

Business Actors' Responsibility for Consumer Losses Due to Product Content Mismatch Skincare Products and Packaging Labels

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Abstract

The rapid growth of the skincare industry in Indonesia has not always been accompanied by adequate compliance with consumer protection laws. One prominent issue is the case of White Tomato products marketed by Dr. Richard Lee, where discrepancies were found between the information on the label and the actual composition of the product, including allegations of relabeling practices that could potentially cause harm to consumers. This study aims to analyze the legal responsibility of business actors for losses arising from such actions and to examine the legal remedies available to consumers. Using a normative juridical method, this study applies a legislative approach and a case approach through a review of relevant regulations and administrative actions issued by the Indonesian Food and Drug Administration (BPOM). The results of the study show that these practices violate the provisions of Law Number 8 of 1999 concerning Consumer Protection, specifically Articles 4, 7, and 8, because they do not provide accurate and clear product information to consumers. Business operators may be held civilly liable under Article 19 of the Consumer Protection Law and Article 1365 of the Civil Code, and may be subject to administrative and criminal sanctions under Articles 61 and 62 of the Consumer Protection Law. Consumers can pursue legal remedies through civil litigation, administrative complaints to the BPOM, or alternative dispute resolution through the BPSK. This study highlights the importance of strict compliance with honest product information and emphasizes the need for stricter regulatory oversight to ensure consumer protection and legal certainty.

INTRODUCTION

The skincare industry in Indonesia has reached a point where it can no longer be ignored. Skincare trends have undergone a remarkable transformation in recent years, driven by growing public awareness of the importance of maintaining healthy skin.¹ This rapid growth is supported by skincare sales in Indonesia, which reached IDR 111.83 trillion in 2022. This is predicted to experience an annual growth of 5.81% CAGR in the period 2022 to 2027.² This is supported by an increase in the number of cosmetic business units dominated by small and medium-sized industries (SMIs).³

However, this growth has not been accompanied by adequate consumer education and protection. The lack of transparency in product information disclosure opens up opportunities for violations, such as the use of inappropriate labels, exaggerated claims, and product relabeling.⁴ Data from BPOM, which revoked the distribution permits of 21 cosmetic products due to production discrepancies with registered data, shows the weak compliance of business actors with regulations. This condition creates a gap between the rapid growth of the industry and the guarantee of consumer protection.⁵

One case that attracted public attention was the White Tomato product marketed by Dr. Richard Lee through CV Athena Mandiri Group with distribution license SD211330691.⁶ This product claimed to contain white tomato extract (*Solanum Lycopersicum*) as its main ingredient and was sold at a premium price of around Rp1.5 million. However, based on the composition data, this exclusive ingredient was not found; instead, it only contained the common and much more affordable L-Glutathione Reduced.⁷ Furthermore, Dr. Richard Lee's White Tomato product was not independently

¹ Rizqi Anugrah Putri Amaylia et al., 2024, *Tren Konsumsi Skincare Di Kalangan Mahasiswa Berdasarkan Penelusuran Merek Skincare Terpopuler Di Kabupaten Banyumas*, Proceedings of the National Conference on Electrical Engineering, Informatics, Industrial Technology, and Creative Media VOL. 4, no. 1.: 1070–79, <https://centive.ittelkom-pwt.ac.id/index.php/centive/article/view/370>.

² CISAS, *Data Penjualan Skincare Di Indonesia Tunjukkan Pelonjakan*, CISAS.

³ Emy Trimahanani, 2024, *Industri Kosmetik Indonesia Tumbuh Sekitar 4,02 Persen per Tahun*. <https://www.vibizmedia.com/index.php/2024/11/29/industri-kosmetik-indonesia-tumbuh-sekitar-402-persen-per-tahun/>, diakses pada tanggal 5 Agustus 2025 pukul 12.30.

