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Strengthening the Rights of Children as End Consumers in the Mandatory Implementation of Indonesian National Standard (Sni) of Toys (Protection of Children as Vulnerable Consumers in Indonesia)

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ABSTRACT

The distribution of unqualified kids toys has raised concerns as it may containing harmful substances is one of recurring problem in Indonesia. The mandatory implementation of the Indonesian National Standard (SNI) for toys and various toy safety regulations have not indicated that children who is considered as vulnerable consumer groups, have really been protected. The rights of the child as a consumer have actually been proclaimed in the enforcement of Human Rights through the formulation of principles of children's rights in the business activities related to the Law on Child Protection and the Law on Consumer Protection. Normative research method is carried out by analyzing the legal norms of Child Protection Law and Consumer Protection Law which relevant to the purpose of mandatory implementation of SNI for toys. The findings of the study show the conformity of legal norms in Child Protection Law and Consumer Protection Law so that the protection of the rights of children as consumers in Indonesia should be carried out together with the protection of children's rights conducted by the government. The formulation of special regulations on children as consumers need to be supported by the active role of specific government commissions / institutions responsible for the protection of children's rights as consumers in Indonesia is very relevant to be formed in the future.

Keywords: consumer protection, children's rights, toy's consumers, business and human rights.

I. INTRODUCTION

The problem of children's toys is still becoming a repeating issue in the industrial and trade sectors in Indonesia. In 2020, UNICEF has announced the results of a study in several Asian

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countries including Indonesia on lead poisoning in children where 1 out of 3 children within a population of 800 million, has a dangerous level of lead in their blood. In the long run lead exposure can bring the risk of damage to the kidneys, heart and other vital organs (UNICEF, 2020). WHO states that due to exposure to high levels of lead in the human body can affect the level of intelligence / IQ, behavior and mental health. Any object, when exposed to lead, automatically becomes a source of lead exposure for the human body (Rees et al., 2022). Data released by the Consumer Product Safety Commission-United States (CPSC-US) states that in 2019, an estimated 240,000 cases of toys-caused injuries occurred in children in the United States (Qin, 2021). The issue of toy safety has become a global agenda to be resolved although there are still many obstacles to overcome, including in the developed countries. In 2020, the Consumer organization World Against Toys Causing Harm Inc. (WATCH) released data on 10 toys that could potentially bring harm including chemical-caused injuries (CNN Indonesia, 2020).

In 2019, a study was conducted on 20 public playgrounds and 12 playgrounds specifically for early childhood or kindergarten in the DKI Jakarta and it was found that 69 percent of playground toys using paints containing lead in hazardous concentration levels (Manurung, 2019). Exposure to heavy metals including lead may cause food poisoning in children, if the lead content stays in the kids' hands then swallowed when the children eats and drinks (detikNews, 2010). A decade ago, in 2012, the Indonesian Consumers Institute Foundation (YLKI) tested imported Chinese toys and found the content of several types of heavy metals in the imported toy samples with high levels exceeding the threshold that the human body can tolerate (YLKI, 2012).

The rampant sales of imported toy products in the market have encouraged the Indonesian government to implement mandatory Indonesian National Standard (SNI) (*Minister of Industry Regulation No. 29 of 2018*, 2018) for Toys as one of the technical regulatory instruments aimed at protecting the health, security, and safety of consumers from the circulation of non-quality goods in the Indonesian domestic market (Nababan, 2018). As a commodity that has an important urgency to be guaranteed the quality of toys that meet the provisions of mandatory SNI Toys is expected to avoid negative impact of toys on the security and safety for children in the long term.

(A) Material and method

Indonesia has a number of norms that protect the rights of children in the Indonesian Constitution 1945 and the Child Protection Law. As consumers of a product, children are

protected by formal legal norms contained in Law No. 8 of 1999 concerning Consumer Protection (*Law No. 8 of 1999 Concerning Consumer Protection*, 1999). Regarding the protection of babies and children as end consumers of toys, the Ministry of Industry has applied the mandatory Indonesian National Standard (SNI) for Toys and other related laws and regulations (*The Regulation of the Minister of Industry Number 24 / MIND / PER / 4/2013*, 2013).

Unfortunately, the provisions regarding the protection of children as consumers have not been specifically formulated in material law in Indonesia. This is important, because children as toy users are in a very vulnerable position. This paper uses a normative juridical method with a discussion of legal norms in the Children Protection Law and the Consumer Law which have relevance to the purpose of enforcing mandatory SNI for Toys. As for the analysis, it is carried out qualitatively.

II. TOY INDUSTRY AND CHILDREN'S CAPACITY AS TOY CONSUMERS

The increasing child population every year affects the large number of toy products needed, so the toy industry in the past five years is one of the potential manufacturing industries in global trading.

