



## Governance Strategy for Free Nutritious Food Procurement: An Administrative Law Perspective

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### Abstract

The Free Nutritious Food Program (MBG) is a strategic government policy to improve the quality of human resources; however, its procurement governance still raises juridical concerns that create discrepancies between *das sollen* and *das sein*. This study aims to analyze the governance of MBG procurement from the perspective of Administrative Law and to formulate procurement strategies in line with the principles of good governance. The research employs a normative juridical method with statute approach and case approaches, using primary legal materials such as Presidential Regulation No. 16 of 2018 and Presidential Regulation No. 83 of 2024, and is qualitatively analyzed. The findings reveal practices of large provider dominance, limited MSME access to the e-catalog, and weak oversight, which contradict the principles of legality, justice, and accountability. The novelty of this research lies in its assertion that MBG procurement is an administrative act (*bestuursdaad*) that must be examined within the framework of Administrative Law to ensure the program's legitimacy, fairness, and sustainability.

### Keywords:

Free Nutritious Food;  
Governance; Procurement of  
goods/services.

## A. INTRODUCTION

The development of a country is not only measured by the aspect of physical infrastructure, but also by the quality of development of its human resources. Superior human resources are the foundation of a nation's future progress.<sup>1</sup>

Human growth is not only supported by formal education but is also supported by the fulfillment of adequate nutritional needs. Adequate nutrition during a child's growth period plays a crucial role in determining the quality of the individual in the future.<sup>2</sup> The long-term

<sup>1</sup> Mahmud Ridwan, "Pembangunan Sumber Daya Manusia Pada Sekolah Kejuruan Di Indonesia: Tantangan Dan Peluang Di Era Revolusi Industri 4.0," *Moderasi: Jurnal Studi Ilmu Pengetahuan Sosial* 2, No. 1 (2021): 1-10, <https://doi.org/10.24239/moderasi.vol2.iss1.35>, p. 2.

<sup>2</sup> Aulia Insani, "Pemenuhan Asupan Gizi Anak Melalui Bekal Makanan Sehat Bagi Kesehatan Anak Usia Dini," *Journal of Innovation Research and Knowledge* 2, No. 3 (2022): 843-848, <https://doi.org/10.53625/jirk.v2i3.3270>, p. 843.

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effects of malnutrition are not only felt by the individual but also have implications for low national productivity and the quality of human resources as a whole.<sup>3</sup> Good nutrition is an integral part of sustainable development strategies and must be a priority in government policy. Programs such as free nutritious meals are strategic steps that not only answer the basic needs of the community, but also build a healthy, intelligent, and competitive generation of the nation as a long-term investment.<sup>4</sup> The Free Nutritious Food Program (MBG) is a strategic step by the government in fulfilling citizens' basic rights and represents a long-term investment to build the Golden Generation 2045, yet its implementation in practice faces several fundamental problems. The main issue lies in the governance of government goods and services procurement, which serves as the instrument for program execution. Without effective, transparent, accountable, and fair procurement governance, the program risks creating disparities in food distribution, dominance by large providers, marginalization of micro-entrepreneurs

and local farmers, as well as potential inefficiency and misuse of the budget. This underscores the importance of the administrative law perspective, as the entire procurement process constitutes a public legal act that must be grounded in the principles of legality, legal certainty, protection of citizens' rights, and good governance. The absence of strengthening in this aspect raises fundamental questions: Is the current MBG procurement governance in line with the principles of administrative law? What reformulation strategies are needed to ensure that MBG procurement truly reflects transparency, participation, and alignment with the public interest? These problems constitute the central focus of this research.

Indonesia is still classified as a country with a high poverty rate. Based on data from the International Monetary Fund (IMF), around 60% of Indonesia's population is still below the poverty line.<sup>5</sup> This condition certainly has a negative impact on various aspects such as life, including health, education, and human resource productivity. The Indonesian government has launched a strategic

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<sup>3</sup> Linuria Asra Laily and Sofwan Indarjo, "Literature Review: Dampak Stunting Terhadap Pertumbuhan Dan Perkembangan Anak," *HIGEIA (Journal of Public Health Research and Development)* 7, No. 3 (2023): 356-364, <https://doi.org/10.15294/higeia.v7i3.63544>, p. 356.

<sup>4</sup> Dessy Maeyangsari, "Ekonomi Biru Sebagai Upaya Pembangunan Berkelanjutan Dan Pemenuhan Hak Asasi Manusia," *Perspektif Hukum* 23, No. 1 (2023): 106-126, <https://doi.org/10.30649/ph.v23i1.172>, p. 113.

<sup>5</sup> Arrijal Rachman, "Data Bank Dunia: 60,3% Penduduk Indonesia Miskin," *CNBC Indonesia*, <https://www.cnbcindonesia.com/news/20250429095537-4-629554/data-bank-dunia-603-penduduk-indonesia-miskin>, accessed July 05, 2025.

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program in the form of providing free nutritious meals for students at the Elementary School (SD), Middle School (SMP), and High School (SMA). This program aims to improve the nutritional quality of Indonesian children from an early age, as well as a long-term investment in building a healthy, intelligent, and competitive golden generation.<sup>6</sup> The success of this program is determined not only by the availability of the budget but also by government procurement governance that is effective, transparent, accountable, and fair. This is where the aspect of administrative law plays a central role, as the entire procurement process constitutes a public legal act that must comply with the principles of good governance, the principle of legality, legal certainty, and the protection of citizens' rights.

