

Halal Certification Revocation and Market Withdrawal for Hazardous Food Products

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Abstract

This research discusses how to withdraw distribution permits and revoke halal certification for food products containing harmful chemicals through the case study of Roti Okko. This product was found to have banned extra ingredients, specifically sodium dehydroacetate, which breaks food safety laws and halal product guarantees. The study examines the legal aspects through statutory and conceptual methods, focusing on the dual enforcement by BPOM and BPJPH for food products with dangerous chemicals, using Roti Okko as a case example. The problem statement looks closely at how the two authorities responded to this double violation and its legal implications. The main findings show a clear division of authority. BPOM can withdraw distribution permits and remove products from sale due to food safety violations. At the same time, BPJPH can revoke halal certification when the ingredient composition does not match the registration details. This process is crucial for protecting consumers in terms of health and religious beliefs. The violation leads to serious legal consequences, including administrative penalties like the withdrawal or revocation of permits, civil claims for compensation, and possible criminal charges. Producers may also have to dispose of products in B3 waste facilities, highlighting the high costs of failing to comply. Practically, these findings suggest the need for better alignment of procedures and improved data sharing between BPOM and BPJPH for policymakers. They also stress the importance for producers to enhance their internal Quality Control systems to guard against various legal risks and to affirm consumer legal protection.

INTRODUCTION

Food refers to anything derived from biological sources—including agricultural, plantation, forestry, fishery, livestock, and aquatic products, including water—whether processed or unprocessed, intended for human consumption as food or beverages. This also includes food additives, raw food materials, and other substances used during the preparation, processing, and/or production of food or beverages.¹ Food has become one of the most essential basic human needs, and its fulfillment is part of human rights as a fundamental component in developing a high-quality human population.²

Along with increasing consumer demands and modern lifestyle patterns, the food industry has experienced significant growth in recent decades. Innovations in processing technology, packaging, and distribution have made processed food products increasingly accessible and widely favored. Digital transformation has enabled food manufacturers to improve operational efficiency and reduce production costs.³ Consumers now tend to choose practical, efficient products with longer shelf life to meet daily needs. This shift in consumption patterns has contributed to a growing number and variety of processed food products circulating in the market, produced both by large industries and micro, small, and medium enterprises. This phenomenon demonstrates that the food sector holds not only strategic value for national food security but also for economic development and public welfare. One of the most widely consumed processed food products today is bread.

Bread is a processed food made primarily from wheat flour and water, typically fermented with yeast. It is widely consumed because it is convenient and can be eaten directly without complex preparation. Many people consume bread as breakfast, packed meals, or snacks. However, despite its practicality, bread often contains Food Additives (Bahan Tambahan Pangan, BTP). These additives are commonly used to enhance flavor or extend shelf life, but their use is subject to maximum allowable limits. Although the use of additives is permitted, it remains strictly regulated under prevailing food safety laws. In practice, there are still manufacturers who violate these regulations, particularly those outlined in BPOM Regulation No. 11 of 2019 concerning Food Additives. Harmful food products may pose serious threats to consumer health and even life.⁴

¹ Undang Undang Nomor 18 Tahun 2012 tentang Pangan.

² Edy Nurchayo, 'Pengaturan dan Pengawasan Produk Pangan Olahan Kemasan,' *Jurnal Magister Hukum Udayana* 7.3 (2018), 403.

³ Latianingsih, Nining, et al. *Transformasi Digital Dalam Produksi Pangan Olahan*. Penerbit Widina, 2025.

⁴ Lorenza, Aulia, Elia Sazeti, Syarifah Widia. "Tanggung Jawab Hukum Produsen atas Makanan Berbahaya dalam Perspektif Strict Liability: Studi Kasus Roti Okko" *Sosial Simbiosis: Jurnal Integrasi Ilmu Sosial dan Politik* 2, no.2 (2025).

One example of such misuse occurred in 2024 involving the packaged bread brand Okko. The case began when BPOM carried out an inspection at the Okko bread production facility on July 2, 2024, and found that the manufacturer failed to comply with the Good Processed Food Production Methods (CPPOB) consistently. Laboratory testing also detected Sodium Dehydroacetate in Okko Bread, which was not listed in the product's registered formulation. This substance is not an approved food additive under BPOM Regulation No. 11 of 2019.⁵

According to BPOM Regulation No. 17 of 2022 amending BPOM Regulation No. 23 of 2019 on Technical Requirements of Cosmetic Ingredients, Sodium Dehydroacetate is only permitted for cosmetic use.⁶ Furthermore, Article 3 paragraph (1) of Government Regulation No. 86 of 2019 on Food Safety specifies that "Food sanitation as referred to in Article 2 paragraph (1) letter (a) shall be carried out to ensure the food is safe for consumption." This provision underscores the importance of regulated standards in ensuring public health through food safety enforcement.

