

Analysis of Trends in Cosmetics Supervision Cases in Indonesia in 2021-2024

Mohamad Kashuri^{a,1*}, Taruna Ikrar^{a,2}, Gunawan Indrayanto^{b,3}

^aThe Indonesian Food and Drug Authority, Jl. Percetakan Negara No 23, Jakarta Pusat, Indonesia, 10560

^bVMA Consultant, Surabaya 60117, Indonesia

¹mohamad.kashuri@pom.go.id, ²taruna.ikrar@pom.go.id, ³gunawanindrayanto@yahoo.com

*corresponding author

ARTICLE INFO

ABSTRACT

Article history

Received:
May 13, 2025

Revised:
September 1,
2025

Accepted:
September 8,
2025

DOI:
<https://doi.org/10.54384/eruditio.v5i2/235>

This study offers a comprehensive analysis of cosmetic product regulation in Indonesia from 2021 to 2024, examining enforcement trends, patterns of regulatory non-compliance, and the evolving oversight role of the Indonesian Food and Drug Authority (BPOM). Data were obtained from BPOM's annual inspection and enforcement reports and analyzed descriptively to identify changes in regulatory compliance over time. The results reveal that the majority of violations originated from Small and Medium-Sized Enterprises (SMEs), accounting for 1–2% of total cases, while larger industries reported slightly higher rates (2.7–6.9%). A significant 165% surge in products without distribution permits was recorded from 2021 to 2022, followed by substantial reductions in 2023 (85%) and 2024 (32%). Adherence to Good Cosmetic Manufacturing Practices (GCMF) showed a consistent improvement from 2022 onwards. Violations involving labeling, advertising, and product claims also declined, though more than 1,500 cases are still reported annually. Public education campaigns have played a crucial role in enhancing consumer awareness and minimizing exposure to unsafe products. Enforcement data further demonstrate a reduction in formal sanctions and warnings, reflecting BPOM's strategic pivot toward a more preventive and facilitative regulatory approach. Looking ahead, BPOM needs to strengthen industry compliance by expanding its technical assistance initiatives through both direct consultations and digital platforms, supporting a more risk-based and innovation-friendly regulatory environment.

Penelitian ini memberikan analisis komprehensif mengenai regulasi produk kosmetik di Indonesia pada periode 2021–2024, dengan menelaah tren penegakan hukum, pola ketidakpatuhan regulasi, serta peran pengawasan Badan Pengawas Obat dan Makanan (BPOM) yang terus berkembang. Data diperoleh dari laporan tahunan inspeksi dan penindakan BPOM, kemudian dianalisis secara deskriptif untuk mengidentifikasi perubahan kepatuhan regulasi dari waktu ke waktu. Hasil penelitian menunjukkan bahwa sebagian besar pelanggaran berasal dari Usaha Mikro, Kecil, dan Menengah (UMKM), dengan kontribusi sebesar 1–2% dari total kasus, sementara industri besar menunjukkan tingkat pelanggaran sedikit lebih tinggi (2,7–6,9%). Peningkatan signifikan sebesar 165% dalam jumlah produk tanpa izin edar tercatat dari 2021 ke 2022, diikuti penurunan substansial pada 2023 (85%) dan 2024 (32%). Kepatuhan terhadap Cara Pembuatan Kosmetika yang Baik (CPKB) menunjukkan peningkatan konsisten sejak 2022. Pelanggaran terkait penandaan, iklan, dan klaim produk juga menurun, meskipun lebih dari 1.500 kasus masih dilaporkan setiap tahunnya. Kampanye edukasi publik memainkan peran penting dalam meningkatkan kesadaran konsumen dan meminimalkan paparan terhadap produk berisiko. Data penegakan juga menunjukkan penurunan jumlah sanksi formal dan peringatan, mencerminkan

pergeseran strategi BPOM menuju pendekatan regulasi yang lebih preventif dan fasilitatif. Pada masa mendatang, direkomendasikan agar BPOM memperluas inisiatif bantuan teknis melalui konsultasi langsung dan pemanfaatan platform digital sebagai strategi untuk meningkatkan kepatuhan industri serta membangun sistem regulasi yang berbasis risiko dan mendukung inovasi.

Keywords: Cosmetics, compliant, cosmetic non-compliant, supervision regulations
Kata Kunci: Kosmetik, kepatuhan, ketidakpatuhan kosmetik, regulasi pengawasan

1. Introduction

Cosmetics are defined as substances or preparations intended to be applied to the external parts of the human body, including the skin, hair, nails, lips, external genital organs, teeth, and oral mucosa with the purpose of cleaning, perfuming, changing appearance, correcting body odors, or protecting and maintaining these areas in good condition (Badan Pengawas Obat dan Makanan, 2020). However, regulatory definitions and categorizations of cosmetics vary considerably across jurisdictions, creating inconsistencies in international supervision and enforcement mechanisms (Su et al., 2020). Such divergence poses challenges for global harmonization, particularly in ensuring consumer safety and enabling effective cross-border regulatory coordination.

