

**SEPARATION OF HALAL AND NON-HALAL FOOD PRODUCT PLACES BY
RETAIL BUSINESS ACTORS: COMPARATIVE STUDY OF PP NUMBER 42
OF 2024 WITH THE DUBAI FOOD CODE**

**Pemisahan Tempat Produk Makanan Halal dan Non-Halal oleh Pelaku Usaha
Ritel: Studi Perbandingan PP Nomor 42 Tahun 2024 dengan Dubai Food
Code**

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Abstract

The existence of unclear information on processed food product labels, especially related to halal ingredients, raises concerns for Muslim consumers who are entitled to get products in accordance with sharia. This study aims to study and compare the regulation of the separation of halal and non-halal product places by retail businesses based on Government Regulation No. 42 of 2024 and the Dubai Food Code. The method used is a normative legal approach with comparative legal analysis of the provisions of the two regulations. The results of this study indicate that although Indonesia has a legal basis regulates the obligation to physically separate halal and non-halal product palices, its implementation is still weak due to the absence of technical guidelines and structured supervision. In contrast, Dubai has established clear operational standards. Fields findings also reinforce the conclusion that retail businesses in Indonesia have not fully implemented the obligation of separation and transparency, as seen in products. This study recommends strengthening technical regulations and supervisory mechanisms at the retail level to protect the right of Muslim consumers as a whole.

Keywords: Dubai Food Code, Halal Product Segregation, Muslim Consumer Protection, Retail Responsibility

Abstrak

Keberadaan informasi yang tidak jelas pada label produk makanan olahan, terutama yang berkaitan dengan bahan halal, menimbulkan kekhawatiran bagi konsumen Muslim yang berhak mendapatkan produk sesuai dengan syariah. Studi ini bertujuan untuk mempelajari dan membandingkan regulasi pemisahan tempat produk halal dan non-halal oleh bisnis ritel berdasarkan Peraturan Pemerintah No. 42 Tahun 2024 dan Kode Pangan Dubai. Metode yang digunakan adalah pendekatan hukum normatif dengan analisis hukum komparatif terhadap ketentuan kedua peraturan tersebut. Hasil penelitian ini menunjukkan bahwa meskipun Indonesia memiliki dasar hukum yang mengatur kewajiban untuk memisahkan tempat produk halal dan non-halal secara fisik, implementasinya masih lemah karena tidak adanya pedoman teknis dan pengawasan terstruktur. Sebaliknya, Dubai telah menetapkan standar operasional yang jelas. Temuan lapangan juga memperkuat kesimpulan bahwa bisnis ritel di Indonesia belum sepenuhnya menerapkan kewajiban pemisahan dan transparansi, seperti yang terlihat

pada produk. Studi ini merekomendasikan penguatan regulasi teknis dan mekanisme pengawasan di tingkat ritel untuk melindungi hak konsumen Muslim secara keseluruhan.

Kata kunci: Kode Pangan Dubai, Pemisahan Produk Halal, Perlindungan Konsumen Muslim, Tanggung Jawab Ritel

INTRODUCTION

In the era of globalization and the increasingly rapid development of the food industry, consumers are faced with new challenges regarding the clarity of ingredient information on processed food product packaging. Product packaging not only protects the product's contents but also conveys important information, such as ingredient composition and safety of use. One of the main elements of packaging is the label, which now not only conveys technical information but is also visually designed to attract attention and shape perceptions of product quality. Therefore, label information must be clearly structured, accurate, and not misleading, so that consumers can correctly understand the product's contents and make choices based on their needs, health, or personal beliefs.¹

Uncertainty about the origin and processing of certain ingredients poses significant challenges, particularly for Muslim consumers who have the right to obtain products that align with their religious values. The lack of transparency in the disclosure of ingredient composition information is a critical concern in consumer legal protection efforts, as it impacts consumers' right to know and choose products consciously and responsibly based on their beliefs. In Indonesia's consumer protection system, halal certification must also be a primary concern. Ideally, every marketed food product should provide clear information about the ingredients used.

From an Islamic legal perspective, a product is considered halal if it is permitted by Allah and His Messenger. This means the product does not contain any animal-derived ingredients prohibited for consumption according to Islamic law and is free from impurities. Allah only forbids something if it contains harmful ingredients, to protect humans from the negative impacts that could arise from its consumption. This is in line with Allah's word in the Quran, Surah Al-Baqarah: 168.