In addition, BPOM's findings raised concerns among Muslim consumers regarding the halal integrity of the product. Article 3 of Law No. 33 of 2014 on Halal Product Assurance outlines the purpose of halal certification, and the use of Sodium Dehydroacetate does not comply with halal-approved ingredients in processed food products. In Islam, halal status is not only a matter of legal compliance but also a form of obedience to religious teachings.⁷ A product considered lawful (halal) for Muslims must meet two criteria: halal (permissible for consumption and not prohibited by Sharia) and tayyib, meaning nutritious and beneficial for health.⁸

Previous research conducted by Dini Pintasa, Setia Ananda, and Aulia Lorenza et al. collectively addressed consumer protection in food products, although from different perspectives. Pintasa and Lorenza specifically examined the Okko Bread case produced by PT Abadi Rasa Food, focusing on food safety violations involving the use of banned preservatives and compensation obligations under Article 19 of the Consumer Protection Act, as well as the application of the Strict Liability principle. Meanwhile, Ananda examined consumer protection from the perspective of Halal Assurance System

⁵ Penjelasan Publik BPOM Nomor HM.01.1.2.07.24.51 Tanggal 23 Juli 2024 Tentang Hasil Uji Penjelasan Publik BPOM Nomor HM.01.1.2.07.24.51 Tanggal 23 Juli 2024 Tentang Hasil Uji Kandungan Natrium Dehidroasetat pada Produk Roti.

⁶ Dini Pintasa. 'Perlindungan Hukum Terhadap Penggunaan Natrium Dehidroasetat Pada Produk Roti', (Skripsi, Universitas Airlangga, 2025), 6.

⁷ Adelia Maelani Agustin, dkk, 'Peran Sertifikasi Halal dalam Melindungi Konsumen Muslim: Tinjauan Hukum Islam dan Hukum Nasional', *Media Hukum Indonesia (MHI)*, 3.1 (2025)

⁸ Mulyati, dkk, 'Makanan Halal dan Tayyib dalam Perspektif Al-Quran,' *Jurnal Ilmu Sosial dan Humaniora*, 1.1 (2023)

implementation in MSME products, highlighting certification barriers and limited public awareness. The common conclusion across these studies is that consumer protection remains suboptimal due to inadequate regulatory compliance by producers—both in food safety and halal integrity. However, a significant research gap remains, as previous studies addressed halal regulation and civil accountability separately. No study has yet analyzed how compensation mechanisms under Strict Liability can be implemented simultaneously with Administrative Law Enforcement sanctions imposed by regulatory authorities (BPOM and BPJPH) in cases involving dual violations such as the Okko Bread incident. Therefore, further research should focus on integrating Strict Liability into the Halal Assurance System to formulate a more comprehensive and cohesive accountability model for consumer protection.

The Okko Bread case, involving simultaneous violations of food safety and potential halal integrity, reflects failures both in regulatory oversight and in the manufacturer's strict liability obligations. Legally, this case raises the need to conceptually examine how the precautionary principle should be implemented in processed food regulation and how civil liability mechanisms can be synchronized with administrative sanctions within a more comprehensive Consumer Protection Theory framework. Given the harm experienced by consumers, greater efforts are required to guarantee and enforce consumer rights.⁹ This presents an academic gap that must be addressed by proposing an integrated legal accountability model.

This study focuses on the role of food regulatory bodies, namely BPOM and BPJPH, in executing enforcement measures—from withdrawing distribution permits and revoking halal certification to supervising the destruction of products containing hazardous chemicals—and assessing the resulting legal consequences. The research argues that to safeguard consumers' fundamental rights to safe and halal food, the enforcement actions by BPOM and BPJPH must be based on the precautionary principle and aligned with the Strict Liability obligations imposed on producers. This approach is necessary to ensure full regulatory compliance. If a manufacturer holding a valid BPOM distribution permit and BPJPH halal certification still engages in violations, such as using banned additives, both authorities are entitled to enforce sanctions including permit withdrawal, halal certification revocation, and product destruction.

