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RECONSTRUCTION OF BUSINESS LAW N THE GOVERNANCE OF THE FREE NUTRITIONAL MEAL PROGRAM IN INDONESIA

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ARTICLE INFORMATION	ABSTRACT
Keywords: *Business Law Reconstruction; Governance; Free Nutritional Meal Program; Procurement of Goods and Services; Legal Certainty.* ***How to quote:*** Trianti, Trias Paras. (2026). Reconstruction of Business Law in The Governance of The Free Nutritional Meal Program in Indonesia, *Critical Legal System,* 1 (2), 174-192. **DOI:** https://doi.org/10.68113/3cahv526	*The Free Nutritional Meal Program (MBG) is a strategic government policy aimed at improving human resource quality through the fulfillment of nutritional needs, particularly for students. Its implementation creates business legal relationships in government procurement, partnerships with business actors and MSMEs, and food supply-chain management. This study aims to analyze weaknesses in business law regulation governing the MBG Program and formulate a reconstruction model that supports effective, transparent, and equitable governance. This normative legal research uses statutory and conceptual approaches, with legal materials analyzed qualitatively through prescriptive juridical analysis. The results show that MBG governance weaknesses can be classified using Lawrence M. Friedman's legal system theory: legal substance remains fragmented in contractual standards, risk allocation, and business-actor protection; legal structure is weakened by overlapping functions and coordination gaps among implementing and supervisory institutions; and legal culture requires stronger compliance with procurement procedures, food-safety standards, transparency, contractual ethics, reporting, and oversight. Reconstruction is directed through five interrelated pillars: regulatory harmonization, contract standardization, institutional strengthening, reinforced oversight and dispute resolution, and empowerment of MSMEs, cooperatives, and Village-Owned Enterprises accompanied by a stronger compliance culture. The novelty of this study lies in integrating those five pillars into a substance-structure-culture reconstruction model, whereas the current governance framework primarily emphasizes administrative program implementation rather than integrated business-law relations. This model is intended to strengthen legal certainty, accountability, fairness, and sustainability in MBG governance.*

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A. Introduction

Indonesia, as a state based on the rule of law (rechtsstaat), places public welfare among the principal objectives of state administration. The fourth paragraph of the Preamble to the 1945 Constitution of the Republic of Indonesia affirms the state's responsibility to protect all Indonesians, advance public welfare, improve the nation's intellectual life, and contribute to maintaining world order.[1] Article 28C paragraph (1) and Article 28H paragraph (1) further guarantee the fulfillment of basic needs, access to health services, and a prosperous life for every citizen. These constitutional foundations require public programs to operate through clear and accountable legal norms directed toward social welfare.[2] The MBG Program also creates contractual and commercial relations alongside administrative relations, placing legal certainty, accountability, and balanced protection of the parties within its legal governance.

The fulfillment of nutritional needs directly influences human development because adequate nutrition contributes to health, intelligence, productivity, and national competitiveness. According to the World Health Organization, adequate nutrition for school-age children supports learning ability, cognitive development, and productivity in adulthood.[3] State policies concerning the provision of nutritious food accordingly form part of the implementation of constitutional responsibilities and long-term investment in the development of human resources.

The government implements the Free Nutritional Meal Program (MBG) through the National Nutrition Agency established under Presidential Regulation Number 83 of 2024. The program is directed toward improving the nutritional status of students, toddlers, pregnant women, and other vulnerable groups while strengthening the national food ecosystem through the participation of farmers, fishermen, cooperatives, micro, small, and medium enterprises (MSMEs), and other business actors in the food sector.[4] The involvement of these actors connects the fulfillment of nutritional needs with economic activities and legal relations arising from the procurement and distribution of food.

Presidential Regulation Number 115 of 2025 concerning Governance for the Implementation of the Free Nutritional Meal Program subsequently regulates program implementation, monitoring,

[1] Agus Hamzah and Rakhmat Bowo Suharto, "State Implementation of Welfare Law on Implementation of Human Rights in Local Governments," *Law Development Journal* 3, no. 1 (2021): 100-105, https://doi.org/10.30659/ldj.3.1.100-105

[2] Pandapotan Damanik et al., *Hukum Administrasi Negara: Teori, Prinsip, dan Praktik Tata Kelola Pemerintahan*, Medan: PT Media Penerbit Indonesia, 2024, page 77

[3] Saddam Rassanjani and Isramatur Rahmi, "Free School Meals Policy: Lessons Learned from Around the World for Indonesia," *Jurnal Ilmu Sosial* 24, no. 1 (2025): 1-28, https://doi.org/10.14710/jis.24.1.2025.1-28

[4] Markus Hadinata, "Free Nutritious Meal Policy in Indonesia under President Prabowo: A Policy, Fiscal, and Political Analysis Grounded in International Evidence," *Jurnal Bina Praja* 18, no. 1 (2026): 65-78, https://doi.org/10.21787/jbp.18.2026.2896

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supervision, evaluation, funding, and procurement of goods and services.[5] Its provisions provide direction and a legal foundation for the implementation of the MBG Program. The regulation primarily governs administrative aspects of program implementation, while contractual relations, allocation of operational and product-liability risks, contractual accountability, and proportional protection for participating business actors receive more general regulation.

The implementation of the MBG Program consequently creates civil and commercial legal relationships through government procurement, food supply contracts, and cooperation with MSMEs, cooperatives, and other business entities. These relationships involve rights and obligations that must be exercised according to legal certainty, good faith, proportionality, transparency, and accountability.[6] These principles correspond with the foundations of contract law and government procurement and provide the legal basis for regulating relations between the government and participating business actors.

Law Number 18 of 2012 concerning Food, Law Number 8 of 1999 concerning Consumer Protection, Law Number 20 of 2008 concerning MSMEs as amended by Law Number 6 of 2023 concerning Job Creation, and Presidential Regulation Number 16 of 2018 concerning Government Procurement of Goods/Services and its amendments provide the normative foundation for these legal relationships. Government procurement under these provisions is carried out efficiently, effectively, transparently, openly, competitively, fairly, and accountably.[7] Their application to the MBG Program connects food regulation, consumer protection, MSME development, procurement law, and contractual relations within one public program.

Authority for the MBG Program is distributed among several institutions, while contractual mechanisms, allocation of responsibilities, food-quality control, MSME protection, and dispute settlement are governed through different legal instruments. The relationship among these provisions influences the certainty of rights and obligations of the parties, particularly where default, food-quality problems, delayed performance, or program-related losses occur.[8] The effectiveness of the MBG Program accordingly depends on business law governance capable of regulating these relationships consistently in addition to adequate state funding.

