

Supervision By The BPOM Regarding The Circulation Of Illegal Cosmetic Products : The Case Of Reza Gladys

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Abstract

This study aims to analyze the effectiveness of oversight conducted by the Indonesian Food and Drug Administration (BPOM) regarding the circulation of illegal cosmetic products in Indonesia through a case study of products marketed by Reza Gladys. The rampant distribution of illegal cosmetics, particularly through digital platforms and social media, highlights structural challenges in ensuring business operators' compliance with product safety, quality, and legality standards as stipulated in laws and regulations. This study employs a normative legal methodology with a legislative and conceptual approach to examine legal provisions regarding BPOM's pre-market and post-market oversight mechanisms, as well as business operators' obligations to obtain marketing authorization before products are distributed. The results of the study indicate that the circulation of illegal cosmetics without marketing authorization poses significant risks to consumers because they do not undergo a safety evaluation process and do not provide accurate information regarding composition or usage instructions. A case study of products marketed by Reza Gladys revealed violations including the absence of marketing authorization, misclassification of cosmetics, and the use of marketing methods that could potentially mislead consumers. These conditions have



resulted in a failure to uphold the principles of legal certainty, consumer protection, and safety standards that the state is obligated to ensure. The findings of this study confirm that although the Indonesian Food and Drug Administration (BPOM) already has a comprehensive regulatory framework, oversight mechanisms still need to be strengthened through the optimization of digital monitoring, enhanced law enforcement capacity, and interagency coordination to minimize loopholes in the circulation of illegal cosmetics. Thus, this study contributes to efforts to strengthen consumer legal protection amid the increasing dynamics of the cosmetics industry.

KEYWORDS

Supervision by BPOM, Illegal cosmetics, Consumer protection, Marketing authorization.

Introduction

The cosmetics industry in Indonesia has experienced rapid growth, marked by rising consumption of skincare, makeup, and body care products across various demographic segments, including teenagers, young adults, and the elderly. This increase in consumption is influenced by various factors, such as advances in information technology, growing public awareness of appearance and skin health, and the development of global beauty trends popularized through social media. Businesses strive to produce a wide variety of products with diverse functions to meet public needs while maximizing consumer interest. When marketing their products, they certainly need strategies, including stating that the products are manufactured overseas and imported directly into Indonesia.

Reza Gladys is a public figure known for actively marketing beauty care products through social media and digital platforms. In practice, she is involved in the distribution and promotion of a number of cosmetic products that are claimed to improve skin quality, brighten the complexion, and provide certain aesthetic effects in a relatively short period of time. One product of interest in this study is Glafidsya Glowing Booster Cell, which is widely marketed to consumers through digital promotional strategies and endorsements. The product attracted public attention because it was promoted with various claims of cosmetic benefits, but it was later found to raise issues regarding legality and compliance with cosmetic regulations in Indonesia.

This case was selected as the subject of this study because the Indonesian Food and Drug Administration (BPOM) found that the product falls under the category of cosmetics that do not comply with legal regulations. Based on the results of BPOM's inspection, the Glafidsya Glowing Booster Cell product was found to lack a valid marketing authorization and had not undergone the notification process required under Indonesia's cosmetic regulatory system. Additionally, BPOM identified discrepancies regarding product classification and the intended use of certain ingredients that do not comply with cosmetic safety standards. These conditions indicate a violation of the provisions set forth in cosmetic regulatory oversight, particularly the obligation of business operators to ensure that every product marketed has undergone safety, quality, and labeling evaluations prior to being distributed to the public.

Thus, the case involving Reza Gladys is relevant for analysis in this study because it reflects the phenomenon of the circulation of illegal cosmetics that utilize social media as their primary marketing channel. Furthermore, this case also illustrates the challenges faced by regulatory agencies in controlling the distribution of cosmetic products in the digital age, characterized by the rapid spread of information and the significant influence of public figures on public consumption decisions. Therefore, an examination of this case is expected to provide a more comprehensive understanding of the dynamics of violations in the circulation of illegal cosmetics as well as the effectiveness of the oversight mechanisms implemented by the BPOM.

Quite a number of people are drawn to the promotion and distribution of these medicines and cosmetics, to the point of ignoring the potential health risks that may arise in the future. Health itself is one of the primary indicators for assessing the success of human development. Without good health, a person cannot lead an economically productive life or obtain a proper education. Conversely, weaknesses in the economic and educational spheres can also impact an individual's understanding and ability to maintain their health. Thus, these three indicators health, education, and the economy are interrelated components that cannot be separated from one another.¹

¹ Weni Wulandari, "Weni Wulandari, 'Pengawasan Peredaran Komersialisasi Krim Yang Mengandung Hydroquinone Secara Bebas Di Marketplace (Studi Di Balai Besar Pengawas Obat Dan Makanan Surabaya'" (2025).

However, this rapid growth has not always been accompanied by improvements in the quality of regulations and oversight of products circulating in the market. On the contrary, technological advancements have actually created loopholes for the circulation of illegal cosmetic products that fail to meet the safety, quality, and legality standards required by the Indonesian Food and Drug Supervisory Agency (BPOM), the authoritative body responsible for overseeing drugs and food in Indonesia.² On various digital platforms, particularly through social media and online marketplaces, illegal cosmetics are becoming increasingly easy to find due to their rapid, widespread distribution, which conventional oversight mechanisms cannot fully reach. This phenomenon poses a serious problem, especially when such products are promoted by public figures or influencers, including the case involving Reza Gladys, who was found to be marketing cosmetic products without a valid distribution license from the BPOM. This case not only illustrates an individual violation but also reflects structural issues in cosmetic oversight in Indonesia.