Globally, the cosmetics industry has witnessed robust growth. According to the Indonesian French Chamber of Commerce and Industry (IFCCI), the Indonesian cosmetics market was projected to grow at a compound annual growth rate (CAGR) of 7.5% from 2021 to 2027, making it the fastest-growing market in Asia and positioning it among the top five global markets within the next 5–10 years (EIBN, 2019). In 2023, the industry's revenue reached USD 8.09 billion and was projected to increase to USD 9.17 billion in 2024 (Mileneo, 2024). This expansion has been driven by consumer demand, digital marketing penetration, and regulatory reforms, such as the streamlined cosmetic notification process introduced by the Indonesian Food and Drug Authority (BPOM). As of 2024, over 90,000 new cosmetic distribution permits had been issued, reflecting both regulatory facilitation and market responsiveness (Kashuri, 2024b).

However, the rapid market expansion has also brought significant regulatory challenges. BPOM reported that illegal cosmetics accounted for 144 out of 335 regulatory violations, representing 43% of all food and drug violations in Indonesia (Marchelin, 2020). These violations include the use of hazardous ingredients, mislabeling, and the distribution of unregistered products. BPOM's publicly accessible database (Direktorat Standardisasi Obat Tradisional, 2024) identifies 947 cosmetic products containing banned substances and highlights 16 products that, although registered as cosmetics, were marketed and used as medicines.

Underlying these violations are various systemic and behavioral factors. Yunianto and Anggoro (2021) identified several causes of illegal cosmetic marketing, including limited consumer awareness, the difficulty of verifying legality, opportunistic behavior by sellers, and weak marketplace surveillance. Wijnarko and Anggoro (2021) further revealed that compliance with Good Manufacturing Practices (GMP) imposes substantial operational costs, particularly in building maintenance, sanitation, and quality control, which may discourage small manufacturers from full adherence. Similarly, Othman et al. (2020) observed that prohibited substances are still prevalent in Malaysian cosmetics, leading to

adverse consumer outcomes and highlighting the need for strict legal enforcement against violators.

Globally, other regulatory authorities have also faced similar issues. For instance, Teixeira et al. (2019) documented safety issues in Brazil based on retrospective analyses from 2006 to 2018, while Ribet et al. (2021) emphasized the importance of cosmetovigilance in improving dermo-cosmetic product safety. Mercader-García et al. (2024) identified allergic reactions associated with phenylethyl resorcinol in Spain, and Vieira et al. (2024) reported the recall of non-compliant products in Portugal due to health risks. Pratiwi et al. (2022) reviewed analytical techniques to detect restricted substances in cosmetics under FDA and EU law. Meanwhile, Barthe et al. (2021) presented advances in alternative testing models to assess genotoxicity and skin irritation without animal testing. In the context of emerging technologies, Yustina et al. (2024) emphasized the need for nano-analysis instruments to monitor nano-cosmetic safety in Indonesia.

Despite extensive efforts by BPOM to safeguard public health, including controlling harmful substances and monitoring dangerous foods (Najemi et al., 2019; Indradewi & Muliati, 2022; Sutriyono et al., 2024), challenges remain. These include limitations in human resources and technology, as well as low public awareness regarding the importance of purchasing safe and authorized cosmetics (Kashuri, 2024a).

Regionally, Indonesia aligns its cosmetic regulation with the ASEAN Cosmetic Directive (ACD), which aims to harmonize safety and technical standards across Southeast Asia. The ACD adopted in 2003 and implemented in 2008 includes eight technical documents covering product definitions, labeling, GMP, safety assessment, and limits of contaminants (Health Sciences Authority (HSA), 2002; Oindrila Ghosal, 2025). At the international level, the Scientific Committee on Consumer Safety (SCCS) of the EU has published the 12th revision of its safety evaluation guidance (Scientific Committee on Consumer Safety of European Union, 2023). Morel et al. (2023) compared regulatory regimes across 17 countries, including ASEAN members, revealing diverse approaches to ingredient restrictions and product approval. Similarly, Ferreira et al. (2022) analyzed regulatory variations between the EU, US, Canada, Japan, China, and Brazil, providing a comparative perspective for policy development. Table 1 summarizes Indonesia's regulatory structure based on these international and national standards.

In addition to aligning with international frameworks, Indonesia requires halal certification for all cosmetic products by October 17, 2026, as mandated by Law No. 33 of 2014, Article 33 (LPPOM MUI, 2024). A comprehensive overview of the registration process is available in Investinasia (Mulya, 2023).

This study aims to analyze trends in BPOM's cosmetic surveillance activities between 2021 and 2024, with a focus on the typology, frequency, and implications of regulatory violations. It also evaluates the contributing factors behind non-compliance and the effectiveness of existing regulatory responses. By offering empirical insights into industry behavior and policy implementation, the findings are expected to support evidence-based decision-making among regulators, industry stakeholders, and consumers.

