

LEGAL PROTECTION FOR UNCERTIFIED HALAL ON FOOD PRODUCT TO CONSUMER

Mega Arum Saputra

Karya Husada University, Indonesia

godongarumsmg@gmail.com

Abstract. Since the enactment of Law Number 11 of 2020 concerning Job Creation which amends some articles in Law Number 33 of 2014 concerning Halal Products Guarantee, Micro and Small Enterprises have been given the convenience of halal certification administration. In this case the writer analysed how the regulation of halal product certification for Micro and Small Enterprises is and how the supervision of the halalness of MSME products that have been labelled as halal is. The method used in this research is normative legal with the approach of descriptive analytical research and qualitative analysis. Regulation of halal products for Micro and Small Enterprises is regulated in Law Number 33 of 2014 concerning Halal Product Guarantee, Law Number 11 of 2020 concerning Job Creation and Government Regulation Number 39 of 2021 concerning Implementation of the Halal Product Guarantee Sector, which regulates halal product statements (self-declaration) from Micro and Small enterprise actors and halal certificates which are free of charge for them. The provision of a halal certificate based on self-declaration in Law Number 11 of 2020 is not in accordance with Law Number 33 of 2014 which requires inspection and testing of products before giving a halal certificate. Supervision of the halalness of MSME products as regulated in Article 103 of Government Regulation Number 39 of 2021 is considered ineffective because the supervision is only carried out periodically and/or at any time. Periodical and/or at any time supervision is more precisely targeted at products produced by large and medium-sized enterprises, and is ineffective for supervision of halal products produced by MSMEs which are very large in number.

Keywords: Halal Certification, Micro and Small Enterprises (MSE).

1. INTRODUCTION

Indonesia is a country with a large Muslim population. Based on statistical data of Indonesian population, 87.18% of 237,641,326 people embraced Islam (BPS, 2020). As a country with a Muslim majority population, the protection of the halalness of a product is an individual right as well as a right as an Indonesian citizen. This is clearly regulated in Article 29 section (2) of the 1945 Constitution: The State guarantees the independence of every resident to embrace their respective religions and to worship according to their religions and beliefs.

To ensure that every religions believer worships and carries out his religious teachings, the state is obliged to provide protection and assurance regarding the

halalness of products consumed and used by the community. In order to do that regulations are made to provide comfort, security, safety, and certainty of the availability of halal products for the community in consuming and using the product as well as to increase added value for business actors to produce and sell Halal Products.¹⁵⁵

Protection of the Muslim community is important considering that many products circulating in the community are not all guaranteed to be halal, and advances in science and technology in the fields of food, medicine, and cosmetics have developed very rapidly. This has a real impact on the shift in processing and utilizing raw materials for food, beverages, cosmetics, medicines, and other products from what was originally simple and natural to processing and utilizing raw materials resulting from scientific engineering. Processing products by utilizing advances in science and technology allows mixing between what is lawful and what is unlawful, both intentional and unintentional. Therefore, to determine the halalness and purity of a product, a laboratory examination is required by experts in the fields of food, chemistry, biochemistry, industrial engineering, biology, pharmacy, and Islamic law comprehension.

In terms of regulations, Laws and Regulations related to Halal products guarantees are constantly changing and updating. It starts from the Regulation of the Minister of Health of the Republic of Indonesia Number: 280/Men.Kes/Per/XI/76 concerning Provisions for Circulation and Marking of Foods Containing Ingredients from Pigs to Government Regulation Number 39 of 2021 concerning the Implementation of the Halal Product Guarantee Sector.

Institutionally, Indonesian Ulema Council (*MUI*) was initially conducting inspections/audits, setting fatwas, and issuing halal certificates. Then it switched to the Halal Product Guarantee Regulatory Agency (*BPJPH*) based on Law Number 33 of 2014 on Halal Product Guarantee, except for the determination of product halal standards that are still issued by *MUI*.

