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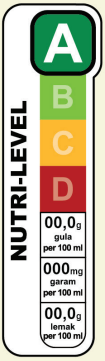
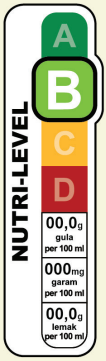
Center for Indonesia's Strategic Development Initiatives

FAQ

Frequently Asked Questions:

Nutri-Level





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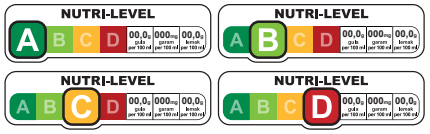
Q1. What is Nutri-Level?

Front-of-Pack Labeling (FOPL) is nutritional information placed on the front of food packaging to make it easier for consumers to see and understand [1]. An effective FOPL should be simple, easy to understand, and able to guide consumers toward healthier choices. **Nutri-Level is one type of FOPL recently introduced in Indonesia that currently implemented only for beverages.** It classifies products into four levels, A, B, C, and D, using colors ranging from dark green for Level A to red for Level D. Level A indicates lower sugar, salt, and fat content, while Level D indicates higher levels. Nutri-Level is regulated by two instruments: the Ministry of Health Decree Number HK.01.07/MENKES/301/2026 on ready-to-eat beverages and the Food and Drug Supervisory Agency Regulation Number 10 of 2026 for packaged beverages.



Design by
Ministry of Health

Design by
Indonesia Food and Drug Administration (FDA)

While a similar system, Nutri-Grade is used in Singapore, no other country uses this model. Multiple traffic light systems like Nutri-Grade and Nutri-Level, are not the only form of FOPL. **Global evidence shows that warning label, such as "High Sugar," "High Salt," or "High Fat," is the most effective type of label for encouraging people to choose products with lower sugar, salt, and fat content.** It is easier for consumers to understand because they can directly identify which products should be limited. This is why the design, thresholds, scope, and implementation of Nutri-Level still need to be carefully assessed to ensure it truly protects consumers.

Warning Label design in Latin America countries

Q2. Is Nutri-Level comprehensive policy for lowering SSF consumption in Indonesia?

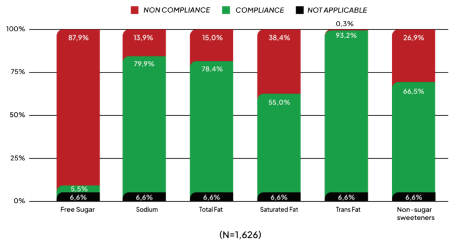
No. The current implementation is only voluntary for ready-to-drink beverages. Rather, the best FOPL system that answers Indonesia's needs is the Front-of-Pack Warning Label (FOPWL) since it regulates all products, using evidence-based NPM, and easy to understand design system. Evidence from other countries where FOPWL has been implemented comprehensively and mandatorily also shows that it can effectively change consumer behavior and encourage healthier purchasing and consumption choices [2]. The Nutrient Profile Model (NPM) study by CISDI and Airlangga University found that over 90% of products on the market are unhealthy, underscoring the need for urgent and widespread regulation of these products [3]. Moreover, **Nutri-Level is confusing** because it gives the impression that the drinks on label A or B are healthier, when in fact they remain ultra-processed and thus risky. The remaining implementation of the Healthier Choice Logo on packaged foods also adds to the confusion, since consumers need to look at two different types of labels.

Why not?

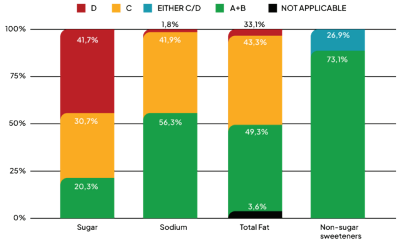
- **Nutri-Level mislead the consumers**
  A summary rating system like Nutri-Level risks **creating a positive bias or a "health halo" effect** for products in higher categories (which are perceived as healthier), even though they may still contain high levels of sugar, salt, and fat [2]. Products classified as B or C do not automatically mean they are healthy to consume at any time.

Moreover based on The Nutrient Profile Model (NPM) study by CISDI and Airlangga University, approximately >87% of ready-to-drink sweetened beverages exceed the sugar threshold according to the best-practice model, while only >41% meet the Nutri-Level D threshold. Similar patterns were also found for salt, total fat, and sweetener Food Additives criteria. This indicates a potential gap between the Nutri-Level threshold and global best practice standards [3]. **These findings highlight the importance of reassessing the Nutri-Level thresholds** altogether and considering the adoption of an evidence-based, internationally recognized NPM, particularly the best practice model.

BEST PRACTICE MODEL



Nutri-level



- **Nutri-Level governed by 2 regulatory standards**
  This is an inconsistent threshold since there are differences in the nutritional components and thresholds used to determine the Nutri-Level. **The Ministry of Health** categorizes it based on free sugar, salt, and **saturated fat**, while **Indonesia FDA** categorizes it based on free sugar, salt, and **total fat**. The nutrient thresholds used to implement Nutri-Level are not known to be based on scientific evidence and are not aligned with global best practices. The thresholds should indicate maximum daily intake based on WHO population nutrient intake goals. **Nutri-Level's thresholds are too lenient**, allowing products high in sugar, salt, or fat to appear healthy and potentially receive scores of A or B.