يَا أَيُّهَا النَّاسُ كُلُوا مِمَّا فِي الْأَرْضِ حَلَالًا طَيِّبًا وَلَا تَتَّبِعُوا خُطُوَاتِ الشَّيْطَانِ إِنَّهُ لَكُمْ عَدُوٌّ مُبِينٌ

"O mankind, eat from whatever is on earth that is lawful and good, and do not follow the footsteps of Satan. Indeed, he is to you a clear enemy. "O mankind, eat of what is lawful and good on earth, and do not follow the footsteps of Satan. Indeed, he is to you an open enemy".²

In the hadith, Prophet Muhammad SAW gave instructions and warnings to his followers to always be careful and pay attention to the food and drinks they consume. This is important because if a Muslim consumes something forbidden, he will receive a heavy punishment. Every Muslim must realize that the boundaries of halal and haram

¹ Carisa Amalia Sukmana et al., "Penggunaan Bahasa Indonesia yang Efektif Pada Label Kemasan Makanan Beku," *Jurnal Bahasa Daerah Indonesia* 1, no. 2 (2024): 8, <https://doi.org/10.47134/jbdi.v1i2.2346>.

² Al-Qur'an Surah Al-Baqarah [2]: 168., *Al-Qur'an dan Terjemahannya*, Edisi Peny (Jakarta: Kementerian Agama RI, 2019).

have been clearly established. Therefore, Muslims should also stay away from matters that are still doubtful (*shubhat*) in order to maintain the integrity of their religion and maintain their honor. Prophet Muhammad SAW said: "Indeed, halal matters are clear, and haram matters are clear. Between the two are doubtful matters that many people do not know. Whoever distances himself from doubtful matters has saved his religion and honor. Whoever falls into doubtful matters, then he falls into haram matters."³

In an effort to strengthen the halal-based consumer protection system, the Indonesian government has issued Government Regulation No. 42 of 2024 concerning the Implementation of Halal Product Assurance. One key point in this regulation is the obligation of business actors to physically separate halal and non-halal products throughout the production process, storage, distribution, and retail sales. This separation includes location, equipment, and procedures to prevent mixing that could question the halal status of the products. Furthermore, non-halal products must be clearly labeled and stored separately from halal products, as a form of transparency and respect for the rights of Muslim consumers to choose products that align with their beliefs.

Taking Dubai as an example, as one of the regions in the United Arab Emirates that implements a legal system based on Islamic values, it places special emphasis on the halal certification and safety of food products. This is reflected in the implementation of the Dubai Food Code, a technical regulation that strictly regulates the handling and presentation of food products, especially those classified as non-halal. Under these provisions, non-halal products such as pork or alcohol must be stored, handled, and served separately, using separate equipment, storage space, and even a cashier. Non-halal products must be clearly labeled with the following text: "Non-Halal Foods Only", and in presentation buffet They are also required to maintain a minimum distance of two meters from halal food. The sale of non-halal products is also only permitted in licensed shops or restaurants.⁴

In comparison, Indonesia already has a legal basis through Government Regulation No. 42 of 2024, but its implementation remains largely normative. Without clear technical guidelines and a coordinated oversight system, retail businesses have yet to fully understand and implement this separation obligation. This creates a gap between the substance of the law and the reality on the ground, ultimately harming Muslim consumers who have the right to obtain products in accordance with Sharia principles.

Studies on Muslim consumer protection in the context of product halal certification, including aspects of labeling, certification, and business actor responsibilities, continue to develop and are widely discussed in legal literature and empirical studies. Tutik Nurul Janah (2020) emphasized the importance of transparency in halal composition and certification as the main instrument to protect Muslim and non-Muslim consumers in choosing food products that align with their beliefs. Nurmayani et al. (2025) in their research revealed Muslim consumers' concerns about gelatin candy products and imported foods without clear halal information, emphasizing the role of BPJPH and public education regarding critical ingredients. Astika et al. (2025) highlighted that modern retail businesses have not fully implemented the precautionary principle in guaranteeing the halal status of products, especially from MSMEs, despite existing regulations such as Law Number 33 of 2014 and Government Regulation Number 42 of 2024. Zulham (2022) emphasized the need for synergy between the state and religious institutions, such as the Indonesian Ulema Council (MUI), in ensuring the protection of Muslim consumers through legitimate halal certification. Meanwhile, Rahmah Maulida

³ HR Bukhari dan Muslim, *Shahih al-Bukhari dan Shahih Muslim* (Riyadh: Darus Sunnah, 2009).