The MBG Program also functions as an instrument of national economic development through legal relationships involving the government, the National Nutrition Agency, goods and service providers, cooperatives, Village-Owned Enterprises (BUMDes), MSMEs, and communities as

[5] Bawon Nul Hakim and Wahida Yuliana, "Implikasi Yuridis Perpres Nomor 83 Tahun 2024 terhadap Tata Kelola Program Makan Bergizi Gratis," *Ekspose: Jurnal Penelitian Hukum dan Pendidikan* 24, no. 2 (2025): 267-283, https://doi.org/10.30863/ekspose.v24i2.10485

[6] M. Rochman, *Pengadaan Barang dan Jasa Pemerintah dalam Konteks Peraturan Presiden No. 46 Tahun 2025: Versi Lengkap*, Pekanbaru: CV Bravo Press Indonesia, 2025, page 24

[7] Adam Khafi Ferdinand and Rinaldy Amrullah, "Micro Small-Level Enterprises (MSES) and Cooperatives in Presidential Regulation Number 12 of 2021," *JASSP (Journal of Advance in Social Sciences and Policy)* 1, no. 2 (2021): 103-113, https://doi.org/10.23960/jassp.v1i2.9

[8] Emirza Nur Wicaksono, "Program Makanan Bergizi Gratis dan Problematika Good Governance dalam Pengelolaan Keuangan Negara," *Jurnal Yuridis* 13, no. 1 (2026): 113-134, https://doi.org/10.35586/jyur.v13i1.14101

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beneficiaries.[9] The scale of this participation places legal certainty, a balanced distribution of rights and obligations, transparency, accountability, and fair business competition as principles governing the interaction among the parties. These principles connect the social objective of nutritional fulfillment with economic activities generated through the national food supply chain.

The concept of the welfare state places the state in a position of responsibility for fulfilling basic social needs through public policies directed toward public welfare. The Preamble to the 1945 Constitution and constitutional guarantees concerning social welfare provide the foundation for that responsibility in Indonesia. Through the MBG Program, the fulfillment of the right to food is linked to equitable economic development by involving local businesses in food production, procurement, and distribution.[10] The program consequently places public welfare and economic participation within the same field of state responsibility.

MBG implementation also gives rise to contractual relations between the government and business actors, distinguishing its legal characteristics from social assistance that relies primarily on administrative relations between the state and beneficiaries. Procurement contracts, food supply agreements, distribution arrangements, and partnerships apply principles of contract law, consumer protection, business competition, good corporate governance, and prudence in the use of state funds.[11] Regulatory coordination among these fields determines the certainty of contractual performance and accountability throughout program implementation.

Agustini and Mulyani examined the contribution of the MBG Program to educational quality and students' nutritional status, identifying inter-institutional coordination, funding certainty, and governance quality as factors affecting program effectiveness.[12] Their research focused on educational policy, leaving the legal implications of procurement, partnerships, and food supply activities for further examination. Basit and Ramadani explored the program's contribution to economic growth through increasing demand for local food products and expanding business opportunities, particularly in agriculture, livestock, fisheries, and food industries, with greater emphasis on economic outcomes than the legal certainty of contractual relationships among business actors.[13] Kusumawati, Muhandri, and Cahyadi examined the food supply chain and the involvement of local MSMEs in the implementation of the Free Nutritional Meal Program (MBG), identifying the role of business partners and cooperatives in food procurement and the

[9] Stepanus Makambombu, "Local Food, Centralized Governance, and the Limits of Policy Localization in Indonesia's Free Nutritious School Meal Program: Evidence from Sumba," *The Journal of Indonesia Sustainable Development Planning* 7, no. 1 (2026): 70-84, https://doi.org/10.46456/jisdep.v7i1.946

[10] Abdullah Fikri, "Program Makan Bergizi Gratis (MBG) dalam Perspektif Konstitusionalisme," *Justicia Sains: Jurnal Ilmu Hukum* 10, no. 2 (2025): 437-459, https://doi.org/10.24967/jcs.v10i2.4576

[11] Zulham, *Hukum Perlindungan Konsumen, Edisi Revisi,* Jakarta: Prenada Media, 2023, page 21

[12] Ucu Agustini dan Sri Mulyani, "Efektivitas dan Tantangan Kebijakan Program Makan Bergizi Gratis sebagai Intervensi Pendidikan di Indonesia," *Jurnal Kiprah Pendidikan* 4, no. 3 (2025): 362-368, https://doi.org/10.33578/kpd.v4i3.p362-368

[13] Muhammad Basit and Hikmah Ramadani, "Analisis Implementasi Program Makan Bergizi Gratis Terhadap Perkembangan Ekonomi," *Journal of Economics Development Research* 1, no. 2 (2025): 49-54, https://doi.org/10.71094/joeder.v1i2.105

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opportunities for strengthening MSME participation.[14] M. Adzan examined legal protection for business actors in government procurement contracts, particularly preventive and remedial protection in resolving contractual disputes. His research provides a legal perspective on the rights and obligations of parties involved in government procurement.[15] Abubakar et al. analyzed supervision of the MBG Program, identifying challenges related to performance standards, monitoring, reporting, and coordination among supervisory institutions.[16] These studies provide a foundation for examining business participation, contractual protection, and institutional accountability. The present research extends these discussions by analyzing the governance of the MBG Program through the relationship between legal substance, legal structure, and legal culture as the basis for business law reconstruction.

The reconstruction of business law in the governance of the Free Nutritional Meal Program (MBG) is guided by Pancasila values, particularly social justice, humanity, and public welfare. Pancasila provides a foundation for national legal reform by integrating justice, democratic values, social welfare, and legal awareness into the development of Indonesian law.[17] The Pancasila economic system prioritizes social balance, fair competition, and equitable distribution of development benefits as foundations for national economic activities.[18] Pancasila as the philosophical foundation of Indonesian economic law, connecting legal certainty, public benefit, and social justice with national development.[19] These perspectives support the reconstruction of business law in the MBG Program through fair contractual relationships, protection of participating business actors, accountability in procurement, and equitable economic opportunities consistent with the objectives of public welfare.

The reviewed studies concentrate on policy effectiveness, economic impact, MSME empowerment, educational outcomes, and governance. Their respective scopes leave business law reconstruction for MBG governance as a distinct area of legal research, particularly concerning the integration of contract law, corporate law, government procurement law, consumer protection, competition law, and good corporate governance. The relationship among legal substance, legal structure, and legal culture in the governance of the MBG Program also forms an analytical area

[14] Nike Kusumawati, Tjahja Muhandri, and Eko Ruddy Cahyadi, "Analisis Struktur Rantai Pasok Pangan dan Keterlibatan UMKM Lokal dalam Pelaksanaan Program Makan Bergizi Gratis (MBG) di Kota Tangerang Selatan," *Jurnal Manajemen dan Organisasi* 17, no. 3 (2026): 275-291, https://doi.org/10.29244/jmo.v17i3.73792

[15] Mohammad Adzan, "Perlindungan Hukum Pelaku Usaha dalam Sengketa Kontraktual Pengadaan Barang dan Jasa Konstruksi Pemerintah Ditinjau dari Aspek Hukum Perdata," *JISPENDIORA: Jurnal Ilmu Sosial Pendidikan dan Humaniora* 3, no. 3 (2024): 164-183, https://doi.org/10.56910/jispendiora.v3i3.3091

[16] Rodlial Ramdhan Tackbir Abubakar et al., "Strengthening the Supervision of the Free Nutritious Meal Program (MBG): Mechanisms, Challenges, and Strategic Solutions," *Publica: Jurnal Pemikiran Administrasi Negara* 18, no. 2 (2026): 465-491, https://doi.org/10.15575/jpan.v18i2.54996

[17] Prakoso Prakoso, Fathur Rokhman, and Eko Handoyo, "Pancasila as a Foundation for Legal Reform: Evaluating the Impact of Civic Education on Indonesian Legal Systems," *Journal of Law and Legal Reform* 5, no. 3 (2024): 1429-1468, https://doi.org/10.15294/jllr.v5i3.16498

[18] Arif Budimanta, "Struktur Ekonomi Pancasila (Pancasilanomics)," *Pancasila: Jurnal Keindonesiaan* 4, Special Edition (2024): 1-27, https://doi.org/10.52738/pjk.v4ix.522

[19] Alvin Yahya et al., "Integration of Pancasila Values in Economic Legal Engineering for National Development," *Walisongo Law Review* 6, no. 1 (2024): 56-70, https://doi.org/10.21580/walrev.2024.6.1.22259

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that has not been the principal focus of those studies. This position establishes the research gap addressed in the present study.