The potential of the toy business in Indonesia is very promising because the population of Indonesian children aged 0-14 years reaches 25% of the total population of Indonesia. Unfortunately, Indonesia's domestic toy market is actually controlled by other countries. Currently, there are a lot of Chinese toy products in the Indonesian market rather than local products, reaching 70% or three times the number of local toys produced by Indonesia due to the large market demand for more affordable toy prices for the public. The problem arises when imported toy products that are not of high quality from China have mostly poor-quality standards that affect the safety of toys (Rantung, 2020). Indonesia is participating in the world toy's market. From the export data in the last few years until the period of 2020, has shown the potential of the toy's market industry. Even though the commodity export value of manufacturing industry in 2020 has been decreased due to the impact of the pandemic, the Ministry of Industry of the Republic of Indonesia has recorded that domestic toy production reaching 343 million US dollars in 2020. This is strengthened by the development of children's toy business units which reached 131 business units on a medium to large industrial scale, and has absorbed more than 36,000 workers (Catriana, 2021).

Next question, whether as a toy user, a child be categorized as a consumer. The definition of a consumer is a person who buys goods or services for their own use (Cambridge Dictionary,

n.d.) and a person can be referred to as a consumer if he is seen as capable of: (1) making choices based on tendencies / interests (2) being able to get something to meet his needs, (3) being able to make reasonable purchase transactions and (4) being able to evaluate a product or choosing a replacement product (Valkenburg & Cantor, 2001). The Consumer Protection Law in its General Provisions states that a consumer is any person who uses goods and/or services available in society, whether for the benefit of oneself, family, other people, or other living beings and not to be traded (*Law No. 8 of 1999 Concerning Consumer Protection*, 1999). Referring to these definitions and various explanations, the child as a toy user can be categorized as a consumer (Nasution, 2000). Children have the ability to influence both parents and adults in terms of the choice of toys to buy. DT Cook shows since the 1930s in the United States is known for its affirmation of the concept of "*pediocrularity*" (the importance of the child's point of view). Children's consumption behavior can develop even though it is initially influenced by their parents buying behavior which forms a consumer typology for the child, on the basis of the consideration that the child has the ability to influence decisions of making choices related to the purchase of his consumption goods (Chiarella, 2009). In the western society, attention to children's rights in the commercial sphere began around the 1960s, that is, when in general society realized the ability of children to spend their pocket money (Chiarella, 2009).

However, it is undeniable that children are included in the vulnerable group category who needs protection. Vulnerability is meaningful as a state or condition that is weak or less able to survive to live a reasonable life. Vulnerability can also be a condition relative to the individual, causing total helplessness. Children are among those who are vulnerable, among others, due to illness or malnutrition, do not receive social protection and education so they are forced to live in more severe conditions than other individuals. Abandoned children, children victims of war, children suffering from dangerous severe diseases and children living with disabilities, can also be categorized as vulnerable children (Arora et al., 2015). As a consumer, a child's vulnerability can be caused by consumption behavior towards the products he needs. When an individual is unable to control his consumption behavior (which is also caused by the actions of business actors) then dependence is created on factors outside of himself with the aim of adjusting his position in order to achieve balance to market conditions. This condition is referred to as consumer vulnerability, a situation where consumers are in a powerlessness, caused by imbalances in market interactions, public consumption patterns, marketing promotions and the products produced (Baker et al., 2005).

The influence of the development of the toy industry which produces a variety of products with different levels of quality, makes children as consumers are in a vulnerable condition and have

different needs than adults. Children need a healthy environment for growth and development, play and learning. These needs must be met and become the responsibility of parents and those around them. It is the right of every child to get security, comfort and safety guarantees in their play activities. In this context it must be observed that having the right carries the consequences of obtaining protection to fulfill his rights. The child is part of the citizenry, the rights of the child are basically human rights then the state is obliged to protect the child from everything that endangers him.

Year of 1979, known as the "International Year of the Child", it was the forerunner of the Convention on the Rights of the Child, receiving a positive response from the Indonesian government with the issuance of Law No. 4 of 1979 concerning Child Welfare, which focuses on ensuring the life and livelihood of children so that they can grow up reasonably spiritually, physically and socially and can meet the basic needs of children (*Law No. 4 of 1979 Concerning Child Welfare*, 1979). These guarantees are considered as the rights of the child which are the basic human rights that they should have obtained.

The appreciation of basic human rights was proclaimed internationally with the birth of the Declaration of Human Rights (UDHR) announced by the United Nations General Assembly (UN) on December 10, 1948. UDHR is a general standard for applying respect and recognition of the 30 basic human rights and freedoms universally recognized by the states that ratified it as well as by the nations of the territories that existed under their legal rule (*Universal Declaration of Human Rights*, 1948). The UN seeks to expand the international community's understanding of global human rights standards in the business and economic spheres including consumer rights to protect the basic rights of individuals. with an emphasis on the concepts of prosperity, honor, and individual dignity as the basis for the recognition of consumer rights as human rights (Jagielska & Jagielski, 2012).

