



Legal Responsibility of Unlabeled Cosmetics Business Actors from the Perspective of Consumer Protection Law

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Submitted: 10 January 2025

Revised: 24 June 2025

Published: 09 July 2025

Abstract:

The circulation of unlabeled cosmetics in Indonesia has become an important issue that threatens the protection of consumer rights. Cosmetics that are not clearly labeled omit crucial and important information for consumers, such as ingredient composition, distribution license, and product expiration date. This risks jeopardizing the health and resulting in financial losses for consumers who are not adequately informed about the products they consume. In this context, the perspective of legal protection of consumers emphasizes that consumers have the right to obtain honest, clear and correct information about the products they buy. According to Law Number 8 Year 1999 on Consumer Protection, business actors are required to provide complete and safe information about the products they distribute, in accordance with Article 4 and Article 7 of Number 8 Year 1999 on Consumer Protection. However, in reality, the circulation of unlabeled cosmetics indicates non compliance with these provisions, leading to violations of consumer rights. This practice not only harms consumers but also creates legal uncertainty, as it is difficult to claim liability in the event of loss due to the product. Based on the perspective of legal protection of consumers, stricter supervision and strict law enforcement are necessary to ensure that existing regulations are effectively implemented. This aims to protect consumer rights, create legal certainty, and prevent the circulation of unlabeled cosmetics that could potentially harm consumers.

Keywords: Legal Responsibility, Cosmetics, Business, Consumer Protection

INTRODUCTION

The distribution of cosmetics lacking proper labeling affects consumers and has significant social and economic ramifications. The most obvious social impact is the injustice faced by consumers who are disadvantaged owing to a lack of transparent information regarding the products they consume. Many consumers are unaware of the potential dangers of non-standardized cosmetic products, such as allergic reactions or harmful chemicals, which can result from using products without adequate information. In addition, the lack of clear labeling affects the public's trust in cosmetic products circulating in the market, thereby reducing the level of consumer satisfaction and loyalty to certain brands (Syafiqoh, 2023).

From an economic perspective, the circulation of unlabeled cosmetics can also harm businesses that comply with regulations. A market filled with products that do not meet standards can lead to unfair competition, as irresponsible businesses are often able to sell products at lower prices, while they do not have to meet the cost obligations for product testing and appropriate labeling of products. This puts pressure on businesses that operate legitimately and in accordance with existing regulations. Furthermore, if these issues are not addressed, there could be a general decline in

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product quality in the cosmetics market, which, in turn, would impact public health and market integrity.

In the long run, the circulation of unlabeled cosmetics has the potential to damage the reputation of the cosmetics industry in Indonesia. One example is several incidents where illegal cosmetic products with exaggerated claims have negatively impacted consumers, such as skin damage or other health problems. If this continues without strict law enforcement, consumers will increasingly feel unsafe choosing products, leading to decreased consumption and losses for the cosmetics industry. Therefore, it is important for the government, regulators, and businesses to work together to create a system that can prevent the circulation of cosmetic products without labels or with inappropriate labels (Winata, 2022).

In facing the challenges of unlabeled cosmetics circulation, the role of regulators is crucial in maintaining the quality and safety of products in the market. Indonesia's Food and Drug Administration (BPOM) plays a major role in overseeing the circulation of cosmetics and ensuring that products sold to consumers comply with the set standards. BPOM has the authority to supervise and inspect cosmetic products circulating in the market and impose sanctions on business actors who violate provisions regarding product labeling and safety. The practice of circulating cosmetics without clear labeling often involves products that are not registered with the Food and Drug Supervisory Agency (BPOM) and are at risk of containing hazardous ingredients or not in accordance with applicable safety standards. This can be detrimental to consumers because they do not obtain adequate information about the content and use of the products they purchase. BPOM has undertaken a concrete initiative by strengthening the regulations associated with the licensing and labeling of cosmetics, as specified in BPOM Regulation Number 17 of 2015, which addresses Cosmetics Supervision and Labeling Requirements (Indriarty, 2018).