While adequate nutrition is a fundamental requirement for developing high-quality human resources, and state intervention through a free nutritious meal program represents a strategic response to this need, the program's success ultimately depends on effective, transparent, inclusive, and accountable procurement governance. In the absence of a reliable procurement system, such state initiatives risk failing to reach target groups in an equitable and sustainable

manner. Poorly managed procurement can give rise to serious problems such as inequality in food distribution, dominance of large providers, the exclusion of micro-entrepreneurs and local farmers, and the risk of inefficiency and misuse of budgets. Procurement governance is not just an administrative technical aspect, but is at the heart of the sustainability and fairness of the Free Nutritious Food Program (MBG). Good governance must ensure that the implementation of MBG procurement, starting from the food supply chain, runs efficiently and fairly, all parties are involved equally, and the program is able to provide maximum benefits with a high level of public trust. This makes strengthening the procurement system the main foundation for the successful implementation of the MBG program and the achievement of the grand vision of Golden Indonesia 2045.

This research urgently needs to ensure that the national priority program runs transparently, accountably, and efficiently in accordance with the principles of good governance. The Free Nutritious Food Program (MBG) which has begun to be implemented by the government requires a structured and standardized procurement system, considering the wide scale of

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<sup>6</sup> Anif Kiftiyah *et al.*, "Program Makan Bergizi Gratis (MBG) Dalam Perspektif Keadilan Sosial dan Dinamika Sosial-Politik," *Pancasila : Jurnal Keindonesiaan* 5, No. 1 (2025): 102-112, <https://doi.org/10.52738/pjk.v5i1.726>, p. 102.

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its coverage and the very large public budget used in this context, Presidential Regulation Number 16 of 2018 concerning Government Procurement of Goods/Services is the main reference that must be complied with, so that the procurement governance strategy in the MBG program must be able to adopt principles such as healthy competition, participation of local business actors, and bias towards MSMEs. In addition, implementation challenges in the field, such as regional disparities, limited capacity of regional procurement actors, and the risk of budget misuse, require adaptive and data-based reformulation of procurement strategies. This research is important to formulate a procurement governance model that is not only in accordance with legal provisions, but also able to encourage the effectiveness of the implementation of the MBG program as a real manifestation of the success of the government goods/services procurement system.

Some studies related to this research include Andin's research, which discusses the application of Pancasila values in the free nutritious food program initiated by the government.<sup>7</sup> Further research by

Wahyuni, discusses the success or failure of the free nutritious meal program and aspects of sustainability in the future.<sup>8</sup> The last research from Andreas discussed the impact of implementing free nutritious meals on the quality of student learning at school.<sup>9</sup>

Several previous studies have discussed the MBG Program from non-legal perspectives. Andin's research emphasized the application of Pancasila values in this program, Wahyuni examined the dilemmas of implementation at the school level and coordination barriers, while Andreas highlighted the program's impact on students' learning productivity. None of these three studies addressed the aspect of administrative law governance in goods/services procurement, even though this aspect is crucial in determining accountability and the effectiveness of policy implementation. Therefore, this research differs by examining MBG from the perspective of administrative law, particularly in its relation to Presidential Regulation Number 16 of 2018 on Government Procurement of Goods/Services.

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<sup>7</sup> Afifah Andin *et al.*, "Penerapan Nilai Pancasila Melalui Program Makan Bergizi Gratis," *Indonesian Journal of Education and Development Research* 3, No. 1 (2025): 370-383, <https://doi.org/http://dx.doi.org/10.57235/ijedr.v3i1.4684>, p.370.

<sup>8</sup> Dinda Tri Ayuni, "Dilema Pelaksanaan Program Makan Bergizi Gratis Pada Siswa," *Triwikrama: Jurnal Ilmu Sosial* 8, No. 8 (2025): 21-30, <https://doi.org/10.9963/mmx6b34>, p. 21.

<sup>9</sup> Kevin Andreas *et al.*, "Tinjauan Kritis Tentang Program Makan Bergizi Gratis Terhadap Produktivitas Belajar Siswa," *Katalis Pendidikan: Jurnal Ilmu Pendidikan Dan Matematika* 2, No. 2 (2025): 22-30, <https://doi.org/10.62383/katalis.v2i2.1428>, p. 22.

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The main research problem is how the governance strategy of goods/services procurement in the MBG Program can be formulated so that it aligns with the principles of administrative law, such as efficiency, effectiveness, openness, fairness, accountability, and the empowerment of MSMEs. This problem is significant because field practices indicate risks of dominance by large providers, exclusion of local business actors, and potential inefficiencies that could harm the public interest. Thus, the research problems can be formulated as follows: (1) what administrative law framework underlies procurement in the MBG Program; (2) how the principles of administrative law are implemented in MBG procurement governance; and (3) what strategies are needed to make MBG procurement governance more effective, transparent, participatory, and aligned with the public interest.

