

Regulation of RTE Foods in Indonesia, Singapore, and USA: A Literature Review

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Abstract. Food is a fundamental human right. In Indonesia Law Government Regulation No. 86 of 2019, classified food into fresh, processed, and Ready-to-Eat (RTE) food. Changes in consumption patterns, particularly in urban areas, have increased RTE food demand. Data from Indonesia Central Bureau of Statistics showed that household spending on RTE foods rose from 25.9% in 2013 to 34% in 2019, the Indonesia Ministry of Health (MoH) recorded 69 food poisoning incidents in 2024 related to RTE products. Similarly, the Singapore Food Agency (SFA) reported 22.5 foodborne illness cases per 100,000 population in 2023–2024, with over half linked to catered foods. In the United States, a 2024 *Salmonella* outbreak from underprocessed RTE meat caused 104 illnesses and 27 hospitalizations. Given recurring RTE food safety incidents, comparing regulatory frameworks is crucial to identify best practices and policy gaps. This study compared RTE food regulations in Indonesia, Singapore, and the United States. Singapore represents a developed Southeast Asian country, while the United States is a leading voice in global food safety. Through a descriptive review it is shown that Indonesia and Singapore adopt Codex Alimentarius Commission principles in food safety and hygiene. Indonesia focuses on licensing and hygiene certification by the MoH, while Singapore enforces centralized control under the SFA (Singapore Food Agency) with strict microbiological and temperature standards. The United States enforces a preventive, risk-based approach via the FDA (Food and Drug Administration) Food Code and USDA-FSIS (United States Department of Agriculture – Food Safety and Inspection Service). Singapore and the United States show more mature and preventive regulatory frameworks. Therefore, Indonesia needs to strengthen risk-based supervision, hygiene certification, and laboratory capacity.

1 Introduction

Food is a fundamental human need, as it is essential for growth and development [1]. The state has an obligation to guarantee the right to food for all its citizens. Food availability encompasses aspects of both food sufficiency and food quality [2]. Ensuring the availability, affordability, and sufficiency of food to meet the needs of the community is one of the obligations of the state. This is stated in Article 1 of Indonesia Law No. 18 of 2012 [2] concerning Food, specifically Articles 1 and 59, which emphasize that the state is responsible for implementing food safety, including monitoring food distribution.

The Indonesia Government Regulation No. 86 of 2019 [3] concerning Food Safety classifies food into three main categories: fresh food, processed food, and Ready-to-Eat (RTE) food processed food. Along with changes in consumer patterns, especially in urban areas, there has been a significant increase in RTE food consumption [4]. Data from the Indonesia Central Bureau of Statistics shows that the proportion of household spending on RTE food increased from 25.9% of total food expenditure in 2013 to 34% in 2019 [5].

RTE food often poses a health risk due to poor hygiene practices by vendors, which can trigger foodborne illnesses. Contamination by bacteria such as *E. coli* and *Salmonella* is quite common, potentially posing a public health problem [6].

In Indonesia, the Ministry of Health (MoH) notes that food poisoning outbreaks (KLB) continue to occur frequently. According to a 2024 report, of the 285 reported cases of food poisoning outbreaks, 69 were caused by RTE Food [7]. The Indonesian MoH emphasizes the importance of implementing food hygiene and sanitation principles in all food preparation units, including fast-food restaurants. Similarly, the Singapore Food Agency (SFA) reported 22.5 foodborne illness cases per 100,000 population in 2023–2024, with over half linked to catered foods [8]. Meanwhile, in the United States, a 2024 *Salmonella* outbreak from underprocessed RTE meat caused 104 illnesses and 27 hospitalizations [9]. This research aims to review and analyze RTE food regulations in Indonesia, Singapore, and the United States. Indonesia is selected as the primary case study, which is then compared with Singapore as a fellow Southeast Asian country with advanced economy status, and the United States as a

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country actively involved in international food policy forums.

2 Material and methods

2.1 Material

The data analysis process was conducted through the extraction from documents, scientific literature, laws and regulations, and publications from official institutions. All collected data were tabulated using Microsoft Excel software to facilitate recording, organizing, and grouping information. Following that, the extracted information was analyzed based on the research problem formulation and objectives, covering aspects such as the definition, classification, quality and safety standards of RTE food, and the institution of RTE food. All data included were systematically referenced to their original sources to ensure the accuracy. Then, the data analysis procedure was conducted descriptively.

