

JURIDICAL ANALYSIS OF THE GOVERNMENT'S NEGLECT OF THE NUTRITIONIST'S ROLE IN THE FREE NUTRITIOUS MEAL PROGRAM

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Abstract

This study analyzes the neglect of the nutritionist's role in the Free Nutritious Meal Program and assesses its compliance with legal provisions regulated in Law Number 17 of 2023 concerning Health, as well as technical regulations in the field of nutrition. This research uses a normative legal research method by examining relevant legislation, technical nutritional guidelines, and scientific literature. The findings indicate a disharmony between the legal norm which clearly mandates the involvement of nutritionists in the planning, implementation, and evaluation of nutritional intervention programs and the government's policy practice, which fails to adequately accommodate this role. This neglect has implications for low quality assurance, potential inaccuracy in menu formulation, and weak accountability in program governance. Consequently, it can be qualified as a form of non-compliance with nutritional service standards and the principle of public health rights protection. This study recommends the refinement of operational regulations, the reinforcement of the nutritionist's role within the program structure, and the enhancement of monitoring mechanisms so that the Free Nutritious Meal Program can run effectively, adhere to professional standards, and ensure the fulfillment of the public's right to safe and quality nutrition.

Keywords: *Nutritionist; Free Nutritious Meal; nutrition regulation; policy accountability*

INTRODUCTION

The Free Nutritious Meal Program (Program Makan Bergizi Gratis) rolled out by the government is a strategic policy aimed at improving public health quality, reducing stunting prevalence, and enhancing national nutritional resilience. However, the implementation of this program has sparked various debates, particularly concerning the minimal involvement of nutritionists as professional personnel who possess specific competencies in the planning, execution, and evaluation of nutritional interventions (Azzahra, L., et al., 2024). In the context of national regulation, Law Number 17 of 2023 on Health, along with its derivative regulations, has affirmed the importance of strengthening human resources in the health sector, including nutrition personnel, as an integral part of public health efforts. Yet, these normative provisions do not appear to be fully reflected in the operational policy of the Free Nutritious Meal Program, creating a gap between the applicable legal framework and the program's practical implementation in the field. This disparity has become a fundamental issue demanding a comprehensive juridical review (Arif, Z., & Pribadi, E. T., 2025).

The success of a nutritional intervention program is significantly influenced by the involvement of professional nutrition personnel who have standardized academic qualifications and competencies in menu design, calculating nutritional needs, ensuring food safety, and monitoring the impact of nutritional interventions on target groups. Food aid or nutrition programs that do not adequately involve nutrition personnel tend to suffer from ineffectiveness, inaccuracy in targeting, and even potential budget wastage due to the incompatibility of menu formulation with the physiological needs of the beneficiaries. Furthermore, the certainty of regulation governing the role, authority, and obligations of nutrition personnel in every public policy directly related to the fulfillment of the right to health is crucial. Nevertheless, literature specifically discussing the disharmony between the regulation of the nutritionist's role in the latest Health Law and the implementation of national-scale government programs, such as the Free Nutritious Meal Program, is still relatively limited (Zulfiani, E., & Layinatul Fuadah, L., 2023).

This condition indicates a legal gap in legal studies regarding how the state should explicitly accommodate, regulate, and integrate the role of nutritionists in national policies based on nutritional intervention. This legal gap is not only related to the absence of adequate operational norms but also to the weak accountability mechanism of the government in ensuring that professional nutrition standards are consistently applied in public programs. Constitutionally, the state is obligated to guarantee the fulfillment of the right to health, including the right to proper food and nutrition, as stipulated in the 1945 Constitution. The absence of nutritionists in the program's design and execution potentially degrades the quality of service, disregards professional standards, and hinders the achievement of national health development goals (Saniyah, N. D. Z., et al., 2025).