The purpose of this study is to analyze and evaluate the implementation of the MBG Program from the perspective of administrative law, as well as to formulate a governance strategy for goods/services procurement that is in accordance with the principles of good governance. This research is expected to provide a theoretical contribution by strengthening administrative law studies in the field of procurement, and a practical contribution by offering recommendations for the government in formulating MBG policies that are more effective, transparent, and inclusive.

## **B. RESEARCH METHODS**

This study employs a normative legal research method with a descriptive-analytical specification. The method aims to systematically, factually, and accurately describe the governance strategy of goods/services procurement in the Free Nutritious Food Program (MBG). The approaches used are the statute approach and the case approach. The statute approach is carried out by examining relevant laws and regulations, particularly Presidential Regulation Number 16 of 2018 on Government Procurement of Goods/Services and its amendments, Presidential Regulation Number 83 of 2024 on the National Nutrition Agency (BGN), as well as derivative regulations related to the implementation of the MBG Program. Meanwhile, the case approach is conducted by examining the program's implementation practices in various regions through secondary data from official government reports and publications of the National Nutrition Agency. The primary legal materials in this study consist of laws and regulations as mentioned above. The secondary legal materials include books, scientific journals, articles, and official government reports relevant to procurement governance and administrative law. The tertiary legal materials comprise legal dictionaries, encyclopedias, and other supporting sources that reinforce the analysis. All data are analyzed qualitatively using content analysis techniques to draw

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normative conclusions based on legal logic and the principles of administrative law.<sup>10</sup>

## C. RESULTS AND DISCUSSIONS

### 1. Free Nutritious Food Program Implementation Scheme

The implementation of this program began with the establishment of the National Nutrition Agency (BGN), which is regulated through Presidential Regulation (Perpres) Number 83 of 2024, which is the main legal basis for the start of the MBG program nationally. The existence of this Presidential Decree shows the seriousness of the government in organizing special institutions that handle the fulfillment of community nutrition, especially for school children. This program is also supported by the Decree of the Deputy for BGN Distribution Number 2 of 2024, which provides detailed operational technical instructions for implementing MBG in various regions, ensuring a robust and effective technical implementation.<sup>11</sup> Both regulations can affirm the state's commitment to improving people's welfare through the provision of equitable, sustainable, and system-based nutrition.

These regulations establish BGN's authority as a central institution responsible for managing nutritional fulfillment programs, including the procurement of food distribution. From a juridical perspective, the implementation scheme is not only a matter of technical execution but also a reflection of administrative law principles, particularly legality, legal certainty, accountability, and the protection of citizens' rights. For instance, the requirement for regional governments to cooperate with local business actors and MSMEs reflects the principle of fairness and participation mandated under procurement law. Similarly, the integration of monitoring and reporting systems corresponds to the principle of transparency and accountability in public procurement. Thus, the implementation scheme must be analyzed not as operational details, but as an embodiment of administrative law principles that ensure the program's legitimacy and sustainability.

Beneficiaries of the MBG Program until June 22, 2025, have reached 5,228,529 people from various categories. Redy Hendra Gunawan, as the Special Staff of the Head of BGN for Communications, said in a press conference that the MBG

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<sup>10</sup> Nelvitia Purba *et al.*, *Metodologi Penelitian Hukum*, 1<sup>st</sup> ed. (Medan: Pustaka Media Publishing, 2024), p. 205-206.

<sup>11</sup> Denok Oktawila and Himawan Estu Bagijo, "Kedudukan Lembaga Negara Dalam Makan Bergizi Gratis," *Jurnal Media Informatika* 6, No. 3 (2025): 1595-1602, <https://doi.org/10.55338/jumin.v6i3.5915>, p. 1595.

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Program, which has been running since January 6, 2025, involves 1,837 SPPG units spread across almost all provinces in Indonesia. BGN has a target to increase the number of SPPG significantly to 7,000 units in August and continue to grow until it reaches 32,000 units in November 2025. Each SPPG absorbs various workers, including 1,837 SPPG heads, 1,499 nutritionists, 1,481 accountants, 1,642 field heads, and 1,525 cooks. The total workforce has reached 72,521 people by early June, and BGN estimates that this number will increase to 1.5 million workers as the program expands to all regions of Indonesia.<sup>12</sup>

Structurally, one SPPG consists of around 50 personnel, who are divided into several functional teams. These teams include: food sorting team, cutting team, processing team, packing team, distribution team, and tableware washing team. Each team has a specific role that is integrated into the daily nutrition service cycle. In addition, each SPPG has a Unit Head, an accountant, and a nutritionist who are tasked with ensuring compliance with national nutrition standards and maintaining service quality. SPPG operates using a digital-based system to record recipient

data and monitor distribution in real time.

SPPG has a function that is not limited to food processing and provision. This unit is also responsible for conducting periodic data collection on beneficiaries, ensuring logistics run on time, and establishing partnerships with local business actors, such as farmers and MSMEs, to provide fresh food. With this system, SPPG is not only a food service provider but also a local food governance node that supports economic equality and national food security. In practice, SPPG is also required to implement strict sanitation and hygiene principles, and report activities accountably to BGN.

