Sweetener Label and Claims Checklist (BPOM)

For sweeteners, beverages and supplements sold in Indonesia

Every word on your label must trace back to the registered formula and a batch-linked lab report. Run this checklist before the label is printed, and again whenever the formula, supplier, claim or packaging changes.

How to use this checklist

The brand's regulatory lead and the registration holder go through it together, with the approved formula, the izin edar and the latest lab reports open. Mark each item one of three ways:

Pass	The label matches and the evidence is on file.
Fix	The label, claim or file needs to change before print.
Ask PRI	The rule or the evidence is unclear; send it for regulatory review.

1. Registration and formula

#	Check	Pass	Fix	Ask PRI
1	The product name, variant and pack size on the label match the izin edar (MD or ML number) exactly.	☐	☐	☐
2	The registration number printed on the pack is the one issued for this product and this registrant, and it shows correctly on CekBPOM.	☐	☐	☐
3	The current production formula is the formula BPOM approved, ingredient by ingredient and level by level.	☐	☐	☐
4	Any change in formula, label, claims or nutrition values since registration has gone through a BPOM variation (Peraturan BPOM No. 23/2023) before the new batch ships; supplier changes are documented; any change of manufacturer or site has been checked with PRI.	☐	☐	☐
5	The label names the producer (or "Diproduksi oleh ... untuk ..." for contract production) or, for imports, the importer and the overseas producer, and these match the izin edar.	☐	☐	☐

2. Ingredient list and sweeteners

Under Peraturan BPOM No. 11/2019 on food additives, every sweetener is either natural or artificial, and each must meet the rules on type, food category and maximum level. Label rules come from Peraturan BPOM No. 31/2018 on processed food labels, as amended.

Natural	Sorbitol, isomaltitol, mannitol, maltitol, lactitol, xylitol, erythritol, thaumatin, steviol glycosides
Artificial	Acesulfame-K, aspartame, cyclamate, saccharin, sucralose, neotame

#	Check	Pass	Fix	Ask PRI
6	Every sweetener in the formula appears in the ingredient list, including any used in small amounts or carried in from a premix.	☐	☐	☐

#	Check	Pass	Fix	Ask PRI
7	Each sweetener appears in the ingredient list with its class and name (for example "Pemanis alami (glikosida steviol)" or "Pemanis buatan (sukralosa)"), and the label carries the warnings that apply: artificial sweeteners, aspartame (fenilalanin), polyols (efek laksatif) and, for table-top artificial sweeteners, the diabetes / low-calorie statement.	☐	☐	☐
8	Each sweetener is permitted for this food category and used within its maximum level.	☐	☐	☐
9	The certificates of analysis from each sweetener supplier confirm the identity and purity stated in the formula.	☐	☐	☐

3. Claims on pack and in advertising

BPOM evaluates the label, including its claims, at registration and approves it as part of the izin edar. Advertising must match the approved label (Peraturan BPOM No. 1/2022), and a product that does not match its approved information can be sanctioned.

#	Check	Pass	Fix	Ask PRI
10	Every claim ("zero calorie", "sugar free", "natural", "pure") is backed by a batch-linked lab report kept on file.	☐	☐	☐
11	A "stevia-only" statement is consistent with the full ingredient list, with no artificial sweetener anywhere in the formula. ("Stevia-only" is not a listed claim; it is a statement about composition.)	☐	☐	☐
12	"Natural" (alami) or "pure" (murni) is used only if the product meets the definition: alami means not mixed and not processed, or processed only physically without changing its properties; murni means nothing else added. A liquid sweetener with water or preservatives rarely qualifies.	☐	☐	☐
13	Claims on the label are the ones BPOM approved for this product as part of the izin edar.	☐	☐	☐
14	Website, marketplace listings, social media and influencer briefs use only the approved claims.	☐	☐	☐
15	Marketing has a written list of approved claims and a sign-off step for any new wording.	☐	☐	☐

4. Nutrition facts and Nutri-Level

Peraturan BPOM No. 10/2026 on nutrition information on processed food labels took effect on 17 June 2026. Products licensed before that date, or whose registration was still in process, have until 17 June 2028 to comply; Nutri-Level becomes mandatory on the same date.