Along with the rapid development of technology and e-commerce, BPOM has adapted by utilizing digital technology to monitor and evaluate the circulation of cosmetics in the online market. This is important considering the increasing number of cosmetic products sold online, which are often without adequate supervision. Regulators must also ensure that supervision is carried out effectively by increasing the capacity of human resources involved in product inspections. Business entities involved in the cosmetics industry that fail to comply with labeling regulations should face rigorous penalties, including monetary fines and other legal repercussions. Meanwhile, it is imperative for regulatory authorities to enhance their understanding of these entities regarding their legal responsibilities related to labeling standards and the critical importance of ensuring that their products are safe for consumer use (Januardi, 2024).

Law No. 36/2009, *Junto* 17/2023 on Health, regulates the obligation of manufacturers, importers, and distributors to ensure that marketed cosmetic products are safe and meet safety standards. Article 106 states that every cosmetic product must be guaranteed safe, while Article 107 requires the product to be registered and have a distribution license from the competent authority. In addition, cosmetic products must be equipped with clear information through labels that include the composition, method of use, and necessary warnings to protect consumers from potential health hazards.

Law No. 7/2014 on Trade regulates the obligation of business actors to ensure that products traded are safe and in accordance with applicable standards, including cosmetic products. Article 21 requires every traded product to be equipped with clear, correct, and non-misleading information, which is stated on the product label. Article 22 emphasizes that product labels must include necessary information, such as identity, composition, usage, and warnings, to protect consumers and ensure the transparency of product information circulating in the market (Isnaini, 2018).

Law No. 8/1999 on Consumer Protection stipulates that every marketed product must provide clear and correct information to consumers, including through proper *labeling*. Article 8 paragraph (1) states that "Every good and/or service circulated and traded in Indonesia must meet good service standards and provide true, clear, and honest information about the condition and guarantee of the goods and/or services." In addition, Article 9 stipulates that information on products, including

cosmetics, must include adequate labeling regarding the identity of the product, the ingredients used, and the method of use, to protect consumers and ensure that the product is safe until it reaches consumers. This regulation aims to ensure that consumers can make informed decisions and avoid the dangers posed by unclear or misleading product labels.

Consumer awareness is also important for reducing the circulation of unlabeled cosmetics. Educating consumers on the importance of checking cosmetic product labels before purchase can be one of the main deterrents to the circulation of illegal cosmetics. Therefore, it is important for the government and related institutions to continue educating the public on how to recognize cosmetics that are safe and in accordance with established standards.

To address the problem of unlabeled cosmetics circulation, comprehensive follow-up measures must be implemented immediately to ensure more effective consumer protection. One of the main steps that must be taken is to strengthen supervision and law enforcement of cosmetic products circulating in the market. This supervision must be carried out more strictly for both cosmetic products sold conventionally in physical stores and those sold through *e-commerce* platforms. The government needs to ensure a more routine and systematic inspection mechanism to ensure that every cosmetic product in circulation meets the standards set by regulations, especially regarding clear and accurate labeling. Strict law enforcement against business actors who violate this provision is also very important. Businesses found selling cosmetic products without labels or with labels that do not meet legal requirements must be given appropriate sanctions, either in the form of fines or bans from selling their products in the market (Ompusunggu, 2023). Along with the development of online trade, more collaboration is required.

Close cooperation with *e-commerce* platforms is urgently required. Many unlabeled or non-compliant cosmetic products circulate on digital platforms, which is difficult to control without cooperation between regulators and platform providers. Therefore, e-commerce platforms must be more active in monitoring the products sold on their platforms and removing products that do not meet regulations. They can also be empowered to verify businesses selling cosmetic products on their sites to ensure that only registered products are marketed.