⁴ Hanny Handayani et al., 2025, *Analisis Pelanggaran Strategi Pemasaran Dalam Praktik Repackaging Dan Overclaim Terhadap Keputusan Pembelian Skincare Lokal*. Jurnal Ilmiah Multidisiplin 1, no. 4: 2299–2309.

⁵ Averus Kautsar, 2025, *Daftar 21 Skincare Yang Dicabut Izin Edarnya Oleh BPOM, Apa Sebabnya?*, detik.com, <https://www.detik.com/kalimantan/berita/d-8049889/daftar-21-skincare-yang-dicabut-izin-edarnya-oleh-bpom-apa-sebabnya>. diakses pada tanggal 28 Oktober 2025 pukul 22.00.

⁶ Muhammad Sukardi, 2025, *BPOM Pastikan White Tomato Milik Dokter Richard Lee Overclaim, Peredaran Dihentikan!*, INEWS.ID, <https://www.inews.id/lifestyle/health/bpom-pastikan-white-tomato-milik-dokter-richard-lee-overclaim-peredaran-dihentikan>. diakses pada tanggal 28 Oktober 2025 pukul 22.00.

⁷ Fanny Violetania Ang et al., 2025, *Pelanggaran Etika Bisnis Dan Profesi Dalam Kasus Skincare Athena: Overclaim, Repackaging, Dan Izin Edar*, Jurnal Ilmiah Manajemen Ekonomi Dan Akuntansi 2, no. 2: 118–25, <https://doi.org/10.62017/jimea>.

produced, but rather relabeled from a product manufactured by PT Imedco Djaja and distributed by CV Athena Mandiri Group. The only difference is the label featuring a white tomato, while the contents are identical to other products sold at lower prices, yet marketed at a significantly higher price through unfounded claims of uniqueness.⁸

The discrepancy between the label or claim and the product's contents, as well as the relabeling, raises strong suspicions that consumers have been misled and suffered financial losses by paying high prices for a uniqueness that did not materialize. This is further reinforced by the statement of a consumer who felt aggrieved in a video on the TikTok app, saying, "This product is safe, but it does not match its claim of containing white tomatoes. We spent 1.5 million rupiah, but this product does not match its claim."⁹ This situation shows that incorrect and inaccurate product information has the potential to harm consumers and reduce their trust in businesses. This practice also clearly violates Article 8 paragraph (1) and Article 7 of Law No. 8 of 1999. Therefore, relabeling and the discrepancy between the contents and the label in the White Tomato case not only cause financial losses to consumers but also contradict the basic principles of consumer protection.¹⁰

This phenomenon indicates that business actors are not only ethically but also legally obligated to ensure that information regarding the content, benefits, and origin of products is conveyed accurately, clearly, and honestly as stipulated in Article 4 letter c of Law Number 8 of 1999 concerning Consumer Protection, which mandates "*the right to obtain accurate, clear, and honest information regarding the condition and warranty of goods and/or services.*"¹¹ In addition, the practice of providing misleading information can have civil consequences under Article 1365 of the Civil Code regarding unlawful acts, which states that "*any act that violates the law and causes harm to another person obligates the person who caused the harm due to their fault to compensate for the harm.*"¹² Thus, the discrepancy

⁸ Rina Ayu Pancarini, 2025, *Overclaim, BPOM Batalkan Izin Edar Suplemen Kesehatan White Tomato*, Tribunnews,, https://id-gr.obnews.co/Flow/News/id/9345655.html?val=916d96d0e83f9c4617e878c27273a612&g_v=XKG7x61ZYELX5AdAzwu4I-tToz_1tynn3a5AFciMaBnbnI9h96sqyahEaFSMFDRZ&ch=transsion. diakses pada tanggal 6 Agustus 2025 pukul 11.00.

⁹ Cicirizkika_. 2024. *Siapa ni yg korban white tometo punya dr. Richard Lee juga?*. Tiktok. <https://vt.tiktok.com/ZSyvHD3oF/>. diakses pada tanggal 11 November 2025 pukul 19.55 WIB.