The circulation of illegal cosmetics is a critical issue because cosmetics are products that come into direct contact with human skin and can have both short-term and long-term health effects. According to the World Health Organization (WHO), the use of cosmetics containing hazardous substances such as mercury, hydroquinone, or steroids has the potential to cause organ damage, nervous system disorders, skin hyperpigmentation, and even cancer risks. In Indonesia, the BPOM regularly releases findings on illegal or hazardous cosmetic products containing banned substances such as Rhodamine B, Red K3, or heavy metals exceeding permissible limits. The BPOM's 2023 Annual Report notes that over 2,200 cosmetic products were found non-compliant due to lacking distribution permits, containing hazardous ingredients, or failing to include labels in accordance with standards.³ These data indicate that the widespread circulation of illegal cosmetics is not an isolated phenomenon, but rather a systemic issue related to weak oversight, high demand, and low consumer literacy.

The research problem stems from a discrepancy between the comprehensive regulations that have been established and actual oversight practices in the field. Normatively, Indonesia has a number of regulations governing cosmetics supervision, including Law No. 17 of 2023 on Health,

² BPOM RI, "Laporan Tahunan 2023" (Jakarta, 2023).

³ World Health Organization (WHO), "Mercury in Skin Lightening Products," 2022.

Law No. 8 of 1999 on Consumer Protection, and BPOM Regulation No. 23 of 2019 on Cosmetics Supervision.⁴ To clarify the legal framework used in this study, the author has compiled a list of relevant laws and regulations in the following table:

Table 1. Inventory of Cosmetics Regulation

No	Regulation	Scope of Regulation	Key Provisions	Relevance to the Case
1.	Law No. 17 of 2023 on Health	Regulates the provision of health services, including the safety of pharmaceutical and cosmetic products	Products on the market must meet safety, quality, and efficacy standards and are subject to government oversight	Illegal cosmetics have not undergone testing and thus pose a potential health hazard to consumers
2.	Law No. 8 of 1999 on Consumer	Protection Regulates the rights and obligations of consumers and business operators	Consumers are entitled to safety, comfort, and accurate information	Consumers are harmed by the use of products without marketing authorization and misleading information
3.	BPOM Regulation No. 23 of 2019 on Cosmetics Supervision	Regulates the supervision of cosmetics (pre-market and post-market)	Requires notification/marketing authorization before products are marketed	The products in the case study lack marketing authorization and thus violate BPOM regulations.

⁴ Kepala Badan, Pengawas Obat, dan Makanan, "Badan pengawas obat dan makanan republik indonesia" 2010 (2019).

These three regulations stipulate that all business operators must ensure that the cosmetic products they market have obtained marketing authorization, meet safety standards, and have undergone a rigorous evaluation process. However, the steadily increasing number of illegal products discovered indicates a lack of effective oversight, particularly in the context of digital marketing. This situation raises fundamental questions regarding the extent to which the BPOM is capable of optimally fulfilling its role in ensuring consumer safety in this complex digital era. Therefore, this study aims to evaluate the effectiveness of the BPOM's oversight of the circulation of illegal cosmetics by using the Reza Gladys product as a case study to provide an empirical illustration of the dynamics of violations and the challenges of oversight.

The specific objectives of this study include identifying the regulatory framework governing cosmetic oversight, analyzing the effectiveness of pre-market and post-market oversight mechanisms, evaluating violations in the case of cosmetics marketed by Reza Gladys, and formulating recommendations for strengthening the oversight system. Thus, this study emphasizes not only descriptive aspects but also analytical and normative ones, aiming to address fundamental issues regarding the effectiveness of state oversight in combating the circulation of illegal cosmetics. This study is expected to make a significant contribution to the development of legal science, particularly in the fields of administrative law, consumer protection, and health policy.

In the academic literature, there are several research gaps that form the critical foundation for this study. First, most research on illegal cosmetics in Indonesia focuses primarily on normative regulatory analysis without conducting an in-depth examination of actual cases, particularly in the context of digital marketing. In fact, digital marketing has unique characteristics, such as rapid distribution, wide reach, and the ability to influence consumers through visual strategies, testimonials, and celebrity endorsements. Second, previous studies tend to discuss BPOM oversight from a public policy perspective, without strongly linking it to administrative law and consumer protection theory. In fact, the issue of illegal cosmetics is not only related to policy but also touches on the legal liability of business actors and the state's obligation to ensure consumer safety. Third, there has been little research highlighting the relationship between state responsibility and the dynamics of the digital market, particularly when businesses utilize algorithms and social media

interactions to distribute hazardous products. Thus, this study aims to address this gap through multidisciplinary analysis and actual case studies.⁵

A number of previous studies have addressed the issue of illegal cosmetics and consumer protection from various perspectives. Anggraini (2024) examined consumer protection in relation to cosmetic product advertising and the role of influencers in the dissemination of illegal cosmetics, while Raina Salsabilla Erlizal (2024) highlighted the responsibility of businesses and marketplaces regarding the circulation of illegal cosmetics on e-commerce platforms. Sri Astuti (2024) employs a Sharia economic law perspective to assess legal protection for consumers using cosmetics without usage instructions, while Resti Riancana (2023) emphasizes consumer losses resulting from deceptive and manipulative cosmetic advertising. On the other hand, Isabelle Farradiva (2024) examines the legal liability of makeup artists who use counterfeit cosmetics in their makeup services. Unlike these studies, this article focuses on the effectiveness of pre-market and post-market oversight conducted by the Indonesian Food and Drug Monitoring Agency (BPOM) regarding the circulation of illegal cosmetics through a case study of products marketed by Reza Gladys, thereby placing special emphasis on regulatory authority and consumer protection within the context of digital marketing.