The implementation of the MBG Program cannot work optimally without synergistic coordination between the central government and regional governments, as well as across sectors at various levels. The central government works in formulating general policies, allocating budgets, and setting national standards, while the regional government is responsible for technical implementation in the field according to local conditions and needs.<sup>13</sup> Collaborative involvement between the Department of Education,

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<sup>12</sup> M. Iqbal Al Machmudi, "Penerima Manfaat MBG Per Juni Capai 5,2 Juta Orang," *Media Indonesia*, 2025, <https://mediaindonesia.com/humaniora/784883/penerima-manfaat-mbg-per-juni-capai-52-juta-orang>, accessed July 08, 2025.

<sup>13</sup> Humas MenPANRB, "Optimalisasi Program MBG, Menteri Rini Sampaikan Strategi Dukungan Dari Kementerian PANRB," *Kementrian PANRB*, 2025, <https://www.menpan.go.id/site/berita-terkini/optimalisasi-program-mbg-menteri-rini-sampaikan-strategi-dukungan-dari-kementerian-panrb>, accessed July 15, 2025.

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the Department of Health, and the Department of Agriculture is crucial to ensure that the distribution of nutritional quality can run smoothly, as well as the availability of fresh and nutritious local food ingredients. The Department of Education ensures this program is integrated into school activities; the Department of Health is responsible for overseeing nutritional standards and food hygiene; and the Department of Agriculture supports the food supply chain from local farmers. Additionally, internal oversight bodies, such as the Main Inspectorate, can optimize their duties as well.<sup>14</sup> This is supported by an external supervisory institution, BPK, or an independent institution to ensure accountability, budget transparency, and overall program effectiveness. Inter-sectoral coordination is the main foundation for building an integrated, nutritious food service system, equitable, and sustainable throughout Indonesia. The MBG program has been implemented since January 2025 and has shown significant progress in efforts to fulfill the nutritional needs of students at various levels of education. Based on a longitudinal study conducted in a number of pilot schools, it was found

that the nutritional status of students experienced a real increase, marked by a proportional increase in the average Body Mass Index (BMI) and a decrease in anemia cases of up to 15% in intervention areas. This finding could strengthen evidence from various international studies that suggest that school meal programs contribute significantly to improving children's health. Beneficiary students reported increased daily energy levels, which had a direct impact on increased participation in both the learning process and extracurricular activities. There is a close relationship between improving nutritional status and the quality of school attendance and student learning concentration, with an average increase in student attendance of 7% and an increase in academic performance of around 5–10%. These facts confirm that nutritional interventions through this program not only impact health aspects but can also be a major driver in improving the quality of national education in a sustainable manner.<sup>15</sup>

The free nutritious meal program is run by the SPPG under the auspices of the National Service Agency (BGN). This represents a concrete government

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<sup>14</sup> Internal BGN, "Wujudkan Efisiensi Dan Transparansi, BGN Rancang Regulasi Pengawasan Intern," [bgn.co.id](https://www.bgn.go.id/news/berita/wujudkan-efisiensi-dan-transparansi-bgn-rancang-regulasi-pengawasan-intern), 2025, <https://www.bgn.go.id/news/berita/wujudkan-efisiensi-dan-transparansi-bgn-rancang-regulasi-pengawasan-intern>, accessed July 15, 2025.

<sup>15</sup> Tim Editor, "Prabowo Minta Penyaluran MBG Dipercepat Pakai Dapur Sekolah," *Kumparan.Com*, 2025, <https://kumparan.com/kumparanbisnis/prabowo-minta-penyaluran-mbg-dipercepat-pakai-dapur-sekolah-25LGrH0pD2E/full>, accessed July 15, 2025.

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intervention in meeting the community's nutritional needs. This program provides nutritious food intake at least once a day, through menus carefully calculated by nutritionists based on established standards and criteria. The primary goal of this program is to ensure that the nutritional needs of vulnerable groups, particularly pregnant women, breastfeeding mothers, and toddlers and to accelerate the reduction of stunting rates in Indonesia. The first 1,000 days of life are the golden period for a child's growth and development. Appropriate nutritional interventions during this period are expected to prevent permanent growth and development disorders, while ensuring a healthier and more productive future generation. This program not only targets vulnerable groups, but also students from kindergarten (TK), elementary school (SD), junior high school (SMP), and senior high school/vocational school (SMA/SMK). Through this strategy, the government aims to create superior and competitive human resources (HR) by 2045, as part of the Golden Indonesia vision.<sup>16</sup>

Under the MBG Program at Painan 2 Public High School, meals are delivered daily at 11:30 a.m. WIB and distributed in the school's main lobby, which has been designated as the distribution location because it can accommodate up to 1,269 meals. The menu consists of rice, chicken or fish, vegetables, and fruits such as bananas or watermelon. The program's implementation still faces several obstacles in the field, even though the menu has been prepared by the SPPG based on the principles of balanced nutrition. The main challenge is the limited means of transportation used to deliver the food, resulting in frequent delays in distribution and disrupting students' learning activities.<sup>17</sup>

Meanwhile, the implementation of the MBG Program at SDN 3 Kepanjen, Malang Regency, has begun since the beginning of 2025, as part of the implementation of the national policy to improve the nutritional status and quality of human resources, especially for students from lower-middle economic backgrounds. The MBG program is run through collaboration between schools and the Kepanjen District SPPG, which regulates the meal delivery schedule,

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<sup>16</sup> Ulya Hajar Dzakiah Yahya, "Menuju Indonesia Emas 2045, Program MBG Diharapkan Atasi Persoalan Gizi Anak Dan Kelompok Rentan," *Warta Ekonomi.Co.Id*, 2025, <https://wartaekonomi.co.id/read572482/menuju-indonesia-emas-2045-program-mbg-diharapkan-atasi-persoalan-gizi-anak-dan-kelompok-rentan?page=2>, accessed July 15, 2025.