2. Methods

This research employed a quantitative, descriptive-analytical methodology to examine trends in the supervision of cosmetic products in Indonesia between 2021 and 2024. A retrospective study design was applied, drawing upon primary data extracted from the

official post-marketing surveillance reports published annually by the Indonesian Food and Drug Authority (Hess, 2004). These surveillance reports provided comprehensive and systematic documentation, encompassing metrics such as the number of registered and unregistered cosmetic products, inspection results of manufacturing facilities, identified cases of non-compliant products, violations concerning advertising, labelling, and marketing claims, as well as regulatory enforcement measures implemented during the observation period.

Table 1. Summary of the Regulation for Cosmetics in Indonesia.

Name of the Regulation	Number of the Regulation	Brief description
Cosmetics Production Permit	Minister of Health of the Republic of Indonesia, No. 1175/MENKES/PER/VIII/2010 of 2010 (Kementerian Kesehatan, 2010a)	This regulation outlines the requirements and procedures for obtaining a production permit for cosmetics in Indonesia.
Supervision of Cosmetics Production and Distribution	Peraturan BPOM No 12, 2023 (Badan Pengawas Obat dan Makanan, 2023a)	This regulation outlines the general provisions, procedures for supervision, administrative sanctions, and closing provisions to ensure that cosmetics production and distribution comply with safety, quality, and environmental sustainability standards.
Amendment to the BPOM Regulation Number 23 Year 2019 Concerning Technical Requirements for Cosmetic Ingredients	Peraturan BPOM No 17, 2022 (Badan Pengawas Obat dan Makanan, 2022a)	This Regulation No. 17, 2022, is an amendment to Regulation No. 23, 2019. It updates the technical requirements for cosmetic ingredients to align with advancements in science and technology, ensuring the safety, quality, and efficacy of cosmetic products
Good Manufacturing Practice (GMP) Certification for Cosmetics	Peraturan BPOM No 33, 2021 (Badan Pengawas Obat dan Makanan, 2021)	This Regulation sets forth the requirements for certifying good manufacturing practices in the cosmetics industry. Adhering to specific standards and guidelines aims to ensure that cosmetic products are produced safely, effectively, and consistently.
Amendment to the BPOM Regulation Number 27 Year 2022 Concerning Supervision of the Importation of Drugs and Food into Indonesian Territory	Peraturan BPOM No 28, 2023 (Badan Pengawas Obat dan Makanan, 2023b)	This Regulation is an amendment to BPOM Regulation No. 27, 2022. It updates the regulations concerning the supervision of the importation of drugs and food into Indonesian territory to ensure compliance with legal and safety standards
Technical Requirements for Cosmetics Labeling	Peraturan BPOM No 30, 2020 (Badan Pengawas Obat dan Makanan, 2020)	This regulation specifies the necessary information that must be included on cosmetic product labels to ensure they are clear, accurate, and not misleading for consumers. It aims to protect consumer health and provide transparency about cosmetic products.
Labeling, Promotion, and Advertising of Cosmetics	Peraturan BPOM No 18, 2024 (Badan Pengawas Obat dan Makanan, 2024)	This regulation replaces several previous Regulations and aims to ensure that cosmetic products are labeled accurately, promoted responsibly, and advertised truthfully to protect consumer rights and safety.

Table 1. (Continued).

Name of the Regulation	Number of the Regulation	Brief description
Technical Requirements for Cosmetic Claims	Peraturan BPOM No 3, 2022 (Badan Pengawas Obat dan Makanan, 2022c)	This regulation aims to ensure that claims made about cosmetic products are accurate, not misleading, and supported by scientific evidence to protect consumer rights and safety.
Technical Requirements for Cosmetics	Peraturan BPOM No 19, 2015 (Badan Pengawas Obat dan Makanan, 2015)	This regulation outlines the standards for safety, quality, labeling, and claims of cosmetic products to ensure they meet regulatory requirements and protect consumer health.
Cosmetics Notification	Minister of Health of the Republic of Indonesia, No. 1176/MENKES/PER/VIII/2010 of 2010 (Kementerian Kesehatan, 2010b)	This regulation outlines the requirements for notifying the Ministry of Health about cosmetic products before they are marketed. The aim is to ensure that all cosmetics meet safety, quality, and efficacy standards to protect consumer health.

3. Results and Discussion

Table 2 provides a summary of the laboratory testing results for samples of commercial cosmetics collected in Indonesia between 2021 and September 2024. The ratio of non-compliant to compliant products was relatively low, ranging from approximately 1% to 2%. Most non-compliant products originated from Small and Medium-Sized Enterprises (SMEs). In contrast, large-scale industries accounted for only 2.7% and 6.9% of the non-compliant cosmetics in 2022 and 2021, respectively. These findings underscore the importance of enhancing BPOM's technical assistance programs to support SMEs. Imported non-compliant cosmetics rose from 8.4% in 2021 to 18.0% in 2024, potentially due to an increase in the importation of cosmetics without an Import Certificate (Table 3, violation indicator number 4). Skincare products represented the largest category of non-compliant cosmetics, ranging from 72.7% in 2024 to 84.5% in 2021. The list of hazardous substances found in cosmetics marketed in Indonesia is published in the database of the Direktorat Standardisasi Obat Tradisional BPOM (Direktorat Standardisasi Obat Tradisional, 2024).