¹⁰ Tangkas Hadi Perwira dan Atik Winanti, 2020, *Perlindungan Konsumen Terkait Iklan Yang Menyesatkan*, 2nd National Conference on Law Studies: Legal Development Towards A Digital Society Era 02, no. 01: 312–20, <https://conference.upnvj.ac.id/index.php/ncols/article/download/1461/936>.

¹¹ Republik Indonesia, "Undang-Undang Republik Indonesia Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen," 1999.

¹² Republik Indonesia. "KUHP: Kitab UU Hukum Perdata," Pasal 1365.

between the label and the product content is not only a marketing ethics issue, but also a form of legal violation that can result in liability for business actors.

However, this study fills that gap because there has been no study that specifically highlights the responsibility of business actors for skincare products that have been approved for distribution but still deviate from substantial provisions, particularly those related to label accuracy and product information truthfulness. Based on this gap, this study aims to analyze the forms of legal liability of business actors and identify legal remedies available to consumers in the White Tomato case. By formulating questions regarding liability and legal remedies, this study is expected to strengthen consumer protection while providing clear guidance in dispute resolution.

Literature Review

A scientific work must be based on previous research to encourage academic development, especially in the field of law. Reviewing previous research allows for the identification of gaps and differences between existing findings and current studies. This study, entitled "Business Liability for Consumer Losses Due to Discrepancies Between the Contents of Skin Care Products and Product Labels," examines the scope of business liability for products whose contents do not match their labels, as well as the legal remedies available to consumers to protect their rights against such losses.

The first previous study was titled "Legal Protection for Consumers against Skin Care Products Sold Online Without Distribution Permits" written by Atha Raihan Azayaka and Eko Wahyudi. This previous study analyzed consumer protection issues arising from the circulation of skin care products without permits in the online market. The authors found that the absence of distribution permits led to administrative violations and weak legal protection, particularly in relation to delays in compensation for consumers. Their focus was primarily on regulatory compliance failures and administrative violations. In contrast, my research focuses on products with valid distribution permits (White Tomato) but with differences in labeling and content, resulting in misleading information.¹³

In contrast to the second study, entitled "Business Liability for Consumers of Hazardous Cosmetics Based on Law No. 8 of 1999" written by Aruna Fatma Hidayah Sumintardirja and Liya Sukma Muliya, which highlights the responsibility of manufacturers for cosmetic products containing hazardous substances such as mercury and hydroquinone. The main issues in this study are product safety and physical harm

¹³ Atha Raihan Azayaka and Eko Wahyudi, 2023, *Perlindungan Hukum Kepada Konsumen Terhadap Produk Skincare Tanpa Izin Edar Yang Dijual Secara Online*, Jurnal Hukum, Politik Dan Ilmu Sosial 2, no. 2: 147-59, <https://doi.org/10.55606/jhps.v2i2.1622>.

suffered by consumers. The study focuses on product safety and physical harm suffered by consumers, while my current study examines the harm arising from inaccurate and misleading product information.¹⁴

The third study by Nadia Shafira and Nursariani Simatupang, entitled "The Legal Responsibility of Beauty Clinics that Cause Losses to Patients Victims of Malpractice," examines the legal responsibility arising from malpractice in beauty clinics. It focuses on the negligence of medical personnel in treatment actions that cause physical damage to consumers. This differs from the present study, which does not discuss medical procedures but rather the responsibility of business operators as producers and marketers of skincare products in providing accurate, clear, and non-misleading information. consumers.¹⁵

From the three previous studies, it appears that no research has specifically examined the responsibility of business actors for products that have been approved for distribution but still violate the substance of the label through inconsistencies between the claims and the product content. Thus, this study fills this gap by emphasizing the importance of product information accuracy as a form of consumer protection, and by using the theoretical framework of strict liability, unlawful acts, and the doctrine of truth in information in consumer protection law. This approach demonstrates the original contribution of this study in distinguishing between administrative compliance, namely having a distribution permit, and substantive compliance, namely the accuracy of information on labels, which has not been explicitly discussed in previous literature.

