



LEGAL ANALYSIS OF SPPG COMPLIANCE IN THE IMPLEMENTATION OF THE MBG PROGRAM: A CASE STUDY OF SPPG CINTAKU SILEBU

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Abstract

Background. This study examines the legal compliance of the Nutrition Fulfillment Service Unit (SPPG) in implementing the Free Nutritious Meal (MBG) Program, with a particular focus on SPPG Cintaku Silebu. Although the MBG Program is supported by comprehensive technical guidelines issued by the National Nutrition Agency, empirical evidence on implementing agencies' legal compliance and its implications for program governance remains limited.

Methods. Employing an empirical legal research approach, this study collected data through document analysis, in-depth interviews with key stakeholders, and direct field observations.

Result. The findings indicate that SPPG compliance is influenced by several interrelated factors, including administrative capacity, human resource competence, regulatory understanding, funding adequacy, and the availability of supporting infrastructure. SPPG Cintaku Silebu generally demonstrates satisfactory compliance with operational standards, particularly in food safety, hygiene, and routine monitoring practices, thereby contributing to effective program implementation and legal certainty. However, several challenges persist, including delayed funding disbursement, inadequate facilities, inconsistent interpretation of technical guidelines, and limited institutional capacity, all of which may hinder full compliance and increase administrative and legal risks.

Conclusion. From a legal perspective, strengthening compliance through clearer regulatory frameworks, enhanced supervision, continuous capacity building, and improved coordination is essential to ensure accountability and the sustainable implementation of the MBG Program.

Implementation. This study contributes to the growing body of literature on public program governance by providing empirical evidence on legal compliance within Indonesia's national nutrition policy and offers practical recommendations for policymakers, regulatory agencies, and program implementers.

Keywords: Legal compliance; Nutrition Fulfillment Service Unit (SPPG); Free Nutritious Meal Program (MBG); public governance; empirical legal research.

I. INTRODUCTION

The Free Nutritious Food (MBG) program is an important step taken by the Indonesian government, launched in 2025 in response to issues of inadequate nutrition (stunting), lack of access to nutritious food, and efforts to achieve a comprehensive improvement in the quality of human resources. This policy aims to provide free nutritious food to vulnerable groups, such as students, pregnant women, and lactating mothers, with the hope that it can strengthen empowerment in education, health, and community welfare.¹

In its implementation, the MBG program is realized through various Nutrition Fulfillment Service Units (SPPG) which play an important role in providing, processing, and distributing nutritious food to beneficiaries. Technical Instructions for the implementation of this program are the main tool that aims to ensure that every step of SPPG activities is carried out in accordance with operational standards, standard procedures, and regulations set by the National Nutrition Agency (BGN). *Juknis* serves as the basis for operational law that regulates the rights, obligations, and responsibilities of implementers in the field so that this national policy can be implemented in an orderly, transparent, and legally accountable manner. SPPG Silebu is a nutrition fulfillment service unit in Silebu Village, Pancalang District, Kuningan Regency which was formed to support the program of providing nutritious food for students and the surrounding community. This program is carried out in the framework of a Healthy Kitchen guided by the National Nutrition Agency (BGN) or institutions related to the nutrition program as a whole. SPPG Silebu was formed as a kitchen service unit to provide nutritious food, especially for students of the Silebu Islamic Boarding School and schools/madrasas around Silebu Village. The goal is to improve nutrition quality through healthy food that meets nutritional standards.

The proposal for the establishment of SPPG was submitted to the authorities (including the National Nutrition Agency) to establish and manage a healthy kitchen to serve thousands of students in a nutritious eating program led by Mulyadi, S.Kep., Nurse. There is also a cooperation agreement document between local managers and other parties for the management of Healthy Kitchens, which is part of the SPPG program, with the regulation of the rights and obligations of both parties during the operational period of the program. These collaborations are generally designed to ensure that the management of nutritious food follows the guidelines set by the program organizers. This program is planned on land owned by Mr.

¹ Amy Shientiarizki, "Legal Protection of Free Nutritious Meal Program Participants for Non-Conformance to Accepted Food Nutrition Standards", *Journal of Social & Legal Sciences*, Volume 4 Number 2, (2026)

Mulyadi himself, which involves the establishment of kitchen facilities and the procurement of equipment, as well as the implementation of the process of providing food for around 2000 students/students in the neighborhood. In general, in Kuningan Regency, SPPG units such as nutritious dining kitchens are also part of the wider community nutrition program. Recently, a number of SPPG kitchens in the Free Nutritious Meal (MBG) program in this area were temporarily stopped by the National Nutrition Agency because they had not met several technical requirements, such as waste treatment plants and sanitation certificates that must be present for safe operations and meet public health standards.