⁴ صاخ – کرتشم, "Food code 2.0," 2023.

(2013) revealed that producers often include halal labels without official certification and use terms that consumers do not understand.

Previous studies have generally focused on labeling, certification, and information transparency in protecting Muslim consumers. However, few studies have specifically addressed the practice of separating halal and non-halal products at the retail level. Therefore, this study attempts to fill this gap by conducting a comparative study between Government Regulation No. 42 of 2024 and the Dubai Food Code, which regulates the requirement for retailers to separate halal and non-halal products. Using a comparative legal approach, this study is expected to provide recommendations for strengthening technical regulations and overseeing the implementation of retail obligations in Indonesia, in order to realize a more optimal Muslim consumer protection system. Based on the background above, the problem formulation in this research can be formulated as follows:

1. What are the provisions of Government Regulation Number 42 of 2024 concerning the Implementation of the Halal Product Assurance Sector and the Dubai Food Code regarding the separation of halal and non-halal products by retail business actors?
2. What is the comparative analysis between the provisions in Government Regulation Number 42 of 2024 concerning the Implementation of the Halal Product Assurance Sector and the Dubai Food Code regarding the separation of halal and non-halal products by retail business actors?

METHOD

This study uses a normative juridical approach, a method based on literature review as the primary source in examining legal issues. The main focus of this study is the legal provisions related to the obligations of retail businesses to separate halal and non-halal products at points of sale, as stipulated in Government Regulation Number 42 of 2024 concerning the Implementation of the Halal Product Assurance Sector and the Dubai Food Code. The legal entities analyzed include primary legal materials in the form of Law Number 33 of 2014 concerning Halal Product Assurance, Government Regulation Number 42 of 2024 concerning the Implementation of the Halal Product Assurance Sector, and the Dubai Food Code, while secondary legal materials consist of scientific articles and relevant legal journals. This study uses a comparative legal approach by analyzing the similarities and differences between the two regulatory systems to obtain a comprehensive picture of the effectiveness of implementing the separation of halal and non-halal product locations by retail businesses.

DISCUSSION or RESULTS/FINDINGS

A. Provisions for Separation of Halal and Non-Halal Product Locations According to Government Regulation Number 42 of 2024 and the Dubai Food Code

As the country with the largest Muslim population in the world, Indonesia has a constitutional and moral obligation to guarantee the halal status of products circulating in the market. Clarity about the halal or non-halal status of food products is not merely a personal matter, but concerns consumer rights, which are protected by law. The opening of free trade and the increasing number of processed products, both domestic and international, pose challenges in ensuring that all products consumed by the public comply with Sharia principles. In this regard, regulations regarding halal product

assurance are crucial so that consumers, especially Muslims, can obtain accurate information before deciding to purchase and consume a product. To strengthen this regulation, the Indonesian government issued Government Regulation Number 42 of 2024 concerning the Implementation of Halal Product Assurance.⁵

Government Regulation Number 42 of 2024 is an implementing regulation of Law Number 33 of 2014 concerning Halal Product Assurance (UU JPH), which aims to strengthen product halal assurance, including by requiring physical separation between halal and non-halal products by business actors, particularly in distribution, sales, and presentation at the retail level. Article 22 of this regulation emphasizes that fresh and processed products derived from halal products must be separated to prevent cross-contamination, both in terms of location, equipment, and procedures. Under certain conditions, processed non-halal products may be combined as long as there is no risk of mixing and are accompanied by a written statement from the producer or distributor. This provision demonstrates that the separation of halal and non-halal products is not merely a matter of business ethics but a binding legal obligation.⁶

Meanwhile, on the international front, Dubai, as one of the global hubs of the halal food industry, has established strict food management standards through a policy document called the Dubai Food Code. This document was prepared by Dubai Municipality and serves as a technical and normative guideline for managing food safety and halal certification. One aspect regulated in detail in the Dubai Food Code is the handling and segregation of non-halal products, such as pork and alcohol, from storage and transportation to serving. The regulation outlines specific requirements for businesses wishing to sell or handle non-halal products, including permits, dedicated kitchens, separate equipment, and clear labeling.⁷