This study makes a significant contribution to the advancement of knowledge. First, it provides a comprehensive understanding of the implementation of cosmetic regulation in the context of digital marketing, a topic that has so far been rarely discussed in Indonesian legal literature. Second, this study contributes to the strengthening of consumer protection theory, particularly regarding the right to consumer safety and security. In the context of illegal cosmetics, consumers are often in a vulnerable position due to limited knowledge regarding product ingredients, health risks, and the legality of the products they consume. Third, this study highlights the need for digital transformation in BPOM's regulatory mechanisms, including the use of big data, artificial intelligence, and cross-platform digital collaboration to detect distribution patterns of illegal products. Fourth, this study strengthens the literature on the administrative liability of business operators in the cosmetics industry, where the status of a

⁵ Kiki Firmantoro, "Kosmetik Ilegal , Otoritas Pengawasan , dan Profesi Medis : Kajian Hukum Administrasi di Indonesia" 03, no. 03 (2025): 125–35.

celebrity or influencer cannot exempt business operators from the legal obligation to obtain a marketing authorization.⁶

The theoretical framework of this study draws upon consumer protection theory, state liability theory, administrative law theory, and the public health risk approach. Consumer protection theory asserts that consumers have the right to safety, comfort, and security in the consumption of goods, as stipulated in Law No. 8 of 1999. These rights include accurate information, quality assurance, and protection from health risks. The theory of state responsibility states that the state has an obligation to protect its citizens from the risks of hazardous products through effective regulation and oversight.⁷ In this context, the BPOM serves as part of the state's instruments to carry out administrative oversight functions. Administrative law theory provides a framework for government actions in exercising supervisory authority, including the issuance of permits, inspections, enforcement, and product recalls. According to Ridwan HR, the effectiveness of administrative law depends on the accuracy of the government's regulatory functions and the application of proportional administrative sanctions.⁸ From a public health perspective, the WHO emphasizes that illegal cosmetics pose a serious threat and require a strong state response.

In the context of the digital cosmetics industry, consumers are vulnerable to the influence of social media, which often features exaggerated claims about product benefits without scientific evidence. Many consumers, including teenagers, purchase products based on the popularity of public figures without paying attention to marketing authorization or product composition. The Reza Gladys case demonstrates how aggressive marketing through social media can accelerate the penetration of illegal products into the market. This underscores the importance of digital literacy and health literacy for the public to prevent the negative impacts of using hazardous products. The Indonesian Food and Drug Administration (BPOM) has undertaken various initiatives, such as the "Cek KLIK" campaign (Check Packaging, Label, Marketing Authorization, and Expiration Date), but the

⁶ Arsita Hidayatul Maulida, "Tinjauan Yuridis Perlindungan Hukum Konsumen Terhadap Peredaran Kosmetik Ilegal Dan Berbahaya" (2024).

⁷ Judicial Review Vol, "Tinjauan Yuridis Terhadap Pemasaran Kosmetik Ilegal Secara Online Di Indonesia Febri Jaya 1" 22, no. 1 (2020): 98–111.

⁸ Laeli Nur Ngazizah, "Pengaruh Harga, Kualitas Produk, Citra Merek Dan Gaya Hidup Terhadap Keputusan Pembelian Produk Skincare Pond's Men Facial Wash" (2023).

effectiveness of these campaigns remains limited as they cannot keep pace with the intense promotion of illegal products on social media.⁹

Taking these various aspects into account, this study underscores the urgency of strengthening a cosmetic regulatory system that is adaptable to technological advancements. Digital-based oversight, collaboration with social media platforms, and enhanced cyber surveillance are strategic steps that the government must take. Furthermore, law enforcement against operators of illegal cosmetics businesses must be strengthened through administrative, civil, and criminal sanctions to serve as a deterrent. Ultimately, this study emphasizes that consumer protection is not solely the responsibility of the BPOM but a shared responsibility among the government, businesses, and the public in creating a safe and equitable cosmetics market.

Method

This study employs a normative legal methodology using both a statutory approach and a conceptual approach. The statutory approach is used to examine various regulations related to the oversight of illegal cosmetics, while the conceptual approach is used to analyze the concepts of authority, legal protection, and state responsibility. The legal materials used consist of primary legal materials in the form of relevant laws and regulations, secondary legal materials in the form of scientific journals, books, and official reports, as well as tertiary legal materials for support. The collection of legal materials was conducted through a literature review. The analysis of legal materials was conducted qualitatively using a descriptive-analytical method, which involves outlining and examining applicable legal provisions and relating them to the issues under study. Additionally, this study employs a case study approach regarding products marketed by Reza Gladys as an empirical illustration to assess the effectiveness of BPOM oversight in practice. This approach was chosen because the research focuses on the alignment between legal norms and their implementation in practice.

⁹ Shofia Anahdiah, "Peran Persepsi pada Iklan dan Literasi Konsumen dalam Keputusan Pembelian Skincare Skintific di Moderasi Heuristic Processing pada Generasi Z di Kota Malang" (2025).