This study develops a reconstruction of business law for the governance of the Free Nutritional Meal Program directed toward strengthening legal certainty, protection of business actors, accountability in program implementation, and harmonization between business law and state administrative law. The proposed reconstruction is intended to support effective, transparent, equitable, and sustainable governance consistent with the objectives of the welfare state. Its novelty lies in formulating business law reconstruction through an analysis of legal substance, legal structure, and legal culture, which is subsequently organized into five interrelated governance pillars.

B. Research Methods

This research is normative legal research using a statutory approach (statute approach) and a conceptual approach (conceptual approach). The statutory approach is used to examine regulations related to the Free Nutritional Meal Program, government procurement of goods and services, consumer protection, and MSME empowerment. The conceptual approach is used to analyze legal certainty, legal protection, business law, and Lawrence M. Friedman's legal system theory as the analytical basis for legal reconstruction. The legal materials consist of primary legal materials in the form of laws and regulations, secondary legal materials in the form of books and scientific journals, and tertiary legal materials in the form of legal dictionaries and encyclopedias. Legal materials were collected through literature study and analyzed qualitatively using prescriptive juridical analysis to identify weaknesses in legal substance, legal structure, and legal culture and to formulate the concept of business law reconstruction in the governance of the Free Nutritional Meal Program in Indonesia.

C. Research Results and Discussion

1. Business Legal Regulations in the Governance of the Free Nutritional Meal Program in Indonesia

The Free Nutritional Meal Program (MBG) involves the government, the National Nutrition Agency, business actors, cooperatives, MSMEs, and goods and service providers in fulfilling the community's right to food and nutrition. The participation of these parties creates business relationships through the procurement, supply, and distribution of nutritious food. Each relationship gives rise to rights and obligations governed by the principles of legal certainty, justice, transparency, and accountability. The implementation of the MBG Program consequently serves public welfare objectives through business activities subject to various statutory provisions.[20]

[20] Abd Rahman, Muhammad Fikri, and Haura Mudya Maysha, "Reformasi Program Makan Bergizi Gratis untuk Pemenuhan Hak Sosial Ekonomi," *Legislatif* 9, no. 1 (2026): 82-104, https://doi.org/10.20956/jl.v9i1.47999

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The constitutional obligation to promote public welfare and guarantee a decent standard of living provides the legal foundation for the implementation of the MBG Program. Law Number 18 of 2012 concerning Food further establishes requirements for food availability, affordability, safety, quality, and equitable distribution.[21] The National Nutrition Agency was subsequently established through Presidential Regulation Number 83 of 2024[3] to administer national nutritional policies. Presidential Regulation Number 115 of 2025 provides further arrangements concerning institutional coordination, program governance, supervision, and accountability. These regulations establish the administrative foundation for implementing the program, with provisions on standardized contractual relationships, risk allocation, and the distribution of legal responsibilities among the parties requiring further specification within business law.

The procurement of food supplies, distribution services, and other supporting services connects the government with business actors through agreements governing the fulfillment of program requirements. These arrangements involve administrative obligations and contractual relationships between the government and suppliers.[22] Contract law governs the agreement, performance of obligations, good faith, and legal responsibility arising from default. The application of these principles provides certainty regarding the rights and obligations of the parties and supports fair business relationships throughout the procurement and distribution process.

The participation of MSMEs, cooperatives, and Village-Owned Enterprises in the national food supply chain also contributes to local economic empowerment.[23] Their involvement reflects the principles of economic democracy, which recognize MSMEs as contributors to national economic development. Business opportunities arising from the MBG Program are closely related to fair access to procurement, certainty of payment, proportional contractual arrangements, and equal opportunities for participating enterprises. Legal protection in these areas supports the continuity of business activities and provides greater certainty for MSMEs and other local enterprises involved in program implementation.

The distribution of authority among implementing institutions, variations in contractual standards, and arrangements concerning risk sharing and legal responsibilities continue to present challenges for the governance of business relationships under the MBG Program.[24] Existing regulations primarily govern administrative procedures, leaving several aspects of contractual relationships and the allocation of responsibilities among business actors subject to further clarification.

[21] Dian Suryana and Dini Dewi Heniarti, "Criminal Liability Policy for Organizers of the Free Nutritious Meal Program in Mass Food Poisoning Cases: A Legal Certainty Approach," *Legitimasi: Jurnal Hukum Pidana dan Politik Hukum* 15, no. 1 (2026): 1-25, https://doi.org/10.22373/legitimasi.v15i1.33752

[22] David Julianto Simbolon, Hulman Panjaitan, and Paltiada Saragi, "Legal Protection in Partnership Agreements for the Procurement of Goods and Construction Services by Micro, Small and Medium Enterprises," *International Journal of Social, Policy and Law* 6, no. 1 (2025): 1-10, https://doi.org/10.8888/ijospl.v6i1.182

[23] Paola Vola et al., "Innovating Public Food Procurement: A Case Study of Dordogne's Path to Sustainability," *Review of Policy Research* 42 (2025): 1450-1462, https://doi.org/10.1111/ropr.70026

[24] Andi Fitrah Latemmamala and Faiz Ahmad Fachri, "Reconstructing Legal Liability and Division of Authority: Mitigating Mass Poisoning in the Free Nutritious Meal Program," *SIGn Jurnal Hukum* 7, no. 2 (2026): 1275-1292, https://doi.org/10.37276/sjh.v7i2.637

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Harmonization of the applicable regulations would strengthen contractual certainty, clarify the responsibilities of participating parties, and improve the protection of business actors. These improvements would also support accountability in the use of state funds and the effectiveness of the MBG Program in achieving national nutritional development objectives.

The Free Nutritional Meal Program (MBG) involves various legal subjects, including the government through the National Nutrition Agency, local governments, goods and service providers, cooperatives, MSMEs, Village-Owned Enterprises (BUMDes), and communities as program beneficiaries. The participation of these parties creates administrative relationships arising from the exercise of governmental authority and civil relationships established through procurement agreements and contractual cooperation.[25] Each party holds rights and obligations according to its respective position in program implementation. These relationships are governed by the principles of freedom of contract, consensualism, good faith, legal certainty, and a balanced distribution of rights and obligations as recognized under Indonesian contract law.