The following is the content of the SPPG, MBG and BGN Law based on its type and content

Table 2 Data on SPPG, MBG and BGN Laws

Yes	Aspects/Entities	Name & Number Rules (Year)	Types & Properties of Norms	Contents of the Principal Provisions / Authorities
1	MBG – Free Nutritious Eating Program	Presidential Regulation of the Republic of Indonesia Number 115 of 2025	Presidential Regulation (Governance of MBG Implementation)	• Establish the implementation of MBG as a national program for nutritional fulfillment. • Regulating the formation of KPPG and SPPG as operational technical implementation units. • Determine the duties and responsibilities of SPPG in the provision, distribution of nutrition, and nutrition education.
2.	MBG – National Food Revenue and Expenditure	Law of the Republic of Indonesia Number 62 of 2024 concerning the State Revenue and Expenditure Budget for the 2025 Fiscal Year	Public financial governance norms that are the authority of the state's annual budget	• Regulating the normative position of the state budget as the basis for spending, revenue, and financing • Annual budget law—valid for one fiscal year and has permanent legal force
3	BGN – National Nutrition Agency	Presidential Regulation of the Republic of Indonesia Number 83 of 2024	Presidential Regulation (Establishment of Institutions)	Establish BGN as a government institution under the President. • Giving BGN the authority to formulate policies to fulfill national nutrition, including MBG. • Establish the tasks, functions, and organizational structure of BGN in the fulfillment of planned nutrition.
4	SPPG – Nutrition Fulfillment Service Unit	Presidential Regulation of the Republic of Indonesia Number 115 of 2025	Presidential Regulation (Organization & Implementation)	Recognizing SPPG as the implementing unit for the implementation of MBG services. • Organize the classification of SPPGs (e.g. agglomeration vs remote) according to the scope of the service. • Arrange cooperation in the implementation of MBG with various parties (government, private, and community).
5	Operational Technical	Regulation of the National Nutrition	Regulations (Regulations)	Describe the obligations of SPPG in handling food waste, waste

	Arrangements (SPPG)	Agency of the Republic of Indonesia Number 1 of 2026		management, and domestic wastewater treatment. • Establish minimum facilities and infrastructure that must be available at SPPG. • Affirm the construction and supervision procedures by BGN.
6	National Food Agency Regulations – Technical Instructions (Juknis)	Regulation of the National Food Agency Number 1 of 2025 concerning Technical Guidelines for the Use of Non-Physical Special Allocation Funds for the Food Security and Agriculture Fund for the 2025 Fiscal Year.	National Food Standards (FAA).	- Establish normative and operational technical instructions for local government work units in the use of Non-Physical DAK Sub-Type Food; - Ensuring the use of funds in accordance with the national goals of food security and agriculture.

II. LITERATURE REVIEW

Definition of *Free Nutritious Eating Program (MBG)*

The Free Nutritious Eating (*MBG*) Program is designed as part of a national policy to improve the nutritional status of the community, especially students, through the provision of free healthy food in educational units. This program is based on several legal and policy provisions that aim to fulfill the right to balanced nutrition and maintain public health.² To ensure the systematic and measurable implementation of the program, the government, through the National Nutrition Agency (BGN) has issued the SPPG MBG Technical Guidelines (Juknis) as operational guidelines, including the implementation mechanism, division of roles, and the rights and obligations of the implementing partners of the Nutrition Fulfillment Service Unit (SPPG). This Juknis is the normative basis for assessing compliance with implementation in the field.

Understanding the Role of the Nutrition Fulfillment Service Unit (SPPG)

SPPG, as an operational partner in implementing the MBG Program, has an important role in ensuring that all stages of implementation, including the provision of foodstuffs and the implementation of nutrition, sanitation, and distribution standards, are carried out in accordance with the applicable Juknis and SOPs.³ Based on the MBG guidelines in educational institutions, MBG is implemented as a component of the Healthy School Movement (Healthy and Nutritious) and is founded on a response to the issue of malnutrition and efforts to improve

² Anifatul Kiftiyah, "Free Nutritious Eating Program (MBG) in the Perspective of Social Justice and Social-Political Dynamics", Indonesian Journal, Volume 5 Issue 1, April (2025)

³ Sources: [Doc. BGN Legal and Public Relations Bureau](#)

the quality of human resources. The implementation of SOPs in SPPG is closely related to compliance with processes that include: receipt of foodstuffs, storage methods, hygiene and sanitation processes, and supervision of the distribution of healthy food to beneficiaries. Non-compliance with these SOPs may result in legal risks, including administrative and criminal liability in the event of a violation of food safety standards.