Based on data from the Central Statistics Agency, approximately 99.9% of all businesses operating in Indonesia come from Micro, Small and Medium Enterprises (*MSMEs*). It was recorded that from 2010 to 2018, the number of *MSMEs* continued to increase to reach 64.2 million units. In 2019, the number of *MSMEs* increased by

¹⁵⁵General explanation of Law Number 33 of 2014 concerning Halal Products Assurance

1.98% from the previous year which reached around 65.5 million units. Thus, the existence of MSMEs in Indonesia has a very large contribution to the Indonesian economy. It was accounted for 60.3% of Indonesia's total gross domestic population (GDP), absorbing up to 97% of the total workforce, and 99% of total employment.¹⁵⁶

Considering that MSMEs dominate the economy in Indonesia, including in this case the provision of the needs of the Muslim community, it is worth to ask whether there are special regulations or facilities for MSMEs in obtaining halal certificates for their products and how the supervision of the halalness of MSME products that have been labelled halal works.

2. STATEMENT OF THE PROBLEMS

Based on the background of the problems above, this research will discuss and analyse two questions which are formulated as follows:

- a. How is the regulation of halal product certification for Micro and Small Enterprises?
- b. How is the monitoring towards halalness of MSMEs products that have been labelled as halal?

3. METHODS OF THE RESEARCH

Method of the research that the writer used in this study is a normative legal research with a descriptive analytical approach. Secondary data is collected through literature study and it is analysed qualitatively. After that, the conclusion is drawn.

4. DISCUSSION

a. Regulations of Halal Product Certification for Micro and Small Enterprises

Based on Article 1 section (5) of Law Number 20 of 2009 concerning Micro, Small and Medium Enterprises, the definition of the business world includes Micro, Small and Medium and Large Enterprises that carry out economic activities in Indonesia and are domiciled in Indonesia. Micro Enterprise is a productive business owned by an individual and/or an individual business entity with a maximum net worth of Rp50.000.000 or annual sales of a maximum of Rp300.000.000. Small Enterprise is a productive economic business that stands

¹⁵⁶Data of Statistics Indonesia, 2010-2020

alone by individuals or business entities that are not subsidiaries or branches of companies that has a net worth of more than Rp50.000.000 and a maximum of Rp500.000.000 or has annual sales results of more than Rp300.000.000 and a maximum of Rp2.500.000.000. Meanwhile, Medium Enterprises is a productive economic business that stands alone by individuals or business entities that are not subsidiaries or branches of companies that has a net worth of more than Rp500.000.000 and a maximum of Rp10.000.000.000 or has annual sales results of more than Rp2.500.000.000 up to a maximum of Rp50.000.000.000.

Regarding the regulation of halal product certification for Micro and Small Enterprises, it is necessary to explore since the regulation regarding halal labels on food products, which is regulated in the Regulation of the Minister of Health of the Republic of Indonesia Number: 280/Men.Kes/Per/XI/76 concerning Provisions for Circulation and Marking of Foods Containing Ingredients from Pigs. In this Regulation of the Minister of Health, Article 2, Section (1) stipulates: "A warning sign must be attached to a food container or package that is produced domestically or from imports containing ingredients derived from pig."; Section (2) "The warning sign referred to in section (1) must be in the form of a picture of a pig and an inscription that reads: "CONTAINING PORK" and ..."; Article 3, "The warning signs referred to in article 2 must be printed on the container or package, or glued with an appropriate adhesive, so that it does not come off easily."; Then in Article 4, "Food containing ingredients derived from pigs that does not meet the requirements in Articles 2 and 3, is prohibited from being circulated in Indonesia."

There is a need to include a special logo printed on the packaging or glued with the appropriate adhesive to give a warning that a food product contains pork because the pork content spread in Indonesia at that time was still small. As for the labelling mechanism, the Minister of Health cooperates with the Association of Indonesian Food and Beverage Entrepreneurs to disseminate a special logo to business actors who need the logo.¹⁵⁷

The inclusion of halal text on food labels was carried out starting in 1985, based on the Joint Decree of the Minister of Health and the Minister of Religion

¹⁵⁷Hayyun Durrotul Faridah, (2019), "Sertifikasi Halal Di Indonesia: Sejarah, Perkembangan, Dan Implementasi," Research and Development Center for Halal Products University of Airlangga 2 Number 2, page 71.

of the Republic of Indonesia No. 42/Menkes/SKB/VIII/1985 and No. 68 of 1985 concerning the Inclusion of Halal Text on Food Labels.