The procurement of goods and services places the government as the purchaser and business actors as suppliers responsible for fulfilling contractual requirements concerning specifications, quality, quantity, and delivery schedules.[26] The government is responsible for conducting procurement transparently, competitively, and accountably, including fulfilling payment obligations according to the agreed contractual terms. Suppliers are responsible for delivering goods and services that comply with food safety requirements, technical specifications, and established quality standards. These reciprocal obligations determine the legal responsibilities of each party throughout contractual performance. Failure to fulfill agreed obligations may constitute default and give rise to claims for compensation, contract termination, or other legal consequences in accordance with applicable statutory provisions and civil law.

The participation of MSMEs, cooperatives, and Village-Owned Enterprises (BUMDes) in the MBG Program reflects the government's affirmative policy to strengthen the people's economy through greater involvement of local businesses in the national food supply chain. Their participation expands business opportunities and supports more equitable economic development across regions. Partnerships between the government and local enterprises are guided by equality, mutual benefit, and fairness in contractual relationships. Fair access to procurement, certainty of payment, business development opportunities, and legal protection in contractual disputes provide a foundation for sustainable cooperation.[27] These guarantees support the continuity of local

[25] Kurnia Gischa Tristiya and Ashilly Achidsti, "Implementasi Program Makan Bergizi Gratis: Studi Kasus di Kota Yogyakarta," *JIIP: Jurnal Ilmiah Ilmu Pemerintahan* 11, no. 1 (2026): 105-127, https://doi.org/10.14710/jiip.v11i1.30499

[26] Niken Novia Sitaresmi, Lukman M. Baga, and Dwi Rachmina, "Bogor Regency Government's Strategy to Optimizing Public Procurement for Micro and Small Enterprises (MSE) Through E-Katalog," *Indonesian Interdisciplinary Journal of Sharia Economics* 8, no. 3 (2025): 14804-14821, https://doi.org/10.31538/iijse.v8i3.7978

[27] Jihan Annisa et al., "Legal Protection for Micro, Small, and Medium Enterprises in the Context of Licensing Legality," *Journal of Legal and Cultural Analytics* 4, no. 2 (2025): 819-834, https://doi.org/10.55927/jlca.v4i2.14403

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enterprises and strengthen the contribution of MSMEs to the implementation of the MBG Program.

The distribution of nutritious food also creates legal responsibilities toward communities receiving the program's benefits. Food supplied to beneficiaries must comply with statutory requirements concerning food safety, nutritional quality, and suitability for consumption. The fulfillment of these standards involves the responsibilities of suppliers and other parties participating in the food distribution chain. Negligence that causes harm to beneficiaries may give rise to legal liability for the responsible parties under the principles of consumer protection and product liability.[28] The protection of beneficiaries' rights consequently forms part of program governance alongside procurement efficiency, contractual performance, and accountability for the quality of food distributed to the community.

The relationships among the government, business actors, and beneficiaries place the principles of business law at the center of MBG Program governance. Contractual arrangements determine the rights and obligations of participating parties, while risk allocation, dispute resolution mechanisms, and supervision govern their responsibilities throughout program implementation. Clear contractual standards and coordinated oversight provide legal certainty for business actors and strengthen accountability for the quality of goods and services received by beneficiaries.[29] The regulation of these relationships supports the effectiveness of the Free Nutritional Meal Program in fulfilling nutritional needs, protecting the interests of participating parties, and promoting public welfare and national economic development.

The regulatory framework governing the Free Nutritional Meal Program (MBG) contains several normative weaknesses concerning business relationships, institutional responsibilities, and compliance with legal obligations.[30] These weaknesses can be examined through Lawrence M. Friedman's legal system theory, which identifies legal substance, legal structure, and legal culture as three interrelated components influencing the operation of law. Legal substance concerns the completeness and consistency of provisions governing contracts, partnerships, risk allocation, and accountability. Legal structure relates to institutional capacity, the distribution of authority, coordination, and supervision, while legal culture concerns the attitudes and conduct of implementing officials and business actors toward their legal responsibilities. The relationship among these components shows that existing regulations provide a legal foundation for the MBG Program, although their integration into business law governance requires further strengthening.

[28] Tegar Raffi Putra Jumantoro and Ermanto Fahamsyah, "Legal Liability of Free Nutritious Meal Program Organizers toward Third-Party Beneficiaries in Mass Poisoning Incidents," *Jurnal Bina Praja* 18, no. 1 (2026): 139-153, https://doi.org/10.21787/jbp.18.2026.2951

[29] Ontran Sumantri Riyanto and Mei Rianita Elfrida Sinaga, "Penegakan Hak Anak atas Makanan Aman dan Sehat: Studi Kasus Keracunan dalam Program Makan Bergizi Gratis Ditinjau dari Tanggung Jawab Negara," *Juris Humanity* 4, no. 1 (2025): 1-11, https://doi.org/10.37631/jrkhm.v4i1.84

[30] Umi Khairiah et al., "Pengaturan Hukum dan Pertanggungjawaban Pidana dalam Program Makan Bergizi Gratis (MBG) dalam Kajian Prinsip Pelayanan Publik dan Akuntabilitas Negara," *Jurnal Ilmiah Penegakan Hukum* 12, no. 2 (2025): 196-206, https://doi.org/10.31289/jiph.v12i2.14087

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Partnerships and procurement contracts between the government and business actors require uniform contractual standards to ensure certainty regarding the rights and obligations of each party. Existing provisions leave several contractual matters insufficiently regulated, particularly the forms of partnerships, payment certainty, food-quality requirements, risk allocation, force majeure, compensation, sanctions for default, and dispute resolution.[31] These arrangements also concern the protection of MSMEs, cooperatives, and Village-Owned Enterprises, whose bargaining positions may differ from those of larger business entities. Variations in contractual provisions and their interpretation can affect the consistency of agreement implementation and the fairness of business relationships. Clear minimum contractual standards would provide a stronger foundation for determining the obligations and responsibilities of the parties involved in the MBG Program.

The National Nutrition Agency, relevant ministries and institutions, regional governments, and supervisory bodies exercise responsibilities concerning food quality, procurement, distribution, and the use of state funds. The effectiveness of these responsibilities depends on institutional capacity, clear divisions of authority, and coordination among the institutions involved.[32] Existing regulations leave certain responsibilities insufficiently specified, particularly when food-quality failures, distribution delays, contractual breaches, or losses to state finances occur. The distribution of authority among several institutions may create overlapping responsibilities and differences in determining which institution must undertake corrective measures or assume legal accountability. These conditions indicate weaknesses in legal structure, particularly concerning institutional coordination, supervisory authority, and the determination of responsibility throughout program implementation.

The allocation of risks in contractual relationships also requires clearer provisions concerning the responsibilities of the government and business actors. Distribution delays, failure to meet contractual specifications, food-safety violations, and extraordinary circumstances affecting contractual performance may give rise to financial losses and legal disputes.[33] Existing arrangements provide limited guidance regarding minimum risk-allocation clauses, the application of force majeure, compensation mechanisms, and the proportional distribution of liability between the parties. Differences in contractual arrangements may consequently create uncertainty when determining responsibility for losses arising during program implementation. These weaknesses fall within legal substance because the clarity of contractual provisions directly influences legal certainty, the protection of business actors, and the settlement of disputes.