Results and Discussion

1. BPOM Oversight of the Circulation of Illegal Cosmetic Products in Indonesia

The oversight of illegal cosmetic products in Indonesia is one of the strategic tasks carried out by the Indonesian Food and Drug Administration (BPOM) to protect public health from the risks associated with the use of products that do not meet safety, quality, and efficacy requirements. This responsibility is carried out by the Indonesian Food and Drug Administration (BPOM), which has the administrative authority to conduct pre-market and post-market controls as stipulated in Presidential Regulation No. 80 of 2017 and BPOM Regulation No. 23 of 2019.¹⁰

Normatively, BPOM's oversight framework is comprehensive. However, in practice, the circulation of illegal cosmetics has actually increased significantly, particularly through digital platforms. This indicates an imbalance between regulatory authority and the effectiveness of oversight implementation. BPOM's findings from 2023 to 2025 reveal a drastic increase in the number of illegal cosmetic products, including those marketed through social media and online marketplaces. This phenomenon underscores that conventional oversight has not been able to keep pace with the speed, distribution patterns, and intensity of digital marketing, especially when such products are promoted by public figures.¹¹

As a result, BPOM's oversight efforts face the following structural challenges:

1. advances in digital technology that accelerate distribution;
2. changes in consumption patterns;
3. limited regulatory resources; and
4. suboptimal cooperation with digital platforms.

The Food and Drug Supervisory Agency (BPOM) is a Non-Ministerial Government Agency (LPND) established pursuant to Presidential Decree of the Republic of Indonesia No. 103 of 2001 as a central

¹⁰ S. Sari, "Pengawasan Pra dan Pasca Edar Produk Kosmetik oleh BPOM," *Jurnal Farmasi Indonesia* 13 no 1 (2021).

¹¹ Diva Fitaloka Oktaviani et al., "Pengawasan Peredaran Kosmetik Tanpa Izin Di Media Digital Melalui Platform Elamahamen Supervision Monitoring the Distribution of Unlicensed Cosmetics On Digital Media Through the Elamahamen Platform terbatas bagi wanita , tetapi juga digunakan oleh pria dan anak-anak dalam berbagai aspek" 8, no. 3 (2025): 2–8.

government institution that carries out specific tasks assigned by the President and reports directly to the President. Under Indonesian regulations, every cosmetic product must be registered and obtain a marketing authorization before being marketed; thus, the presence of illegal cosmetic products—whether lacking a marketing authorization, containing hazardous ingredients, bearing counterfeit labels, or marketed with misleading claims—poses a serious threat to consumers. As the regulatory agency, BPOM has the mandate to conduct pre-market and post-market oversight through the review of registration documents, inspections of production and distribution facilities, sample collection, laboratory testing, and enforcement actions. This authority is supported by various national regulations, including BPOM Regulations governing cosmetic registration, cosmetic ingredient requirements, and provisions regarding labeling, promotion, and advertising.

In recent years, the Indonesian Food and Drug Administration (BPOM) has observed a significant increase in the circulation of illegal cosmetics in Indonesia. Intensive monitoring conducted in early 2025 revealed that the value of seized illegal cosmetics exceeded Rp31.7 billion, a tenfold increase compared to the previous year. Official BPOM data records that hundreds of thousands of units of illegal cosmetics from dozens of brands were found circulating in various regions of Indonesia, most of which were marketed online through e-commerce and social media, including those promoted by influencers without product safety verification. These illegal cosmetics include products containing hazardous ingredients such as hydroquinone, mercury, or steroids—substances prohibited in cosmetics due to the risk of causing irritation, long-term skin damage, and systemic side effects. Additionally, BPOM has identified new methods used in the distribution of illegal cosmetics, such as forging distribution license numbers, making medical efficacy claims that do not align with the product category, and using fake import labels to inflate market value.¹²

The BPOM performs eleven primary functions: formulating policies, implementing policies, developing operational procedures, conducting oversight, coordinating oversight activities, providing guidance, taking enforcement actions, coordinating the implementation of activities, managing assets related to oversight duties, supervising the execution of technical tasks, and providing substantive support related to drugs and

¹² Ria Apriani Kusumastuti, "Peredaran Kosmetik Ilegal Tembus Rp 31,7 Miliar, BPOM Temukan Banyak," 2025.

food.¹³ The establishment of BPOM was driven by technological advancements that brought about rapid and significant changes in the pharmaceutical, traditional medicine, food, cosmetics, and medical device sectors. These developments have enabled products from both domestic and international sources to circulate widely and rapidly, reaching all segments of society. The abundance of products available in the market has also influenced consumer patterns and lifestyles.

However, the public's knowledge regarding the selection and use of safe and appropriate products remains limited. Meanwhile, massive commercial advertising and promotions often encourage consumers to consume products excessively and irrationally. Changes in production technology, the dynamics of international trade, and these consumption patterns effectively increase risks to consumer health and safety. If products that fail to meet standards, are defective, or are contaminated with hazardous substances enter circulation, the resulting impacts can be widespread and occur rapidly.¹⁴

Pursuant to Article 2 of Presidential Regulation No. 80 on the Food and Drug Supervisory Agency, the duties of the BPOM are as follows:

1. The Food and Drug Supervisory Agency is tasked with carrying out government duties in the field of drug and food supervision in accordance with the provisions of laws and regulations.
2. The drugs and food referred to in paragraph (1) consist of drugs, drug ingredients, narcotics, psychotropic substances, precursors, addictive substances, traditional medicines, health supplements, cosmetics, and processed foods.¹⁵

The BPOM also has functions related to the implementation and supervision of drugs and food, as stipulated in Article 3. In carrying out its drug and food supervision duties, the BPOM performs functions in the implementation and supervision of drugs and food as regulated in Article 3. In carrying out these duties, BPOM performs various functions, including: formulating national policies in the field of drug and food supervision; implementing these national policies; drafting and establishing norms, standards, procedures, and criteria for pre-

¹³ Undang Undang et al., "karena dalam hal ini telah diatur dalam undang undang perlindungan konsumen.," 2016.