Legal Basis and Technical Guidelines (Juknis)

MBG is formally implemented under the coordination of the National Nutrition Agency (BGN) and implements a number of legal bases such as: Law No. 20 of 2003 concerning the National Education System; Law No. 17 of 2023 concerning Health; Government Regulation No. 86 of 2019 concerning Food Safety; and Presidential Regulation No. 83 of 2024 concerning the National Nutrition Agency as the organizing institution. The MBG technical instructions issued by BGN serve as a legal basis for operations, regulating the selection of implementing partners (SPPG), the distribution of duties and responsibilities, and the implementation process of food provision in line with legal and administrative norms.

The Function of SPPG in the Implementation of MBG

The Nutrition Fulfillment Service Unit (SPPG) is a technical unit that is at the forefront of the provision, processing, and distribution of nutritious food in the MBG program. The role of SPPG includes providing nutritious food raw materials; processing according to nutritional and hygienic standards; distributing to target groups in accordance with the provisions; implementing reporting; as well as quality control and food safety.

The Importance of Self-Care: A Legal Perspective

Technical guidelines or instructions (juknis) are instruments used to provide instructions for implementing certain policies or programs in an organization or government agency. In this context, compliance with the juknis is very important to ensure that the program runs in accordance with the regulations that have been set. According to Peter Mahmud Marzuki (2020), the juknis functions as an administrative instrument that regulates operational steps in a program. Compliance with the guidelines is important in program implementation because they provide clear directions on how the program should be implemented.⁴

⁴ Peter Mahmud Marzuki, "Legal Research: An Introduction", Jakarta: Kencana, (2020).

A Suspension and Termination Order (SPPG) is an official document issued by law enforcement officials to suspend or stop legal proceedings in a certain case. Its main function is to provide legal certainty, guarantee the rights of suspects or related parties, and safeguard the public interest. The SPPG acts as an administrative and procedural instrument that is legally binding.⁵

Legal Basis

SPPG usually refers to the provisions in the Criminal Procedure Code (KUHP), especially the articles that regulate the termination of investigations and detention. For example, Article 109 of the Criminal Code regulates the right of suspects to request a suspension of detention, while Article 40 of the Criminal Code regulates the termination of investigations.

Contents and Structure of the Judiciary

The SPPG Guidelines contain operational instructions on the issuance procedure for letters, including: conditions for issuance, identification of the case, suspect status, and evidence supporting suspension or termination. Internal procedures: Approval mechanism by superiors or authorized officials before the letter is issued. Administrative format: mention of related parties, letter number, date, legal basis, and signatory officials. Follow-up: Instructions for the police, prosecutor's office, or court regarding the implementation of the letter.

Legal Principles

SPPG jurisprudence must reflect legal principles, such as legality, based on applicable laws and regulations. Transparency: Relevant parties have access to information about procedures and reasons for suspension/termination. Legal Certainty: Avoid abuse of authority and guarantee the rights of suspects.

Definition of Legal Compliance

Law is one of the instruments to regulate people's behavior in social life. Sociologically, law contains various elements, including plans of action or behavior, certain conditions, and situations. Many experts have put forward definitions of law with their respective opinions.

⁵ R. Soerjono Soekanto & Sri Mamudji, "Normative Law Research: A Brief Review", Jakarta: RajaGrafindo (2021).

According to Abdul Manan (2009), law is a series of regulations that govern certain behaviors and deeds of human beings in social life.⁶ The law itself has a fixed characteristic: it is an organ of abstract regulations; it regulates human interests, and anyone who violates the law will be sanctioned according to what has been determined.

Compliance with the law relates to how well an individual or organization follows the rules that apply in a particular legal system. In the context of government initiatives, legal compliance is essential to ensure that all policy and program implementation runs in accordance with established regulations. According to Andi (2015), legal compliance reflects people's understanding of the law and is embedded in their daily attitudes.⁷ Compliance also serves as a measure of the success of law enforcement in society.

Legal compliance is an awareness of the benefits of the law that gives birth to a form of "loyalty" of society to the legal values enforced in living together, which is manifested in behavior that is actually obedient to the values of the law itself, so that it can be seen and felt by fellow members of society.

Legal awareness is actually the awareness or values contained in humans about laws that exist or are expected to exist. Actually, what is emphasized is the values of the legal function, not the legal assessment of concrete events in the society concerned.

Legal Compliance Factors

According to Soerjono Salman, the essence of legal compliance has 3 (three) factors that cause citizens to comply with the law, including:

- 1) *Compliance*: Compliance based on the expectation of rewards and an effort to avoid penalties or sanctions that may be imposed if someone violates the provisions of the law. This obedience is not based on a belief in the purpose of the legal rule in question, but rather on the control of the holder of power. As a result, legal compliance will exist if there is strict supervision of the implementation of these legal rules.
- 2) *Identification* occurs when compliance with legal rules exists not because of its intrinsic value, but so that the group's membership is maintained and there is a good relationship with those who are authorized to apply these legal rules. The attraction to obedience is

⁶ Prof. Dr. H. Abdul Manan, SH, S.IP, M.Hum, "*Legal Aspects*" (2009)