The Minister of Health issued a decree regarding the inclusion of halal text on food labels in Decree of Minister of Health No. 82/Menkes/SK/I/1996. This decree is an implementation of the Joint Decree of the Minister of Health and the Minister of Religion of the Republic of Indonesia No. 42/ Menkes/SKB/VIII/1985 and No. 68 of 1985 concerning the inclusion of halal text on food labels. Then, there are several things that need to be adjusted in the Decree of the Minister of Health above. The Minister of Health then issued a decree on the amendment to the Decree of the Minister of Health of the Republic of Indonesia Number 82/Menkes/SK/VIII/1996 regarding the inclusion of the words "Halal" on food labels, in the Decree of the Minister of Health No. 924/ Menkes/SK/VIII/1996

Then Law Number 7 of 1996 concerning Food was formed regarding the inclusion of the contents of food information (Halal) on labels, it is regulated in Article 30 section (1) of Law Number 7 of 1996: Everyone who produces or imports food into the territory of Indonesia that is packaged for trade is obligated to attach a label to, inside, and or on food packaging. With reference to this provision, the inclusion of halal text is not an obligation unless everyone who produces food and/or imports food into Indonesian territory for trade states that the food in question is halal for Muslims.

In 1998, the Assessment Institute for Foods, Drugs, and Cosmetics, the Indonesian Council of Ulema (*AIDC ICU/LPPOM MUI*) was officially formed based on the Decree of the Indonesian Council of Ulama No. Kep./18/MUI/1998. The main authority of AIDC ICU is to inspect products and provide halal certification. Meanwhile, the halal label permit that is embedded on food product packaging is issued by the Ministry of Health (MOH), namely the National Agency of Drug and Food Control (*BPOM*).

In 1999, Law No. 8/1999 on Consumer Protection was also passed. In Article 2 of Law Number 8 of 1999 the principle of consumer protection is stated which reads "Consumer protection is based on benefits, justice, balance, consumer security and safety, and legal certainty". Based on the article, consumers clearly get legal protection, which is one of the rights of consumers in Article 4, namely: The right to security, comfort and safety in consuming goods and/or services.

In 1999 the government issued Government Regulation of the Republic of Indonesia Number 69 of 1999 concerning Labels and Advertisements, which in Article 10 paragraph (1) and Article 11 are regulated:

Article 10

- (1) "Every person who produces or imports packaged food into the territory of Indonesia for trading and declares that the food is halal for Muslims, is responsible for the truth of the statement and is obliged to include a statement or writing of halal on the label."

Article 11

- (1) To support the truth of the halal statement as referred to in Article 10 section (1), every person who produces or imports packaged food into the territory of Indonesia for trading must first check the food at an accredited inspection agency in accordance with the provisions of the current regulation.
- (2) The examination as referred to in section (1) is carried out based on the guidelines and procedures stipulated by the Minister of Religion by taking into account the considerations and suggestions of religious institutions that have competence in the said field.

In order to provide certainty of the halalness of packaged and traded food in Indonesia, the Minister of Religion issued a decree on guidelines and procedures for the inspection and determination of halal food in the Decree of the Minister of Religion Number 518 of 2001. Article 2, (1) "To support the truth of the halal statement issued by the producer or importer of food packaged to be marketed the Inspection Agency must first examine the food." Article 7 (1) "In order to carry out inspection of halal food, the Head of the Inspection Agency forms an Inspection Team and issues an inspection warrant, which includes inspection of administration, production process, laboratory, packing process, packaging and storage of products, as well as inspection of transportation, distribution, marketing, and presentation systems." Article 8, (1) "In the case of food inspected by the Inspection Agency has met the requirements of halal food and has been declared halal, the Agency issues a Halal Certificate." The Minister of Religion issued a decree on the agency implementing halal food inspection in *KMA* Number 519 of 2001. The issuance of Decree of the Minister of Religion (*KMA*) 518 of 2001 and *KMA* 519 of 2001 further strengthened *MUI* as a halal

certification agency as well as agency that conducts inspections/audits, determines fatwas, and issues halal certificate.

Based on the above regulations, it was not found in the Regulation of the Minister of Health of the Republic of Indonesia Number: 280/Men.Kes/Per/XI/76 and in the Decree of the Minister of Religion Number 518 and Number 519 of 2001 any regulations and provisions specifically regulating halal product certification for MSMEs.