<sup>17</sup> Winny and Yusnanik Bakhtiar Abdillah, "Implementasi Kebijakan Makan Bergizi Gratis (Studi Pada SMA Negeri 2 Painan Kecamatan IV Jurai Kabupaten Pesisir Selatan)," *Jurnal Edu Research* 6, No. 2 (2025): 424-431, <http://117.74.115.107/index.php/jemasi/article/view/537>, p. 425.

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portion sizes, and student responses to the meal menu. Meals are distributed twice daily, depending on grade level and lesson time. The budget for meals is set at a maximum of 15,000 Rupiah per serving, which includes a complete menu that meets nutritional standards. However, limited SPPG funds and suboptimal internal governance are the main obstacles, so that the food menu cannot be consistent, and sometimes distribution disrupts the learning process. The high level of student enthusiasm for this program shows that MBG has a positive impact on increasing school participation and awareness of the importance of healthy eating patterns from childhood.<sup>18</sup>

## **2. Governance Strategy for the Procurement of Free Nutritious Food as an Effective Implementation of Government Procurement of Goods/Services**

The government's implementation of the MBG policy demonstrates a concrete commitment to ensuring the nutritional needs of schoolchildren are met. This policy not only aims to reduce malnutrition but is also a strategic effort to improve the overall health of the

younger generation. By fulfilling daily nutritional needs, it is hoped that children can grow and develop optimally, both physically and cognitively, thereby contributing to improving the quality of Indonesia's human resources in the future. Implementation of this policy is the state's responsibility in realizing children's rights to proper health and education as mandated in the constitution and laws, and regulations.<sup>19</sup>

The governance strategy for the Free Nutritious Food Program (MBG) should not be viewed solely from the perspective of administrative management, but must be critically analyzed within the framework of Administrative Law. As an administrative act (*bestuursdaad*), the procurement of goods and services in the MBG Program requires compliance not only with Presidential Regulation No. 16 of 2018 on Government Procurement of Goods/Services but also with the fundamental principles of legality, legal certainty, accountability, fairness, and transparency. This means that governance is not merely a technical matter of procurement procedures, but rather a juridical issue that tests the extent to which state actions in MBG implementation reflect the principles of

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<sup>18</sup> Ikka Febryanti *et al.*, "Implementasi Kebijakan Makan Bergizi Gratis (MBG) (Studi Kasus Pada SDN 3 Kepanjen Kabupaten Malang)," *Dialogue Jurnal Ilmu Administrasi Publik* 7, No. 1 (2025): 67-79, <https://doi.org/https://doi.org/10.14710/dialogue.v7i1.26628>, p. 69.

<sup>19</sup> Dian Herdiana, "Implementasi Kebijakan Makan Bergizi Gratis (MBG): Faktor-Faktor Pendorong Dan Penghambat," *Madani: Jurnal Ilmiah Multidisiplin* 3, No. 2 (2025): 470-478, <https://doi.org/https://doi.org/10.5281/zenodo.15063556> Implementasi, pp. 473-474.

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good governance and the protection of citizens' rights.

The SPPG was established to implement the MBG Program. The target number of SPPG beneficiaries is expected to reach 15 million by 2025. This will automatically increase demand for staple foods such as rice, vegetables, animal protein, and other complementary ingredients. This situation raises concerns about the readiness of the upstream sector, particularly farmers, fishermen, and small business owners in the supply chain, to meet demand consistently, with quality, and affordably. If not managed properly, this could lead to supply imbalances that could lead to food inflation and burden the overall program implementation.

In the implementation of the MBG, there is a fundamental discrepancy between *das sollen* and *das sein*. *Das sollen* is reflected in the normative provisions of Presidential Regulation No. 16 of 2018 on Government Procurement of Goods/ Services and Presidential Regulation No. 83 of 2024 on the National Nutrition Agency, which emphasize the principles of legality, legal certainty, fair competition, justice, and the obligation to provide affirmative measures for MSMEs as stipulated in Article 65. However, *das sein* in practice reveals the dominance of large providers, limited access for MSMEs to the e-catalog system, collusive practices, and weak oversight mechanisms. This divergence between law and practice creates the potential for maladministration,

as the government has not fully implemented the general principles of good governance (*algemene beginselen van behoorlijk bestuur*), particularly the principles of non-discrimination, proportionality, and accountability. From the perspective of Administrative Law, this condition undermines the legitimacy of government administrative actions in MBG procurement. Therefore, a reformulation of procurement governance strategies that reaffirms the application of administrative law principles—legality, legal certainty, justice, transparency, accountability, and the protection of citizens' rights—is essential to ensure that the MBG Program is not only legally valid but also fair and sustainable as a public policy.