⁷ Andi Hamzah, "*Indonesian Legal Compliance and Law Enforcement in Indonesia*", (2015)

the gain gained from these relationships. Thus, compliance depends on the good and bad of the interaction.⁸

- 3) *Internalization*. At this stage, one obeys the rules of the law because such obedience intrinsically has a reward. The content of the rules is in accordance with the personal values concerned, or because he changes the values that he originally adhered to. The result of such a process is conformity based on intrinsic motivation. The central point of this process is the person's belief in the purpose of the rules in question, regardless of their influence or values on the group or the holder of power or supervision. This stage is the highest degree of obedience, where obedience arises because of the applicable law in accordance with the values adhered to.

With this, it can be concluded that the essence of legal compliance is essentially such as:

- a. *Compliance*, a form of community legal compliance caused by sanctions for violators of the rules, so that the purpose of compliance is only to avoid existing legal sanctions, such as if the police, as law enforcement, carry out operations aimed at checking the completeness of the violators, they will choose other ways to avoid the operation.
- b. *Identification*, a form of legal compliance in society caused by the desire to maintain pleasant relationships with other people or groups, such as a minor who has a desire to drive, but because one of the child's parents is a law enforcer, the minor prefers not to use a motor vehicle.
- c. *Internalization*, The form of community legal compliance, because the community knows the purpose and function of the legal rules, so that it causes the community to obey these regulations, such as parents who prohibit minors from using motor vehicles because minors are usually still less able to control emotions, lack of maturity in thinking, low awareness of responsibility, and plus a lack of understanding of the importance of safety. By knowing these three types of obedience, we can identify how effective a law and regulation is. The more people who obey a law only with compliance or identification, the lower the quality of the law's effectiveness. On the other hand, the more citizens of the community obey a law with internalized obedience, the higher the quality of the effectiveness of the rule or law.

⁸ Soekanto Soerjono, "*Legal Awareness and Legal Compliance*", (1982)

Frame of Mind

The framework of thought in this study will focus on assessing compliance with the Cluster Implementation Order (SPPG) in the implementation of the Juknis (Technical Instructions) in the MBG program. This research will combine various legal theories and related practices to understand and examine how law enforcement is applied in this context. The following are the data of previous research:

Table 1
Past Research Data

Research/Year	Research Focus	Gaps with this research
Imron M(2025)	Implementation of the MBG Program at SPPG and its conformity with technical instructions in the field. This research prioritizes the implementation of the MBG Program in SPPG and its relevance to technical instructions from the perspective of sharia maqashid, with an emphasis on implementation aspects and Islamic values.	This research is more oriented towards legal analysis related to SPPG's compliance with technical instructions, which aims to assess conformity with existing regulations and potentially provide assessments and policy suggestions.
Suprpto et al. (2025)	Focus on the initial assessment of the implementation of the MBG Program as a whole and its compatibility with practice in the field	My research focuses more on legal studies regarding SPPG's compliance with technical guidelines. Therefore, my research is more directed and detailed on the elements of legal compliance, whereas Suprpto's study has a broader evaluative approach.
Shirley A; Shawn Scott; Romney A Heru. (2026)	Focusing on legal aspects that protect MBG Program participants and the establishment of legal responsibilities for organizers from administrative, civil, and criminal perspectives.	This research is more focused on legal studies regarding SPPG's compliance with existing technical guidelines.

Rayhan & Zulham (2025)	Focus on the implementation of halal assurance obligations in the MBG Program and its conformity with the JPH Law, while your study is more of a legal analysis related to SPPG's compliance with the technical guidelines for the implementation of MBG. Thus, Rayhan's research focuses on the halal dimension.	This study covers more general legal compliance in all program implementation.
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III. RESEARCH METHODS

Research Approach

This study uses an empirical legal research method. This method focuses on the idea that law cannot be analyzed only through written legal documents, but must be understood as a social phenomenon that occurs in the lives of people and program implementers. The empirical method positions the law as part of social reality, so data is obtained from field observations, such as respondents' views, implementers' actions, and situations related to the implementation of the SPPG MBG Silebu program.

The empirical approach differs from normative legal research, which focuses only on the analysis of secondary legal sources. In empirical research, information is obtained from respondents who directly experience the legal phenomenon being studied.

Types of Research

The type of research applied is descriptive-analytical empirical research. Descriptive research aims to explain regularly the state of compliance with the implementation of SPPG as seen in the field. After that, analytical research was conducted to elaborate on the relationship between various factors that have an impact on the level of compliance with the provisions in the technical guidelines for implementing the MBG SPPG Silebu program.

This research is an empirical type because it produces primary data through observation and direct interviews with research subjects in accordance with the character of empirical legal research that emphasizes the collection of real data from legal phenomena in society.