The provisions for halal product certification specifically for MSMEs are found in Law Number 33 of 2014 concerning Halal Products Guarantee (*UUJPH*), namely in Article 44 section (2): in the case that the business actor is a micro and small enterprise, the cost of halal certification can be facilitated by the other party. In the explanation of Article 44 section (2) it is explained that what is meant by "other parties" include the government through the State Budget (*APBN*), regional governments through the Regional Budget (*APBD*), companies, social institutions, religious institutions, associations and communities. Even though Article 44 section (2) of Law Number 33 of 2014 regulates halal product certification for MSMEs, what is regulated is not about the convenience in obtaining halal certificates, instead it only stipulates that the cost of halal certification proposed by MSMEs can be facilitated by other parties, and it is not free of charge.

With the same editorial, the provision of fees for certification of MSME halal products that can be facilitated by other parties is also regulated in Government Regulation Number 31 of 2019 concerning Implementing Regulations of Law Number 33 of 2014 concerning Halal Products Guarantee.

However, since the enactment of Law Number 11 of 2020 concerning Job Creation, there have been a number of laws amended for the sake of simplifying, synchronizing and trimming regulations in order to facilitate business actors, including Micro and Small Enterprises (MSE). One of the amended laws is Law Number 33 of 2014 concerning Halal Products Guarantee. Regarding the adjustment to Law Number 11 of 2020, Government Regulation (*PP*) Number 31 of 2019 was also revoked by Government Regulation Number 39 of 2021 concerning the Implementation of the Halal Product Guarantee Sector.

The amendments to Law Number 33 of 2014 by Law Number 11 of 2020 concerning Job Creation, which are related to halal product certification for MSEs, namely:

1. There is an additional Article which is Article 4 A of Law Number 11 of 2020: the obligation of halal certification based on **the statement of business actors** specially for **Micro and Small Business Actors**.
2. Amendment to Article 44 Section (2), namely Halal Certification for micro and small business actors is free of charge.

The existence of provisions in Article 4 A of Law Number 11 of 2020, which requires Micro and Small Business Actors to self-declare the halalness of their products has caused a polemic. The existence of this self-declaring halal rule can be considered as setting aside the basic provisions (essence) namely the obligation to inspect and test products, and also contradicts Law Number 33 of 2014 which requires all products to be inspected and/or tested by the Halal Inspection Agency (*LPH*).

The existence of several cuts in the process and time in obtaining halal certificates in Law Number 11 of 2020 is appropriate and worthy of appreciation so that business actors can easily and quickly obtain halal certificates, but regarding product inspection and testing, it is absolutely necessary to take, so that there are no doubts for the Muslim community about a product.

The regulatory pattern adopted by Law Number 11 of 2020 concerning Job Creation is classified as Risk-Based Regulation (RBR), which in its implementation recognizes several stages.¹⁵⁸

Based on the Risk-Based Regulatory Pattern in Law Number 11 of 2020, the types of businesses carried out by MSE actors in the food sector are not entirely included in the Halal Positive List of Materials (non critical materials) or consist of materials that are not included in the halal criticality category. such as materials obtained from nature, but there is no guarantee that MSEs do not use meat, margarine, and various artificial ingredients that have a high criticality so that they must be researched and traced for halalness. Therefore, inspection and testing

¹⁵⁸Robert Baldwin, Martin Cave dan Martin Lodge, *Understanding Regulation: Theory, Strategy, and Practice*, 2nd ed, Oxford University Press, 2012, h. 40-67, Julia Black dan Robert Baldwin, "Really Responsive Risk-Based Regulation" *Law & Policy*, Vol. 32, 2010, h. 181

of products absolutely must be carried out, including products produced by MSEs, because food/drinks that enter the body directly affect the solemnity of worship and obedience to God.¹⁵⁹

Product inspection and testing is time consuming because there are very few Halal Inspection Agencies (*LPH*) and Halal Auditors. Currently, there are only 3 (three) Halal Inspection Agencies (*LPH*), namely LPPOM MUI, LPH Sucofindo and LPH Surveyor Indonesia. There are 9 Halal Inspection Agencies (*LPH*) that will be established, namely: Salman Mosque Development Foundation ITB, BPPSI Pekanbaru, DPP Hidayatullah Jakarta, Halalan Studies Thayyiban Muhammadiyah Jakarta, Certification Center of the Directorate of Standardization and Quality Control of the Ministry of Trade, UNHAS, Yayasan Bersama Madani Padang, UB Malang, and Unsyiah Banda Aceh. Therefore, it is urgent to immediately establish at least 1 (one) Halal Inspection Agency (*LPH*) in each provincial capital, and produce hundreds of Halal Auditors who carry out product inspections and testing.