#	Check	Pass	Fix	Ask PRI
16	Every labelled nutrition value is backed by a government or accredited lab result. Imported products may use a certificate of analysis from an accredited lab in the country of origin.	☐	☐	☐
17	Lab results for energy, total fat, saturated fat, cholesterol, total sugar and salt are no more than 120% of the labelled values, and other declared nutrients are at least 80%.	☐	☐	☐

#	Check	Pass	Fix	Ask PRI
18	A "zero calorie" or "sugar free" claim meets the threshold for that claim in Peraturan BPOM No. 1/2022, and the calculation is kept with the lab report.	☐	☐	☐
19	The lab report names the batch it was tested on, so the sample can be traced to production.	☐	☐	☐
20	For ready-to-drink, powdered and concentrated beverages: the expected Nutri-Level grade (A to D, based on sugar, salt and fat) has been estimated.	☐	☐	☐
21	The sweeteners used fit that grade: Level A allows no sweeteners, Level B natural sweeteners only, Levels C and D natural and artificial.	☐	☐	☐
22	Products licensed before 17 June 2026, or in registration on that date, have a dated plan to meet the 17 June 2028 deadline.	☐	☐	☐

5. Good practice (not a BPOM requirement)

Outsourced production and response planning. These items are not BPOM requirements, but where the brand, the registration holder and the factory are different companies, the label depends on all three staying aligned.

#	Check	Pass	Fix	Ask PRI
23	The supply contract requires the manufacturer to use only the registered formula and to notify the brand before any ingredient or supplier change.	☐	☐	☐
24	The contract gives the brand audit rights and access to batch records and lab reports.	☐	☐	☐
25	Recall and withdrawal duties are assigned in writing between brand, registrant and manufacturer.	☐	☐	☐
26	Retained samples are kept for every batch on the market.	☐	☐	☐
27	A named accredited lab can test a retained sample at short notice.	☐	☐	☐
28	A draft public statement and an internal escalation path are ready in case a test result or social media post questions the label.	☐	☐	☐

Possible BPOM sanctions, depending on the type, level and risk of the violation: product withdrawal, a temporary halt to production, or revocation of the izin edar.

Ticked "Fix" or "Ask PRI"? Talk to PRI before the next batch ships

Do not print, ship or advertise until every item in sections 1 to 4 is a Pass. Some of these gaps, such as an undeclared sweetener or a claim the product cannot support, are enough for BPOM to withdraw a product, halt production or revoke its izin edar. As the Beeru case showed, one viral lab result can start an investigation within days.

Product Registration Indonesia (PRI) reviews your formula, label and claims against BPOM rules, flags what must change before print, and handles any variation BPOM requires. Our team, most of whom are healthcare professionals, works on food, beverage and supplement registrations every day.

Book a label and claims review with PRI now →
Send us your label, formula and latest lab report, and we will tell you what to fix before your next batch reaches the shelf.

Sources

- BPOM Public Explanation No. HM.01.1.11.26.304 (2 Nov 2026): pom.go.id
- BPOM press release HM.01.1.07.26.191 on Nutri-Level (30 Jul 2026): pom.go.id
- Peraturan BPOM No. 11/2019 on Food Additives; Peraturan BPOM No. 10/2026 on Nutrition Information on Processed Food Labels; Peraturan BPOM No. 26/2021, Article 13 (120% and 80% rule)
- Peraturan BPOM No. 31/2018 on Processed Food Labels (as amended); Peraturan BPOM No. 1/2022 on claims; Peraturan BPOM No. 23/2023 on registration and variations
- BPOM guidance booklet "Label Pangan Olahan" (sweetener warnings, producer and importer details, "alami" and "murni")
- CekBPOM registration lookup: cekbpom.pom.go.id

This checklist is a general review aid based on BPOM regulations as of November 2026. It is not legal advice and does not replace a review of your specific product, label and documents.

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