Table 1. Nutri-Level Threshold per 100 ml of beverage based on KMK Number HK.01.07/MENKES/301/2026

Nutrients*	A	B	C	D
Sugar (g)	≤ 1	> 1 - 5	> 5 - 10	> 10
Salt (mg)	≤ 5	> 5 - ≤ 120	> 120 - ≤ 500	> 500
Saturated fat (g)	≤ 0.7	> 0.7 - 1.2	> 1.2 - 2.8	> 2.8
Sweetener Additives	No added sweet-eners	Contains Natural Sweeteners	Contains natural sweeteners and/or artificial sweetener food additives	

* toppings or additional servings such as boba, syrup, cream, cheese foam , or whipped cream are not included in the calculation.

Table 2. Nutri-Level Threshold per 100 ml of beverage based on BPOM Regulation Number 10 of 2026

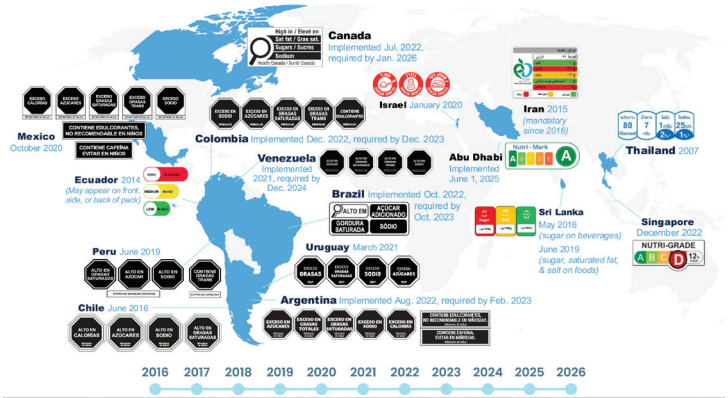
Nutrients*	A	B	C	D
Sugar (g)	≤ 0.5	> 0.5 - ≤ 6	> 6 - ≤ 12.5	> 12.5
Salt (mg)	≤ 5	> 5 - ≤ 120	> 120 - ≤ 500	> 500
Total Fat (g)	≤ 0.5	> 0.5 - ≤ 3.0	> 3 - ≤ 17	> 17
Sweetener Additives	No added sweet-eners	Contains Natural Sweeteners	Contains natural sweeteners and/or artificial sweetener food additives	

- **Based on best practice, evidence-based FOPL should be applied mandatory,** meanwhile the current FOPL (Nutri-Level) is still voluntary. Policies need to be mandatory in order to have equal impact across the food supply and show the best result.

Q3. If Nutri-Level is not based on best practices, what is a better system?

One effective system in global practice is **a mandatory warning label accompanied by a strong Nutrient Profile Model (NPM).** Warning label use simple messages, with black octagonal label such as "High Sugar," "High Salt," or "High Saturated Fat." Several Latin American countries, such as Chile, Mexico, Peru, Uruguay, and Argentina have implemented warning labels on food and beverage products that exceed certain nutrient thresholds (based on best practice standards). Various studies on the implementation of warning label in Latin American countries have shown a significant impact on reducing unhealthy food consumption in countries that have implemented them [4-7].

Warning Label instant noodle package in Latin America country



Mandatory and voluntary FOPL in use around the world

Q4. What are the advantages of warning label over other systems?

Warning label are simpler, more explicit, and easier to understand for various groups of people. If a product is high in a particular nutrient, the label directly states "High Sugar/Salt/Fat." Multiple studies show that warning label is more effective at helping consumers accurately **identify unhealthy products and encourage healthier purchasing decisions** compared to other scoring based FOPL such as multiple traffic lights (Nutri-Level), Health Star Rating and GDA [2]. Warning label has been shown to **reduce consumers' perceptions of the "healthiness" of a product** containing high levels of nutrients that need to be restricted, compared with other types of front-of-package labels [8,9]. Moreover, several studies showed that warning labels **decrease the consumption of high sugar, salt, and fat (SSF) food**, which aligned with the policy objective to reduce SSF consumption among the population [10-13].

Ilustration of warning label design in Indonesia context

In the Indonesian context, label design needs to account for the diverse levels of nutritional literacy within the community. Not everyone has the time, knowledge, or ability to understand the meaning of colors, percentages, and letters on labels. Various studies show that warning label are **easier to understand for people with varying levels of nutritional literacy**, including those with low literacy, because they present information simply and clearly, in a way that is easily and quickly recognized without the need to calculate or interpret complex nutritional labels [14-22]. However, further research is needed to assess their effectiveness across different population groups and levels of nutritional literacy in Indonesia.

Q5. What are the benefits and urgency of implementing warning label in Indonesia?

Warning label has the potential to reduce sugar, salt, and fat consumption among the population which contribute to an increased risk of non-communicable diseases such as obesity, diabetes, hypertension, and cardiovascular disease. Warning label not only provide information but also help consumers quickly identify products that need to be limited. **Warning label are easy to read, simple, clear, and not open to multiple interpretations.** Warning label based on a strong nutrient profiling model are proven more effective than summary scores in helping consumers quickly identify products high in nutrients of concern.

To be effective, labeling should cover all food and beverages to ensure that consumer protection is comprehensive rather than partial. **The implementation need to be closely monitored, and part of a broader healthy food policy**, including **restrictions on marketing unhealthy foods**, **excise taxes on sweetened beverages and/or ultra-processed products**, food regulations in schools and other public facilities, and consistent public education.

Government Regulation No. 28 of 2024 has opened the way for several complementary measures, including labeling, marketing restrictions, healthy food zones, and the potential for implementing excise taxes on health-risk products. With this comprehensive approach, warning label can not only help consumers quickly understand when products are high in nutrients of concern but also support healthier food choices, encourage the availability of healthier products, and help create a healthier food environment.

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