Research Location and Time

The location for this study is Silebu, which is the implementation area of the MBG SPPG program. The research will be carried out from March 2026 until it is completed.

Population and Sample

a. Population

The population studied is all individuals or groups involved in implementing the MBG SPPG program in Silebu. This can include everyone involved, either directly or indirectly, related to the research topic.

b. Sample

The research sample will be selected using observation and interview methods, with purposive sampling as the appropriate technique. This technique is used to select individuals or groups who have direct knowledge or experience relevant to the implementation of the SPPG, and who can provide in-depth and useful information for the research

Operational Variables and Definitions

The main variables in this study are:

- a. Compliance with the implementation of the SPPG program, which refers to how much the implementation actions are in accordance with the applicable technical rules.
- b. Factors that determine compliance are elements that affect the implementation in accordance with the provisions, such as employee understanding, resources, and supervision.

Operational definitions are compiled to ensure that each variable can be clearly measured through research tools.

Data Collection Techniques

Primary data collection is carried out through structured interviews with those who run the MBG SPPG program and program participants to obtain stories about the implementation experience and challenges faced. Direct observation of the state of implementation at the location to obtain objective information about the reality of implementation. Secondary data collection is carried out by examining the literature on relevant regulations, technical instructions for the implementation of SPPG, and other supporting documents.

Data Analysis Techniques

Primary data obtained from interviews were analyzed in a qualitative way. Qualitative analysis was carried out by categorizing the themes that emerged from the interviews to identify compliance patterns as well as the factors that led to them.

IV. RESULTS AND DISCUSSION

Research results

This study uses an empirical approach with in-depth interview techniques to resource persons who have professional competence and experience in supervising the regional financial management system. This interview aims to explore information regarding the legal analysis of SPPG compliance in the implementation techniques of the MBG program, especially related to the role of implications for non-compliance with the SPPG and obstacles to the implementation of MBG.

Results of interviews with owners regarding implications

As a result of an interview with Mulyadi S, Kep Ners, the owner who holds the establishment of SPPG Siblebu Cintaku, it was found that the implications of non-compliance with this SPPG can include various aspects from both administrative and criminal perspectives.⁹ The system is theoretically designed to focus on procedural compliance, governance and unlawful acts. However, according to the owner's view, the effectiveness of the mechanism has been partially implemented optimally. As follows:

Administrative aspects. The uncertainty regarding SPPG Siblebu Cintaku does not cause various administrative consequences. Based on the existing policies, compliance can lead to administrative sanctions such as reprimands or even temporary suspension. However, at SPPG Siblebu Cintaku, it has a very important role in supervision and evaluation and is often carried out every day before doing work. The goal is to ensure the implementation of SOP rules and the achievement of development goals that have been carried out according to the standards and applicable rules.

Civil Aspects. If non-compliance causes losses to other parties such as food poisoning that endangers the beneficiaries, then the organizer can be held civilly liable such as unlawful acts. If it is proven that it does not meet the service standards as required in the regulations.

A lawsuit for damages can also be filed by the victim or the victim's legal representative against SPPG as the program organizer. This is in accordance with the concept of legal *compliance* that *non-compliance* not only has an administrative impact, but can also open civil liability depending on the consequences caused by the violation. However, in SPPG Siblebu Cintaku, there is nothing that causes food poisoning or that endangers MBG recipients. Because SPPG Siblebu always conducts regular checks and evaluations.

⁹ Mulyadi S, Kep Ners "Interview with Mulyadi S, Kep Ners, Owner of SPPG Siblebu Cintaku," March 05, 2026.

Criminal Aspects. In addition to *administrative* and civil sanctions, there are also potential criminal implications. If non-compliance with the Silebu Cintaku SPPG involves elements of fraud, corruption or abuse of authority in the management of this program. Then the perpetrator can be subject to criminal sanctions in accordance with the applicable provisions. Criminal law in this aspect aims to provide a deterrent effect to the perpetrator and protect the interests of the state for the community. The resource person also emphasized that legally, violations of food safety standards in criminal and administrative forms should point to the provisions of Law No. 18/2012 on SPPG food, which plays an important role because it can have an impact on public and public trust.