2.2 Methods

This study employed a literature review method and was conducted from June to October 2025. The research focused specifically on RTE Food regulations in Indonesia, Singapore, and the United States, Selected as a representation of the variation of regulatory systems and the level of regulatory maturity in food safety governance. The literature review involved the systematic analysis of official regulatory documents, laws, government guidelines, and peer-reviewed scientific literature that related to RTE food. The literature searched used several main keywords were developed after gaining insight into relevant keywords from regulatory documents that emerge from the initial search results which are depicted in Table 1.

Table 1. List of main keywords for literature search

No.	Keywords
1	Regulasi AND Pangan Siap Saji AND Indonesia Contam* AND Limit AND Ready to Eat Food OR RTE Food OR Food AND Indonesia
2	Regulation AND Ready to Eat Food OR RTE Food OR Food Stall OR Food Service* OR Restaurant OR Food Court AND Singapore
3	Regulation AND Ready to Eat Food OR RTE Food OR Food Stall OR Food Service* OR Restaurant OR Food Court AND United States
4	Stall* OR Restoran* OR Warung Makan OR Food Court AND Indonesia Batas Cemaran AND Pangan Siap Saji AND Indonesia
5	Stall* OR Food Service* OR Restaurant OR Food Court AND Singapore Contam* AND Limit AND Ready to Eat Food OR RTE Food OR Food
6	Stall* OR Food Service* OR Restaurant OR Food Court AND United States Contam* AND Limit AND Ready to Eat Food OR RTE Food OR Food

The data sources were obtained through targeted searches using Google search engine, applying pre-defined keywords that relevant to RTE foods regulations. These keywords were then further developed based on insights gained from regulatory documents identified in the initial search results. The analysis examined and compared RTE food regulations based on four key aspects which are institutional framework, regulatory definitions, classification of RTE food products, and contaminant limits. These aspects are determined based on the research objectives and are used as a framework in the data extraction process and comparative analysis. In addition to the national regulations of the countries studied, the Codex Alimentarius standards were used as an international reference framework to provide context and strengthen the comparative analysis. Codex documents were not treated as separate objects of analysis, but rather served as benchmarks for the similarities and differences in regulatory approaches. All collected data was systematically extracted, tabulated, and analyzed to identify regulatory alignments, differences, and gaps between Indonesia, Singapore, and the United States.

3 Result and Discussion

3.1 Definition

The Codex Alimentarius Commission provides a general definition for ready-to-eat (RTE) food, namely any food that is normally consumed in its raw state or any food handled, processed, mixed, cooked, or otherwise prepared into a form in which it is normally consumed without further processing. This definition establishes the basic principle that RTE is food that can be consumed directly without further processing. However, the Codex establishes this definition as a general principle that can be adopted and adapted by each country and adjusted to the country's food system. Therefore, despite differences in terms or definitions, the definition of RTE food from the Codex and from selected countries has the same general principle: Any food (including beverages) which is ready for immediate consumption (could be raw or cooked, hot or chilled) without further processing at the point of sale [10]. The Codex provides a global framework that encompasses definitions ranging from raw foods commonly consumed fresh, such as fresh fruit or vegetables, to foods that have undergone processing and are ready to be consumed without further processing. The General Principles of Food Hygiene (CXC 1–1969) document is the primary document governing the entire food supply chain [11]. In addition, Codex also specifically addresses food prepared and sold for direct consumption in the Code of Hygienic Practice for the Preparation and Sale of Street Foods (CAC/RCP 43–1995) document, where the scope of this document includes RTE, which provides guidance focused on environmental hygiene, clean water availability, equipment sanitation, and food protection from physical, chemical, and biological contamination [12]. Codex also has explicit guidance related to *Listeria*

monocytogenes in RTE Foods in the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods [13].

The Indonesian Government Regulation Number 86 of 2019 on Food Safety, define RTE Processed Food as food and/or drink that has been processed and is ready to be served directly at the business premises or outside the business premises, such as food served in catering services, hotels, restaurants, eateries, cafeterias, canteens, street vendors, mobile food stalls (food trucks), and mobile food vendors or similar businesses. This shows that regulations in Indonesia regulate RTE food with an emphasis on the serving stage and food business activities as an inseparable part of the RTE production chain. This emphasis reflects an operational approach and is based on the efforts of the business operators, in which food safety control is carried out through hygiene and sanitation requirements at the place and in the food processing and serving process. This approach is regulated in the Minister of Health Regulation No. 1096/Menkes/Per/VI/2011 regarding Guidelines for Hygiene and Sanitation for Catering Services, which regulates administrative obligations, including ownership of a *Sertifikat Laik Higiene* (SLHS) [14]. This certificate is issued by the District/City Health Office and is mandatory for business operators such as catering services, restaurants, canteens, hotels, and food trucks. Despite the fact that Indonesian regulations do not explicitly define ready-to-eat foods based on shelf life, Government Regulation No. 86 of 2019 exempts processed foods with a shelf life of less than 7 (seven) days from the requirement for distribution and production permits. This provision indicates that foods intended for immediate consumption are treated differently from packaged processed foods with longer shelf lives [3].