¹⁴ Celfin Wahyudi Dicky Dan Elfrida Ratnawati, "Perlindungan Konsumen Terhadap Peredaran Kosmetik Yang Melanggar Standart BPOM" 5, no. 4 (2023): 485–91.

¹⁵ "Peraturan Presiden Republik Indonesia Nomor 80 Tahun 2017 Tentang Badan Pengawas Obat Dan Makanan" (n.d.).

market and post-market supervision; and conducting supervision before and after products are distributed.

In addition, BPOM also plays a role in coordinating oversight with central and local government agencies; providing technical guidance and supervision in the field of drug and food oversight; and taking enforcement action against violations of laws and regulations. Furthermore, BPOM coordinates tasks, provides guidance, and offers administrative support to all organizational units within its jurisdiction, including the management of state-owned assets under its responsibility. In addition, BPOM monitors the performance of duties within its internal operations and provides substantive support to all organizational units to enhance the effectiveness of drug and food oversight.

Pursuant to Article 4 of Presidential Regulation No. 80 of 2017 on the Food and Drug Supervisory Agency, BPOM has the authority to conduct supervision in the field of drugs and food. This authority includes the issuance of product marketing authorizations and certificates that must meet standards for safety, efficacy/benefits, and quality, including the conduct of testing in accordance with applicable laws and regulations. In addition, BPOM is also authorized to conduct intelligence and investigative activities in the field of drug and food supervision in accordance with applicable laws. Furthermore, BPOM has the authority to impose administrative sanctions for violations of laws and regulations in this field.

Therefore, in accordance with the provisions governing its functions, the BPOM carries out its duties and exercises its authority in accordance with applicable regulations, so that medicines and foods circulating in the community meet the required standards for consumption or use by the public, and consumers receive legal protection in accordance with Article 4 of the Consumer Protection Law (UUPK). Consumer rights include: the right to comfort, security, and safety; the right to choose goods/services based on value, condition, and warranty; the right to receive accurate, clear, and honest information; the right to express opinions and file complaints; the right to advocacy, protection, and dispute resolution; the right to receive guidance and education; the right to be treated honestly and without discrimination; the right to receive compensation or damages if the agreement is not fulfilled; and other rights stipulated in laws and regulations.

The objective of consumer protection under Law No. 8 of 1999 on Consumer Protection is to enhance consumers' awareness, capabilities, and self-reliance in protecting themselves. Additionally, consumer protection aims to safeguard consumers' dignity and well-being from the negative impacts of using goods and/or services, as well as to empower consumers to understand and assert their rights. Furthermore, these objectives also include the creation of a protection system that guarantees legal certainty, transparency, and access to information. On the other hand, consumer protection is aimed at fostering awareness among business actors to act honestly and responsibly, as well as improving the quality of goods and/or services so as to provide comfort, security, and safety for consumers.

Therefore, Indonesia requires an effective and efficient Drug and Food Surveillance System (SisPOM) capable of detecting, preventing, and monitoring the circulation of such products to protect consumer safety, security, and health, both at the national and international levels. To meet these needs, the BPOM was established as an agency with an extensive surveillance network, both domestic and global, as well as law enforcement authority and high professional competence.

1. Pre-Market Control

Pre-market oversight is a form of regulation conducted before cosmetic products are distributed to the public. Under this mechanism, the BPOM implements a cosmetic notification system as the primary requirement for businesses to obtain a marketing authorization. This system is not merely a standard registration process, but a comprehensive verification process regarding safety, quality, ingredient composition, benefit claims, and the completeness of product labeling. Business operators are required to submit information in the form of cosmetic formula documents, raw material specifications, safety evidence, and packaging designs. Only after undergoing administrative and technical verification does BPOM issue a notification number as proof that the product is eligible for distribution.

This pre-market mechanism is designed to act as a gatekeeping system. This means that every cosmetic product must pass through a safety screening process before it can enter the market. In the context of national regulations, this mechanism embodies the state's protection of consumers' right to safe products, as stipulated in Article 4 (a) of the Consumer Protection Act. However, evaluation

results show that the pre-market mechanism faces significant challenges, particularly in addressing digital distribution patterns. Businesses can easily launch products into the market without a notification process, especially when promotions are conducted online. Platforms such as Instagram, TikTok, and marketplaces enable rapid marketing without direct oversight by regulatory agencies

According to the Public Warning on Cosmetics Without Marketing Authorization issued by BPOM in 2023–2024, the majority of illegal cosmetics are circulating without notification because manufacturers or distributors use social media as a platform for promotion and distribution. Among these products, many cosmetics were found to make exaggerated claims, contain hazardous ingredients, and lack labeling information that meets standards. This situation indicates that pre-market mechanisms have not been able to keep pace with the increasingly innovative and aggressive speed of digital marketing. This aligns with a report from the Ministry of Communication and Information Technology stating that more than half of the circulation of illegal health products occurs through digital channels.¹⁶

However, in practice, there are several weaknesses:

1. Digital marketing loopholes
Businesses can make direct sales through social media even if they do not yet have a marketing authorization. Digital marketing does not require system verification, so illegal products can circulate on a large scale before the BPOM can intervene.
2. Reliance on business integrity
A document-based notification system allows for formula manipulation, document forgery, or discrepancies between the submitted composition and the actual product.
3. Lack of oversight regarding advertisements and endorsements
There are no binding legal requirements for influencers or social media celebrities to verify a product's legality before

¹⁶ Adela Intan Prabawati dan Yunita Reykasari, "Tanggung Jawab Badan Pengawas Obat dan Makanan (BPOM) Dalam Pelaksanaan Pengawasan ' Minyak Kita ' Sebelum Beredar dan Selama Beredar," no. 1 (2025): 1–13.

promoting it. This creates a major loophole in the distribution of illegal cosmetics.