Based on previous literature, this study examines the mechanisms for withdrawing distribution permits and revoking halal certification for processed food products containing hazardous chemicals, as well as the scope of producer liability during the

⁹ Hamid, A. H., & SH, M. (2017). *Hukum Perlindungan Konsumen Indonesia* (Vol. 1). Sah Media.

withdrawal and destruction process. The significance of this research lies in affirming the obligation of businesses to comply with legal standards in producing processed foods. If a certified producer still commits violations, BPOM and BPJPH have full authority to enforce sanctions. Therefore, this research analyzes the mechanisms and legal implications of withdrawing distribution permits and halal certification for food products containing hazardous chemicals.

METHODS

The research method employed in this study is normative legal research, which aims to identify legal norms, legal principles, and legal doctrines to address the legal issues under examination.¹⁰ The normative legal approach is appropriate for analyzing legal norms and doctrines such as the principles of Strict Liability, Administrative Law Enforcement, and the Halal Integrity System in order to formulate an ideal concept of producer liability. This method is supported by a Statute Approach to review regulatory consistency among the Consumer Protection Law, Food Law, and Halal Product Assurance Law, as well as a Conceptual Approach to explain the legal implications of withdrawing distribution permits and halal certification.

Data collection was carried out through a Literature Study to obtain primary and secondary legal materials, complemented by interviews with representatives from relevant regulatory authorities—one representative from BPOM and three representatives from BPJPH. Validation of interview data was performed by cross-verifying the findings with literature-based data. The collected legal materials were then analyzed using Descriptive-Analytical and Interpretive techniques to identify, interpret, and critically evaluate the existing legal enforcement practices. The results were subsequently synthesized to construct an Integrated Producer Liability System model as the proposed solution to the research problem.

RESULTS AND DISCUSSION

1. Mechanism for Revocation of Distribution Permits and Halal Certification for Food Products Containing Hazardous Chemicals

The circulation of processed food products in Indonesia is regulated not only to ensure quality, safety, and consumer health but also to protect consumers' rights to suitable, safe, and socially compliant products. Regulations governing food circulation encompass a broad scope, ranging from food safety standards and distribution permits

¹⁰ Jonaedi Efendi, dkk, 'Metode Penelitian Hukum Normatif dan Empiris'. Kencana, Jakarta, 2022.

to halal certification requirements. Article 67 of Law No. 18 of 2012 concerning Food emphasizes the importance of food safety management to ensure that food remains safe, hygienic, of proper quality, nutritious, and not contrary to religious values, beliefs, and cultural norms.¹¹

Furthermore, paragraph (2) of the same article stipulates that food safety management must prevent possible biological, chemical, or other contaminants that may disrupt, harm, or endanger human health. This provision demonstrates that food safety is a fundamental pillar of consumer protection and serves as a legal basis for the state to guarantee public access to safe and proper consumable food.

Accordingly, every circulating food product—including processed food—must comply with administrative requirements, namely obtaining a distribution permit from BPOM and halal certification from BPJPH for products labeled as halal. This obligation is reinforced in Article 4 of Law No. 33 of 2014 concerning Halal Product Assurance, which states that every product entering, circulating, or traded in Indonesia must be halal-certified.¹²

Compliance with these requirements is mandatory for food producers to ensure both safety and halal status. If violations occur—such as the use of prohibited substances or unreported changes in product composition—oversight authorities such as BPOM and BPJPH may take collective action in the form of revoking the distribution permit and halal certification. These measures serve not only as law enforcement but also as preventive action to preserve public trust in the national food supervision system.

Structurally, BPOM and BPJPH hold significant supervisory roles over food circulation. However, effective oversight cannot rely solely on these institutions due to the vast distribution network and high volume of food products circulating within Indonesia. Therefore, compliance awareness among business operators and producers, as well as public vigilance, is necessary to support supervision.

Business operators are expected to possess strong legal awareness to comply with licensing and labeling obligations, while the public must enhance consumer literacy to make informed and critical product choices. The lack of legal awareness and low level of food-safety literacy among consumers often results in violations of food safety and halal standards receiving insufficient attention.¹³ This is reflected in ongoing cases such as the

¹¹ Pasal 67 Undang-undang Nomor 18 Tahun 2012 tentang Pangan.

¹² Pasal 4 Undang-undang Nomor 33 Tahun 2014 tentang Jaminan Produk Halal.