METHOD

This study uses normative legal research focusing on the assessment of positive legal norms regarding business operator responsibility and consumer protection. The research was conducted through a literature study by examining laws and regulations, legal doctrines, legal theories, and relevant literature related to the inconsistency between product content and packaging labels and the practice of relabeling by business actors. The approaches used included the statute approach and the case approach. The statutory approach was used to analyze the legal provisions that form the basis of business operator liability, particularly Law No. 8 of 1999 concerning Consumer Protection, the

¹⁴ Fatma Hidayah Sumintardirja Aruna and Liya Sukma Muliya, 2023, *Tanggungjawab Pelaku Usaha Terhadap Konsumen Pengguna Kosmetik Berbahaya Berdasarkan UU Nomor 8 Tahun 1999*, *Jurnal Riset Ilmu Hukum (JRIH)* 3, no. 2: 63–68.

¹⁵ Nadia Shafira and Nursariani Simatupang, 2023, *Pertanggungjawaban Hukum Klinik Kecantikan Yang Menimbulkan Kerugian Pada Pasien Korban Malpraktik*, *EduYustisia : Jurnal Edukasi Hukum* 2, no. 2: 7–12.

Civil Code, and Regulation of the Minister of Health of the Republic of Indonesia No. 1176/MENKES/PER/VIII/2010 concerning Cosmetics Notification. On the other hand, the case approach is applied by examining the White Tomato case marketed by Dr. Richard Lee. This case is analyzed based on the criteria of normative violations of Articles 4, 7, and 8 of Law Number 8 of 1999 concerning Consumer Protection, regulatory actions, namely statements by the Food and Drug Supervisory Agency (BPOM), and potential consumer losses, as an explanation of the application of legal norms in practice.

The data for this study was sourced from primary legal materials, namely Law No. 8 of 1999 concerning Consumer Protection, the Civil Code Civil Code, and Regulation of the Minister of Health of the Republic of Indonesia No. 1176/MENKES/PER/VIII/2010 concerning Cosmetics Notification, secondary legal materials, namely books, journals, scientific articles, and tertiary legal materials, namely legal dictionaries and encyclopedias. Data collection techniques were carried out through a literature study of all relevant legal sources. The data obtained was analyzed qualitatively with descriptive characteristics, namely by describing, interpreting, and compiling legal arguments regarding the responsibility of business actors and the legal measures that consumers can take due to losses resulting from the inconsistency of skincare product contents with packaging labels and relabeling practices carried out by business actors.

RESULTS AND DISCUSSION

1. Business Operator Liability to Consumers for Discrepancies Between Skincare Product Contents and Product Labels

The role of business actors in handling losses caused by products that harm consumers is crucial, especially when there is a discrepancy between the product content and the label, and when business actors engage in relabeling practices. In this case, the obligation to take responsibility falls on business operators as the parties that manufacture or trade the products. Conversely, consumers are usually the ones who suffer the most from these products. This obligation is confirmed through various legal sources, such as legislation and civil law. Therefore, the form of responsibility of business operators must be carried out in accordance with applicable regulations when the legal provisions governing consumer protection are violated.¹⁶

¹⁶ Juldin Latama et al., 2024, "Tanggungjawab Pelaku Usaha Bagi Konsumen Terhadap Keamanan Pangan Dalam Prespektif Hukum Perlindungan Konsumen," *Hakim: Jurnal Ilmu Hukum Dan Sosial* 2, no. 1: 211-24.