The halal product assurance system in Indonesia is fundamentally rooted in constitutional recognition of the rights of Muslims to practice their religion. This was then concretely formulated in the Halal Product Assurance Law, which serves as the primary legal basis for implementing halal product assurance in Indonesia. Article 1 of the law stipulates that a halal product is defined as a product that has been declared halal in accordance with Islamic law. Thus, the Halal Product Assurance Law provides a legal basis for Muslims to have the right to protection in accessing products that align with their religious principles, including food, beverages, medicines, cosmetics, chemical products, and other consumer goods.⁸

The enactment of the JPH Law is inseparable from empirical conditions in society, where, for years, the clarity of the halal status of various products in circulation has not been fully guaranteed. Prior to the enactment of this law, halal assurance responsibilities were mostly carried out voluntarily by producers or through non-governmental organizations such as the Indonesian Ulema Council (MUI), which plays a key role in the certification process. Although the MUI has played a significant role, the lack of a national legal obligation has resulted in partial and uneven protection for Muslim consumers. Therefore, the JPH Law is intended to emphasize that halal assurance is not merely a preference, but rather a legal obligation that must be fulfilled by business actors.

⁵ Mabarroh Azizah, "Peran Negara dalam Perlindungan Konsumen Muslim di Indonesia," *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi* 4, no. 2 (2021): 139–51, <https://doi.org/10.24090/volksgeist.v4i2.5184>.

⁶ Pemerintah Republik Indonesia, "Peraturan Pemerintah Republik Indonesia Nomor 42 Tahun 2024 tentang Penyelenggaraan Bidang Jaminan Produk Halal" (Jakarta, 2024), <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024>.

⁷ صاخ – کرتشم, "Food code 2.0," 2023.

⁸ Pemerintah Republik Indonesia, "Undang-Undang Republik Indonesia Nomor 33 Tahun 2014 tentang Jaminan Produk Halal" (Jakarta, 2014), <https://peraturan.bpk.go.id/Home/Details/38685>.

The JPH Law also stipulates that the implementation of halal product assurance is comprehensive and systematic, encompassing processing, storage, distribution, and sales. This is further emphasized in Government Regulation No. 42 of 2024. This regulation was issued as a derivative regulation of the JPH Law and plays a strategic role in outlining technical provisions regarding the implementation of halal product assurance, particularly in the distribution and retail sectors.

One of the important provisions in Government Regulation Number 42 of 2024 is the requirement to physically separate halal and non-halal products during distribution, sales, and presentation, as stipulated in Article 22. This separation not only aims to prevent contamination but also to ensure transparency of information for Muslim consumers in selecting products that align with their beliefs. This regulation emphasizes that non-halal products must be clearly labeled and must not be mixed with halal products in the same place or container.⁹

Although the provisions of Government Regulation No. 42 of 2024 have normatively regulated this separation principle, its implementation in the field still faces challenges. One of these is the lack of detailed technical guidelines, such as standards for separation distances, shelf design, or oversight mechanisms at the retail level. This lack of clarity has the potential to lead to misunderstandings among business actors, particularly modern retailers operating on a massive and multinational scale. As a result, business actors have not optimally implemented this obligation because they view it as a moral recommendation, not a legally binding instrument.

Thus, both the JPH Law and Government Regulation No. 42 of 2024 have mandated the separation of halal and non-halal products as part of mandatory legal protection for businesses, including the retail sector. However, their effectiveness still depends heavily on technical strengthening and legal awareness among businesses themselves. This underscores the importance of conducting comparative studies with other countries that have implemented similar systems more operationally, such as the Dubai Food Code.

As one of the international trade hubs in the Middle East, Dubai has a fairly strict food regulatory system, particularly in ensuring that food meets halal standards for the Muslim community. One of the technical regulations used is the Dubai Food Code, developed by Dubai Municipality as an official guide for all food businesses, both large and small.

The Dubai Food Code specifically regulates the handling of non-halal food products through a separate chapter entitled Handling of Non-Halal Foods. These provisions not only address the ingredients of food but also detail its storage, transportation, preparation, and presentation. The primary objective is to ensure that halal and non-halal products are not physically or functionally mixed, thus maintaining and fully guaranteeing the halal status of the product throughout the distribution chain.