On Monday November 17, 2025, a statement by a Deputy Speaker of the House of Representatives (DPR RI) regarding the unnecessary role of nutrition experts in the Free Nutritious Meal Program (MBG) triggered a polemic after a video snippet went viral on social media. During a consolidation event for the MBG Nutritional Fulfillment Service Unit (SPPG) across Bandung Regency, the Deputy Speaker interrupted a presentation by a nutritionist who was detailing technical issues related to the rampant placement of non-nutritionists in functional nutrition positions and proposing collaboration between the National Nutrition Agency (BGN) and the Indonesian Nutritionist Association (PERSAGI) to fulfill the need for competent professional personnel, including sanitation experts in every service unit. The Deputy Speaker's response, which deemed the nutritionist's stance as arrogance, was then accompanied by his statement that policy drafting falls under the legislative authority, and his plan to propose changing the nomenclature of "nutritionist" to "nutrition supervisor" so that it no longer requires specific professional qualifications. Furthermore, he asserted that the MBG does not need Persagi or nutritionists because, according to him, anyone can become a nutritionist through a brief three-month training course with a National Professional Certification Agency (BNSP) certification. This controversy raises fundamental questions about respect for professional standards, the boundaries of policymaking authority, and the legal implications of placing non-professional personnel in strategic programs concerning the right to health and food safety (Kompas.com, 2025).

Therefore, this study is important and urgent. First, to provide a juridical analysis that can explain the extent of alignment between the provisions of Law No. 17 of 2023 on Health and the implementation of the Free Nutritious Meal Program, particularly concerning the role of nutrition personnel. Second, this research can fill the literature gap regarding nutrition regulation and the involvement of nutrition professionals in public policy. Third, the results of the analysis are expected to provide recommendations for improving regulation and its implementation mechanism so that government programs are not only administratively executed but are also evidence-based, meet professional standards, and guarantee legal protection for the community as beneficiaries. Thus, this research is expected to make a substantive contribution to strengthening the governance of national nutrition policy, while realizing a more effective, just, and sustainable nutritional intervention program.

RESEARCH METHOD

The research method used in this study is normative legal research, which focuses on the analysis of legal rules, principles, and doctrines related to the role of nutritionists in the Free Nutritious Meal Program. This research examines various legislative provisions, particularly Law No. 17 of 2023 on Health, its derivative regulations, and other regulations governing professional standards and the authority of nutrition personnel. Data is obtained through library research (*studi kepustakaan*) by utilizing primary legal materials such as laws and government regulations, secondary legal materials in the form of scholarly literature and previous research, and tertiary legal materials such as legal dictionaries and encyclopedias. Analysis is conducted through legal interpretation techniques, including systematic, teleological, and historical interpretation, as well as a conceptual and statutory approach to examine the definition, scope, and authority of nutrition personnel from a health law perspective. A juridical-critical approach is applied to identify legal gaps, normative disharmony, and inconsistencies between regulations and the practice of government programs (Marzuki, P. M., 2017).

RESULT AND DISCUSSION

1) Regulation of the Role and Authority of Nutritionists in the National Health System Based on Law No. 17 of 2023 on Health

The regulation regarding the role and authority of nutritionists in Law Number 17 of 2023 on Health indicates a strengthening of the legitimacy of the nutrition profession as an integral part of the national health system. This Law explicitly positions nutrition personnel as one of the health workers who possess the professional competence to implement efforts to improve the nutritional status of the community. This recognition is reflected in the provisions concerning the implementation of public health efforts, which affirm that the fulfillment of nutritional needs is part of preventive and promotive health services. Thus, nutritionists are no longer positioned merely as supporting personnel, but as key actors in the planning, implementation, and evaluation of nutritional interventions based on physiological needs and national food security standards. This regulation emphasizes that the presence of nutritionists is a crucial prerequisite for guaranteeing the quality of nutritional interventions, while

simultaneously addressing public health challenges such as stunting, anemia, obesity, and chronic malnutrition (Amalia, R., & Rekon, R. 2022; Arif, Z., & Pribadi, E. T., 2025).

In the context of authority, Law No. 17 of 2023 provides scope for nutritionists to practice their profession independently or collaboratively with other health professions. This authority includes menu planning, calculating nutritional needs for individuals and groups, community nutrition education, monitoring nutritional status, and supervising food safety at the community and institutional levels. The Law also mandates the existence of competency standards, registration, and certification that nutrition personnel must meet to practice legally. This provision shows that the state has granted strong legal legitimacy to the nutrition profession, while also ensuring that the nutritional services provided to the public have quality, safety, and accountability that comply with scientific standards. From a health system perspective, this affirms that the professionalization of nutrition personnel is part of the strategy to improve the quality of national health resources (Arif, Z., & Pribadi, E. T., 2025).