Developing more advanced analytical methods to detect hazardous ingredients in cosmetics is essential to improve the effectiveness of regulatory oversight, particularly considering the increasing number of imported products. Although analytical technologies have significantly improved, the complex composition of cosmetic matrices and the presence of various trace-level unauthorized additives continue to pose challenges. Therefore, the application of suitable pre-treatment techniques becomes crucial. Du et al. (2024) offer a comprehensive overview of the development of pre-treatment techniques tailored to different cosmetic types, including emulsified, liquid, powdered, and wax-based matrices.

Table 2. BPOM Surveillance Results from Laboratory Testing

Criteria	Years			
	2021	2022	2023	2024 ^a
1. Laboratory Testing:				
a. Compliant	22,591	25,502	24,941	17,688
b. Non-compliant	259	367	329	300

Table 2. (Continued).

Criteria	Years			
	2021	2022	2023	2024 ^a
2. Non-Compliance Category :				
a. Containing PRC ^{b, d}	46	159	154	126
b. Containing PAT ^{c, d}	213	208	175	174
3. Non-compliant Cosmetic Producer.				
a. Large scale	18	10	12	11
b. SMEs ^e	219	307	271	235
c. Importers	22	50	46	54
4. Type of non-compliant cosmetics:				
a. Skincare	219	298	256	218
b. Decorative	40	69	73	82

Note: ^aData from January to September 2024, ^bCosmetics contain prohibited or restricted pharmaceutical/chemical compound(s), ^cCosmetics contain permitted substance(s) with a concentration above the threshold limit, ^d The list of permitted and prohibited compounds and their concentrations are described by BPOM Regulation No 17, 2022 (Badan Pengawas Obat dan Makanan, 2022a), ^e SMEs: Small and Medium-Sized Enterprises.

Table 3 outlines routine inspection activities conducted in factories, distribution centers, and retail outlets, covering document review, field observation, and stakeholder interviews. Seven violation categories were identified. Products deemed non-compliant during these inspections were subject to sampling and laboratory testing. However, the actual number of non-compliant cosmetics found through lab testing far exceeds those flagged through routine inspections (refer to Table 2, violation category 2; Table 3, violation category 2). This poses a significant concern for consumers who are exposed to potentially harmful products. It highlights the urgency to increase sampling rates in the market. Approximately 1–2% of cosmetics currently available may contain harmful substances that could adversely affect health (Table 2, violation indicator number 1).

Table 3 (violation indicator number 1) shows that the production and distribution of cosmetics without a distribution permit rose by 165% from 2021 to 2022, followed by declines to 85% in 2023 and 32% in 2024. Additionally, the production of cosmetics not adhering to GMP standards declined substantially in 2023 and 2024 (violation indicator number 3). The surge in imported cosmetics without Import Certificates from 2022 to 2024 (violation indicator number 4), driven by e-commerce expansion and illegal trade, reflects the need for BPOM to strengthen digital-based supervision mechanisms. Big data analytics and artificial intelligence have great potential in the early detection of illegal cosmetic products on digital platforms. Kalia et al. (2023) demonstrated that social influences have a significant impact on consumer behavior during online shopping.

Table 3. Summary of the Violations Committed Observed in Factories, Distributors, and Stores

No.	Violation Criteria	Years				Regulation Violated
		2021	2022	2023	2024	
1.	Producing/ distributing cosmetics without a distribution permit	696	1,448	1,230	459	- Regulation of the Minister of Health of the Republic of Indonesia No. 1175/MENKES/PER/VIII/2010 of 2010 on Cosmetic Production Permit. (Kementerian Kesehatan, 2010a) - BPOM Regulation No. 12 of 2023 on the Supervision of Cosmetics Production and Distribution (Badan Pengawas Obat dan Makanan, 2023a)
2.	Producing/ distributing cosmetics containing pharmaceutical/prohibited compounds	9	2	5	30	BPOM Regulation No. 17 of 2022 on Amendments to BPOM Regulation No. 23 of 2019 on Technical Requirements for Cosmetic Ingredients (Badan Pengawas Obat dan Makanan, 2022a)
3.	Producing cosmetics that do not comply with the GMP	87	101	52	33	BPOM Regulation No. 33 of 2021 on Certification of Good Cosmetic Manufacturing Practices (Badan Pengawas Obat dan Makanan, 2021)
4.	Importing cosmetics without an Import Certificate	NA	50	48	181	BPOM Regulation No. 28 of 2023 on Amendments to BPOM Regulation No. 27 of 2022 on the Oversight of Drug and Food Importation into the Territory of Indonesia (Badan Pengawas Obat dan Makanan, 2023b)
5.	Labeling Violations	6,413	3,792	2,599	1,712	- BPOM Regulation No. 30 of 2020 on Technical Requirements of Cosmetics Label (Badan Pengawas Obat dan Makanan, 2020) - BPOM Regulation No. 18 of 2024 on Labelling, Promotion, and Advertising of Cosmetics (Badan Pengawas Obat dan Makanan, 2024)
6.	Violations of Advertising and Claim Practices	5,575	6,165	4,497	1,782	- BPOM Regulation No. 18 of 2024 on Labelling, Promotion, and Advertising of Cosmetics (Badan Pengawas Obat dan Makanan, 2024) - BPOM Regulation No. 3 of 2022 on Technical Requirements for Cosmetic Claims (Badan Pengawas Obat dan Makanan, 2022c) - BPOM Regulation No. 19 of 2015 on Technical Requirements for Cosmetics (Badan Pengawas Obat dan Makanan, 2015)
7.	Injectable products registered as cosmetics	NA	NA	4	15	- Regulation of the Minister of Health of the Republic of Indonesia Number 1176/MENKES/PER/VIII/2010 of 2010 on Cosmetic Notification (Kementerian Kesehatan, 2010b) - BPOM Regulation No. 21 of 2022 on Procedures for Submitting Cosmetic