a. Civil liability

In the event of a violation of these legal provisions, business operators are legally liable for any losses suffered by consumers. The responsibility of business operators under consumer protection law is not limited to providing information, but also to ensuring that the products on the market are safe and comply with established standards. Law Number 8 of 1999 concerning Consumer Protection serves to protect consumer rights and balance the position between consumers and business operators. This refers to the idea that business operators are obliged to be responsible for consumer losses arising from the use of goods obtained, including when there is a discrepancy between the product content and the packaging label as well as relabeling practices.¹⁷

Referring to Law Number 8 of 1999 concerning Consumer Protection, the responsibility of business actors towards consumers is based on Article 19 Paragraph (1), which states: *"Business actors are responsible for providing compensation for damage, contamination, and/or losses suffered by consumers as a result of consuming goods and/or services produced or traded."* In the case of White Tomato by Dr. Richard Lee, this provision confirms that business operators must be responsible for providing compensation to consumers who have suffered losses. Compensation can take the form of a refund or replacement of goods of a similar type or value to the product purchased by the consumer, as stated in Article 19 Paragraph (2) of Law Number 8 of 1999 concerning Consumer Protection.¹⁸

In the context of civil law, the violation that occurred was the discrepancy between the product's contents and the packaging label, and the practice of relabeling in the case of White Tomato by Dr. Richard Lee constitutes an Unlawful Act (*Perbuatan Melawan Hukum* or Tort) or *Onrechtmatige Daad* as stipulated in Article 1365 of the Indonesian Civil Code (*Kitab Undang-Undang Hukum Perdata*).¹⁹

The failure of business operators to ensure that product information matches the label is a serious form of negligence that has caused losses to consumers. These losses include financial losses and immaterial losses such as anxiety, reduced sense of security when using skincare products, and a decline in consumer confidence in business operators. Therefore, as the party that manufactures and distributes White Tomato, Dr. Richard Lee must pay compensation in accordance with the law.

¹⁷ Jetmiko Setiawan, Yetti, and Indra Afrita, 2025, *Tanggung Jawab Hukum Pelaku Usaha Atas Produk Cacat Tersebut*, Jurnal Ilmu Hukum "The Juris" IX, no. 1: 217–33.

¹⁸ Republik Indonesia, "Undang-Undang Republik Indonesia Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen," 1999.

¹⁹ Republik Indonesia, "Kitab Undang-Undang Hukum Perdata," n.d.

b. Administrative Responsibilities

In addition to civil liability, violations related to White Tomato products may also result in administrative liability for business operators. As stated in Article 20 Paragraph (1) of the Regulation of the Minister of Health of the Republic of Indonesia No. 1176/MENKES/PER/VIII/2010 concerning Cosmetics Notification, *"Violations of the provisions in this Regulation may be subject to administrative sanctions in the form of:*

- 1) *written warning;*
- 2) *temporary ban on the distribution of cosmetics;*
- 3) *withdrawal of cosmetics that do not meet the requirements of quality, safety, efficacy, and labeling from circulation;*
- 4) *destruction of cosmetics; or*
- 5) *temporary suspension of the production and/or distribution of cosmetics."*²⁰

These provisions form the basis for the actions taken by the the National Agency of Drug and Food Control (BPOM) against White Tomato products. In Public Explanation Number HM.01.1.2.03.25.85 dated March 9, 2025, regarding the results of BPOM's follow-up on the relabeling and advertising of WT health supplements that did not comply with regulations, BPOM stated that it had:

- 1) Revoked the distribution permit for White Tomato products
- 2) Issued a stern warning regarding violations of distribution, labeling, and promotion activities for the product. BPOM.
- 3) Instructed the business operator to recall and cease all advertisements related to the White Tomato product from all media channels.
- 4) Halted the distribution of the product, which does not comply with applicable regulations.²¹

These actions by the National Agency of Drug and Food Control (BPOM) were clearly intended to protect consumers from the distribution of products that could cause harm.

c. Criminal Responsibility

In addition to civil and administrative liability, business actors may also be subject to criminal sanctions as referred to in Article 61 of Law Number 8 of 1999 concerning Consumer Protection, which states that *"Criminal prosecution may be brought against business actors and/or their management."*²²

²⁰ Peraturan Menteri Kesehatan, "Peraturan Menteri Kesehatan Republik Indonesia Nomor 1176/Menkes/Per/Viii/2010 Tentang Notifikasi Kosmetika" (Jakarta, 2010).