Another key point is that document-based pre-market mechanisms still rely on the honesty of businesses when submitting information. In some cases, businesses falsify documents or claim that raw materials are safe, even though they contain hazardous substances. Therefore, documentation-based oversight alone is insufficient to address the circulation of illegal cosmetics that exploit digital technology innovations. Stricter verification standards and an integrated data-based system between the BPOM, customs, and digital platforms are needed.

2. Post-Market Control

Post-market surveillance is a mechanism for monitoring products already in circulation. This mechanism includes on-site inspections of production and distribution facilities, sampling for laboratory testing, label inspections, monitoring of advertisements, and administrative actions such as written warnings, product recalls, destruction, blocking of advertisements, and the issuance of public warnings.

In addition to these administrative actions, the Indonesian Food and Drug Administration (BPOM) also announced via its official Instagram account in 2024 that cosmetic products marketed by Reza Gladys were deemed Non-Compliant (TMK) and their distribution permits were officially revoked. This announcement is part of post-market control, demonstrating that BPOM takes corrective action after identifying non-compliance in these products. The BPOM 2023 Annual Report indicates that more than 2,200 cosmetic products were found to be non-compliant. These products include cosmetics without distribution permits, cosmetics containing banned ingredients such as mercury and hydroquinone, as well as cosmetics with exaggerated claims not supported by scientific data.¹⁷

This post-market surveillance is crucial because many products slip through pre-market screening and can only be identified once they are on the market. Additionally, laboratory testing of product

¹⁷ Imam Suyudi et al., "Analisis Pengawasan Post-Market Badan Pengawas Obat dan Makanan pada Peredaran Kosmetik Berbahaya" 6 (2022): 135–52.

samples allows the BPOM to detect hazardous ingredients not listed on the label. The World Health Organization states that the use of cosmetics containing mercury can cause kidney damage, nervous system disorders, and developmental disorders in children. Meanwhile, long-term use of hydroquinone and steroids can cause permanent skin hyperpigmentation, hormonal disturbances, and an increased risk of skin cancer. These findings underscore that weaknesses in post-market surveillance can lead to very serious health risks.

In addition, post-market surveillance also includes the regulation of cosmetic advertising. Many businesses promote their products using hyperbolic narratives, invalid testimonials, and claims that do not comply with BPOM regulations. Content published on social media is extremely difficult to control due to its fast-paced, viral, and widespread nature. In this situation, the BPOM must collaborate with digital platforms to take down advertisements or links that violate regulations. However, businesses can often create new accounts and resume illegal promotions, thereby reducing the effectiveness of enforcement.

However, the effectiveness of post-market surveillance faces several limitations:

1. Enormous product volume
The number of products in circulation far exceeds surveillance capacity, allowing many products to reach consumers undetected.
2. Digital distribution is difficult to monitor
Promotions and sales via social media do not leave a distribution trail that is easy to track.
3. Lack of critical thinking among consumers
Consumers tend to trust claims of instant beauty results and influencers, so they do not verify marketing authorizations.
4. Administrative sanctions that do not serve as a deterrent
Although the BPOM revokes marketing authorizations and issues public warnings, businesses often repeat the violations.
5. Administrative sanctions that have not served as a deterrent
Although the BPOM has revoked marketing authorizations and issued public warnings, businesses often continue to violate regulations.

Challenges in post-market surveillance are further compounded by the public's low level of awareness regarding how to identify legal cosmetics. Although the BPOM has launched the "Cek KLIK" campaign (Check Packaging, Label, Distribution Permit, Expiration Date), the reality is that the campaign has not yet reached all segments of the population. Many consumers focus solely on low prices and claims of instant benefits without considering product safety. On the other hand, it shows that endorsements by influencers have a significant influence on cosmetic purchasing decisions, so many consumers are exposed to information whose accuracy has not been verified.

3. Legal Analysis of the Effectiveness of BPOM Oversight

Based on an analysis of regulations and their implementation, it can be concluded that pre-market and post-market oversight have a solid legal foundation, but their effectiveness still faces structural challenges. These challenges stem from three main aspects. First, advancements in digital technology enable businesses to bypass pre-market legal processes and market products rapidly. Second, the sheer volume of products in circulation often means that post-market inspection capacity is insufficient to meet on-the-ground needs. Third, low public literacy leaves consumers vulnerable to misleading promotions.

From an administrative law perspective, the effectiveness of oversight depends heavily on the consistent enforcement of sanctions. Ridwan HR emphasized that without firm sanctions that serve as a deterrent, businesses will not be deterred from repeating violations. The enforcement of sanctions in the supervision of illegal cosmetics is often limited to product recalls, without follow-up actions such as heavy fines or criminal proceedings. In fact, in cases involving the circulation of hazardous products, criminal sanctions can be applied as a form of maximum protection for the public.

From an administrative law perspective, the BPOM has exercised its authority in accordance with the law, but its effectiveness has been hampered by:

1. limitations in digital oversight,
2. the difficulty of conducting initial verification of products marketed online,
3. insufficient oversight of influencers,

4. weak enforcement of administrative and criminal sanctions.

From the perspective of consumer protection regarding safety and information, these needs remain unmet because:

1. illegal products continue to circulate and are advertised extensively;
2. many consumers do not know how to check notification numbers;
sanctions against businesses are insufficient to prevent repeat violations.

From the perspective of the state's normative responsibility, it has provided protective instruments through the BPOM. However, empirically, oversight has not been able to prevent the circulation of hazardous cosmetics. Thus, the state has not fully fulfilled its due diligence obligations in ensuring consumer safety.