No.	Violation Criteria	Years				Regulation Violated
		2021	2022	2023	2024	

Notifications (Badan Pengawas Obat dan Makanan, 2022b)

Table 3 (violation indicators 5 and 6) also shows a decline in violations related to labeling, claims, and advertising between 2021 and 2024. However, the total number of such cases remained relatively high, exceeding 1,500 annually. This indicates the importance of public education campaigns to raise awareness of the risks of unsafe cosmetics. Nayak et al. (2023) emphasized the necessity of understanding the potential health risks associated with cosmetics and using them appropriately to reduce adverse effects. Establishing a cosmetovigilance system could help minimize these events.

Table 4. Enforcement Actions of the BPOM Regulatory Violations

No.	Violation Criteria and Sanction	Years			
		2021	2022	2023	2024
1.	Producing/ distributing cosmetics without a distribution permit:				
	a. Temporary suspension of activities	NA	NA	NA	3
	b. Written Warning/ Recall Order/ Destruction	696	1,448	1,230	459
	c. Notification suspension	NA	NA	22	NA
2.	Producing/ distributing cosmetics containing pharmaceutical/ prohibited compounds:				
	a. Temporary suspension of activities	NA	NA	1	4
	b. Revoke the distribution permit	7	2	5	27
	c. Written Warning/ Recall Order/ Destruction	9	2	3	29
	d. Closure of notification access	NA	NA	NA	5
	e. Closure of import certificate access	NA	NA	NA	2
3.	Producing cosmetics that do not comply with the GMP:				
	a. Temporary suspension of activities	NA	NA	1	1
	b. Written Warning	87	101	52	33
4.	Importing cosmetics without an Import Certificate:				
	a. Written warning	NA	50	48	NA
	b. Destruction order	NA	NA	NA	NA
	c. Closure of electronic public services access	NA	NA	NA	152
	d. Closure of import access	NA	NA	NA	29
5.	Labeling Violations:				
	a. Technical guidance	5,936	3,438	2,238	1,359
	b. Written warning	477	354	361	353
	c. Revoke the distribution permit	NA	NA	NA	NA
6.	Violations of advertising and claim practices:				
	a. Technical guidance	3,260	4,079	728	695
	b. Written warning	2,315	2,086	3,769	1,083
	c. Revoke the distribution permit	NA	NA	NA	NA
7.	Injectable products registered as cosmetics:				
	a. Revoke the distribution permit	NA	NA	4	15
	b. Temporary suspension of activities	NA	NA	1	NA
	c. Notification suspension	NA	NA	2	2
	d. Import certificate access suspension	NA	NA	1	NA

Note: NA (Not Available) indicates that no violations were found during the respective sampling and inspection activities.

In 2023 and beyond, BPOM identified injectable products that were incorrectly categorized as cosmetics (violation indicator number 7). These findings suggest that every possible method is being used to distribute cosmetics, including deceptive practices. It is therefore critical that BPOM enhances its market monitoring efforts, especially for cosmetics distributed online.

Table 4 summarizes enforcement actions undertaken by BPOM from 2021 to 2024 in response to the violations outlined in Table 3, seventh column. A single violation may lead to multiple sanctions. For example, in 2024, 459 violations involving the unauthorized production or distribution of cosmetics resulted in 459 written warnings and three temporary operational suspensions (violation indicator number 1). The total number of written warnings, recall orders, and destruction notices increased from 2021 to 2022 but declined from 2022 to 2024 for violation number 1. Written warnings for violation indicators 5 and 6 also saw a decreasing trend from 2021 to 2024. Meanwhile, the number of revoked distribution permits and recall/destruction orders for violation indicator number 2 significantly increased in 2024. For violation indicator 3 (labeling), no distribution permits were revoked, although a small number were revoked for violations related to advertising and product claims (violation indicator number 6). As shown in Tables 3 and 4, some years or categories display the notation “NA,” which signifies that no violations were identified during the inspection or sampling period. This may reflect full compliance or a limited scope of surveillance during that time.