Furthermore, there is the potential for unfair competition between businesses, such as between traditional market traders and large suppliers involved in procuring food for the MBG program. The potential for unfair business competition in the implementation of the MBG program is a crucial issue that requires serious attention, especially in the context of government procurement of goods/ services that involve a large budget and a broad implementation reach. The MBG program, which essentially allocates the provision of nutritious food on a mass and regular basis to students throughout Indonesia, opens opportunities for various businesses in the food, catering, and logistics sectors to participate. However, without strict supervision and a transparent selection mechanism,

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this program is very vulnerable to being exploited by large business actors who have political connections or capital advantages to dominate the market and eliminate small business actors, especially local MSMEs.<sup>20</sup>

Unfair competition can occur in the form of horizontal collusion (between service providers), vertical collusion (between providers and procurement committees), unit price manipulation, and even monopolistic and oligopolistic practices by certain business actors who successfully control the majority of procurement contracts. Furthermore, the imbalance in access to tender information, the e-catalog system that is not yet fully inclusive regionally, and the limited capacity of MSMEs to meet the specified technical specifications can also widen the gap and encourage unfair competitive practices.<sup>21</sup> In the context of MBG procurement, there is a clear potential conflict between legal norms and actual practice. Normatively, Article 5 of Presidential Regulation No. 16 of 2018 on Government Procurement of Goods/Services affirms fair competition as a principle that must be upheld in every procurement process. However, in practice, indications have

emerged of large providers dominating procurement contracts, potentially creating monopolistic conditions and marginalizing local MSMEs that should, in fact, be prioritized. This situation highlights a discrepancy between *das sollen* and *das sein*, where the legal provisions mandating fairness and equal opportunity for all business actors are undermined by unfair competition practices. Such contradictions between law and practice not only weaken the legitimacy of the MBG policy but also create risks of maladministration, as the government fails to implement the principles of legality, fairness, and accountability in public procurement.

The conflict between norms and practice carries significant juridical consequences. If the government allows monopolistic or collusive practices to persist in MBG procurement, the resulting administrative actions risk contravening the general principles of good governance (*algemene beginselen van behoorlijk bestuur*) and may be subject to judicial review before the Administrative Court (PTUN). Moreover, failure to guarantee fair competition and to ensure MSME participation as mandated under Article 65 of Presidential Regulation

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<sup>20</sup> Zaenal Arifin, Muhammad Amirullah, and Tri Nugroho, "Praktik Persaingan Usaha Tidak Sehat Dalam Pengadaan Barang/Jasa Pemerintah Di Sektor Jasa Konstruksi," *Jurnal USM Law Review* 7, No. 2 (2024): 757-767, <https://doi.org/10.26623/julr.v7i2.8368>, pp. 758-759.

<sup>21</sup> Muhammad Iqbal, "Pengaruh Pelaksanaan E Katalog Dalam Pengadaan Barang/Jasa Pemerintah Terhadap UMKM," *Jurnal USM Law Review* 3, No. 1 (2020): 77-97, <https://doi.org/10.26623/julr.v3i1.2204>, pp. 80-81.

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No. 16/2018 can be classified as maladministration, involving abuse of authority, discriminatory treatment, and neglect of the principle of proportionality. Such conditions not only diminish the legitimacy of the MBG Program but also risk eroding public trust in the government's integrity in managing public procurement. Therefore, a reformulation of procurement governance strategies is urgently required to restore alignment between legal norms and practical implementation, ensuring that MBG procurement genuinely reflects the principles of legality, legal certainty, fairness, and the protection of citizens' rights within the framework of Administrative Law.

Unfair competition practices in government procurement, as manifested in the form of horizontal collusion, vertical collusion, price manipulation, monopoly, and oligopoly, constitute a violation of the principles of good governance and the fundamental norms stipulated in Presidential Regulation No. 16 of 2018 on Government Procurement of Goods/Services. This regulation normatively mandates the principles of fair competition, transparency, justice, and accountability in every procurement process. When unfair competition occurs, it not only undermines program efficiency and effectiveness but also creates the potential for maladministration due to abuse of authority and non-compliance with the principle of legality.

Furthermore, unequal access to tender information and the non-inclusive

nature of region-based e-catalog systems reflect violations of the principles of equality and non-discrimination in administrative law. Such conditions generate legal uncertainty for small and local enterprises, as the state fails to guarantee equal treatment in procurement mechanisms. Likewise, the limited capacity of MSMEs, when not accompanied by affirmative government policies, illustrates weak implementation of the principle of protection for vulnerable groups, even though Article 65 of Presidential Regulation No. 16/2018 explicitly mandates prioritization for MSMEs.

Accordingly, the issues of unfair competition and the exclusion of MSMEs in the governance of MBG procurement should not be regarded merely as technical matters, but rather as juridical problems concerning the legitimacy of administrative actions by the state. Without reformulation through stricter legal instruments and consistent implementation, MBG procurement risks contravening the principles of administrative law that demand legal certainty, fairness, proportionality, and the protection of citizens' rights.

Without protection and affirmation for local business actors, the MBG program risks creating economic concentration in the hands of a handful of large service providers, which is contrary to the spirit of equality and empowerment of the local economy as mandated in Presidential Regulation No. 16 of 2018 concerning Government

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Procurement of Goods/Services. It is crucial for the government to establish a fair, transparent, and participatory procurement governance strategy, including strengthening anti-unfair competition regulations, conducting open audits of program implementation, and providing facilitation and assistance to MSMEs so they can compete healthily in the MBG procurement ecosystem.