¹³ Aulia Lorenza, dkk, 'Tanggung Jawab Hukum Produsen atas Makanan Berbahaya dalam Perspektif Strict Liability: Studi Kasus Roti Okko', *Sosial Simbiosis: Jurnal Integrasi Ilmu Sosial dan Politik*.2.2 (2025)

Roti Okko product, where the preservative Sodium Dehydroacetate – prohibited for food and designated only for cosmetic use – was detected.

The presence of this hazardous chemical was discovered by BPOM during a routine inspection of Roti Okko's production facilities. This finding raised concern because the use of such substances poses significant health risks to consumers.

Following the discovery, BPOM immediately coordinated with BPJPH to ensure comprehensive follow-up handling. The coordination process included confirming findings, gathering additional evidence through facility tracing, collecting samples, and conducting laboratory testing. Although coordination occurred, each agency continued performing its respective legal duties within the framework of existing regulatory mechanisms.

BPOM's follow-up mechanism included periodic inspection, sample testing of the product and its label, and subsequent quality testing. BPOM then classified whether product recall was necessary.¹⁴ In the Roti Okko case, the company was proven to have used hazardous chemical preservatives, requiring a recall and cessation of product distribution. The recall was categorized as Class I due to its potential to cause serious harm or death.¹⁵ Therefore, BPOM ordered the cessation of all Roti Okko product distribution and sales, serving as a measure to protect consumers' rights to safe and eligible food.

In addition to classifying the recall level, BPOM issued a public warning to inform the public that the product contained hazardous chemicals and should not be consumed. This step is part of post-market surveillance aimed at increasing consumer awareness.

BPOM subsequently issued an official recall order addressed to the producer, distributors, and the Regional BPOM Office in Bandung as field supervisors. The order required complete product withdrawal within 14 calendar days and mandatory periodic reporting by the producer on recall progress.

After receiving recall reports, BPOM conducted a verification inspection to ensure that all hazardous products were successfully removed. This verification process formed the final stage of legal enforcement in the case.

Simultaneously, BPJPH's supervisory team coordinated with BPOM to examine product samples and inspect the production site to verify halal compliance. The

¹⁴ Imelda Hera Natalia and Handoyo Prasetyo. "Tinjauan Yuridis Perlindungan Konsumen Terhadap Pangan Olahan Impor Tanpa Izin Edar : Studi Kasus Pemusnahan Satu Ton Milk Bun Asal Thailand" *Media Hukum Indonesia (MHI)* 2, no. 3 (2024).

¹⁵ Anak Lampiran I Peraturan Kepala BPOM Nomor 22 Tahun 2017 tentang Penarikan Pangan dari Peredaran.

inspection covered ingredients, production processes, and equipment to prevent cross-contamination.

Findings revealed inconsistencies between the ingredients used and the composition submitted during halal certification. BPJPH declared that the producer had failed to maintain halal assurance obligations as required under Government Regulation No. 39 of 2021 concerning Halal Product Assurance Implementation. Article 65 requires business operators to implement a Halal Product Assurance System (BPJPH),¹⁶ and Article 84 paragraph (1) requires reporting any changes in product composition.¹⁷ Based on these provisions, the producer's failure to report ingredient changes constitutes a legal violation. The argument that halal enforcement discriminates against business operators is therefore unfounded because the law aims to protect Muslim consumers' rights.¹⁸

BPJPH subsequently issued sanction recommendations, which were determined by the Head of BPJPH. Based on findings and coordination outcomes, sanctions included revocation of halal certification and recall. However, because the recall was already executed by BPOM, BPJPH focused solely on halal certificate revocation and continued monitoring efforts. If monitoring confirms full recall, the producer must destroy the remaining product under BPOM and BPJPH supervision to ensure accountability and prevent redistribution.

This case demonstrates the importance of institutional synergy between BPOM and BPJPH in enforcing food safety and halal compliance. The collective revocation of the distribution permit and halal certification underscores that any violation—whether related to safety or halal integrity—carries serious consequences.

The effectiveness of coordination is evident from synchronized sanctions producing maximum legal and economic impact. However, BPJPH's reliance on BPOM's laboratory findings indicates a reactive supervision model that may delay timely enforcement. Enforcement challenges also stem from reliance on producer compliance. Although BPOM classified the recall as Class I—requiring the strictest level of control—the outcome still depends on the producer's cooperation, presenting risks in post-market supervision.