However, although the normative regulation in the Health Law indicates a strengthening of the nutritionist's position, the concrete implementation in public policies, including the Free Nutritious Meal Program, is still not aligned with this regulative mandate. Many operational steps in the program do not explicitly require the involvement of nutrition personnel at every stage, thus creating a gap between written law and its implementation. Juridically, the presence of a nutritionist is a consequence of the professional recognition granted by the law. If the government ignores the obligation to involve nutritionists in a nutrition intervention-based program, it can be categorized as a form of non-compliance with an imperative legal norm. The absence of nutritionists in menu formulation, calculation of nutritional needs, and quality control of food potentially reduces the program's effectiveness, obscures accountability, and may lead to misdirected budget usage (Zulfiani, E., & Layinatul Fuadah, L., 2023; Nugroho, A. A., et al., 2025).

Furthermore, Law No. 17 of 2023 mandates that every health policy must consider the aspect of evidence-based policy. In the field of nutrition, scientific evidence shows that the success of interventions can only be achieved if they are managed by professionals who comprehensively understand nutritional science. When a government program does not include nutrition personnel as part of the implementing structure, the policy does not fulfill the evidence-based principle and potentially contradicts the spirit of the Health Law itself (Oddo, V. M., et al., 2022). Thus, the Free Nutritious Meal Program, which is not integrated with the role of nutritionists, precisely demonstrates a disharmony between legal norms and public policy, and indicates a weakness in the governance of the national health system.

2) National and Technical Nutrition Regulation Provisions on the Standard Involvement of Nutritionists in the Planning, Implementation, and Evaluation of Nutritious Food Programs

The regulation concerning the involvement of nutritionists in both national and technical nutrition regulations has essentially formed a sufficiently comprehensive legal framework to ensure the quality of food and nutrition interventions. At the national level, various regulations such as the Minister of Health Regulations on nutrition service standards, guidelines for food quality management systems, and technical guidelines for handling nutrition problems clearly

mandate the presence of competent nutrition personnel at every stage of program implementation. These regulations affirm that nutritionists have the authority to conduct nutritional needs assessment, formulate menu plans and nutrition interventions, ensure food safety, and monitor the nutritional status of target groups. Thus, national nutrition regulations have established the standard that any form of program-based nutritional intervention must involve nutritionists as a strategic element in the governance of nutrition services (Amalia, R., & Rekon, R. 2022).

In the aspect of planning, nutrition regulations place nutritionists as the party responsible for conducting situation reviews, calculating the specific nutritional needs of the target population, and determining the menu composition based on nutritional recommendations consistent with national and international standards. These technical provisions are reflected, for instance, in the guidelines for preparing institutional menus, supplementary feeding (PMT) guidelines, and nutrition management guidelines in the community. All these documents consistently mandate that menu planning is not merely an administrative activity but a scientific process requiring the academic competence of nutrition personnel. This role is crucial because a failure in nutrition planning can directly impact nutritional inaccuracy, mismatch with physiological needs, or even pose a risk to food safety (Azzahra, L., et al., 2024).

During the implementation stage, technical regulations stipulate that nutritionists must participate in quality control, food safety control, food preparation, and food distribution to target groups. This supervision covers sanitation aspects, recalculation of nutritional values, and verification of whether the menu served aligns with the standards established during the planning phase. This provision emphasizes that the execution of a nutritious food program is not just about cooking or distributing food but a public health process requiring professional expertise. The absence of nutritionists during the implementation phase can lead to the risk of menu deviations, a decline in nutritional quality, and even potential health problems due to unmaintained standards of hygiene and food safety (Zulfiani, E., & Layinatul Fuadah, L., 2023; Wicaksono, E. N., 2025).

Meanwhile, in the evaluation stage, nutrition regulations mandate the involvement of nutritionists in monitoring the program's impact on community nutritional status, analyzing results, and making recommendations for improvement. Evaluation is carried out through anthropometric measurements, consumption behavior interviews, and nutritional adequacy analysis, all of which require scientific interpretation skills. Without the involvement of nutritionists, program evaluation potentially becomes invalid, not evidence-based, and unable to provide a true picture of the effectiveness of the interventions carried out. The regulation clearly positions evaluation as a scientific process that cannot be substituted by non-professional personnel (Maliati, N., 2023; Sari, M. D., 2024).

