in Indonesia. NADFC will be the single agency to coordinate all the bodies involved in food safety regulation. MoH will help NADFC in relation to foodborne illnesses, while other ministries will collaborate in the preparation of food safety standards and requirements. In carrying out inspections and enforcement, NADFC will work with local government according to their respected tasks which will be regulated in the regulatory partnership (like the FRP) between them.

Not only is there a lack of coordination between bodies, the enforcement of food adulteration laws and regulations by NADFC is also hampered by insufficient number of food safety inspectors. The issue is analysed further in the sub-section below.

D. CONCLUSION

This study found out that there are several issues in food safety administrative enforcement in Indonesia. These issues are limited enforcement funding; lack of community knowledge and awareness towards food safety; lack of competent food inspectors; and lack of coordination between food safety administrative bodies. These issues have hampered the effective enforcement for food safety in Indonesia.

To make improvement, the present study recommends some solutions, namely applying industry funding; implementing food hygiene rating; establishing enforcement guidelines; and appointing a single coordinating body for food safety.

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