Then Article 79 and Article 80 of Government Regulation Number 39 of 2021 which further regulates halal self-declaration by MSEs, namely the existence of a number of requirements/criteria, namely: Products are not risky or use materials that have been confirmed to be halal; and a production process that is guaranteed to be halal and simple. Then the business actor makes a contract/pledge containing the halalness of products and materials used as well as the halal product process. Particularly for the process of halal products, assistance is carried out by Islamic community organizations or legal Islamic religious institutions and/or universities. The article does not stipulate certain conditions or abilities as a companion, and it is not clear whether the assistant's position is to see directly the product process or act as a guarantor that products produced by MSEs are halal and whether there are consequences for the companions if in the future the products produced by MSEs are proven as not halal.

Then related to free of charge for MSEs who want to get halal certificates as regulated in Article 44 Section (2) of Law Number 11 of 2020, it is inappropriate if the government is considered to care about MSEs that are difficult to pay the costs of obtaining halal certification because the system for giving halal

¹⁵⁹Burhanuddin, (2011), *Pemikiran Hukum Perlindungan Konsumen Dan Sertifikasi Halal*, Malang: UIN Maliki Press, page 18.

certificates by self-declaring by business actors themselves needs no significant costs to be incurred.

Article 81 Section (1) of Government Regulation Number 39 of 2021 reaffirms that applications for Halal certificates submitted by micro and small business actors are free of charge, but there is a sentence "taking into account the state's financial capacity". In the Explanation of Article 81 Section (1) of Government Regulation Number 39 of 2021 it is explained that the MSE which is not subject to fees is based on the criteria and priorities that will be regulated further by *BPJPH*. The provisions and explanation of Article 81 Section (1) of Government Regulation Number 39 of 2021 are not in line with and in contrary to Article 44 Section (2) of Law Number 11 of 2020 which confirms that: Halal certification for micro and small business actors is **free of charge**.

b. Supervision of the Halalness of MSME Products that Have Been Labelled Halal

The supervision of the halalness of MSME products that have been labelled halal is regulated in Law Number 33 of 2014 concerning Halal Products Guarantee, and it does not include the provisions revised by Law Number 11 of 2020 concerning Job Creation.

Article 49 of Law Number 33 of 2014 stipulates that: Halal Product Guarantee Regulatory Agency (*BPJPH*) supervises the Halal Product Guarantee (*JPH*).

Article 50 of Law Number 33 of 2014 stipulates: Supervision of Halal Product Guarantee is carried out on: a. Halal Inspection Agency (*LPH*); b. Halal Certificate validity period; c. halalness of products; d. inclusion of Halal Label; e. inclusion of non-halal information; f. separation of locations, places and tools for slaughter, processing, storage, packaging, distribution, sales, and presentation between halal and non-halal products; g. presence of a Halal Supervisor; and/or h. other activities related to Halal Product Guarantee.

Article 51 of Law Number 33 of 2014 stipulates: (1) The Halal Product Guarantee Regulatory Agency (*BPJPH*) and related ministries and/or institutions that have the authority to supervise Halal Product Guarantee can carry out supervision individually or jointly. (2) Supervision of *JPH* with related ministries

and/or institutions as referred to in section (1) shall be carried out in accordance with the provisions of laws.

The provisions of Article 49, Article 50 and Article 51 of Law Number 33 of 2014 above are also re-regulated in Government Regulation Number 39 of 2021 concerning the Implementation of the Halal Product Guarantee Sector.

Although Article 6 of Law Number 33 of 2014 stipulates that the Halal Product Guarantee Regulatory Agency (*BPJPH*) has the authority to supervise Halal Product Guarantee, Law Number 33 of 2014 concerning Halal Product Guarantee does not stipulate the duties of the Halal Product Guarantee Regulatory Agency (*BPJPH*) in carrying out supervision. In administrative law, the supervision imposed on the Halal Product Guarantee Regulatory Agency (*BPJPH*) is more accurately called a supervisory function than a supervisory authority because authority is a part of the function.