[31] Zidan Fahrian and Made Aditya Pramana Putra, "Analisis Yuridis terhadap Pertanggungjawaban Resiko Pelaksanaan Program Makan Bergizi Gratis pada Skema Kemitraan," *Jurnal Media Akademik* 4, no. 2 (2026), https://doi.org/10.62281/qx047v59

[32] Dwi Prasetyo et al., "School SPPG Coordination in Indonesia's Free Nutritious Meal Program (MBG): A Case Study in Bojonegoro, East Java," *Jurnal Bina Praja* 18, no. 1 (2026): 19-34, https://doi.org/10.21787/jbp.18.2026.2955

[33] Akbar Sanjaya, "The Government's Legal Responsibility in the Free Nutritional Meal Program Poisoning Case in Indonesia," *International Journal of Research and Innovation in Social Science* 10, no. 5 (2026): 8771-8784, https://dx.doi.org/10.47772/IJRISS.2026.100500590

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The conduct of implementing officials and business actors also influences compliance with procurement procedures, food-safety standards, transparency requirements, contractual obligations, and supervisory mechanisms. Their understanding of legal responsibilities affects the implementation of regulations and the accountability of each party involved in the MBG Program. Consistent compliance with contractual provisions, accurate reporting, and acceptance of supervision support the development of a legal culture that respects food safety and responsible management of state funds.[34] The relationship between legal substance, legal structure, and legal culture demonstrates how weaknesses in contractual arrangements, institutional coordination, and compliance influence the quality of business law governance. These findings provide the foundation for reconstructing business law regulations through clearer contractual standards, stronger institutional responsibilities, effective supervision, and greater accountability in the implementation of the MBG Program.

2. Reconstruction of Business Law in the Governance of the Free Nutritional Meal Program in Indonesia

Business law reconstruction in the governance of the Free Nutritional Meal Program (MBG) requires improvements in legal substance, legal structure, and legal culture to address weaknesses in program implementation. Existing regulations provide the legal foundation for the MBG Program through provisions governing different administrative and business activities. The relationship among these provisions requires closer coordination, particularly concerning contractual standards, risk allocation, protection of business actors, institutional responsibilities, and compliance with legal obligations. Regulatory harmonization must be accompanied by clearer contractual arrangements, stronger institutional coordination, effective supervision, and the development of compliance, integrity, and transparency among implementing officials and business actors. These improvements are directed toward strengthening legal certainty and protecting the interests of all parties involved in the program.

The principles of the rechtsstaat and welfare state provide the philosophical and conceptual foundations for developing these regulatory improvements.[35] The rechtsstaat emphasizes legal certainty and accountability in the exercise of public authority, while the welfare state directs the implementation of law toward the fulfillment of public welfare. Lawrence M. Friedman's legal system theory serves as the primary analytical framework for examining the relationship between legal substance, legal structure, and legal culture in MBG governance. The interaction of these three components explains how the quality of regulations, institutional performance, and compliance with legal obligations influences program effectiveness. Transparency, accountability,

[34] Putri Erlyn et al., "Tata Kelola Keamanan Pangan Program Makan Bergizi Gratis: Integrasi Sertifikasi Higiene dan Sanitasi serta Pengawasan Operasional di Palembang," *Jurnal Bina Praja* 18, no. 2 (2026): 339-352, https://doi.org/10.21787/jbp.18.2026.3440

[35] Afgha Okza Eriranda, Fajar Rahmad S., and Eny Kusdarini, "Makna Welfare State Ditinjau dari Implementasi Pasal 34 Ayat (1) Undang-Undang Dasar 1945," *Jurnal Hukum IUS QUIA IUSTUM* 31, no. 3 (2024): 560-584, https://doi.org/10.20885/iustum.vol31.iss3.art4

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proportionality, efficiency, and a balanced distribution of rights and obligations serve as operational principles guiding the proposed reconstruction.

The regulation of food, government procurement of goods and services, consumer protection, MSME empowerment, and the governance of the National Nutrition Agency requires harmonization to strengthen legal certainty in business relationships. This harmonization includes the formulation of implementation guidelines governing minimum procurement-contract clauses, provider selection, performance indicators, risk allocation, force majeure, compensation, sanctions for default, and dispute resolution through litigation and non-litigation mechanisms.[36] Clearer contractual provisions would reduce differences in legal interpretation and establish consistent standards for determining the rights and responsibilities of the parties. Within legal substance, these arrangements are directed toward ensuring that business relationships between the government and participating enterprises comply with statutory requirements, contractual fairness, and the principles of legal certainty.

The implementation of these regulatory arrangements involves the National Nutrition Agency, relevant ministries and institutions, regional governments, and supervisory bodies responsible for procurement, food distribution, quality control, budget realization, and provider performance. Clear divisions of authority and coordination among these institutions support the effective exercise of their respective responsibilities.[37] Supervision can be strengthened through transparent procurement procedures, independent and coordinated oversight, public participation, and an integrated information system that enables relevant stakeholders to monitor program implementation and identify the responsibilities of participating institutions. These arrangements strengthen legal structure by clarifying institutional functions, supporting timely corrective measures, and ensuring accountability when problems arise during program implementation.

Compliance with procurement procedures, food-safety standards, contractual ethics, transparent reporting, and supervisory mechanisms also depends on the conduct and legal awareness of implementing officials and business actors. The development of integrity, responsibility, and respect for legal obligations supports consistent implementation of the regulations governing the MBG Program. Business law reconstruction accordingly integrates regulatory harmonization and contractual standards within legal substance, institutional coordination and supervision within legal structure, and compliance, transparency, and legal awareness within legal culture. The relationship among these components provides the foundation for strengthening legal certainty, protecting business actors and beneficiaries, and improving accountability in state financial management. This

[36] Avrilin Nafisah Candra et al., "Failure of Governance and State Responsibility in the Free Nutritious Meals (FNM) Program," *Journal of Social Policy and Development Studies* 2, no. 2 (2025): 27-38, https://doi.org/10.65119/jspds.v2i2.33

[37] Muhammad Abduh, Aos Kuswandi, and Derriansya Putra Jaya, "Governance and Environmental Determinants of Severe Malnutrition in Indonesia: Evidence for Strengthening the Free Nutritious Meal Program," *Jurnal Bina Praja* 18, no. 1 (2026): 79-91, https://doi.org/10.21787/jbp.18.2026.2922

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reconstruction is directed toward realizing fair and effective governance of the MBG Program in accordance with Pancasila values and the objectives of the welfare state.

Business law reconstruction in the governance of the Free Nutritional Meal Program (MBG) is directed toward strengthening legal certainty and ensuring fair, transparent, and sustainable business relationships.[38] The weaknesses identified in the preceding discussion provide the basis for developing five pillars of reconstruction, consisting of regulatory strengthening, standardization of contractual relationships, institutional strengthening, improvement of supervision and dispute resolution, and empowerment of local business actors. Referring to Lawrence M. Friedman's legal system theory, regulatory strengthening and contractual standardization concern legal substance, while institutional development and supervision relate to legal structure. The empowerment of local business actors is connected with the development of legal culture through compliance, procurement ethics, transparency, and legal awareness. The relationship among these five pillars forms an integrated model for improving business law governance in the MBG Program.