Nevertheless, despite the fact that national and technical regulations have detailed standards for the involvement of nutritionists, the reality of implementation on the ground, especially in the Free Nutritious Meal Program, shows a reduction of the role or even disregard for this mandate. The government, in many cases, only emphasizes the administrative and logistical provision of food, without ensuring the involvement of nutritionists in accordance with the standards set by technical regulations. This situation not only creates disharmony between norms and practice but also illustrates the weak commitment of the government in

translating the regulatory framework into operational mechanisms. Yet, normatively, nutrition regulations have been designed to ensure that every nutrition intervention is carried out by parties with professional competence to protect the health rights of the community (Fikri, S., & Hikam, R. M., 2025; Saniyah, N. D. Z., et al., 2025).

Thus, it can be concluded juridically that nutrition regulations, both national and technical, explicitly mandate the involvement of nutritionists in the planning, implementation, and evaluation of nutritious food programs. However, the effectiveness of these regulations is highly dependent on the consistency of implementation at the policy level. If the involvement of nutrition personnel is ignored, as in the implementation of the Free Nutritious Meal Program, the government is not only violating technical standards but also disregarding the principles of health protection guaranteed by regulation. This gap is the main problem and demands attention through a more in-depth juridical review to ensure that nutrition regulations are executed according to their mandate to guarantee the quality of national nutritional interventions.

3) Alignment of the Free Nutritious Meal Program Policy with Legislation Regarding the Role of Nutritionists

The analysis of the government's policy conformity in the Free Nutritious Meal Program with legislative provisions indicates a discrepancy between the applicable legal norms and the policy practice. Normatively, Law No. 17 of 2023 on Health explicitly places nutritionists as health workers with professional authority in organizing public health efforts, including fulfilling nutritional needs and providing nutritious food. The Law mandates that every nutrition intervention must be competency-based, evidence-based, and implemented by health workers who meet professional standards. This provision provides a strong basis for the systematic involvement of nutritionists in programs related to food provision and nutritional intervention, encompassing planning, implementation, and evaluation (Arif, Z., & Pribadi, E. T., 2025).

However, a closer analysis of the Free Nutritious Meal Program policy reveals that the involvement of nutritionists is not a primary component in its design or execution. In several policy documents and official statements regarding the program, stronger emphasis is placed on logistics, food provision, and budget management, without affirming that nutritionists must be a mandatory technical element. The absence of provisions regarding the nutritionist's role in the program implementation guidelines indicates a reduction of the legal norm that should serve as the operational basis. Yet, based on national nutrition regulations and applicable technical guidelines, nutritionists have a central role ranging from menu planning that meets Recommended Dietary Allowance (RDA) standards, calculating nutritional needs based on age groups, supervising food quality and safety, to evaluating the program's impact on participants' nutritional status (Fikri, S., & Hikam, R. M., 2025; Viriana, B., & Tjoneng, A., 2025).

This inconsistency is further apparent when compared to technical nutrition regulations that have established standards for the involvement of nutrition personnel in every institutional food program. These regulations meticulously stipulate that menu planning cannot be carried out by non-professional personnel, and that every food service related to public health must be under the supervision of a nutritionist. However, the implementation of the Free Nutritious Meal Program tends to sideline this role, thereby opening up potential risks of unguaranteed

nutritional quality, inaccurate targeting, and weak control over food safety. Consequently, the program policy not only fails to meet technical standards but also potentially violates the principle of public health accountability regulated in the Health Law.

Furthermore, Law No. 17 of 2023 emphasizes the importance of applying an evidence-based policy approach in health policy. Scientific evidence demonstrates that the success of nutrition intervention programs depends on the involvement of nutritionists who possess academic competence, assessment skills, and a deep understanding of menu planning and nutritional quality control. The non-involvement of nutritionists in the Free Nutritious Meal Program means that the policy does not fully adhere to the evidence-based principle, thus making it inconsistent with the mandate of the Law. A program not based on professional standards risks creating budget wastage due to inaccurate nutritional formulation and may even threaten the public's right to health if the provided food does not meet minimal nutritional standards (Arif, Z., & Pribadi, E. T., 2025; Virlana, B., & Tjoneng, A., 2025).