The following is a table of the types of violations of the legal basis and the form of responsibility:

Table 1. Table of SPPG's Non-Compliance with the MBG Implementation Guidelines

Types of Violations	Legal Basis	Form of Responsibility
Violations of food safety standards	Law No. 18/2012 on Food	Criminal and administrative
Consumer/recipient rights are not fulfilled	Law No. 8/1999 on Consumer Protection	Civil (Compensation), Administrative
Deviations in MBG's technical procedures	Presidential Decree No. 83/2024 & SK BGN	Administrative, policy evaluation
His negligence threatens the right to health	1945 Constitution Article 28H	Administrative/civil criminal

Results of Interviews with Owners Related to Obstacles

Results of an interview with Mulyadi S.Kep.Ners. related to the obstacles that occurred in SPPG Silebu Cintaku, several meetings were obtained such as:

Funding Issues. One of the main obstacles in the implementation of MBG by SPPG Silebu Cintaku is the existence of insufficient budget limitations and often late with the deadline determined by programs such as MBG require a large allocation of funds, both for the provision of nutritious food, distribution, and monitoring of its implementation, if the available funds are

insufficient and received late, the implementation of the program will not be in accordance with the expectations specified in the *juknis*.¹⁰

Limitations of Infrastructure and Facilities. Often the technical specifications set standards related to the provision of facilities and infrastructure to support the running of the MBG program, but often the existing infrastructure is inadequate both in terms of food storage, this limited vehicle facility causes the implementation of the MBG program to be less than optimal and can even contradict the provisions of the technical specifications which require the provision of sufficient and decent facilities.

Legal Implications Related to SPPG Jurisprudence

The Free Nutritious Meal Program (MBG) is held by the government through the National Nutrition Agency (BGN) based on regulations and technical guidelines listed in a number of decisions and instructions, including the decree of the Deputy for Systems and Governance Number 009/05/01/SK.09/08/2025 regarding the Selection of MBG SPPG Partners (*Juknis*) which is the legal reference for the implementation of the MBG program.¹¹

In following the technical guidelines, SPPG, as the organizer of the program activities, is responsible for meeting the standard operating procedures (SOP) of the MBG program, including hygiene and food nutritional quality standards. Obtain and maintain sanitary *hygiene feasibility* (SLHS) certification as proof that MBG's kitchen and production process meet the food safety requirements that have been determined. Submit reports on the use of funds and the implementation of the program in accordance with existing technical provisions.

Based on the results of an interview with Mulyadi S, Kep Ners, the owner who holds the establishment of SPPG Siblebu Cintaku on March 5, 2026 at 13:15, it shows that the legal implications for SPPG compliance have very good SOPs, because SPPG Siblebu shows a fairly mature understanding of food safety SOPs; this is reflected in their consistency in conducting routine inspections and periodic evaluations at every stage of kitchen operations. In addition, cleanliness and hygiene in the kitchen are the main concerns in the operation of SPPG Cintaku Siblebu. The condition of the kitchen, which is always kept clean and hygienic, shows compliance with the basic principles of food safety as stipulated in the BGN SOP, which requires a production environment to be free from pollution and supports the creation of safe and nutritious food. This condition stipulates that partners in this public service program follow

¹⁰ Mulyadi S, Kep Ners "Interview with Mulyadi S, Kep Ners, Owner of SPPG Siblebu Cintaku," March 05, 2026.

¹¹ [Source : Doc. Legal and Public Relations Bureau](#)

the formally established SPPG SOP rules, certification guidelines, continuous internal reporting, and audit systems.¹²

Constitutional Basis (1945 Constitution)

The constitutional basis for SPPG compliance comes from several provisions in the 1945 Constitution of the Republic of Indonesia (1945 Constitution):

Article 27 paragraph (1): Affirms that every citizen has the same rights and obligations before the law. In the context of SPPG, each party involved is obliged to comply with the provisions of the management and payment of salaries or other contributions.

Article 28D paragraphs (1) and (2): Regulates citizens' rights to fair legal recognition, guarantee, protection, and certainty. SPPG compliance is part of fulfilling legal obligations that are balanced with the right to obtain information and legal protection.

Articles 23A and 23B: Relating to transparent and accountable management of state finances. SPPG compliance is an instrument to maintain the integrity of public finances and prevent misuse of funds.

Complementary Legal Foundations

In addition to the 1945 Constitution, several regulations in Indonesia strengthen SPPG compliance: Law Number 17 of 2003 concerning State Finance: Emphasizing accountability and transparency in the management of state finances, including salary or allowance payments. Law Number 20 of 2003 concerning the National Education System: Emphasized that every educational institution and educator is obliged to comply with administrative standards, including the payment of allowances and reporting. Government Regulations and Related Ministerial Regulations: Determine the technical mechanism for compliance, for example Government Regulation No. 53 of 2015 concerning Civil Servant Discipline if the SPPG is related to the salary of civil servant teachers, or the Minister of Education and Culture regarding the management of BOS funds.

SPPG Compliance With MBG: An Empirical Phenomenon

Compliance with regulations is an important indicator of the effectiveness of a public policy. In this context, the Building Supervisory and Management Unit (SPPG) is responsible

¹² Mulyadi S, Kep Ners "Interview with Mulyadi S, Kep Ners, Owner of SPPG Silebu Cintaku," March 05, 2026.

for ensuring the implementation of regulations related to Building Management (MBG). SPPG's compliance with MBG reflects the extent to which technical and administrative regulations are followed and reflects the institution's compliance with applicable legal norms. This phenomenon is empirical because it can be observed through field practice, internal audits, compliance reports, and interviews.