In addition to law enforcement, oversight strategies need to be strengthened through the integration of digital systems. The government can develop a QR code-based product tracking system, an automated system for detecting illegal advertisements, and data integration between BPOM and digital platforms. This is essential to address the challenges of an increasingly complex digital commerce era.¹⁸

2. Case Analysis of Reza Gladys: Status, Violations, and Follow-Up by the BPOM

According to an official report, the Indonesian Food and Drug Administration (BPOM) stated that the cosmetic product Glafidsya Glowing Booster Cell, marketed by Reza Gladys, does not have a valid distribution permit because it is not registered in the BPOM's official database and is legally classified as an illegal product.¹⁹

The product is circulating without having undergone the notification or marketing authorization process as required by Indonesian laws and regulations. This status was further confirmed through a post by BPOM

¹⁸ Henry Devilita Rahmaputri dan Farida Tuharea, "Tinjauan Yuridis Terhadap Pengawasan Peredaran Produk Makanan Import Ditinjau dari Peraturan Badan Pengawas Obat dan Makanan (BPOM) No. 28 Tahun 2023 di Kota Jayapura" 3, no. 9 (2025): 6042–48.

¹⁹ Badan Pengawas Obat dan Makanan Republik Indonesia, "BPOM Nyatakan Produk Glafidsya Glowing Booster Cell Tidak Memiliki Izin Edar," *Timses Indonesia*, 2025.

on its official Instagram account on July 30, 2025, which stated that Glafidsya Glowing Booster Cell is one of 16 illegal cosmetic products whose marketing authorization has been revoked. One of the most serious violations identified by BPOM was the presence of a needle inside the product packaging, an act that clearly violates cosmetic safety standards and puts consumers at risk.

Additionally, BPOM found discrepancies in the registration numbers between the old and new packaging of the Glafidsya product, even though the contents remained the same. This finding indicates label manipulation or an attempt at disguise carried out without undergoing the retesting procedures required by cosmetic distribution regulations. Such practices legally constitute a violation of administrative licensing provisions and reinforce the product's illegal status.

Normatively, the distribution of cosmetic products without a marketing authorization constitutes a violation of BPOM Regulation No. 24 of 2020 on Cosmetic Registration, which explicitly requires every cosmetic product to undergo a notification process and obtain a marketing authorization number before being marketed.²⁰ Products that do not undergo this process are classified as Non-Compliant Products (TMK) and are considered illegal to distribute in Indonesia. This regulation is enforced to ensure that every product on the market has undergone safety, quality, and labeling assessments as part of consumer protection.

The violations committed by Reza Gladys also contravene Law No. 8 of 1999 on Consumer Protection, specifically Article 8, which prohibits businesses from selling goods that do not meet safety and quality standards and from failing to provide accurate information to consumers. Illegal cosmetic products such as Glafidsya Glowing Booster Cell not only lack distribution permits but also have the potential to mislead consumers with unverifiable claims and unguaranteed safety levels.²¹ Thus, such marketing practices constitute a violation of consumers' right to accurate information, the right to safety, and the right to obtain products that are suitable and do not endanger health.

²⁰ Badan Pengawas Obat dan Makanan RI, "Peraturan BPOM Nomor 24 Tahun 2020 tentang Perubahan Kedua atas Peraturan BPOM Nomor 1 Tahun 2018 tentang Pengawasan Pangan Olahan untuk Keperluan Gizi Khusus" (2020).

²¹ Ida Kurnia, "Hak Konsumen untuk Mendapatkan Informasi dan Keamanan Produk atas Beredarnya Skincare Tanpa Izin Edar," 2025, 7858–67.

Furthermore, Law No. 17 of 2023 on Health stipulates that all medicines and cosmetics in circulation must meet the safety and quality standards set by the state. Since the products marketed by Reza Gladys are unregistered and have not undergone official testing, they are legally deemed not to meet the safety standards required by law, thereby posing a potential risk to public health. The discovery of needles in the packaging further reinforces indications of a serious risk to consumers, as the use of needles or microneedles in beauty products reclassifies the product into the category of medicine, no longer cosmetics.²²

This was stated directly by the Head of the Indonesian Food and Drug Administration (BPOM), Taruna Ikrar, who emphasized that beauty products containing needles must be registered as drugs and may only be used by medical professionals. He also added that the use of non-sterile products via injection, especially when administered by non-medical personnel, can pose risks of infection, severe allergic reactions, and even systemic disorders in the body.

Based on BPOM's findings, at least 16 illegal cosmetic products have had their distribution licenses revoked, including Glafidsya Glowing Booster Cell. These products include, among others, PDRN.S by Bellavita, Sappire PDRN, Ribeskin Superficial Pink Aging, Goddesskin DNA Salmon at Rumah Aja, various variants of Mesologica MD, Curenex Lipo, Lipo Lab PPC Solution, as well as a number of products from MCCM such as Deoxycholic, Organic Silicon, Cellulite, Hyaluronic Acid 1%, and Vitamin C Cocktails. This list indicates that the circulation of illegal cosmetic products linked to Reza Gladys is not an isolated incident but points to a pattern of large-scale distribution of illegal cosmetics.

From an administrative standpoint, the BPOM has the authority to revoke marketing authorizations and recall products from circulation if discrepancies in composition or violations of labeling requirements are found, as stipulated in BPOM Regulation No. 23 of 2019 on Cosmetics Supervision. The BPOM's action to revoke the marketing authorization for the Glafidsya Glowing Booster Cell product constitutes the exercise of this administrative authority. Furthermore, in several related legal

²² Aplikator Microneedle dan Izin Edarnya, "Kamal, Diamanta Putri Permana dan Ubaidillah" 5, no. 2 (2025): 363–73.

proceedings, it was also revealed that Reza Gladys allegedly provided Rp4 billion to Nikita Mirzani to cover up the product's flaws. Despite this, Reza continued to distribute the product to the public, reinforcing the assumption of intentional misconduct in the illegal actions.