Regulations concerning food, government procurement of goods and services, consumer protection, MSME empowerment, and governance of the National Nutrition Agency require harmonization to establish consistent legal provisions for program implementation. The relationship among these regulations determines the distribution of authority, procurement procedures, and legal responsibilities of participating parties. Harmonization can be strengthened through implementation guidelines governing partner selection, provider requirements, performance evaluation, and accountability mechanisms.[39] Clear provisions in these areas support the uniform application of business law and provide certainty regarding the obligations arising from procurement and partnership activities. Regulatory strengthening constitutes the first pillar of reconstruction within legal substance, directed toward improving the coherence of legal provisions governing business relationships in the MBG Program.

The implementation of these regulations involves contractual relationships between the government and business actors responsible for supplying goods and services. Procurement contracts should contain minimum provisions governing the rights and obligations of the parties, food-quality standards, distribution schedules, payment mechanisms, risk allocation, force majeure, compensation, sanctions for default, and dispute resolution. The standardization of these provisions provides a common legal foundation for contractual performance and reduces differences in the interpretation of agreements. Contractual arrangements based on good faith and a balanced distribution of responsibilities also support fair protection for the government and participating providers. The second pillar of reconstruction accordingly strengthens legal substance

[38] Luana F. J. Swensson et al., "Public Food Procurement as a Game Changer for Food System Transformation," *The Lancet Planetary Health* 5, no. 8 (2021): e495-e496, https://doi.org/10.1016/S2542-5196(21)00176-5

[39] Ewit Nurdayanti, Muhamad Ali, and Isfi Sholihah, "Analisis Kesiapan Standar Mutu dan Kepatuhan Halal Pemasok Pangan Lokal dalam Rantai Pasok Program Makan Bergizi Gratis (MBG) di Kabupaten Lombok Timur," *ARMADA: Jurnal Penelitian Multidisiplin* 4, no. 7 (2026): 2635-2642, https://doi.org/10.55681/armada.v4i7.2960

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by establishing clearer contractual standards that support legal certainty, prevent disputes, and maintain sustainable business relationships throughout program implementation.

Contractual certainty also depends on the institutions responsible for implementing and supervising the MBG Program. The National Nutrition Agency, relevant ministries, regional governments, and supervisory bodies exercise functions that require clear divisions of authority and effective coordination. Each institution should have defined duties, responsibilities, and performance indicators corresponding to its role in procurement, food distribution, quality control, and financial management. Coordination among these institutions can be supported through an integrated information system containing procurement activities, distribution records, food-quality assessments, budget realization, and provider performance.[40] The availability of coordinated information enables responsible institutions to identify problems, determine appropriate corrective measures, and account for decisions taken during program implementation. Institutional strengthening constitutes the third pillar of reconstruction within legal structure, with emphasis on clarity of authority, coordination, and public accountability.

The exercise of institutional authority must be accompanied by supervision capable of ensuring compliance with procurement procedures, contractual obligations, food-quality requirements, and the responsible use of state funds. Internal oversight can be coordinated with public participation involving communities, academics, and professional organizations to strengthen transparency and accountability in program implementation. Supervisory mechanisms should also provide clear procedures for identifying contractual violations, evaluating losses, and determining the responsibilities of participating parties. Disputes arising between the government and providers may be resolved through negotiation, mediation, or arbitration before litigation, where appropriate under the applicable legal provisions and contractual agreements. These arrangements form the fourth pillar of reconstruction within legal structure, supporting effective supervision, timely corrective action, fair dispute resolution, and continuity in the implementation of the MBG Program.

The participation of MSMEs, cooperatives, and Village-Owned Enterprises (BUMDes) in the MBG supply chain provides opportunities to strengthen local economic activities and expand the involvement of communities in national development.[41] Business law reconstruction should guarantee fair access to procurement, certainty regarding partnership arrangements and payments, business development opportunities, and legal protection for participating enterprises. These guarantees are accompanied by the responsibility of business actors and implementing officials to comply with procurement procedures, food-safety standards, contractual obligations, and transparent reporting requirements. Legal awareness, integrity, and acceptance of supervision

[40] Ary Santoso, Briliantina Dwi Melianawati, and Eka Avianti Ayuningtyas, "Governance Analysis of the Implementation of the Free Nutritious Meal Program," *Jurnal Manajemen Bisnis dan Organisasi* 4, no. 1 (2025): 240-270, https://doi.org/10.58290/jmbo.v4i1.423

[41] Avrina Dwijayanti, "Policy Spillover: Analisis Jaringan Dampak Kebijakan Makan Siang Bergizi Gratis terhadap Sektor Pertanian," *Jurnal Administrasi Publik* 20, no. 2 (2024): 281-308, https://doi.org/10.52316/jap.v20i2.435

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contribute to the development of responsible business conduct throughout the supply chain. The fifth pillar connects the empowerment of local business actors with legal culture by encouraging compliance and accountability in business relationships. The involvement of MSMEs, cooperatives, and BUMDes consequently supports economic development while strengthening the implementation of business law principles in the MBG Program.

The five pillars form a business law reconstruction model founded on legal certainty, justice, expediency, and accountability in the governance of the Free Nutritional Meal Program. Regulatory harmonization and contractual standardization strengthen legal substance by clarifying the rights and obligations of participating parties. Institutional coordination, supervision, and dispute resolution improve legal structure through clearer responsibilities and more effective accountability mechanisms. The empowerment of local business actors, accompanied by compliance, integrity, and legal awareness, contributes to the development of legal culture. The novelty of this reconstruction lies in connecting the weaknesses identified in legal substance, legal structure, and legal culture with corresponding regulatory and institutional improvements within a unified governance model. This approach provides a foundation for addressing differences among legal provisions, institutional coordination problems, and weaknesses in compliance while supporting fair business relationships, protection of program beneficiaries, and accountable management of state funds.

D. Conclusion

The Free Nutritional Meal Program (MBG) has a general legal foundation, with business relationships concerning procurement, partnerships, food supply, and program accountability requiring greater regulatory integration. An analysis based on Lawrence M. Friedman's legal system theory identifies weaknesses in three interrelated components. Legal substance concerns fragmented provisions governing contractual standards, risk allocation, force majeure, compensation, dispute resolution, and proportional protection for business actors. Legal structure involves overlapping institutional functions, coordination gaps, and unclear divisions of responsibility among implementing and supervisory institutions. Legal culture concerns compliance with procurement procedures, food-safety standards, transparency, contractual ethics, reporting obligations, and supervision. The proposed reconstruction addresses these weaknesses through five pillars consisting of regulatory harmonization, standardization of contractual relationships, institutional strengthening, improvement of supervision and dispute resolution, and empowerment of MSMEs, cooperatives, and Village-Owned Enterprises (BUMDes) accompanied by stronger compliance practices. The novelty of this reconstruction lies in connecting these five pillars with legal substance, legal structure, and legal culture within a unified business law governance model. This reconstruction strengthens legal certainty, institutional accountability, fair protection of the parties, and sustainable implementation of the MBG Program in accordance with public welfare objectives.