Compliance and Determinants

Compliance can be explained through several theoretical approaches. According to Tyler (2006), regulatory compliance is influenced by the perception of legal legitimacy and procedural fairness. This means that SPPGs tend to be compliant if they consider MBG legally valid and the implementation process is fair and transparent.¹³

In addition, internal factors such as organizational capacity, technical understanding of MBG, and periodic supervision affect compliance levels. External factors, including social pressures, government inspections, and the risk of legal sanctions, also play a significant role (Gunningham, Kagan, & Thornton, 2003). Empirical phenomena show that even if regulations are clear, compliance can vary due to resource constraints or the perception of compliance benefits and costs.¹⁴

Empirical Phenomena in the Field

Field studies in several government building institutions show variations in the level of SPPG compliance with MBG. Some buildings consistently implement MBG protocols, including routine maintenance, building audits, and complete documentation. Meanwhile, other buildings show partial compliance, for example simply following administrative procedures without ensuring the technical aspects of the building are met. This phenomenon shows that compliance is not only influenced by written regulations, but also by internal management practices, external monitoring, and technical understanding of SPPGs.

The Impact of Compliance in Legal and Community Perspectives

Definition of Legal Compliance

¹³ Tyler, T. R., "Legal Compliance", (2006)

¹⁴ Gunningham, Kagan, & Thornton, "Shaping Environmental Law and Policy", (2003)

Legal compliance is the behavior of an individual or group that adjusts its actions in accordance with applicable legal norms. This obedience not only reflects acceptance of formal rules, but also shows the internalization of legal values in society.¹⁵

Positive Legal Perspectives

From the formal legal side, compliance has a direct impact on the effectiveness of law enforcement. Law-abiding individuals reduce the burden on law enforcement officials and minimize violations that have the potential to cause conflicts. This compliance is also an indicator of the legitimacy of the legal system; The higher the level of compliance, the stronger the legal position in regulating society.¹⁶

Socio-Community Perspective

From a social perspective, legal compliance plays a role in creating social order and stability. Societies that respect the rule of law tend to build harmonious social relations and reduce conflict. Legal compliance also strengthens social norms because laws often reflect generally accepted values and ethics in society.

The Impact of Compliance on Social and Economic Development

A high level of legal compliance supports economic and social development. For example, compliance with contract laws and business licensing encourages investors to operate safely, increases market confidence, and reduces the risk of legal disputes. In the long run, legal compliance contributes to the creation of a productive and just society.¹⁷

Legal Compliance Challenges

While legal compliance is important, factors can reduce compliance, such as a lack of understanding of the law, injustice in law enforcement, or a culture that tolerates violations. Therefore, the legal approach must be balanced with legal education and community development so that compliance is not merely coercive, but becomes social awareness.

V. CONCLUSION

Compliance with the law has a double effect: it increases the effectiveness of the law and strengthens the social structure. The legal view emphasizes compliance as a regulatory tool, while the social view highlights compliance as the basis for balanced public relations.

¹⁵ Soerjono Soekanto, "Sociology of Law: An Introduction". Jakarta: RajaGrafindo Persada, (2010).

¹⁶ Jimly Asshiddiqie. "Indonesian Constitution and Constitutionalism", Jakarta: Rajawali Pers, (2014).

¹⁷ Maria Farida Indrati. "Law and Development: Indonesian Perspective", Yogyakarta: Gadjah Mada University Press, (2016).

Therefore, law enforcement strategies need to consider formal and cultural aspects so that compliance can be achieved sustainably.

4.2.5 Obstacles to the Implementation of the MBG Program by SPPG Against Juknis

According to the Atrabis Journal, a qualitative study on the implementation of MBG in SPPG (FGD) shows operational and accountability obstacles. Doi: 10.38204/atrabis.v11i2.2745 has one example of the obstacles identified in the implementation of MBG at the SPPG level is non-compliance with the operational standards set in the Juknis. According to the findings of a qualitative study that examined the implementation of MBG in West Bandung Regency, MBG operators often do not consistently comply with the SOPs that have been set, including in the production process, distribution schedule, and food safety standards. This condition directly causes a decrease in the effectiveness of services and incompatibility with the implementation of what is regulated in the Juknis.¹⁸

This non-compliance can be caused by several factors:

- a. Variation in the quality of raw materials and lack of supplier control.
- b. Inconsistency in the implementation of production time and quality standards.
- c. Lack of training and competence of SPPG human resources in understanding and applying Juknis appropriately.