²¹ "Hasil Tindak Lanjut BPOM Terhadap Relabelling Dan Iklan Suplemen Kesehatan WT Yang Tidak Sesuai Ketentuan," Badan POM, 2025.

²² Republik Indonesia, "Undang-Undang Republik Indonesia Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen," 1999.

Then, Article 62 of Law Number 8 of 1999 concerning Consumer Protection stipulates criminal sanctions that can be imposed on business actors who violate the provisions of Law Number 8 of 1999 concerning Consumer Protection, namely imprisonment for a maximum of five years and two years, as well as fines of up to two billion rupiah and five hundred million rupiah. Furthermore, Article 62 also states that if the violation causes serious injury, serious illness, and other harmful effects, additional criminal provisions may be applied to the violator.²³

As a form of responsibility for these violations, Dr. Richard Lee has issued an apology. Although the business operator has publicly apologized for negligence in marketing and the discrepancy between product content and labeling, as well as the relabeling practices it carried out, these actions do not eliminate the legal consequences that have arisen. Accountability must still be enforced to ensure the restoration of consumer rights and to provide a deterrent effect for other business operators. Therefore, both the mismatch in content and the relabeling practice are two types of violations that are interrelated, both of which confirm the dissemination of incorrect product information and establish legal liability for the business operator concerned.²⁴

2. Legal Remedies That Can Be Pursued by Consumers for Losses Arising from Product Content Non-Conformity

In dealing with the consequences of product content discrepancies and relabeling practices, consumers have the right to seek compensation from businesses. In the case of White Tomato, BPOM has revoked the distribution permit and ordered the product to be recalled, but these administrative measures have not provided direct relief to affected consumers. Therefore, consumers can also pursue other legal remedies to obtain redress.

One way to resolve disputes is through litigation, namely by filing a civil lawsuit in court or with a consumer dispute resolution agency to obtain compensation for losses incurred. However, this process often requires significant costs and takes a long time. Therefore, consumers can also take non-litigation legal action.²⁵ The Consumer Dispute Resolution Agency (BPSK) was established by Law No. 8 of 1999 on Consumer Protection to handle and resolve disputes between consumers and businesses outside of court

²³ Sahda Saraswati Akbar et al., 2025, "Pertanggungjawaban Hukum Owner Skincare Terkait Overclaim Pada Produk Kecantikan," *Forschungforum Law Journal* 2, no. 1: 81-95.

²⁴ Yazir Farouk, 2024. "Minta Maaf, Richard Lee Tarik Produk Scincare Yang Diklaim Mengandung Tomat Putih," *Suara.com*, <https://www.suara.com/entertainment/2024/12/23/214000/minta-maaf-richard-lee-tarik-produk-scincare-yang-diklaim-mengandung-tomat-putih>. diakses pada tanggal 5 Agustus 2025 pukul 12.30.

²⁵ Sri Maharani M.T.V.M and Rhevy Ramadhan Permadi, "Kajian Yuridis Perbuatan Melanggar Hukum Oleh Penjual Skincare Yang Iklannya Menyesatkan Berdasarkan Pasal 1365 KUHPerdata," *Rewang Rencang: Jurnal Hukum Lex Generalis* 6, no. 4 (2025): 1-14.

through conciliation, mediation, and arbitration mechanisms, which are considered more efficient and facilitate consumers' access to justice.²⁶