With these measures, the problem of unlabeled cosmetics circulation can be minimized, making the cosmetics market in Indonesia safer and more reliable and providing better protection for consumers. The government, business actors, and the public need to work together to create an ecosystem that is conducive to the trade of cosmetic products that are safe, high-quality, and in accordance with applicable legal standards.

In Indonesia, the issue of unlabeled cosmetics is gaining increased attention because of its potentially serious implications for consumer health and safety. Many businesses ignore the obligation to include clear information on product content and instructions for use for the sake of profit. This violates the basic principles of consumer protection stipulated in Law No. 8/1999 on Consumer Protection, which explicitly emphasizes consumers' right to obtain transparent and accurate information before making a purchase. In addition, regulations related to cosmetic products are also regulated in the BPOM Regulation, which requires every product to be registered and have a label that meets safety standards (Simanjuntak, 2020).

The practice of distributing unlabeled cosmetics is still rampant, indicating that law enforcement by BPOM No. 21/2018 Article 68 on the withdrawal of illegal cosmetics needs to be improved to be more effective in protecting the public from health risks. In this case, it is important to evaluate whether the existing regulations meet the criteria of consumer law protection. If law enforcement focuses only on legal certainty without considering justice and expediency, consumer protection against illegal cosmetics can be considered inadequate and can harm public trust in the legal system.

In the modern era, characterized by increasing public awareness of health and beauty, the use of cosmetic products has become an important part of daily lifestyle. However, the emergence of cosmetic products without clear labeling has become a serious problem that confuses consumers. Unlabeled products often do not include important information, such as the identity of the

business, ingredient composition, expiration date, or distribution permit. This condition not only makes it difficult for consumers to understand the safety and quality of the products used but also creates uncertainty regarding legal liability (Khairi, 2022).

In the event of losses, such as harmful side effects or other health problems. Aggrieved consumers are confused as to where to report or hold accountable, given the absence of information leading to the manufacturer or distributor of the product. This phenomenon creates a legal loophole that harms consumers and highlights the need for stricter supervision by the authorities to protect the public from the risks of using cosmetic products that do not meet legal standards.

HN skincare products that do not meet the safety standards and applicable regulations but are still sold through *e-commerce* platforms can be considered illegal products. This is because, in accordance with Law Number 36 of 2009 on Health and Law Number 8 of 1999 on Consumer Protection, every cosmetic product marketed in Indonesia must be registered and meet safety standards set by competent authorities, such as the BPOM. Products that are not registered or do not meet these requirements risk endangering consumer health and violating existing regulations. Sellers who market illegal products through e-commerce are also accountable for distributing goods that fail to meet legal standards. Consequently, they may be subject to legal sanctions in accordance with the applicable regulations.

Existing regulations already cover important aspects related to consumer protection and supervision of cosmetic products, including the obligation to provide clear labeling and accurate information. Law No. 36/2009 on Health, Law No. 7/2014 on Trade, as well as BPOM regulations, have set strict requirements for businesses to ensure the safety and transparency of products circulating in the market. The legal protection perspective of consumers emphasizes the importance of clear, understandable, and consistently applied laws to create social stability. In this case, although the regulations are adequate, stronger supervision and consistent law enforcement are needed to ensure that these principles can be effectively implemented to create legal certainty that protects consumers and businesses that comply with the rules.

METHODS

This study adopts the juridical normative legal research method, which focuses on the study of law as a social norm that includes legislation, customary law, and decisions from judicial institutions (Dewata, 2010). Juridical normative legal research focuses on the study of applicable legal norms and their practical application. This study seeks to understand the legal system by examining existing laws, regulations, and relevant legal decisions (Dianti, 2020). In this context, normative juridical legal research was used to evaluate the regulations related to the circulation of unlabeled cosmetics and their legal implications. In the context of normative research, the data source used consists of secondary data, including primary and secondary legal materials (Marzuki, 2009).