Imbalances in business scale and access to distribution networks can lead to the dominance of certain parties, marginalizing small traders and local farmers. To prevent this kind of market distortion, government policy intervention is needed in the form of procurement regulations that favor micro, small, and medium enterprises (MSMEs). These regulations could include a regional cluster-based procurement system, transparency of cooperation contracts, and fiscal incentives for local suppliers. The Food Security Agency, the Agriculture Agency, the Maritime Affairs and Fisheries Agency, and the Cooperatives and SMEs Agency at both the regional and central levels need to be actively integrated.

To ensure that procurement governance within the MBG Program implemented by the government continues to adhere to Presidential Regulation Number 16 of 2018 concerning Government Procurement of Goods/Services. This is because food procurement under the MBG program is part of the goods/services procurement process funded by the

state budget (APBN) or regional budget (APBD). All procedures, mechanisms, and basic principles in the Presidential Decree remain the primary reference for implementing MBG procurement. Therefore, a successful procurement process encompasses two aspects: quality and quantity. If the evaluation of MBG procurement meets these two aspects, it can be concluded that the MBG implementation has been successful and has met the established targets.

Presidential Regulation No. 16 of 2018 stipulates a number of mandatory principles for procurement of goods/services, including efficiency, effectiveness, transparency, openness, competition, fairness, and accountability. In the context of MBG procurement, these principles are crucial to ensure that the entire process of providing nutritious food is on target, within budget, and free from irregularities. For example, transparency can be ensured through an e-purchasing system based on an e-catalog, while accountability can be enforced through electronic reporting and tiered supervisory audits.

Furthermore, the Presidential Decree also provides space for the involvement of micro, small, and medium enterprises (MSMEs) in the procurement process. Through the provisions of Article 65, the government is required to prioritize MSMEs in procurement packages with a certain value, as long as they meet the qualification requirements. In this case, the procurement of nutritious food through local providers or school

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cooperatives, which are included in the MSME category, is a form of implementation of the principle of strengthening the local economy and equitable distribution of program benefits. The use of local or sectoral e-catalogs facilitated by the Government Goods/Services Procurement Policy Agency (LKPP) is also an important instrument to support the involvement of regional MSMEs.

In addition, Presidential Regulation No. 16 of 2018 concerning Government Procurement of Goods/Services also regulates various procurement implementation methods, including direct procurement and self-management mechanisms, which can be adapted to the needs and scale of the MBG program implementation in the field. For example, in areas with limited access, MBG implementation can be carried out through type III self-management involving community organizations, cooperatives, or educational institutions as implementers. Meanwhile, in areas with food service providers already registered in the e-catalog, procurement can be done through electronic ordering (e-purchasing) to ensure speed and efficiency.

The involvement of the National Agency for Food Security (LKPP) and the National Agency for National Development Planning (BGN) in the procurement of the MBG Program is a strategic component in ensuring the effectiveness, efficiency, and accountability of program

implementation. LKPP, as an institution that has the authority to determine policies and systems for government procurement of goods/services, also plays a crucial role in preparing procurement regulations and mechanisms in accordance with the principles of good governance. In the context of MBG, LKPP has prepared technical guidelines for the procurement of nutritious food that support the acceleration of program implementation in various regions through the national e-catalog platform and local e-catalogs based on regions.

One concrete step taken by LKPP is to prepare the business actor ecosystem to be ready to participate in MBG procurement through various training programs, technical assistance, and facilitation of provider registration into the local e-catalog system. LKPP encourages the involvement of local MSMEs by expanding their participation space through simplifying requirements, opening sectoral and region-based e-catalogs, and conducting business matching between ministries/agencies and potential business actors. In addition, LKPP also collaborates with local governments and related agencies to provide technical guidance for business actors in the food, catering, and logistics sectors so that they can supply the procurement standards and technical requirements of the MBG program. Through this initiative, LKPP not only ensures the involvement of business actors in the procurement chain but also contributes to building

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the competency and competitiveness of MSMEs in a sustainable manner. This effort reflects LKPP's commitment to creating an inclusive, fair, and supportive procurement system for local economic development, in accordance with Presidential Regulation No. 16 of 2018 concerning Government Procurement of Goods/Services. In addition, LKPP also actively assists local governments in implementing MBG procurement, including providing training to local procurement implementers and suppliers. LKPP specifically encourages the use of e-catalogs for the procurement of ready-to-eat food, fresh food ingredients, and distribution services, to ensure quality and timeliness. This approach also provides space for the participation of local MSMEs as primary suppliers, in line with the provisions of Presidential Regulation No. 16 of 2018 concerning Government Procurement of Goods/Services, which prioritizes the involvement of MSMEs in government procurement of goods/services.

Meanwhile, the National Agency for National Education (BGN) serves as an institution that ensures that nutritional standards and food sufficiency the MBG Program. BGN's involvement includes developing standard nutritious food menus based on the nutritional needs of school children by age, as well as monitoring the quality of food distributed through procurement schemes. BGN is also a key technical partner in assisting local governments in planning menus according to needs and periodically

evaluating the nutritional impact of the MBG program.