One of the key principles of the Dubai Food Code is that any business wishing to handle non-halal products must first obtain annual approval from the Food Safety Authority. This permit covers all activities, including the import, storage, sale, and serving of non-halal food and beverages. This provision emphasizes that non-halal products may only be handled by businesses that possess legal legitimacy and meet established supervision standards.¹⁰

⁹ Pemerintah Republik Indonesia, “Peraturan Pemerintah Republik Indonesia Nomor 42 Tahun 2024 tentang Penyelenggaraan Bidang Jaminan Produk Halal” (Jakarta, 2024), <https://peraturan.bpk.go.id/Details/304896/pp-no-42-tahun-2024>.

¹⁰ صاځ – كرتشم, “Food code 2.0,” 2023.

In terms of storage and transport, the Dubai Food Code requires strict physical separation. Foods such as pork and its derivatives must be placed in separate storage units labeled "Pork and Pork".Non-Halal Foods Only". These products must also be transported using special vehicles or containers not used for halal food. Similarly, beverages containing alcohol or other haram substances must be stored separately from halal products and are not allowed to share storage shelves.¹¹

During the food preparation phase, regulations are increasingly stringent. Businesses are required to establish separate kitchens that are structurally and functionally separate from the halal kitchen. All equipment used to prepare non-halal food must be specifically labeled and must not be used interchangeably with halal food. The use of a marking system, such as color coding, is also highly recommended to avoid errors in daily operations. Furthermore, staff responsible for handling non-halal food are not permitted to handle halal food, ensuring complete separation of responsibilities within the production process.¹²

Equally important are restrictions on the sale and serving of non-halal food. The Dubai Food Code only permits non-halal products to be sold in supermarkets or large stores with a minimum area of 5,000 square feet and that have received special permits. For dining establishments, only four-star hotels or clubs with official permits are permitted to serve non-halal food. These establishments must also have separate kitchens and equipment and be marked with bilingual warning signs (Arabic and English) stating that non-halal products are served on the premises. These provisions are part of Dubai's commitment to providing transparency and respecting the religious principles of the Muslim community.¹³

Thus, it can be concluded that the Dubai Food Code explicitly and in detail establishes standards for separating halal and non-halal products, with a preventative and legally binding approach. This approach demonstrates that compliance with halal principles is not only seen as the responsibility of producers but also as a legal obligation inherent in all business actors in the food distribution chain, especially in the retail sector that deals directly with consumers. Such regulations can serve as a model for other countries, including Indonesia, to develop similar, more operational systems to ensure product halalness at the retail level.

The principle of legal certainty not only requires written norms but also requires that these norms embody values of justice and be operationalized in practice. A regulation is considered effective if it serves as a binding guideline for behavior across all levels of society and is consistently enforced. Therefore, the existence of legal regulations must be accompanied by an implementation mechanism that ensures the substance of the regulation is truly implemented in real life. In this regard, this principle is crucial given the sensitivity of the issue of halal (permissible) for Muslims.

One concrete form of implementation of halal product assurance in Indonesia is the issuance of Government Regulation No. 42 of 2024. This regulation is a continuation of the mandate of the JPH Law, which emphasizes the importance of protecting Muslim consumers through halal certification for products circulating in the market. In Government Regulation No. 42 of 2024, the government not only emphasizes the obligation of certification but also expands the scope of its regulations to include routine and systematic monitoring to ensure halal products continue to meet halal standards throughout their distribution period. However, to date, there are no technical details

¹¹ *Ibid*

¹² *Ibid*

¹³ *Ibid*

governing how this monitoring should be carried out. The absence of implementing regulations regarding the establishment of a special institution or task force for halal product supervision has resulted in weak implementation in the field. As a result, monitoring of business compliance with halal standards has been sporadic and has not been carried out by a structurally designated authority.¹⁴

If supervision is not carried out continuously, there is concern that the quality of halal assurance for a product will decline. Previously granted certification may lose its meaning if it is not accompanied by regular evaluation and control of the distribution, placement, and separation of halal products from non-halal ones. This situation clearly contradicts the essence of Government Regulation No. 42 of 2024 and the principle of protecting Muslims as outlined in previous regulations. Therefore, concrete steps are needed from the government to establish technical derivative legal instruments to ensure the sustainability of halal principles, including at the retail level.¹⁵

B. Comparative Analysis of Separation of Halal and Non-Halal Product Locations: PP Number 42 of 2024 and Dubai Food Code

The halal or haram provisions of a product cannot be viewed as a purely technical issue, but rather as a social and spiritual issue that directly touches on aspects of people's beliefs.¹⁶ Therefore, clear information about ingredients in food products is crucial to avoid misleading consumers. Businesses, both domestic producers and importers, have a responsibility to provide accurate and non-misleading information about the products they market. This constitutes a legal responsibility that is not only administrative but also moral.