This study aims to address problems related to the circulation of unlabeled cosmetics based on secondary data. The primary legal materials in this research include relevant laws and regulations, particularly Law Number 8 of 1999 on Consumer Protection and related regulations governing cosmetics, and BPOM Law Number 12 of 2017 on Cosmetics. Secondary legal materials consist of legal theories that will be used for analysis, especially consumer protection theory. The data collection technique applied in this research is a literature study, which was carried out by collecting, reviewing, and analyzing various sources of law and literature related to the research topic.

RESULTS

The qualifications of business actors from the perspective of consumer protection play a crucial role, especially in maintaining the integrity of the market and the safety of products in circulation. Business actors, including manufacturers, distributors, resellers, and retailers, are responsible for ensuring that the products they offer are not only of high quality but also safe for consumers. Evaluations of business actors' actions show that non-compliance with established standards can

have a detrimental impact on consumers, including serious health risks due to the use of unsafe products.

According to Law No. 8/1999 on Consumer Protection, Article 4 states that consumers are entitled to correct, clear, and honest information about the goods and services they use. When businesses do not provide proper information, such as in the case of unlabeled cosmetic products, they are potentially putting consumers at significant risk. In many cases, unlabeled cosmetic products may contain harmful ingredients unknown to consumers, such as mercury or hydroquinone, which can cause allergic reactions, skin damage, or even long-term health problems. This shows that the actions of businesses that ignore regulations not only violate consumers' rights but also potentially jeopardize their health (Simanjuntak, 2020).

Furthermore, Article 8 of the same law stipulates that business actors are prohibited from producing or selling goods that do not meet safety standards, which is relevant in the context of cosmetics. Non-compliance with this provision results in legal sanctions, as listed in Article 62, where violating business actors may be subject to fines or revocation of business licenses.

This illustrates that every business actor, from manufacturers to retailers, can be held accountable for the products they distribute, regardless of their position in the distribution chain. It can be analyzed that the circulation of unlabeled cosmetics in Indonesia poses serious risks to consumers, especially in relation to health and safety. From a legal protection perspective, existing regulations, such as Law No. 36 of 2009 on Health and Law No. 8 of 1999 on Consumer Protection, emphasize that all cosmetic products must have a distribution license and clear labeling. Unlabeled cosmetics not only violate the law but also make it difficult for consumers to understand the composition and potential dangers of the product. BPOM plays an active role in law enforcement to protect consumers from illegal products (Khairi, 2022).

The impact of business actors' non-compliance with these regulations is extensive. In addition to the direct harm to consumers, such as jeopardized health, noncompliance can also undermine public trust in the cosmetics industry as a whole. In the long run, this may lead to decreased consumer interest in products that are supposed to be safe and of high quality. Therefore, it is important for all businesses to understand and properly fulfill their responsibilities. The implementation of strict regulations and effective supervision by relevant authorities is key to ensuring that the cosmetics market operates within a safe corridor and in accordance with consumer protection principles (Fatahillah, 2023). Thus, a healthy and equitable market environment should be created for all parties. This regulation also serves as a reminder for all parties involved in the chain. Distribution from manufacturers to retailers: about their responsibilities in providing quality products. Through these measures, consumer protection aims to ensure that every individual has the right to access products that are not only effective but also safe for their health (Sibarani, 2017).

DISCUSSION

Regulations Related to the Circulation of Legal Cosmetics

Regulations governing cosmetics in Indonesia cover various stages, from the manufacturing process to distribution to consumers, to ensure that products in circulation are safe and meet established standards. Law Number 36 Year 2009 on Health regulates the obligation of manufacturers to ensure that cosmetic products produced or distributed are safe for use by consumers and do not endanger health. Article 106 emphasizes that every product produced or imported must meet the safety and quality standards specified by the competent authority (Notoatmodjo, 2010).