Although the number of injectable products falsely registered as cosmetics remains small, it demonstrates attempts to circumvent the classification of medical products. This further underscores the need for clear definitions between medical and cosmetic categories, along with stricter cross-sectoral supervision. All injectable products registered as cosmetics were eventually revoked (violation indicator number 7). A review of BPOM’s enforcement data from 2021 to 2024 reveals a downward trend in technical guidance sanctions and written warnings, suggesting a regulatory shift toward a more supportive and proactive approach. Going forward, BPOM is expected to expand its technical assistance initiatives through direct consultations and **interactive digital platforms such as webinars**.

The declining trend in certain violation types may reflect improved enforcement effectiveness (Tables 2–5). Nevertheless, fluctuation in specific categories signals persistent challenges in cosmetic product oversight. Globally, regulators continue to face difficulties in controlling new cosmetic ingredients, calling for flexible yet robust risk-based regulations. Collaborative approaches with customs and other agencies can strengthen prevention efforts against the entry of illegal substances into Indonesia.

According to Su et al. (2020), regulations must remain adaptive to market dynamics by incorporating modern supervision technologies, fostering innovation, and prioritizing scientific research. Risk-based regulatory models implemented in developed countries (Scientific Committee on Consumer Safety of European Union, 2023) provide valuable frameworks that Indonesia can adopt to enhance its oversight of cosmetics. In line with this, (Kashuri, 2024b) offers concrete steps to safeguard domestic cosmetic products from being overwhelmed by imported alternatives, thereby promoting the growth of local industries.

4. Conclusions

This study reveals that the most prominent regulatory violations in Indonesia's cosmetic sector between 2021 and 2024 were related to unauthorized distribution, non-compliance with ingredient restrictions, deviations from Good Manufacturing Practices (GMP), misleading claims, and improper labeling practices. The findings underscore that despite regulatory modernization and intensified enforcement by BPOM, including risk-based surveillance strategies, significant compliance gaps persist, particularly in online distribution channels and imported products. Factors contributing to these violations include limited industry awareness, challenges in GMP implementation, and regulatory loopholes in ingredient control and advertising claims. The analysis emphasizes the importance of enhancing digital monitoring systems, strengthening cross-border collaboration under the ASEAN Cosmetic Directive, and improving public education to foster a culture of compliance. Insights from this study provide empirical support for risk-based and preventive regulatory approaches, offering valuable input for national policy formulation and future regional harmonization efforts.

References

- Badan Pengawas Obat dan Makanan. (2015). *Peraturan Kepala Badan Pengawas Obat dan Makanan Republik Indonesia Nomor 19 Tahun 2015 Tentang Persyaratan Teknis Kosmetika*.
- Badan Pengawas Obat dan Makanan. (2020). *Peraturan Badan Pengawas Obat dan Makanan Nomor 30 Tahun 2020 tentang Persyaratan Teknis Penandaan Kosmetika*.
- Badan Pengawas Obat dan Makanan. (2021). *Peraturan Badan Pengawas Obat dan Makanan Nomor 33 Tahun 2021 tentang Sertifikasi Cara Pembuatan Kosmetika yang Baik*.
- Badan Pengawas Obat dan Makanan. (2022a). *Peraturan Badan Pengawas Obat dan Makanan Nomor 17 Tahun 2022 tentang Perubahan atas Peraturan Badan Pengawas Obat dan Makanan Nomor 23 Tahun 2019 tentang Persyaratan Teknis Bahan Kosmetika*.
- Badan Pengawas Obat dan Makanan. (2022b). *Peraturan Badan Pengawas Obat dan Makanan Nomor 21 Tahun 2022 tentang Tata Cara Pengajuan Notifikasi Kosmetika*.
- Badan Pengawas Obat dan Makanan. (2022c). *Peraturan Badan Pengawas Obat dan Makanan Nomor 3 Tahun 2022 tentang Persyaratan Teknis Klaim Kosmetika*.
- Badan Pengawas Obat dan Makanan. (2023a). *Peraturan Badan Pengawas Obat dan Makanan Nomor 12 Tahun 2023 tentang Pengawasan Pembuatan dan Peredaran Kosmetik*.
- Badan Pengawas Obat dan Makanan. (2023b). *Peraturan Kepala Badan Pengawas Obat dan Makanan Nomor 28 Tahun 2023 tentang Perubahan atas Peraturan Badan Pengawas Obat dan Makanan Nomor 27 Tahun 2022 tentang Pengawasan Pemasukan Obat dan Makanan ke dalam Wilayah Indonesia*.
- Badan Pengawas Obat dan Makanan. (2024). *Peraturan Badan Pengawas Obat dan Makanan Nomor 18 Tahun 2024 tentang Penandaan, Promosi, dan Iklan Kosmetik*.
- Barthe, M., Bavoux, C., Finot, F., Mouche, I., Cuceu-Petrenci, C., Forreryd, A., Chérouvrier Hansson, A., Johansson, H., Lemkine, G. F., Thénod, J.-P., & Osman-Ponchet, H. (2021). Safety Testing of Cosmetic Products: Overview of Established Methods and