The sanction mechanism applied reflects compliance with Due Process of Law, including valid evidence, inspection, sampling, and laboratory confirmation prior to sanction decisions. The 14-day recall deadline also acknowledges producers' procedural

¹⁶ Pasal 65 Peraturan Pemerintah Nomor 39 Tahun 2021 tentang Jaminan Produk Halal.

¹⁷ Pasal 84 ayat (1) Peraturan Pemerintah Nomor 39 Tahun 2021 tentang Jaminan Produk Halal.

¹⁸ Konoras, Abdurrahman. *Jaminan Produk Halal Di Indonesia Perspektif Hukum Perlindungan Konsumen*. Rajawali Pers. 2017

rights, although further analysis is needed regarding explicit avenues for legal objection or appeal.

Finally, enforcement also aligns with principles of Good Governance. Transparency was fulfilled through public warning issuance, while accountability was ensured through supervisory oversight during product destruction. This case exemplifies state commitment to responsible and transparent food and halal regulation.

2. Legal Implications of Revoking Distribution Permits and Halal Certification on Food Products Containing Hazardous Chemicals

Law enforcement is a fundamental issue faced by every society.¹⁹ In the context of food regulation, law enforcement functions not only as a repressive mechanism against violations but also as a preventive instrument to ensure compliance among business actors. The existence of a distribution permit and halal certification plays a vital role in ensuring that every product circulating in the community meets established safety, quality, and halal standards.

However, in practice, violations of these regulations remain prevalent, particularly in the use of prohibited food additives or amounts exceeding permissible limits. The use of hazardous preservatives not only violates regulatory provisions but also threatens consumer safety and undermines public trust in the national food surveillance system. This situation is evident in the case of the Roti Okko product, which used a prohibited preservative in its processed food ingredients.

In the Roti Okko case, the producer was found to have used Sodium Dehydroacetate, a chemical substance banned for processed food and designated solely for cosmetic use. The use of such a substance poses serious health risks. Based on this finding, BPOM imposed administrative sanctions in the form of revocation of the product's distribution permit and mandatory product recall. Meanwhile, BPJPH revoked the halal certification due to discrepancies between the actual composition and the data submitted during certification.

The legal basis for product recall is regulated under Article 7 of the Head of BPOM Regulation No. 22 of 2017 concerning Food Recall, which authorizes BPOM to act against producers who violate food safety standards. The regulation classifies recalls based on potential health risks. Roti Okko was categorized as Class I recall because the product contained a banned food additive, Sodium Dehydroacetate, which is suspected of

¹⁹ Yusmanita, 'Penegakan Hukum Terhadap Tindak Pidana Penggunaan Bahan Berbahaya Untuk Produksi Pangan Industri Rumah Tangga Di Kota Pontianak Berdasarkan Undang-undang Tentang Pangan.' *Jurnal Nestor Magister Hukum*, 3.4.

causing serious health problems, including death. Therefore, the recall of Roti Okko was classified at the highest severity level.

The implementation of a Class I recall demonstrates that Indonesia's food surveillance mechanism adheres to the precautionary principle to prevent serious health risks. The implications of such sanctions extend beyond revocation and may include mandatory destruction of harmful products. Legally, the revocation of a distribution permit and halal certification serves as a deterrent, encouraging stronger compliance among food producers.

Operationally, revocation of a distribution permit requires not only cessation of product circulation but also destruction of all hazardous products to prevent re-entry into the market. This underscores that violations of food regulations are not merely administrative in nature but carry serious legal consequences affecting business sustainability and producer accountability.

As part of legal responsibility, the producer must carry out the recall and destruction process under the supervision of BPOM and BPJPH. The producer is required to withdraw all products distributed through supply chains and provide periodic progress reports to ensure identification and retrieval of all affected products. Because this case falls under the Class I recall category, the reporting period was set within 30 days as stipulated in BPOM's recall order.

In addition to the revocation and destruction process, BPJPH's decision to revoke the halal certification carries significant implications, especially for Muslim consumers who rely on halal labeling as a guarantee of product safety and halal integrity. This decision demonstrates that halal status must be aligned with the *thayyib* (safe and wholesome) principle. Thus, if a halal-certified product is found to contain hazardous ingredients, its halal status may also be revoked. The legal consequence therefore extends beyond administrative sanctions to reinforce producer accountability in ensuring halal integrity and product safety.

Following product withdrawal, full responsibility lies with the producer to ensure lawful destruction of the recalled products. This destruction must occur at licensed facilities that comply with hazardous and toxic waste (B3) disposal standards. This obligation is mandated because the product contains Sodium Dehydroacetate categorized as B3 waste. Thus, destruction must follow applicable environmental regulations, such as Government Regulation No. 22 of 2021 on Environmental Protection and Management, to prevent environmental pollution and protect public health.