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Bibliography

Abd Rahman, Muhammad Fikri, dan Haura Mudya Maysha, "Reformasi Program Makan Bergizi Gratis untuk Pemenuhan Hak Sosial Ekonomi," *Legislatif* 9, no. 1 (2026): 82–104, https://doi.org/10.20956/jl.v9i1.47999.

Abdullah Fikri, "Program Makan Bergizi Gratis (MBG) dalam Perspektif Konstitusionalisme," *Justicia Sains: Jurnal Ilmu Hukum* 10, no. 2 (2025): 437–459, https://doi.org/10.24967/jcs.v10i2.4576.

Adam Khafi Ferdinand dan Rinaldy Amrullah, "Micro Small-Level Enterprises (MSES) and Cooperatives in Presidential Regulation Number 12 of 2021," *JASSP (Journal of Advance in Social Sciences and Policy)* 1, no. 2 (2021): 103–113, https://doi.org/10.23960/jassp.v1i2.9.

Afgha Okza Eriranda, Fajar Rahmad S., dan Eny Kusdarini, "Makna Welfare State Ditinjau dari Implementasi Pasal 34 Ayat (1) Undang-Undang Dasar 1945," *Jurnal Hukum IUS QUIA IUSTUM* 31, no. 3 (2024): 560–584, https://doi.org/10.20885/iustum.vol31.iss3.art4.

Agus Hamzah dan Rakhmat Bowo Suharto, "State Implementation of Welfare Law on Implementation of Human Rights in Local Governments," *Law Development Journal* 3, no. 1 (2021): 100–105, https://doi.org/10.30659/ldj.3.1.100-105.

Akbar Sanjaya, "The Government's Legal Responsibility in the Free Nutritional Meal Program Poisoning Case in Indonesia," *International Journal of Research and Innovation in Social Science* 10, no. 5 (2026): 8771–8784, https://doi.org/10.47772/IJRISS.2026.100500590.

Alvin Yahya et al., "Integration of Pancasila Values in Economic Legal Engineering for National Development," *Walisongo Law Review* 6, no. 1 (2024): 56–70, https://doi.org/10.21580/walrev.2024.6.1.22259.

Andi Fitrah Latemmamala dan Faiz Ahmad Fachri, "Reconstructing Legal Liability and Division of Authority: Mitigating Mass Poisoning in the Free Nutritious Meal Program," *SIGn Jurnal Hukum* 7, no. 2 (2026): 1275–1292, https://doi.org/10.37276/sjh.v7i2.637.

Arif Budimanta, "Struktur Ekonomi Pancasila (Pancasilanomics)," *Pancasila: Jurnal Keindonesiaan* 4, Special Edition (2024): 1–27, https://doi.org/10.52738/pjk.v4ix.522.

Ary Santoso, Briliantina Dwi Melianawati, dan Eka Avianti Ayuningtyas, "Governance Analysis of the Implementation of the Free Nutritious Meal Program," *Jurnal Manajemen Bisnis dan Organisasi* 4, no. 1 (2025): 240–270, https://doi.org/10.58290/jmbo.v4i1.423.

Avrilin Nafisah Candra et al., "Failure of Governance and State Responsibility in the Free Nutritious Meals (FNM) Program," *Journal of Social Policy and Development Studies* 2, no. 2 (2025): 27–38, https://doi.org/10.65119/jspds.v2i2.33.

Avrina Dwijayanti, "Policy Spillover: Analisis Jaringan Dampak Kebijakan Makan Siang Bergizi Gratis terhadap Sektor Pertanian," *Jurnal Administrasi Publik* 20, no. 2 (2024): 281–308, https://doi.org/10.52316/jap.v20i2.435.

@Creative Commons Attribution-ShareAlike 4.0 International License (CC BY-SA 4.0)

Bawon Nul Hakim dan Wahida Yuliana, "Implikasi Yuridis Perpres Nomor 83 Tahun 2024 terhadap Tata Kelola Program Makan Bergizi Gratis," *Ekspose: Jurnal Penelitian Hukum dan Pendidikan* 24, no. 2 (2025): 267–283, https://doi.org/10.30863/ekspose.v24i2.10485.

David Julianto Simbolon, Hulman Panjaitan, dan Paltiada Saragi, "Legal Protection in Partnership Agreements for the Procurement of Goods and Construction Services by Micro, Small and Medium Enterprises," *International Journal of Social, Policy and Law* 6, no. 1 (2025): 1–10, https://doi.org/10.8888/ijospl.v6i1.182.

Dian Suryana dan Dini Dewi Heniarti, "Criminal Liability Policy for Organizers of the Free Nutritious Meal Program in Mass Food Poisoning Cases: A Legal Certainty Approach," *Legitimasi: Jurnal Hukum Pidana dan Politik Hukum* 15, no. 1 (2026): 1–25, https://doi.org/10.22373/legitimasi.v15i1.33752.

Dwi Prasetyo et al., "School SPPG Coordination in Indonesia's Free Nutritious Meal Program (MBG): A Case Study in Bojonegoro, East Java," *Jurnal Bina Praja* 18, no. 1 (2026): 19–34, https://doi.org/10.21787/jbp.18.2026.2955.

Emirza Nur Wicaksono, "Program Makanan Bergizi Gratis dan Problematika Good Governance dalam Pengelolaan Keuangan Negara," *Jurnal Yuridis* 13, no. 1 (2026): 113–134, https://doi.org/10.35586/jyur.v13i1.14101.

Ewit Nurdayanti, Muhamad Ali, dan Isfi Sholihah, "Analisis Kesiapan Standar Mutu dan Kepatuhan Halal Pemasok Pangan Lokal dalam Rantai Pasok Program Makan Bergizi Gratis (MBG) di Kabupaten Lombok Timur," *ARMADA: Jurnal Penelitian Multidisiplin* 4, no. 7 (2026): 2635–2642, https://doi.org/10.55681/armada.v4i7.2960.

Jihan Annisa et al., "Legal Protection for Micro, Small, and Medium Enterprises in the Context of Licensing Legality," *Journal of Legal and Cultural Analytics* 4, no. 2 (2025): 819–834, https://doi.org/10.55927/jlca.v4i2.14403.

Kurnia Gischa Tristiya dan Ashilly Achidsti, "Implementasi Program Makan Bergizi Gratis: Studi Kasus di Kota Yogyakarta," *JIIP: Jurnal Ilmiah Ilmu Pemerintahan* 11, no. 1 (2026): 105–127, https://doi.org/10.14710/jiip.v11i1.30499.

Law Number 18 of 2012 concerning Food.

Law Number 20 of 2008 concerning Micro, Small and Medium Enterprises.

Law Number 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation becomes Law.

Law Number 8 of 1999 concerning Consumer Protection.

Luana F. J. Swensson et al., "Public Food Procurement as a Game Changer for Food System Transformation," *The Lancet Planetary Health* 5, no. 8 (2021): e495–e496, https://doi.org/10.1016/S2542-5196(21)00176-5.