The non-litigious legal remedies available to consumers include:

a. Negotiation

Negotiation is a communication process between two or more parties with differing interests who seek to reach an agreement. In the White Tomato case, consumers who feel aggrieved by the discrepancy between the product content and its packaging label, as well as the relabeling practices, may initiate direct discussions with the business actor, namely Dr. Richard Lee, to achieve an amicable settlement, which may take the form of compensation or advertising clarification.

b. Mediation

Mediation is a private, confidential, and cooperative conflict resolution process involving a neutral third party, the mediator, such as the Consumer Dispute Settlement Agency (BPSK), who assists in facilitating dialogue between consumers and the business actor of the White Tomato product. Mediation is often more economical compared to resolution via litigation channels.

c. Conciliation

Conciliation is a dispute resolution process involving the intervention of a neutral third party known as a conciliator. The conciliator provides recommendations or solutions to the disputing parties. Conciliation is characterized by being more proactive in offering settlements, although such suggestions remain non-binding unless agreed upon by the parties. In the White Tomato case, conciliation could serve as an initial step to find flexible common ground and avoid protracted conflict.

d. Arbitration

Arbitration is the resolution of a dispute by an arbitrator or arbitrators, where the parties agree to be subject to or abide by the decision rendered by the arbitrator(s) they have selected. In this case, arbitration constitutes a dispute resolution method wherein both parties, namely the consumers and the White Tomato business actor, agree to submit the settlement to an arbitrator, such as the BPSK. An arbitral award

²⁶ Upik Ika Apriana, 2014, *Mediasi Dan Konsumen 'Studi Tentang Peran Mediator Dalam Penyelesaian Sengketa Konsumen Oleh Badan Penyelesaian Sengketa Konsumen Di Semarang*, Naskah Akademik Universitas Muhammadiyah Surakarta, hlm 1-2.

is final and binding, providing legal certainty more expeditiously than court litigation.²⁷

Thus, consumers possess various legal remedies, whether through administrative, non-litigious, or litigious channels, to obtain recovery for losses arising from the discrepancy between the White Tomato product content and its product label. This regulatory framework aims to ensure the protection of consumer rights, create legal certainty, and encourage business actors to adhere to standards of safety, informational honesty, and business ethics in the trade of health products.

CONCLUSION

The actions of business operators related to White Tomato products, particularly the discrepancy between product content and packaging labels and relabeling practices, violate consumers' rights to accurate, clear, and honest information as guaranteed in Articles 4, 7, and 8 of Law Number 8 of 1999 concerning Consumer Protection. Such violations give rise to multiple layers of legal liability, namely civil liability in the form of an obligation to provide compensation based on Article 19 of Law -Law Number 8 of 1999 concerning Consumer Protection and Unlawful Acts under Article 1365 of the Civil Code, administrative liability through BPOM sanctions, and criminal liability as regulated in Articles 61 and 62 of Law Number 8 of 1999 concerning Consumer Protection. Consumers can seek redress through litigation or non-litigation channels, including dispute resolution at the Consumer Dispute Settlement Agency (BPSK) through negotiation, mediation, conciliation, or arbitration.

This study makes a significant contribution by comprehensively analyzing the interaction of BPOM administrative sanctions as a trigger for enforcing responsibility in consumer protection law, showing how these layered sanctions should be implemented to ensure full restoration of consumer rights and create legal certainty. Based on these findings, it is recommended that policy recommendations be directed at strengthening BPOM's post-market surveillance. In addition, skincare companies with "bold" promotional claims should be required to have product insurance so that compensation funds are available quickly for consumers, so they do not have to wait long for civil litigation processes. For further research, studies can focus on the effectiveness of BPOM enforcement, comparisons of regulations in various jurisdictions, or analysis of the access

²⁷ M.T.V.M and Permadi, "Kajian Yuridis Perbuatan Melanggar Hukum Oleh Penjual Skincare Yang Iklannya Menyesatkan Berdasarkan Pasal 1365 KUHPerdota."

and effectiveness of the Consumer Dispute Settlement Agency (BPSK) as a mechanism for resolving consumer disputes.

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