The legal implications arising from the revocation of the distribution permit and halal certification extend beyond administrative sanctions to potential civil and criminal

liability. Under consumer protection law, producers may be sued for damages, including refunds, compensation, or reimbursement of potential losses as stipulated in Article 19(1) of the Consumer Protection Law.²⁰ Although no direct consumer harm was reported in this case, the violation of food safety regulations opens the possibility of future civil claims.

From a criminal perspective, the use of prohibited food additives constitutes a violation of Article 75(1) of Law No. 18 of 2012 on Food.²¹ Producers proven to violate this Article may be subject to sanctions under Article 136 of the same law, which provides imprisonment of up to five years or fines up to Rp 10,000,000,000. The existence of criminal sanctions illustrates that the law functions both preventively and repressively to address serious risks posed to public health.

Additionally, revocation of halal certification results in the loss of the producer's right to use halal labeling, significantly affecting consumer trust and causing economic loss. Thus, the legal consequences include administrative, civil, and criminal liabilities, underscoring the importance of compliance with halal certification and distribution permit regulations as a form of legal protection for the public.

The Roti Okko case clearly illustrates how noncompliance with food regulatory requirements may result in wide-ranging legal consequences. From a legal perspective, violations of food safety and halal standards are not only viewed as harm to consumers but also as breaches of the precautionary principle that requires preventive measures before products reach the market. Accordingly, producer responsibility extends beyond production to distribution and consumer-level monitoring.

The enforcement of a Class I recall, halal certification revocation, and the potential imposition of criminal sanctions reflect proportional state action aligned with risk severity. Within the framework of consumer protection, these sanctions serve as both precautionary enforcement and deterrence. Such sanctions are appropriate, as they protect fundamental consumer rights and enforce strict liability principles.

In the Roti Okko case, the mandates of BPOM and BPJPH operate as complementary rather than overlapping authorities—BPOM overseeing safety and quality (*thayyib*), whereas BPJPH ensures halal compliance. Revocation of both permits demonstrates integrated enforcement where violations of food safety result in automatic loss of halal status, reinforcing trust among Muslim consumers.

²⁰ Revania Nanda and Dwi Desi Yayi Tarina. "Perlindungan Konsumen Terhadap Transaksi Jual Beli Online Kosmetik Bermerek Palsu Melalui E-Commerce" *Hukum dan Masyarakat Madani* 12, no.1 (2022).

²¹ Pasal 75 ayat (1) Undang-undang Nomor 18 Tahun 2012 tentang Pangan.

The implications of this case should be understood within the broader context of public policy and consumer protection. Effective food regulation requires not only strong institutional enforcement by BPOM and BPJPH but also awareness and compliance among producers and consumers. In the long term, strong sanction enforcement must be accompanied by legal education to ensure that compliance is seen not merely as an administrative requirement but as an ethical commitment to public trust and sustainability in the national food industry.

CONCLUSION

The Okko Bread case demonstrates that the withdrawal of distribution permits by BPOM and the revocation of halal certification by BPJPH function as an essential form of integrated legal enforcement in consumer protection, applying proportionate sanctions based on the severity and potential harm of food safety violations. Juridically, the coordinated actions of both institutions illustrate complementary authority, where violations of food safety automatically trigger the loss of halal integrity, reflecting a dual-enforcement model grounded in the principles of good governance, transparency, and accountability. However, the critical assessment reveals regulatory gaps, particularly due to the reactive nature of sanctions, the strong reliance on producer compliance, and the absence of a clear mechanism for objection or appeal, which undermines the full realization of due process of law for business actors.

To strengthen this regulatory framework, the study proposes harmonization of policies and closure of legal loopholes. BPOM and BPJPH should establish a Joint Regulation governing an integrated sanction pathway and standardized reporting procedures for composition changes to prevent procedural inefficiencies. Furthermore, legislative and regulatory bodies must clarify administrative dispute mechanisms to ensure legal certainty for producers contesting permit and certification withdrawal decisions. At the industry level, producers must reinforce compliance with the Halal Assurance System, integrating safety (*thayyib*) principles and shifting regulatory adherence from a formal obligation to an ethical commitment. This study concludes that enhancing institutional synergy through regulatory harmonization is key to achieving effective multi-dimensional consumer protection.

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