Article 98 section (1) Government Regulation Number 39 of 2021 stipulates the requirements for the Halal Product Guarantee Supervisor, namely:

- a. a Muslim;
- b. a civil servant assigned to a work unit that has duties and functions in the field of supervision;
- c. at least has a bachelor degree;
- d. understand and have broad insight regarding the halalness of products according to Islamic law
- e. pass training as the Halal Product Guarantee Supervisor.

Then related to the supervision time, it is regulated in 103 Government Regulation Number 39 of 2021, namely:

- 1) Halal Product Guarantee Supervision is carried out periodically and/ or from time to time.
- 2) Halal Product Guarantee Supervision is carried out periodically as stated in section (1) is implemented once in six month.

The supervision time regulated in Article 103 of Government Regulation Number 39 of 2021 is considered ineffective if it is carried out periodically and/or at any time, moreover if the periodical supervision is carried out once in 6 (six) months. Monitoring periodically and/or at any time is more precisely targeted at products produced by large and medium-sized enterprises. Supervision of halal

products produced by MSMEs is more effectively carried out routinely and continuously.

Regarding supervision, Article 53 of Law Number 33 of 2014 also stipulates that: the public can participate in supervising the circulated halal products in the form of submitting complaints or reporting to the Halal Product Guarantee Regulatory Agency (*BPJPH*). Unfortunately, many people would rather see the price in choosing a product rather than seeing or examining the content of the food/drink or whether it is labelled as halal or not. In addition, many people do not know about the existence of the Halal Product Guarantee Regulatory Agency (*BPJPH*), whether it is only at the central level or at the provincial and city/district levels. It is important to be socialized, so that the community can participate and report products that have not been labelled halal to the authorities overseeing halal product guarantees.

5. CLOSING

1. Conclusion

- a. Halal product certification regulations for Micro and Small Enterprises are regulated in Law Number 33 of 2014 concerning Halal Product Guarantee, Law Number 11 of 2020 concerning Job Creation and Government Regulation Number 39 of 2021 concerning Implementation of the Halal Product Guarantee Sector, which regulates the declaration of halal products (self-declaring) from Micro and Small business actors and there is no fee for halal certificates from Micro and Small business actors. The provision of a halal certificate based on self-declaration in Law Number 11 of 2020 is not in accordance with Law Number 33 of 2014 which requires inspection and testing of products before giving a halal certificate.
- b. Supervision of the halalness of MSME products as regulated in Article 103 of Government Regulation Number 39 of 2021 concerning the Implementation of the Halal Product Guarantee Sector is considered ineffective because the supervision is only carried out periodically and/or at any time. That kind of provision is more effective for products produced by large and medium-sized enterprises, and it is ineffective for supervision of halal products produced by SMEs which are very large in number.

2. Suggestions

- a. The issuance of a halal certificate based on self-declaration in Law Number 11 of 2020 needs to be reviewed and revised/amended. Product inspection and testing before providing a halal certificate is an absolute requirement that cannot be ruled out on the grounds of making it easier to obtain a halal certificate. The inspection and testing of products takes a long time because the Halal Inspection Agency (*LPH*) and Halal Auditors are still very few. Therefore, it is urgent to immediately establish at least 1 (one) Halal Inspection Agency (*LPH*) in each provincial capital, and produce hundreds of Halal Auditors who can carry out product inspections and testing.
- b. Article 103 of Government Regulation Number 39 of 2021 which regulates the time for supervision of halal product guarantees needs to be revised, by changing the supervision time, which is carried out in a planned, routine and sustainable manner. To facilitate coordination in supervision at the regional level, the Halal Product Guarantee Regulatory Agency (*BPJPH*) must be formed at the regional level.

BIBLIOGRAPHY

- Baldwin, Robert, Martin Cave dan Martin Lodge, (2012) *Understanding Regulation: Theory, Strategy, and Practice*, 2nd ed, Oxford University Press.
- Black, Julia dan Robert Baldwin, “*Really Responsive Risk-Based Regulation*” *Law & Policy*, Vol. 32,2010.
- Burhanuddin, (2011), *Pemikiran Hukum Perlindungan Konsumen Dan Sertifikasi Halal*, Malang: UIN Maliki Press.
- Faridah Hayyun Durrotul, (2019), “*Sertifikasi Halal Di Indonesia: Sejarah, Perkembangan, Dan Implementasi*,” *Research and Development Center University of Airlangga 2 Number 2*.