- New Approach Methodologies (NAMs). *Cosmetics*, 8(2), 50. <https://doi.org/https://doi.org/10.3390/cosmetics8020050>
- Direktorat Standardisasi Obat Tradisional, S. K. dan K. (2024). *Database Kosmetik Mengandung Bahan Berbahaya*. <https://Standar-Otskk.Pom.Go.Id/Otskk-Db/Kategori/Database-Kosmetik-Mengandung-Bahan-Berbahaya>. <https://standar-otskk.pom.go.id/otskk-db/kategori/database-kosmetik-mengandung-bahan-berbahaya>
- Du, X.-N., He, Y., Chen, Y.-W., Liu, Q., Sun, L., Sun, H.-M., Wu, X.-F., & Lu, Y. (2024). Decoding Cosmetic Complexities: A Comprehensive Guide to Matrix Composition and Pretreatment Technology. *Molecules*, 29(2). <https://doi.org/10.3390/molecules29020411>
- EIBN. (2019). *EIBN Sector Reports: Cosmetics 2019*. https://madeinindonesia.com/images/minisite/itpc_uae/2019_EIBN_New_Report_-_Sector_Cosmetics.pdf
- Ferreira, M., Matos, A., Couras, A., Marto, J., & Ribeiro, H. (2022). Overview of Cosmetic Regulatory Frameworks around the World. In *Cosmetics* (Vol. 9, Issue 4, p. 72). <https://doi.org/https://doi.org/10.3390/cosmetics9040072>
- Health Sciences Authority (HSA). (2002). *ASEAN Cosmetic Directive*. <https://www.hsa.gov.sg/cosmetic-products/asean-cosmetic-directive>
- Hess, D. R. (2004). Retrospective studies and chart reviews. *Respiratory Care*, 49(10), 1171–1174.
- Indradewi AASN, Muliati NM (2022) The role of BPOM in the distribution of Cosmetics that contain hazardous substances in Denpasar. In: Arifin B, Porio E, Sedana G (Eds), *Proceedings of The International Conference on Multi-Disciplines Approaches for The Sustainable Development*. Dwijendra University, Denpasar, 244–253.
- Kalia, P., Zia, A., & Kaur, K. (2023). Social influence in online retail: A review and research agenda. *European Management Journal*, 41(6), 1034–1046. <https://doi.org/https://doi.org/10.1016/j.emj.2022.09.012>
- Kashuri, M. (2024a, October 19). *Peran BPOM dalam Menjaga Keamanan Kosmetik : Apa yang Perlu Diketahui Publik ?* <https://jurnalpost.com/peran-bpom-dalam-menjaga-keamanan-kosmetik-apa-yang-perlu-diketahui-publik/73223/>
- Kashuri, M. (2024b). *Menjaga Produk Kosmetik Lokal dari Impor*. PT. Revormasi Jangkar Philosophia.
- Kementerian Kesehatan. (2010a). *Peraturan Menteri Kesehatan Nomor 1175/MENKES/PER/VIII/2010 Tahun 2010 tentang Izin Produksi Kosmetika*.
- Kementerian Kesehatan. (2010b). *Peraturan Menteri Kesehatan Nomor 1176/MENKES/PER/VIII/2010 Tahun 2010 tentang Notifikasi Kosmetika*.
- LPPOM MUI. (2024). *2026 , Cosmetics Must Be Halal*. <https://halalmui.org/en/2026-cosmetics-must-be-halal/>
- Marchelin, T. (2020). *Not Everything ' s On Fleek : Illegal Cosmetics on the Rise in Indonesia*. Jakarta Globe. <https://jakartaglobe.id/news/not-everythings-on-fleek-illegal-cosmetics-on-the-rise-in-indonesia>
- Mercader-García, P., González-Pérez, R., Gatica-Ortega, M. E., & Pastor-Nieto, M. A. (2024). Cosmetovigilance for infrequent allergens in Spain using a national online registry: The example of allergic contact dermatitis caused by phenylethyl resorcinol. *Contact Dermatitis*, 90(3), 245–252. <https://doi.org/https://doi.org/10.1111/cod.14460>
- Mileneo, M. F. (2024). *Industri Kosmetik Indonesia Semakin “ Glowing ”*, Kian