Furthermore, the Head of BPOM Regulation No. 12/2020 on Cosmetics Supervision provides further guidance on the registration and supervision of cosmetics, both domestically produced and imported (Rahmawati, 2024). Cosmetic products must be registered with the BPOM before being marketed, and every cosmetic product must undergo feasibility and safety tests before obtaining a distribution permit (Setiawan et al., 2023). This is to ensure that products that reach consumers meet safety standards and do not contain hazardous materials that can endanger health.

At the distribution and marketing stage, Law No. 7/2014 on Trade regulates the obligation to provide accurate and clear information on product labels. Articles 21 and 22 require cosmetic products sold in the market to include information on composition, usage, and warnings necessary to protect consumers. Clear and correct labeling is essential for consumers to make informed decisions about the products they buy and use.

Finally, Law No. 8/1999 on Consumer Protection completes this set of regulations by establishing the right of consumers to obtain correct and clear information about the products they purchase, as well as the right to protection from dangerous or unsafe goods. Article 8 requires all marketed goods, including cosmetics, to meet established standards and provide consumers with truthful and non-misleading information. This regulation ensures that every stage, from manufacture to consumer, is protected by laws that can provide safety and certainty.

Qualifications of Business Actors in Consumer Protection Regulations

The qualification of business actors in the circulation of unlabeled cosmetics includes various parties involved in the distribution chain, from manufacturers to retailers. In this context, business actors are defined as individuals or legal entities that conduct economic activities related to cosmetics. According to Law No. 8/1999 on Consumer Protection, Article 5 underlines that every business actor must provide accurate information about the products they sell. This requires all parties in the distribution chain, from manufacturers to resellers, to ensure that the products they offer are properly labeled and meet safety standards. Government Regulation No. 29 of 2021, Article 1, point 2 states, "business actors referred to in trading activities include producers, distributors, wholesalers, and retailers.

The qualifications of business actors in the circulation of unlabeled cosmetics can be seen from their legal responsibilities related to the fulfillment of cosmetic product labeling regulations stipulated by law. Business actors who do not include clear labels on their cosmetics may be subject to sanctions in accordance with the provisions of the Consumer Protection Law and regulations issued by the Food and Drug Supervisory Agency (BPOM) (Hamid, 2019).

Business practices that do not comply with regulations can have serious implications for consumers and businesses. Non-compliance with labeling can pose health risks to consumers, including allergic reactions due to harmful ingredients in cosmetics. In addition, Article 62 of Law No. 8/1999 on Consumer Protection emphasizes that business actors who violate the provisions may be subject to sanctions, including fines or revocation of business licenses. This emphasizes that the responsibility of business actors lies not only with producers but also includes distributors, *resellers*, and retailers.

Furthermore, every business actor can be held liable if the products they distribute are not in accordance with the applicable regulations. This is in line with Article 3 of Government Regulation No. 69/1999 on Food Labels and Advertisements, which states that information on labels must be reliable and clear, and emphasizes that all parties in the distribution chain are obliged to ensure compliance with this provision. Thus, strict regulations are needed to maintain consumer safety and ensure the integrity of the cosmetics market, where all business actors have equal responsibility in circulating safe and critical products.

Liability of Consumers Harmed by Unlabeled Cosmetics

Law No. 7 of 2014 concerning Trade in article 1 point 6 states that business actors include every person or business entity that carries out activities in the field of trade, whether producers, distributors, wholesalers, or retailers. Liability for losses suffered by consumers due to unlabeled cosmetics should fall on the party that created or produced the product. However, in the case of cosmetics that circulate anonymously without a clear identity of the business actor, consumers face difficulties in claiming responsibility. In this case, consumers can file a claim with the party that last sold the product, that is, the retailer. Retailers have an obligation to ensure that the products sold are safe and meet the set standards, in accordance with consumer protection regulations.