Meanwhile, Singapore's Food Agency (SFA) has officially defined and regulated RTE foods as any of food that marketed for immediate human consumption without needing additional preparation to lessen or remove risks, and that comply with microbiological standards specified in Eleven Schedule of the Food Regulations [15]. This definition also includes foods like cup noodles, powdered drinks, syrups, or other concentrated foods that must be diluted prior to being eaten. Singapore's approach to RTE foods relies on assessing risk and prioritize managing microbiological hazards through prescriptive and measurable safety standards. Singapore Food Agency has established regulation whereby safety controls are primarily implemented through the implementation of prescriptive and measurable safety standards, which detail the requirements that food businesses must meet, including microbiological limits and technical requirements for food processing and handling.

Under the framework of the Food Safety Modernization Act (FSMA), as implemented by the Food and Drug Administration (FDA), the United States regulates RTE food in accordance with the provisions set out in the Code of Federal Regulations (21 CFR 117.3). According to this regulation RTE food are described as foods that typically eaten without any additional processing that can significantly reduce

biological hazards [16]. The definition highlights the importance of the predictive aspects which are based on anticipation of potential hazards that may increase during the food production or distribution process and preventive measures aimed at preventing hazards such as control at every critical point of the production process with the aim of hazards never appearing, which is in line with the application of the Hazard Analysis and Risk-Based Preventive Control (HARPC) approach in the United States national security system.

CAC is the only food guideline used as a reference for establishing global food standards [17]. Codex does not specifically classify RTE foods in detail. However, guidance on the control of *Listeria monocytogenes* in Foods is provided through CAC/GL 61-2007. This approach is adopted because *L. monocytogenes* is able to grow at refrigeration temperatures and RTE foods do not focus on the process of killing *L. monocytogenes* before the consumption process [13]. RTE foods are categorized as supporting and non-supporting *L. monocytogenes* growth. In this guideline, RTE foods proven to not support *L. monocytogenes* growth can be considered less restrictive than those for products that do support the growth of the pathogen. This document states that "the ability of an RTE food to support the growth of *L. monocytogenes*" is the main risk factor. According to Codex guidelines, if there is no evidence that classified an RTE food as not supporting the growth of *Listeria monocytogenes*, then it should be considered to the RTE that support the growth of *L. monocytogenes*. The characteristics of products that classified as product that "not supporting growth of *Listeria monocytogenes*" can be group into two categories: RTE food with a pH \leq 4.4 and RTE food with a water activity \leq 0.92 [13].

3.2 Classification of RTE

In Indonesia, there is currently no direct classification of RTE food, as regulated by the Codex. However, in Indonesia, the classification of RTE foods is primarily based on the type of business operation. The Indonesian MoH Law No. 1096 of 2011 states that catering services provide food based on orders and do not sell it directly to consumers. Meanwhile, businesses such as hotels, restaurants, cafeterias, and canteens prepare and serve food directly to consumers. Street vendors, food trucks, and similar businesses also prepare and sell food directly at the sales location [14].

Singapore's RTE Food regulations do not explicitly publish an official scheme dividing RTE food into high/medium/low risk categories. However, the SFA regulator uses a risk-based approach in its oversight practices, and several Singaporean technical documents mention high-risk and require extra precautions when handling or preparing these RTE products such as Food Regulations under the Sale of Food Act, Chapter 283, Eleventh Schedule of the Food Regulations, SFA Guidelines on Microbiological Criteria for RTE Food, SFA Guidance on the Control of *L. monocytogenes*, SFA Food Safety Management System Guidelines, and SFA Risk-Based Inspection and Surveillance Framework [15]. RTE foods such as salads and cut fruit are considered high-risk because they do not undergo

further heat treatment, such as cooking or microwaving [18]. This means that if food is contaminated with bacteria or other pathogens, the bacteria will not be killed before the food is served [19].