In conclusion, the government's policy in the Free Nutritious Meal Program is not yet consistent with the legislative provisions, both in Law No. 17 of 2023 and other technical nutrition regulations. This inconsistency points to a gap between normative regulation and policy implementation, and reflects the weak commitment of the government in ensuring that national nutrition interventions are carried out based on health law principles and professional standards. The disregard for the role of nutritionists is not merely a violation of regulatory provisions but also potentially reduces the program's effectiveness and harms the community as beneficiaries. Therefore, the harmonization of policy with legal norms and nutrition regulations is an urgency that cannot be overlooked to ensure that the Free Nutritious Meal Program operates accurately, safely, and in accordance with applicable scientific standards.

4) Qualification of the Neglect of the Nutritionist's Role as a Form of Non-Compliance or Violation of Legal Provisions Concerning Nutritional Services and Public Health Program Governance

The analysis of the neglect of the nutritionist's role in the Free Nutritious Meal Program suggests that this action can be qualified as a form of non-compliance, with the potential to constitute a violation of legal provisions concerning nutritional services and public health program governance. Fundamentally, Law No. 17 of 2023 regarding Health has established nutritional services as an integral part of the implementation of promotive, preventive, curative, and rehabilitative health efforts. Within this framework, nutritionists are granted the professional mandate to ensure that every nutritional intervention conducted by the government or public institutions adheres to scientific standards and minimum service standards (Arif, Z., & Pribadi, E. T., 2025). Consequently, the exclusion of nutritionists from a national-scale food program like the Free Nutritious Meal Program can be considered contrary to the basic norms regulated by the law.

Furthermore, from the perspective of technical regulations related to nutritional services, the neglect of the nutritionist's role is deemed inconsistent with institutional nutrition management guidelines, which stipulate that all food provision activities for community groups, especially those involving public funding, must be under the supervision of nutritional personnel. These guidelines encompass standards for menu planning, calculation of nutritional

needs, food safety, sanitation of implementation, and the process of evaluating intervention impact. The absence of a nutritionist in the executive structure of the Free Nutritious Meal Program leads to the non-fulfillment of these standards. As a result, the program not only deviates from the established technical governance framework but also risks lowering the nutritional quality provided to target groups, particularly school children and other vulnerable populations (Zulfiani, E., & Layinatul Fuadah, L., 2023; Wicaksono, E. N., 2025).

From the perspective of public health governance, neglecting the nutritionist's role can also be viewed as a violation of the principles of accountability and quality of service. Law No. 17 of 2023 mandates that the government must guarantee the quality of health services provided to the public, including nutritional services. This quality can only be achieved if the government involves personnel with professional competency in accordance with professional standards. When a program that is substantively a nutritional intervention does not involve nutritionists, there is a breach of the professional authority that is regulated and protected by law. This neglect also potentially violates the public's right to receive nutritional services that are correct, safe, and appropriate to their physiological needs, as guaranteed in legal provisions regarding the right to Health (Zulfiani, E., & Layinatul Fuadah, L., 2023, Sanjaya, N. D. Z et al., 2025).

Moreover, this act of neglect can be understood as a form of non-compliance with the principle of evidence-based policy, which is the cornerstone of health policy formulation. Consistent scientific research indicates that nutritional interventions without the involvement of nutritionists tend to have lower effectiveness, are susceptible to menu formulation errors, and risk failing to meet appropriate nutritional standards (Oddo, V. M., et al., 2022). Therefore, when the government proceeds with the program without involving nutritionists, it runs counter not only to technical legal norms but also to scientific principles that have been juridically institutionalized within the health policy system through the Health Law. Consequently, policy correction and the reinforcement of operational regulations are necessary to ensure the program's execution truly aligns with the legal mandate and the established professional standards for nutritionists.

5) Juridical Implications of Neglecting the Nutritionist's Role on the Implementation of Government Programs and the Protection of the Public's Right to Safe and Quality Nutritional Services

The juridical implications of neglecting the nutritionist's role in the Free Nutritious Meal Program have a significant impact on the implementation of government programs and the protection of the public's right to safe, quality, and standards-compliant nutritional services. Normatively, Law No. 17 of 2023 on Health affirms that the government is responsible for providing health services that meet professional standards, minimum service standards, and the principles of safety and quality of service. When the government ignores the role of the nutritionist, who is explicitly recognized as a professional health worker, the government can be deemed to have failed to meet its legal obligation to guarantee the quality of nutritional interventions. This failure is not merely administrative but substantive, as it concerns legal certainty and the fulfillment of the public's right to quality health services (Amalia, R., & Rekon, R., 2022; Azzahra, L., et al., 2024).