This violation also carries criminal consequences. Under Article 62 of the Consumer Protection Law, business operators who trade goods that do not meet safety standards, fail to provide accurate information, or mislead consumers may face imprisonment or a fine. Meanwhile, under Article 435 of Law No. 17 of 2023 on Health, Reza Gladys faces a maximum sentence of 12 years in prison or a fine of Rp5 billion for producing or distributing pharmaceutical preparations or medical devices that do not meet safety and quality standards.

Overall, this case demonstrates that the distribution of illegal cosmetic products by Reza Gladys involves administrative, civil, and criminal violations. The BPOM's actions in revoking the distribution license, ordering the product recall, and issuing a public warning through the Cek KLIK principle (Packaging, Label, Distribution License, and Expiration Date) constitute appropriate legal measures to protect the public from health risks posed by illegal cosmetic products.²³

The Reza Gladys case reveals complex forms of administrative and criminal violations, including:

1. Lack of a distribution license and failure to register with BPOM.
2. Label manipulation and discrepancies in registration numbers between old and new packaging.
3. Use of needles within the microneedle product.
4. Misleading promotions via social media.

These findings indicate that the violations are not merely administrative but involve criminal elements due to the distribution of products that endanger public health. In relation to the Theory of State Responsibility, this theory asserts that the state has a duty to protect the public from harmful activities, including the distribution of unsafe products. In the Indonesian context, this duty is carried out through the BPOM as the agency responsible for the safety of pharmaceutical and food products.

²³ Amad dan Firyal Arribah Syafiqoh Sudiro, "Perlindungan Hukum Terhadap Konsumen Dari Produk Kosmetik Yang Ilegal" 8, no. 12 (2023).

Based on these findings, it can be concluded that the theory of state responsibility calls for the strengthening of oversight mechanisms, the enhancement of institutional capacity, and the updating of regulations relevant to developments in the digital marketing ecosystem.²⁴

Recommendations for Strengthening the BPOM Oversight System

Based on the results of the research and theoretical analysis, the BPOM's oversight of the circulation of illegal cosmetics still has weaknesses, both in the pre-market and post-market stages. Therefore, this study offers the following recommendations:

1. **Strengthening Digital Oversight Regulations**

BPOM needs to develop specific regulations regarding the marketing of cosmetics on social media and marketplaces. These regulations must include an obligation for influencers or digital celebrities to verify the legality of products before promoting them. Additionally, digital platforms must be required to implement an automated verification system for product distribution license numbers before products can be listed.²⁵

2. **Integration of the Oversight System with Marketplaces and Social Media**

BPOM can collaborate with digital platforms such as TikTok, Instagram, and marketplaces to build a data integration system that enables automatic verification of BPOM notification numbers. Thus, products without distribution permits can be immediately blocked before being sold to consumers.

3. **Strengthening the Capacity of Regulatory Officials**

BPOM needs to increase the number and capacity of inspectors, particularly in the field of digital oversight. The use of technologies such as web crawling, machine learning, and AI-based monitoring systems can help detect illegal products more quickly and accurately.

4. **Tightening of Administrative and Criminal Sanctions**

This study recommends the imposition of stricter sanctions against businesses proven to be distributing illegal cosmetics, including

²⁴ Wicaksono, Setyawan, dan Adiwibowo.

²⁵ Devani Olivia Winardi, ""Penerapan Regulasi BPOM Dalam Iklan Kosmetik : Upaya Perlindungan Konsumen Dari Klaim Tidak Tepat Di Jawa Barat"" 23 (2025): 8–15.

increased fines, revocation of business licenses, and criminal investigations. Heavier sanctions are expected to serve as a deterrent and prevent businesses from repeating violations.

5. Improving Consumer Literacy

The BPOM needs to launch a large-scale educational campaign regarding the dangers of illegal products and how to check marketing authorizations through the Cek BPOM app. This education should target vulnerable groups such as teenagers and active social media users who are frequently exposed to cosmetic advertisements.²⁶

6. Regulatory Updates Regarding the Cosmetics Notification System

The notification system needs to be strengthened with stricter verification mechanisms, including mandatory document audits, random testing of formulations, and restrictions on product claims that cannot be scientifically proven.

Conclusion

Based on the research findings, the Food and Drug Supervisory Agency's (BPOM) oversight of the circulation of illegal cosmetics is supported by adequate regulatory frameworks and mechanisms through pre-market and post-market supervision. However, its effectiveness remains suboptimal, particularly in addressing digital distribution channels that accelerate the circulation of illegal products, thereby highlighting a gap between legal norms and on-the-ground practices.

In a case study of products marketed by Reza Gladys, violations were found in the form of the absence of distribution permits and marketing that had the potential to mislead consumers. This indicates that oversight has not yet been able to anticipate the dynamics of digital marketing and the role of influencers. Therefore, strengthened oversight is needed through the use of digital technology, law enforcement, and cooperation with digital platforms to ensure consumer protection.

²⁶ Nuralifah, "Cerdas Di Marketplace: Panduan Membedakan Kosmetik Asli, Ilegal, Dan Tiruan Serta Pentingnya Cek Bpom Pada Kosmetik Viral Di Sma Negeri 2 Kendari" 3, no. 01 (2026): 100–106.

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