4.2.6 Obstacles to the Implementation of the MBG Program by SPPG Against Juknis: An Empirical Phenomenon Approach

The implementation of the MBG program by SPPG is one of the important instruments to ensure the effectiveness and compliance of the implementation of activities according to the guidelines. However, in the field there are several obstacles that affect the realization of program goals. Based on an empirical review, these barriers can be grouped into three main categories, namely: *structural*, resource and communication. Theoretically, the implementation of government programs must be guided and efficient as stipulated in Law number 30 of 2014 concerning Government Administration. However, empirical phenomena show that there is a gap between regulation and practice in the field.

- a. Structural Barriers:

Structural obstacles arise and incompatibilities between the institutional capacity of the SPPG and the demands of the judiciary. Empirical phenomena show that some

¹⁸ Atrabis Journal, " *On Qualitative Studies on the Implementation of MBG in SPPG (FGD) Showing Operational Obstacles and Accountability*.", doi: 10.38204/atrabis.v11i2.2745, December (2025)

SPPGs experience obstacles in the preparation of MBG reports due to complex and less flexible technical formats¹⁹.

This causes the monitoring and evaluation process to be less than optimal. For example, the number of indicators in the MBG technique sometimes exceeds the capacity of the field team, so some aspects are not recorded in detail.

b. Resource Barriers:

Limited Human Resources (HR) and facilities are also significant obstacles. A field study by Sutaryo (2018) revealed that some SPPGs have a limited number of individuals. Meanwhile, the burden of implementing MBG is high.²⁰

As a result, supervision is partial and administrative formality, not substantial. In addition, the limitation of transportation facilities and information technology slows down the process of collecting field data.

c. Communication and Socialization Barriers to Jurisprudence:

Communication barriers are related to understanding and socializing the technical aspects. Empirical phenomena in several regions show that MBG techniques are not socialized evenly to all SPPG personnel. This causes differences in interpretation in the implementation of the program, so that there is a variation in the quality of MBG between units²¹. The lack of clarity in reporting and accountability mechanisms also exacerbates barriers.

¹⁹ Ridwan, A, "Government Program Management: Theory and Practice in Indonesia", Jakarta: Rajawali Press (2017)

²⁰ Sutaryo, B, "Supervision and Evaluation of Public Programs", Yogyakarta: Pustaka Siswa (2018)

²¹ Naaution, H, "Public Policy and Program Implementation: Empirical Approach", Bandung: Alfabeta (2019)

CHAPTER V CONCLUSION AND SUGGESTIONS

5.1 Conclusion

Based on the results of the research and discussion of the legal analysis of SPPG compliance in the MBG program, several conclusions can be drawn as follows:

a. The Influence of Legal Implications Related to the SPPG Cintaku Silebu Juknis :

Legal implications play a crucial role in the effectiveness of the Cintaku Silebu SPPG regulation. SPPG shows a high level of compliance with MBG SOPs, including aspects of hygiene and food nutritional quality, through routine inspections and periodic evaluations carried out. Although there are no detailed regulations on non-compliance, the principles of legal certainty, transparency, and accountability contained in the 1945 Constitution remain the basis for the implementation of this program.

Challenges such as the difference between written regulations and practices that occur in the field as well as views on justice require socio-cultural adaptation and a powerful approach to legal socialization. Overall, the law serves as a key element to guarantee that regulations are implemented effectively, provide certainty, and maintain stability in social interactions.

b. Forms of Obstacles to the Implementation of the Free Nutritious Meal Program (MBG) by SPPG Silebu to the Provisions in the Technical Instructions (juknis):

The implementation of the Free Nutritious Meal Program (MBG) from SPPG Silebu has a crucial role in ensuring the effectiveness of activities carried out in accordance with the guidelines that have been set. The results of the study indicate that this program faces a number of challenges, namely: delays in disbursement of funds and incompleteness of documents, procurement and storage of foodstuffs that do not fully meet the criteria, lack of understanding of the guidelines by officers, and coordination and supervision that have not run optimally. These challenges result in some provisions in the guidelines not being fully implemented. There is a need for improvement in the fields of administration, technical logistics, human resources, and coordination to ensure that the MBG program can achieve maximum nutrition goals.

5.2 Suggestions

Based on the above conclusion, the author gives some suggestions as follows:

a. For Lawmakers and Governments

The government needs to consider upgrading the status of MBG technical to a stronger regulation (e.g. Government Regulation or Ministerial Regulation), so as to have higher legal force and provide stronger legal certainty for SPPG technical implementers.

b. For SPPG Organizers

It is recommended to develop a comprehensive supervision system, which combines external audits, field monitoring, and the application of legal and technical indicators, in order to ensure that each SPPG follows the standards set out in the technical guidelines and the principles of good administrative law. As well as providing legal education and technical training on a regular basis to SPPG managers is needed so that their understanding of the technical and legal standards of the implementation of MBG increases, which in turn strengthens operational compliance in the field.

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