A more specific juridical implication can be seen in the potential violation of provisions concerning nutritional service standards. Various technical regulations, including institutional nutrition management guidelines and minimum service standards, stipulate that nutritional personnel must be involved in the planning, implementation, and evaluation of nutritious food programs. Disregarding this obligation means the government is not running the program governance in accordance with the applicable laws and regulations. This non-compliance can be qualified as a form of maladministration in the provision of public services because the program proceeds without meeting the required professional standards. This maladministration opens the door for criticism, evaluation, and even corrective actions by supervisory bodies or other accountability mechanisms (Sari, M. D., 2024; Saniyah, N. D. Z., et al., 2025).

In the context of public rights protection, the juridical implication of neglecting the nutritionist's role becomes more complex. The public has a constitutional right to health guaranteed by Article 28H of the 1945 Constitution, including the right to adequate nutrition as a key determinant of health status. When the government provides a nutritional intervention without involving competent professional personnel, there is a potential violation of the public's right to safe and quality nutritional services. This violation can occur through non-standard menus, inadequate nutrient intake, or compromised food safety (Maliati, N., 2023; Wicaksono, E. N., 2025). Thus, neglecting the nutritionist's role directly threatens the fulfillment of public rights, especially for vulnerable groups such as schoolchildren who are the program's targets.

Another juridical implication relates to the aspect of accountability in government program implementation. Every public policy utilizing the state budget must be carried out based on the principles of effectiveness, efficiency, and legal accountability. Without the involvement of nutritionists, program effectiveness becomes difficult to measure scientifically, impact evaluation is rendered invalid, and budget utilization potentially fails to reach its intended target. This can lead to legal issues in the form of budgetary waste (inefficiency) or program failure, which contravenes the general principles of good governance. From the perspective of state administrative law, this condition can be categorized as an error in policy implementation procedures or a violation of the obligation to meet minimum service standards (Nugroho, A. A., et al., 2025; Virlana, B., & Tjoneng, A., 2025).

The juridical implications of this neglect also potentially affect the legitimacy of the government program as a whole. The Free Nutritious Meal Program, despite having positive social goals, will lose its legal basis and implementative quality if not executed according to the mandate of the law. A program that fails to comply with nutritional regulations and professional provisions risks inviting lawsuits or demands for policy correction from the public, professional organizations, or public service oversight bodies. Therefore, neglecting the nutritionist's role is not merely a technical issue but a legal problem that touches upon the aspects of state responsibility, protection of public rights, and the integrity of national program governance. Consequently, integrating the nutritionist's role is a fundamental requirement for this program to operate according to legal standards, fulfill public health principles, and provide optimal benefits for citizens.

CONCLUSION

The neglect of the nutritionist's role in the Free Nutritious Meal Program creates a discrepancy between government policy and the applicable legal provisions in Law No. 17 of 2023 concerning Health, as well as various technical regulations related to nutritional services. Normatively, the legislation has affirmed the mandatory involvement of nutritionists in the planning, implementation, and evaluation of nutritional intervention programs. However, the program's implementation shows a disharmony with this mandate, potentially leading to a decline in the quality of nutritional services, weakening policy accountability, and threatening the public's right to access safe and quality nutrition. This gap between the legal norm and its execution not only indicates weak program governance but also carries the potential for maladministration and violations of public health protection principles. It is hoped that the government will immediately review the design and operational guidelines of the Free Nutritious Meal Program by ensuring the involvement of expert nutritionists at all stages of the program. This needs to be reinforced through the development of derivative regulations or Standard Operating Procedures (SOPs) that explicitly mandate the presence of nutritionists as part of the planning and implementation team. Additionally, nutritional professional organizations should be involved in independent evaluation and supervision to ensure the program's execution remains within the scope of scientific and professional standards. The government is also advised to enhance the institutional capacity of regional authorities to enable them to run the program in compliance with regulations and to secure adequate budget allocation for nutritional personnel. Thus, the national nutritional intervention program can be implemented effectively, meet legal provisions, and provide optimal protection for the public's right to adequate nutrition.

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