M. Rochman, Pengadaan Barang dan Jasa Pemerintah dalam Konteks Peraturan Presiden No. 46

@Creative Commons Attribution-ShareAlike 4.0 International License (CC BY-SA 4.0)

Tahun 2025: Versi Lengkap, Pekanbaru: CV Bravo Press Indonesia, 2025.

Markus Hadinata, "Free Nutritious Meal Policy in Indonesia under President Prabowo: A Policy, Fiscal, and Political Analysis Grounded in International Evidence," *Jurnal Bina Praja* 18, no. 1 (2026): 65–78, https://doi.org/10.21787/jbp.18.2026.2896.

Mohammad Adzan, "Perlindungan Hukum Pelaku Usaha dalam Sengketa Kontraktual Pengadaan Barang dan Jasa Konstruksi Pemerintah Ditinjau dari Aspek Hukum Perdata," *JISPENDIORA: Jurnal Ilmu Sosial Pendidikan dan Humaniora* 3, no. 3 (2024): 164–183, https://doi.org/10.56910/jispendiora.v3i3.3091.

Muhammad Abduh, Aos Kuswandi, dan Derriansya Putra Jaya, "Governance and Environmental Determinants of Severe Malnutrition in Indonesia: Evidence for Strengthening the Free Nutritious Meal Program," *Jurnal Bina Praja* 18, no. 1 (2026): 79–91, https://doi.org/10.21787/jbp.18.2026.2922.

Muhammad Basit dan Hikmah Ramadani, "Analisis Implementasi Program Makan Bergizi Gratis Terhadap Perkembangan Ekonomi," *Journal of Economics Development Research* 1, no. 2 (2025): 49–54, https://doi.org/10.71094/joeder.v1i2.105.

Nike Kusumawati, Tjahja Muhandri, dan Eko Ruddy Cahyadi, "Analisis Struktur Rantai Pasok Pangan dan Keterlibatan UMKM Lokal dalam Pelaksanaan Program Makan Bergizi Gratis (MBG) di Kota Tangerang Selatan," *Jurnal Manajemen dan Organisasi* 17, no. 3 (2026): 275–291, https://doi.org/10.29244/jmo.v17i3.73792.

Niken Novia Sitaresmi, Lukman M. Baga, dan Dwi Rachmina, "Bogor Regency Government's Strategy to Optimizing Public Procurement for Micro and Small Enterprises (MSE) Through E-Katalog," *Indonesian Interdisciplinary Journal of Sharia Economics* 8, no. 3 (2025): 14804–14821, https://doi.org/10.31538/iijse.v8i3.7978.

Ontran Sumantri Riyanto dan Mei Rianita Elfrida Sinaga, "Penegakan Hak Anak atas Makanan Aman dan Sehat: Studi Kasus Keracunan dalam Program Makan Bergizi Gratis Ditinjau dari Tanggung Jawab Negara," *Juris Humanity* 4, no. 1 (2025): 1–11, https://doi.org/10.37631/jrkhm.v4i1.84.

Pandapotan Damanik et al., Hukum Administrasi Negara: Teori, Prinsip, dan Praktik Tata Kelola Pemerintahan, Medan: PT Media Penerbit Indonesia, 2024.

Paola Vola et al., "Innovating Public Food Procurement: A Case Study of Dordogne's Path to Sustainability," *Review of Policy Research* 42 (2025): 1450–1462, https://doi.org/10.1111/ropr.70026.

Prakoso Prakoso, Fathur Rokhman, dan Eko Handoyo, "Pancasila as a Foundation for Legal Reform: Evaluating the Impact of Civic Education on Indonesian Legal Systems," *Journal of Law and Legal Reform* 5, no. 3 (2024): 1429–1468, https://doi.org/10.15294/jllr.v5i3.16498.

Presidential Regulation of the Republic of Indonesia Number 115 of 2025 concerning Governance of the Implementation of the Free Nutritional Meal Program.

@Creative Commons Attribution-ShareAlike 4.0 International License (CC BY-SA 4.0)

Presidential Regulation of the Republic of Indonesia Number 16 of 2018 concerning Government Procurement of Goods/Services and its amendments.

Presidential Regulation of the Republic of Indonesia Number 83 of 2024 concerning the National Nutrition Agency.

Putri Erlyn et al., "Tata Kelola Keamanan Pangan Program Makan Bergizi Gratis: Integrasi Sertifikasi Higiene dan Sanitasi serta Pengawasan Operasional di Palembang," *Jurnal Bina Praja* 18, no. 2 (2026): 339–352, https://doi.org/10.21787/jbp.18.2026.3440.

Rodlial Ramdhan Tackbir Abubakar et al., "Strengthening the Supervision of the Free Nutritious Meal Program (MBG): Mechanisms, Challenges, and Strategic Solutions," *Publica: Jurnal Pemikiran Administrasi Negara* 18, no. 2 (2026): 465–491, https://doi.org/10.15575/jpan.v18i2.54996.

Saddam Rassanjani dan Isramatur Rahmi, "Free School Meals Policy: Lessons Learned from Around the World for Indonesia," *Jurnal Ilmu Sosial* 24, no. 1 (2025): 1–28, https://doi.org/10.14710/jis.24.1.2025.1-28.

Stepanus Makambombu, "Local Food, Centralized Governance, and the Limits of Policy Localization in Indonesia's Free Nutritious School Meal Program: Evidence from Sumba," *The Journal of Indonesia Sustainable Development Planning* 7, no. 1 (2026): 70–84, https://doi.org/10.46456/jisdep.v7i1.946.

Tegar Raffi Putra Jumantoro dan Ermanto Fahamsyah, "Legal Liability of Free Nutritious Meal Program Organizers toward Third-Party Beneficiaries in Mass Poisoning Incidents," *Jurnal Bina Praja* 18, no. 1 (2026): 139–153, https://doi.org/10.21787/jbp.18.2026.2951.

The 1945 Constitution of the Republic of Indonesia.

Ucu Agustini dan Sri Mulyani, "Efektivitas dan Tantangan Kebijakan Program Makan Bergizi Gratis sebagai Intervensi Pendidikan di Indonesia," *Jurnal Kiprah Pendidikan* 4, no. 3 (2025): 362–368, https://doi.org/10.33578/kpd.v4i3.p362-368.

Umi Khairiah et al., "Pengaturan Hukum dan Pertanggungjawaban Pidana dalam Program Makan Bergizi Gratis (MBG) dalam Kajian Prinsip Pelayanan Publik dan Akuntabilitas Negara," *Jurnal Ilmiah Penegakan Hukum* 12, no. 2 (2025): 196–206, https://doi.org/10.31289/jiph.v12i2.14087.

Zidan Fahrian dan Made Aditya Pramana Putra, "Analisis Yuridis terhadap Pertanggungjawaban Resiko Pelaksanaan Program Makan Bergizi Gratis pada Skema Kemitraan," *Jurnal Media Akademik* 4, no. 2 (2026), https://doi.org/10.62281/qx047v59

Zulham, Hukum Perlindungan Konsumen, Edisi Revisi, Jakarta: Prenada Media, 2023

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