In modern trade practices, particularly in the retail sector, violations of consumer rights are still found, particularly related to the distribution of non-halal food products without clear information. This is a crucial issue, given that consumers are in a weaker position compared to businesses. Therefore, when oversight is suboptimal or when retailers fail to provide transparent information, consumers bear the risk. The state has demonstrated its responsibility in providing protection through the Consumer Protection Law, which affirms legal liability for business practices that harm the public. However, in practice, this protection has not yet fully reached all aspects of product distribution, especially at the retail level.¹⁷

As a country with the largest Muslim population in the world, Indonesia has a moral and constitutional responsibility to ensure that products in circulation align with sharia values, including clarity about the product's halal status. This responsibility extends beyond producers and importers to retailers who directly interact with consumers. In this regard, it is crucial for retailers to function not only as distribution channels but also as active guardians of information. As the final point in the marketing chain, retailers have direct access to consumers and have significant potential to influence purchasing decisions through the way products are presented, labeled, and categorized. Therefore, inaccuracy or negligence on the part of retailers in displaying product ingredient

¹⁴ Difanti Ameliananda Zafitriani dan Karimatul Khasanah, "Kepastian Hukum dalam Pelaksanaan Pengawasan Produk Bersertifikat Halal di Indonesia," *el hisbah Journal of Islamic Economic Law* 4, no. 1 (2024): 13–26, <https://doi.org/10.28918/elhisbah.v4i1.7551>.

¹⁵ *Ibid*

¹⁶ Mabarroh Azizah, "Peran Negara dalam Perlindungan Konsumen Muslim di Indonesia," *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi* 4, no. 2 (2021): 139–51, <https://doi.org/10.24090/volksgeist.v4i2.5184>.

¹⁷ Flau Rita Nindya Astika, Supriyono, dan Fatma Ayu Jati Putri, "Perlindungan Hukum terhadap Konsumen Usaha Ritel Modern di Indonesia (Studi Penelitian di Warung Sayur Segar Cangakan Kabupaten Karanganyar)," *Jurnal Cakrawala Ilmiah* 4, no. 10 (2025): 1421–28, <https://doi.org/10.53625/jcijurnalcakrawalailmiah.v4i10>.

information can seriously impact consumer rights, particularly those of Muslim consumers.¹⁸

Furthermore, real-world examples further emphasize the gap between normative provisions and the technical implementation of the separation of halal and non-halal product labels in Indonesia. The author found that at a modern retail outlet, two processed food products, "Fini Sour Little Mix" and "Alamii Honey Gummy," listed gelatin as an ingredient without specifying its origin, whether it came from cows, fish, or pigs. This ambiguity is problematic because, according to the BPOM's Guidelines for Labeling Processed Foods, any ingredients derived from animals must be specifically listed, for example, "beef gelatin" or "pork gelatin," so that consumers can accurately determine the halal status of the ingredient. In this case, while it cannot necessarily be concluded that the products contain non-halal ingredients, the lack of adequate information raises doubts about their halal status. Furthermore, these two products were also found to be placed alongside halal-labeled products without any physical separation or markings to distinguish their halal status.

This lack of segregation indicates that retailers have not fully implemented their active role in ensuring the clarity and security of product information, as outlined in Article 22 of Government Regulation No. 42 of 2024, which explicitly requires physical separation of halal and non-halal products in distribution, sales, and presentation. Comparatively, the Dubai Food Code further regulates this through technical provisions requiring the separation of storage locations, equipment, and cashiers, as well as clear labeling for non-halal products. Compared to this, implementation in Indonesia still shows significant weaknesses, particularly in the aspect of supervision and the lack of detailed technical guidelines. Therefore, improvements to implementing regulations and strengthened oversight are needed so that Muslim consumer protection is not limited to normative rules but can be implemented effectively and comprehensively in retail practices as business actors interact directly with consumers at the endpoint of distribution.