The synergy between LKPP and BGN are crucial element in establishing an integrated MBG procurement governance ecosystem. LKPP ensures that the procurement process operates according to principles such as transparency, accountability, and efficiency, while BGN ensures that the nutritional content and quality of the food provided truly align with the program's primary purpose, which is to improve children's nutritional status and health. This collaboration also enables the establishment of an integrated monitoring and evaluation system, both for procurement and health outcomes.

The involvement of LKPP and BGN in the procurement of the MBG Program not only reflects administrative coordination but, more importantly, represents the implementation of the principles of Administrative Law. LKPP's role in preparing regulations, mechanisms, and facilitating MSME participation aligns with the principles of legality and good governance, which require every administrative act of the state to be based on clear, transparent, and accountable legal foundations. LKPP's efforts to expand MSME access through national and regional e-catalogs, simplified requirements, and technical assistance can be regarded as the application of the principles of fairness and non-discrimination, as well as the realization of the mandate of Article 65 of Presidential Regulation No. 16 of 2018,

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which obliges affirmative measures for MSMEs. Meanwhile, BGN's involvement in establishing nutritional standards and supervising food quality demonstrates the protection of citizens' rights to health, which forms part of the state's duty to uphold the principles of legal certainty and the protection of fundamental rights. The synergy between LKPP and BGN reinforces the legitimacy of government administrative actions in the MBG Program by ensuring the simultaneous fulfillment of the principles of efficiency, transparency, participation, and accountability. Thus, the collaboration of these two institutions is not merely a technical mechanism but a juridical instrument that determines the validity of MBG procurement governance within the framework of Administrative Law.

The application of the principles of Administrative Law in the governance of the MBG is essential to guarantee the legitimacy of government actions as well as the successful implementation of the program. The principle of legality requires that all policies and procurement mechanisms under MBG be grounded in a clear legal basis as stipulated in Presidential Regulation No. 16 of 2018

and its derivative regulations.<sup>22</sup> The principle of legal certainty is necessary to establish clarity in procedures, technical standards, and oversight mechanisms, thereby ensuring that business actors, particularly MSMEs, have certainty in their participation.<sup>23</sup> The principles of fairness and non-discrimination mandate equal treatment for all business actors, with affirmative measures for MSMEs in accordance with Article 65 of Presidential Regulation No. 16/2018, to prevent their marginalization by dominant large providers. The principle of proportionality emphasizes the fair distribution of procurement packages so that they correspond to the capacities of providers across different regions without creating disparities in access. The principles of transparency and accountability require open access to information through e-catalog systems and effective public oversight to prevent collusion, monopolistic practices, and maladministration.<sup>24</sup> Finally, the principle of protection of citizens' rights provides a normative foundation that the fulfillment of children's nutritional needs constitutes a constitutional right that the state is obliged to guarantee. By

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<sup>22</sup> Adellya Salsabilla Hermawan, "Penerapan Asas Asas Hukum Administrasi Negara Dalam Instrumen Pemerintahan Yang Baik," *Education: Jurnal Sosial Humaniora dan Pendidikan* 2, No. 3 (2022): 58-67, <https://doi.org/10.51903/education.v2i3.270>, p. 61.

<sup>23</sup> Abdur Rahim *et al.*, "Relevansi Asas Kepastian Hukum Dalam Sistem Penyelenggaraan Administrasi Negara Indonesia," *JiIP - Jurnal Ilmiah Ilmu Pendidikan* 6, No. 8 (2023): 5806-5811, <https://doi.org/10.54371/jiip.v6i8.2575>, p. 5807.

<sup>24</sup> Muhammad Soleh Aminullah and Nur Julian Majid, "Asas-Asas Penyelenggaraan Negara Pespektif Undang-Undang Dan Hukum Islam," *Mitsaqan Ghalizan* 4, No. 1 (2024): 36-51, <https://doi.org/10.33084/mg.v4i1.6843>, p. 42.

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consistently applying these principles, the governance of MBG procurement will not only be administratively effective but also lawful, fair, and aligned with the principles of the rule of law.

#### D. CONCLUSIONS

The findings of this study reveal a significant gap between *das sollen* and *das sein* in the implementation of the Free Nutritious Food (MBG) Program. Normatively, Presidential Regulation No. 16 of 2018 on Government Procurement of Goods/Services and Presidential Regulation No. 83 of 2024 on the National Nutrition Agency emphasize the principles of legality, legal certainty, fairness, fair competition, and affirmative measures for MSMEs. However, in practice, the dominance of large providers, limited MSME access to the e-catalog system, and weak oversight mechanisms persist, creating potential maladministration and undermining public trust. Based on an analysis within the framework of Administrative Law, this research identifies five strategic parameters of MBG procurement governance that align with good governance principles: (1) application of the principles of legality and legal certainty in every administrative act (*bestuursdaad*); (2) enhancement of MSME access and affirmative inclusion in the e-catalog system; (3) improvement of transparency and accountability through open audits and electronic reporting mechanisms;

(4) implementation of proportionality and fairness in the regional allocation of procurement packages; and (5) protection of citizens' constitutional rights to nutrition fulfillment. Integrating these five parameters will ensure that MBG procurement governance not only meets the formal requirements of legality but also achieves effectiveness, inclusiveness, and sustainability in accordance with the core values of good governance.

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