Referring to the legal liability of consumers in Article 8, Paragraph 1, Letter (e) of Law No. Law No.8 of 2009 concerning Consumer Protection stipulates that business actors may not produce and/or trade goods and/or services that are not in accordance with the quality, level, composition, processing, style, fashion, or certain uses as stated in or description of the goods and/or services. This makes the position of consumers protected by law to minimize the case of a cosmetic product that is detrimental to the health of the public (Syamsuddin & Haryati, 2020).

If the retailer is aware of the source or origin of the product he is selling, they can pursue a claim against the distributor who supplied the goods. As an intermediary between the manufacturer and retailer, the distributor is responsible for ensuring that marketed products meet specified legal and quality requirements. In an ideal situation, if the distributor knows the identity of the manufacturer or business, the legal liability for consumer harm can be transferred to the business responsible for the manufacture or circulation of cosmetics. Thus, even if the product is anonymous at the retailer level, a clear distribution channel can pave the way for proper product liability.

Juridical and non-juridical Factors Causing Business Actors not to comply with Regulations

One of the juridical factors that cause business actors not to comply with consumer protection regulations related to cosmetics without labeling is a lack of understanding or awareness of their existing legal obligations. This lack of legal knowledge causes many business actors to not understand the applicable regulations, so they do not understand the legal obligations that must be obeyed.¹⁹ Although regulations governing the circulation of cosmetics, such as Law No. 36/2009 on Health and Regulations from BPOM, have clearly stipulated the obligation to provide complete information through labels, some businesses may not fully realize the importance of this or choose to ignore it. In this case, a lack of legal education or training on product safety standards and legal obligations can be a major cause of regulatory violations in the industry. This lack of understanding often leads to noncompliance with existing regulations.

Despite strict regulations, weak implementation and supervision often allow businesses to ignore these obligations. Lack of inspections from authorities or difficulties in monitoring cosmetic products sold on e-commerce platforms can exacerbate this situation. As a result, cosmetics that do not meet safety standards or do not have clear labeling can remain in circulation, endangering consumers and reducing the effectiveness of legal protection.

Beyond juridical factors, there are also non-juridical factors that influence business actors' non-compliance with consumer protection regulations. One of the main factors is market pressure and intense competition. In an effort to remain competitive, especially in the highly dynamic cosmetics market, some businesses may feel burdened by the procedures and costs associated with registration and licensing requirements.

The cost and time required to fulfill all legal requirements, such as obtaining a distribution permit from BPOM or printing labels that comply with regulations, are considered barriers for some business actors, especially small and medium enterprises. In addition, the non-compliance factor related to the value of business ethics also affects business actors in running a cosmetics business. Some businesses, especially those that are newly developed or operate on a small scale, may not be highly aware of the importance of business ethics and consumer protection. They are more focused on short-term profits and may neglect their obligations to ensure product safety and provide clear labeling information. This factor exacerbates regulatory noncompliance, as it ignores social and legal responsibilities in the pursuit of financial gain.

Accurate and transparent information about the products they use prevents fraud and exploitation. Legal certainty is achieved through strict regulations that require all cosmetic products to be registered and labeled appropriately so that consumers can make informed choices. In addition, expediency is observed in efforts to protect public health, given that the use of unsafe cosmetic products can carry serious health risks. The importance of applying the theory of legal objectives in consumer protection, which demands justice for consumers in obtaining clear information

about the products they buy, especially in the context of safe and standardized cosmetics, cannot be overstated (Wahjuningati, 2022).

By applying consumer protection theory, it is hoped that existing regulations will not only be normative but also have a real impact on daily life. Therefore, in the face of the circulation of unlabeled cosmetics, it is important for all business actors to be aware of their responsibilities and for legal authorities to ensure the implementation of strict regulations to achieve justice, legal certainty, and benefits for the entire community.