- Menjanjikan untuk Ekonomi Masa Depan.*
<https://www.goodnewsfromindonesia.id/2024/11/29/industri-kosmetik-indonesia-semakin-glowing-kian-menjanjikan-untuk-ekonomi-masa-depan>
- Morel, S., Sapino, S., Peira, E., Chirio, D., & Gallarate, M. (2023). Regulatory Requirements for Exporting Cosmetic Products to Extra-EU Countries. *Cosmetics*, 10(2). <https://doi.org/10.3390/cosmetics10020062>
- Mulya, A. (2023). *Cosmetic Registration in Indonesia: Requirements and Process*. Investinasia. <https://investinasia.id/blog/cosmetic-registration-in-indonesia/>
- Najemi, A., Purwastuti, L., & Nawawi, K. (2019). The Role of the Food and Drug Supervisory Agency (Bpom) in Managing Circulation of Cosmetics and Hazardous Foods. *Berumpun*, 2(2), 76–92. <https://doi.org/10.33019/berumpun.v2i2.21>
- Nayak, M., Virendra, M. P., Pharm, S. L. M., Prabhu, S. S., & Edin, F. (2023). *Awareness level regarding adverse reactions caused by cosmetic products among female patients : A cross- - sectional study*. March, 2512–2519. <https://doi.org/10.1111/jocd.15734>
- Oindrila Ghosal. (2025). *NADFC (BPOM) Regulations of Cosmetics in Indonesia NADFC / BPOM*. <https://www.artixio.com/post/nadfc-bpom-regulations-of-cosmetics-in-indonesia>
- Othman, N. N., Zakaria, Z., & Aziz, A. (2020). *Legal Control for the Safety of Cosmetic Products Application Use in Malaysia*. 3(Special Issue), 1–6. <https://doi.org/https://doi.org/10.3687/jhis.a0000080>
- Pratiwi, R., Auliya As, N. N., Yusar, R. F., & Shofwan, A. A. (2022). Analysis of Prohibited and Restricted Ingredients in Cosmetics. In *Cosmetics* (Vol. 9, Issue 4, p. 87). <https://doi.org/https://doi.org/10.3390/cosmetics9040087>
- Ribet, V., Claudin, L. A., Brinio, E., Berthier, A., Millet, V., Halbeher, C., Sauvaire, L., Laborderie, M., Lafosse, S., Olivan, A., Labadie, F. G., & Ferret, P.-J. (2021). Surveillance of dermo-cosmetic products: a global cosmetovigilance system to optimise product development and consumer safety. *European Journal of Dermatology*, 31(4), 463–469. <https://doi.org/10.1684/ejd.2021.4101>
- Scientific Committee on Consumer Safety of European Union. (2023). *The SCCS Notes of Guidance for the testing of Cosmetic ingredients and their safety evaluation 12th Revision*. https://health.ec.europa.eu/document/download/32a999f7-d820-496a-b659-d8c296cc99c1_en?filename=sccs_o_273_final.pdf
- Su, Z., Luo, F., Pei, X., Zhang, F., Xing, S., & Wang, G. (2020). Final Publication of the “Regulations on the Supervision and Administration of Cosmetics” and New Prospectives of Cosmetic Science in China. In *Cosmetics* (Vol. 7, Issue 4, p. 98). <https://doi.org/https://doi.org/10.3390/cosmetics7040098>
- Sutriyono, Hardyansah, R., Khayru, R. K., Arifin, S., Saktiawan, P., & Pakpahan, N. H. (2024). BPOM IN MONITORING AND CONTROLLING ILLEGAL COSMETICS. *International Journal of Service Science, Management, Engineering, and Technology*, 5(2), 16–21. <https://ejournalisse.com/index.php/isse/article/view/119>
- Teixera, A., de Almeida, A., Melo, D., Leitão, L., & Silva, L. (2019). Descriptive analysis of notifications of adverse events of cosmetic products registered in Notivisa , from 2006 to 2018. *Vigilância Sanitária Em Debate*, 7(4), 17–25. [https://doi.org/Teixera, A., de Almeida, A., Melo, D., Leitão, L., & Silva, L. \(2019\). Descriptive analysis of notifications of adverse events of cosmetic products registered in Notivisa , from 2006 to 2018. 7\(4\), 17–25.](https://doi.org/Teixera, A., de Almeida, A., Melo, D., Leitão, L., & Silva, L. (2019). Descriptive analysis of notifications of adverse events of cosmetic products registered in Notivisa , from 2006 to 2018. 7(4), 17–25.)

- <https://visaemdebate.incqs.fiocruz.br/index.php/visaemdebate/article/view/1384/1174>
Vieira, D., Duarte, J., Vieira, P., Gonçalves, M. B. S., Figueiras, A., Lohani, A., Veiga, F., & Mascarenhas-Melo, F. (2024). Regulation and Safety of Cosmetics: Pre- and Post-Market Considerations for Adverse Events and Environmental Impacts. In *Cosmetics* (Vol. 11, Issue 6, p. 184). <https://doi.org/pkk;phttps://doi.org/10.3390/cosmetics11060184>
- Wijanarko, R. A. K., & Anggoro, Y. (2021). Evaluation of GMP Compliance on Cosmetics : Case Study on Cosmetic Industries in Indonesia. *Journal of International Conference Proceedings (JICP)*, 4(2), 150–160. <https://doi.org/https://doi.org/10.32535/jicp.v4i2.1235>
- Yunianto, E. P., & Anggoro, Y. (2021). *Understanding Illegal Cosmetic Circulation in Indonesian Online Marketplace through Problem Analysis Triangle*. 4(3), 34–41.
- Yustina, Y., Bodrorini, N., Sophian, A., & Lukitaningsih, E. (2024). Review: Policy strategy of nano cosmetic testing in Indonesia. *Pharmacia*, 71, 1–10. <https://doi.org/https://doi.org/10.3897/pharmacia.71.e118872>