The US Food and Drug Administration does not explicitly release a high-risk/medium-risk/low-risk scheme for all RTE food products in one main document. However, the FDA does provide guidance regarding RTE food that support the growth of pathogens such as *Listeria monocytogenes* and RTE food that do not support the growth of pathogens, as explained in CPG Sec 555.320 (*Listeria* guidance) [20], which explains that the FDA classifies RTE food based on the product's ability to support the growth of pathogens, as an indicator of risk through risk ranking. Examples of RTE food products that have the potential to support pathogen growth include meat, seafood, and dairy products, requiring further oversight by the FDA through its microbiology guidelines and standards. The regulations also require RTE food businesses to identify whether the food they produce is RTE food, and if so, implement an appropriate food safety program for the RTE food products they sell.

3.3 Competent Authority (Control)

The Codex Alimentarius Commission develops international food standards and guidelines aimed at protecting consumer safety and ensuring fair food trade practices. However, Codex does not enforce regulations but rather serves as a standards-setting [21]. Codex Alimentarius was established under a joint FAO/WHO program to develop internationally recognized food standards and codes of practice as a reference for member countries [22].

Control of the Food Safety Standards for RTE Food in Indonesia is primarily conducted by the Indonesian MoH through the Directorate General of Public Health. The technical regulations governing hygiene and sanitation in catering businesses in Indonesia currently refer to the Indonesian MoH Law Number 1096/MENKES/PER/VI/2011 [14]. However, the current licensing mechanism for food businesses follows a risk-based business licensing system in accordance with The Government Regulations in Law Number 11 of 2020 concerning Job Creation and its derivative regulations [23].

The Indonesian MoH, through Ministerial Regulation Number 2 of 2023, also regulates provisions regarding Environmental Health Quality Standards / *Standar Baku Mutu Kesehatan Lingkungan* (SBMKL) established by the Food Safety Management System (RTE Food). The SBMKL specifically stipulates in Article 8, paragraph 1, "SBMKL and Food Media Health Requirements are established for RTE Processed Food." The SBMKL for RTE Processed Food also encompasses biological, chemical, and physical elements. Health requirements for RTE Food cover the serving area, equipment used, food handlers, and the food itself. This regulation also includes requirements that food must be protected and free from contamination, including stages such as receiving, storing ingredients, processing, serving management,

distribution, or transportation, and mandatory requirements for compliance with hygiene and sanitation principles. SBMKL places greater emphasis on hygiene, sanitation, and environmental quality aspects related to the food preparation process to ensure it does not endanger public health [24].

The Singapore Food Agency (SFA) is a statutory body under the Ministry of Sustainability and the Environment (MSE) in Singapore [25]. The SFA is the national food agency responsible for overseeing food safety and food security in Singapore. In Singapore, regulations for RTE Food are regulated by the Food Regulations and enforced by the SFA. The SFA regulations, defines RTE Food and requires them to meet certain microbiological standards listed in the Eleventh Schedule to ensure that the food is free from pathogens that could pose a health risk [15]. The SFA conducts inspections to test for the presence of pathogens that cause foodborne illness and ensures that RTE Food, including imported products, meets these safety requirements. The SFA adopts a science-based risk assessment and management approach to food safety and establishes food safety standards aligned with international standards. The SFA has implemented regulations throughout the food supply chain, including licensing, inspection, sampling, testing, and enforcement. The SFA also implements a practical and risk-based approach by conducting a Market Monitoring Program (MMP) that targets high-risk foods for sampling and more stringent testing in markets/retail. Operational level supervision (food handling in restaurants or food stalls) in Singapore is also assisted by the National Environment Agency (NEA) through guidance in the Food Handling Book [19], which regulates the proper and hygienic handling, preparation, and cooking of food for sale to the public.

The FDA regulates most types of food, including RTE foods. The FDA also publishes the FDA Food Code, which serves as a guideline for authorities and businesses to ensure safe food handling practices, including prepared foods, in retail settings [26]. The FDA is also responsible for monitoring and enforcing food regulations, including product sampling, inspections of RTE food production facilities, and recalls if products are deemed hazardous. Through the Food Safety Modernization Act (FSMA), the FDA has expanded authority to conduct more frequent inspections, access food facility records, and establish preventive controls [27], as well as regulate food imports and foreign supply chains. Specifically, regulations.