In this regard, it is interesting to see how other Muslim-majority countries regulate similar matters in a more structured and operational manner. One example is the United Arab Emirates, particularly Dubai, which has implemented the Dubai Food Code as a concrete form of technical regulation for the handling of halal and non-halal products in the food sector, including retail. In principle, Government Regulation No. 42 of 2024 rests on the principles of business responsibility and prudence in the distribution of halal products, but this regulation does not yet establish a technically binding mechanism at the retail level. Meanwhile, the Dubai Food Code is based on Sharia-based preventive principles that are concretely applied within the scope of food supervision. This indicates that Dubai places halal aspects as part of a holistic food management system, not merely administrative labeling.

When compared normatively, Government Regulation No. 42 of 2024 and the Dubai Food Code both emphasize the importance of separating halal and non-halal products as a form of protection for Muslim consumers. However, their approaches differ significantly. The Indonesian regulation tends to be declarative and normative, emphasizing mandatory separation as a general principle that is not yet accompanied by adequate technical instruments. In contrast, the Dubai Food Code develops a more operational, technocratic approach through detailed regulations regarding storage space, cooking utensils, double labeling, and routine inspections. This difference in approach

¹⁸ Mhd Alawik Btr dan Zulham, "Kewajiban Transparansi Informasi Halal pada Platform Digital Shopee Food," *Halal Tourism and Pilgrimage* 6, no. 1 (2025): 83–96, <https://doi.org/10.58968/http.v1i1.86>.

reflects the differing levels of regulatory readiness in each country. Indonesia is still in the process of strengthening its system, while Dubai has implemented a Sharia-based food monitoring system integrated into its city policies.

Regulations for the separation and handling of halal and non-halal products in Indonesia and Dubai show significant differences, particularly in technical and implementation aspects. Dubai, through the Dubai Food Code, establishes very specific operational requirements for the management of non-halal products. These regulations include separate storage and processing areas, explicit labeling, and specific shelves, containers, and equipment that must not be used for halal products. Beyond the technical aspects, fundamental differences also arise in the oversight model. In Dubai, oversight is carried out by an integrated authority unit under the city's food agency, with direct authority to impose administrative sanctions.¹⁹ In contrast, in Indonesia, supervision is spread across several institutions and lacks a dedicated unit focused on separating halal and non-halal products at the distribution level. This lack of integrated oversight has the potential to create gaps in implementation on the ground.

From a socio-cultural perspective, Dubagai, as a cosmopolitan city governed by Islamic law, implements halal food regulations with a strict and disciplined approach for businesses. Meanwhile, Indonesia, the country with the largest Muslim population, still faces challenges in implementing uniform halal standards, primarily due to differences in readiness across regions and minimal coordination between agencies. This demonstrates that successful regulatory implementation is not solely a matter of legal norms, but also institutional readiness and a culture of compliance among businesses.

Thus, although regulations on Muslim consumer protection have been adopted in the Indonesian legal system, their implementation is still not as comprehensive as in Dubai. Further technical regulations that are operational and binding are needed, particularly for the retail and distribution sectors. Strengthening these technical aspects will not only clarify business responsibilities but also ensure fairness and legal certainty for consumers who require a comprehensive and transparent assurance of product halalness.

CONCLUSION

A review of Government Regulation No. 42 of 2024 and the Dubai Food Code reveals that both share a similar goal of ensuring the protection of Muslim consumers by physically separating halal and non-halal products. However, Indonesian regulations remain general and normative, lacking clear technical guidelines or integrated monitoring mechanisms. This contrasts sharply with the Dubai system, which implements detailed and binding technical regulations, covering everything from storage and cooking utensils to serving procedures. On-the-ground evidence demonstrates continued non-compliance by retailers with the principles of prudence and information transparency, as evidenced by the presence of several products containing critical ingredients without adequate information and placed adjacent to products clearly labeled halal. Therefore, concrete efforts are needed by the Indonesian government to develop binding operational regulations and strengthen the monitoring system to ensure that halal assurance can be effectively implemented in the distribution and sales of food products.

¹⁹ صاخ – کرتشم, "Food code 2.0," 2023.

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