Analysis of Unlabeled Cosmetics Circulation in the Perspective of Legal Protection for Consumers

The qualifications of business actors in the perspective of legal protection of consumers play a crucial role, especially in maintaining the integrity of the market and the safety of products in circulation. Business actors, including manufacturers, distributors, resellers, and retailers, have the responsibility to ensure that the products they offer are not only of high quality but also safe for consumers (Susiyarti, 2024). Evaluations of business actors' actions show that non-compliance with established standards can have a detrimental impact on consumers, including serious health risks due to the use of unsafe products.

According to Law No. 8/1999 on Consumer Protection, Article 4 states that consumers are entitled to correct, clear, and honest information about the goods or services they use. When businesses do not provide proper information, such as in the case of unlabeled cosmetic products, they are potentially putting consumers at significant risk. In many cases, unlabeled cosmetic products may contain harmful ingredients unknown to consumers, such as mercury or hydroquinone, which can cause allergic reactions, skin damage, or even long-term health problems (Yudith Ridzkia, 2023). This shows that businesses that ignore regulations not only violate consumers' rights but also potentially jeopardize their health. Furthermore, article 8 of the same Law stipulates that business actors are prohibited from producing or selling goods that do not meet safety standards, which is relevant in the context of cosmetics. Non-compliance with this provision results in legal sanctions, listed in Article 62, where violating business actors may be subject to fines or revocation of business licenses.

This illustrates that every business actor, from manufacturers to retailers, can be held accountable for the products they distribute, regardless of their position in the distribution chain. It can be analyzed that the circulation of unlabeled cosmetics in Indonesia poses serious risks to consumers, especially in relation to health and safety. From a legal protection perspective, existing regulations, such as Law No. 36 of 2009 on Health and Law No. 8 of 1999 on Consumer Protection, emphasize that all cosmetic products must have a distribution license and clear labeling. Unlabeled cosmetics not only violate the law but also make it difficult for consumers to understand the composition and potential dangers of the product. BPOM plays an active role in law enforcement to protect consumers from illegal products.

The impact of business actors' non-compliance with these regulations is far-reaching. In addition to direct harm to consumers, such as jeopardized health, non-compliance can also undermine public trust in the cosmetics industry as a whole. In the long run, this may lead to decreased consumer interest in products that are supposed to be safe and quality. Therefore, it is important for all businesses to understand and properly carry out their responsibilities. The implementation of strict regulations and effective supervision by relevant authorities is key to ensuring that the cosmetics market operates within a safe corridor and in accordance with consumer protection principles. Thus, creating a healthy and equitable market environment for all parties.

This regulation also serves as a reminder for all parties in the chain. Distribution from manufacturers to retailers about their responsibilities in providing quality products. Through these measures, consumer protection aims to ensure that every individual has the right to access products that are effective and safe for their health.

CONCLUSION

From the perspective of consumer legal protection, the responsibility of unlabeled cosmetics business actors, whether producers, distributors, or retailers, is expressly regulated in Trade Law Number 7 Year 2014, which expands business actors to include not only producers but also the last retailer. Based on this regulation, retailers are included in the category of business actors who can be held liable if consumers suffer losses due to the use of unlabeled cosmetics. As a party in direct contact with consumers, retailers have a legal obligation to ensure that the products sold are safe and up to the standard. In the event of a dispute, the retailer is not only directly liable to the consumer.

Consumers but must also prove the existence of a distribution chain involving distributors or producers as the main responsible parties. This approach provides clearer legal protection to consumers, ensures that each party in the distribution chain is responsible according to its role, and ensures that consumer rights are properly fulfilled. This creates a legal balance that encourages business actors to be more careful and responsible when marketing cosmetic products.

Conflict of Interest

All authors declare no conflicts of interest.

Funding

This study received no external funding.

How to Cite:

Santoso, C.C., Saputra, N.A., Pati, D.D.K. (2025). Legal Responsibility of Unlabeled Cosmetics Business Actors from the Perspective of Consumer Protection Law. *International Journal of Law, Social Science, and Humanities (IJLSH)*, 2(2), 187–196. <https://doi.org/10.70193/ijlsh.v2i2.201>.

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