3.4 Safety and Quality Standard

The Codex guidelines on contaminant limits in RTE Food emphasize the comprehensive control of food contamination risks throughout the food supply chain [28]. This principle is encompassed in the General Principles of Food Hygiene [11], which establishes Good Hygiene Practices (GHP) and the application of Hazard Analysis and Critical Control Points (HACC) as the primary basis for ensuring food safety. In this regard, Codex published the Principles and Guidelines for the

Establishment and Application of Microbiological Criteria Related to Foods [12], which outlines the basic concepts for establishing microbiological criteria. Among the microbiological contaminants, the primary pathogen of concern in RTE Food is *Listeria monocytogenes*. The guidelines classify RTE foods based on their ability to support the growth of *L. monocytogenes* [13]. For this group of products that do not support pathogen growth, microbial contamination limits of up to 100 CFU/g are acceptable until the end of their shelf life. However, for products that do support growth, *L. monocytogenes* presence must be undetectable in a 25 g sample. The RTE definition only indicates that a product can be consumed without reheating, but does not reflect the product's ability to support the growth of *Listeria monocytogenes* during storage. Therefore, food safety classification must consider the product's intrinsic characteristics and storage conditions, as recommended in CAC/GL 61-2007. The classification of RTE food requires consideration of intrinsic product characteristics such as pH, water activity, packaging, storage temperature, shelf life, and post-lethality treatment. The CAC also sets standards for chemical contamination through the General Standard for Contaminants and Toxins in Food and Feed guidelines [28]. Therefore, it only refers to the contamination limits explicitly defined in the selected Codex standard. For instance, RTE meals for infants and young children.

The Indonesian MoH regulates the safety requirements for RTE Food through Health Ministerial Regulation No. 2 of 2023, specifically within the framework of the Environmental Health Quality Standards / *Standar Baku Mutu Kesehatan Lingkungan* (SBMKL). This regulation stipulates that RTE food must meet health requirements covering biological, chemical, and physical aspects, and must be produced and handled in accordance with hygiene and sanitation principles [24].

The Singapore Food Agency (SFA) establishes microbiological standards for RTE, as stipulated in the Eleventh Schedule Microbial Standards for Food. In these guidelines, the SFA establishes several microbial contamination limit parameters for RTE foods. These parameters cover both indicators for Part I (*Enterobacteriaceae* and *Escherichia coli*) and Part II (Pathogens). Part I stipulates that in RTE foods, the number of *Enterobacteriaceae* (including *E. coli* of all strains) must not exceed 10,000 CFU per gram for solid food or 10,000 CFU per milliliter for liquid food. However, this provision does not apply to RTE foods such as fresh fruit, fresh vegetables, and ripened cheese, as well as RTE foods containing any of these ingredients. Furthermore, the SFA also specifically stipulates that the number of *E. coli* of all strains in each RTE must not exceed 100 CFU per gram or per ml, without exception. Meanwhile, in Part II, the provisions in the SFA Pathogen section have regulated that in RTE foods, the number of certain pathogens must be below the maximum limit set, namely *Bacillus cereus* \leq 200 CFU/g or mL, *Clostridium perfringens* \leq 100 CFU/g or mL, and coagulase-positive *Staphylococcus aureus* \leq 100 CFU/g or mL. Specifically for RTE foods in the

form of raw seafood, the level of *Vibrio parahaemolyticus* must also not exceed 100 CFU/g or mL. In addition to the pathogens specifically stipulated in the regulation, all other pathogens must not be detected at all in RTE foods, so this standard emphasizes the principle of strict control of pathogenic microorganisms to ensure food safety for consumers. [15].

The FDA regulations do not establish a standard value for all food RTE categories (e.g., CFU/g). Microbiological tolerance is determined based on product characteristics such as pH, water activity, and risk assessment during the production process [20]. While there is no single standard, several pathogens such as *Listeria monocytogenes*, *Salmonella*, *E. coli*, and *Staphylococcus aureus* are prioritized bacteria in RTE food control [26]. The FDA categorizes RTE products based on their ability to support the growth of *Listeria monocytogenes*. If the *Listeria monocytogenes* count in RTE foods reaches or exceeds 100 CFU/gram, the food is considered adulterated. This approach demonstrates that risk assessment is conducted according to product characteristics, resulting in a clearer and more measurable monitoring system [20].

4 Conclusion

Overall, regulations on RTE foods show that Codex Alimentarius provides the global foundation—offering a broad definition, classifying products based on *Listeria monocytogenes* growth potential, and outlining general microbiological and chemical contaminant limits.

Indonesia adopts this principle but applies it more operationally, emphasizing food service contexts, with oversight by the Indonesian MoH that establish the general framework for food safety requirements. Singapore, through the SFA, aligns closely with Codex but is more prescriptive, setting specific microbiological limits and enforcing comprehensive supply-chain monitoring. The United States, via the FDA and FSMA, focuses on preventive controls under HARPC, with targeted numerical limits primarily for *Listeria*. In essence, Codex acts as the core reference, while each country adapts classification, oversight, and contamination control according to national risk priorities.

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