The development of world consumer protection showed a bright spot when the United Nations issued UN Resolution No.A/RES/39/248 on April 16, 1985, namely the United Nation Guidelines for Consumer Protection (UNGCP) which affirmed the need for consumer protection and established the interests of consumers as follows (Barkatullah, 2015):

- (1) protection from hazards to the health and safety of consumers;
- (2) economic and social protection of consumers;
- (3) the availability of adequate information;
- (4) the implementation of appropriate training;

- (5) the provision of consumer education;
- (6) efforts to provide effective compensation;
- (7) freedom to form relevant consumer organizations or organizations with the interests of consumer protection.

The implementation of UNGCP has an impact on concern for consumer rights which ultimately brings a positive understanding of the position of children in commercial activities that continue to develop until the concept of consumer classification is formed over three groups, namely (Chiarella, 2009):

- (1) child consumers; the purchase decision relates to adults,
- (2) autonomous consumers; consumers with independent purchasing power,
- (3) as well as potential consumers; the formation of the child's loyalty to a brand.

Indonesia's positive law has not enacted regulations governing the protection of specifically the position and rights of children as consumers. The Law on Consumer Protection regulates the position of legal subjects as consumers in general and has not specialized in regulating children and vulnerable consumers. If the legal protections for adult legal subjects differ from those of legal subjects who are within the age group of children, then each should have an interest that needs to be accommodated. Similarly, in the position of children as consumers, it is necessary to accommodate their interests, weaknesses and different backgrounds from those of adult as legal subjects.

Ronald Dworkin has provided an overview of the presence of laws and regulations that ensure justice and legal certainty should make it easier for the people to take their rights as they should. Any legally conscious individual will be able to place his (legal) rights in earnest, according to Dworkin, it is a very fundamental first step to affirm equity before the law as is his opinion that anyone who is earnest in looking at legal rights should accept important ideas related to rights, namely first with regard to human dignity and the second is the idea of political equality – meaning that a group of people should accept an important idea related to rights, namely first with regard to human dignity and the second is the idea of political equality – meaning that a group of people should accept an important idea related to rights, namely first with regard to human dignity and the second is the idea of political equality – meaning that a group of people should accept an important idea related to rights, namely first with regard to human dignity and the second is the idea of political equality – meaning that a group of people having legal freedom to determine a decision that results in the general good then other individuals must also

have the same legal freedom to determine their attitude (Dworkin, 1978).

The law is expected to be able to bridge individual values and at the same time group values that accommodate the individual's values. This is the concept of justice as a common good, which can be implemented in view of the rights of children as consumers. The rights of the child as an individual eventually developed and it required its arrangement in the position of the child as a consumer of toys. Ideally, the law is seen as not just using the provisions of laws and regulations. Law enforcement is not only limited to the success of enforcing laws and regulations but must also pay attention to how the law works in the realities that exist in society and can be a solution to things needed by the community.

Children as consumers, naturally the number of the population will always increase. The ability of children to convince and influence their families and environment to follow their desired consumption patterns is a potential market that cannot be ignored by business actors/marketers. However, in economic activity, marketing strategies aimed at achieving the greatest profit often do not take into account the interests of consumers, thus clarifying the inequality of position between consumers and business actors. This is what makes the position of the consumer quite complicated. Because not all individuals have the awareness, courage and willingness to realize the rights as consumers.

III. UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS AS AN INITIAL PERSPECTIVE FOR THE PROTECTION OF CHILDREN'S RIGHTS AS CONSUMERS

A human being in his interaction with other legal subjects to the life of society and state, has rights and obligations attached to him from birth. These rights and obligations are natural and universal, known as human rights. Indonesia applies the principles of human rights in Law No. 39 of 1999 concerning Human Rights which stipulates the need for protection mentioned in Articles 52, 64, 71 and 74. Overall, the implementation of protection is the responsibility of the government (Article 71) which includes implemented measures in the fields of law, politics, economy, social, culture, defense of state security, and others (*Law No. 39 of 1999 Concerning Human Rights*, 1999). The implementation of UDHR as a milestone in the protection of human rights requires countries that ratify it to be held accountable for human rights violations in their countries. The UN adopted nine international treaties that follow up on the UDHR (UNICEF, n.d.), pointing out the bright spots of broader human rights protections in the international world.

However, business development and world economic activity experience dynamics that are

often contrary to human rights principles. Corporate-related issues colored by human rights violations began to be rife in the 1990s, influenced by the wave of expansion of transnational companies (Business Leaders Initiative on Human Rights et al., 2006). John Kenneth Galbraith in his study entitled "The Culture of Contentment" found that the internationalization of capital and production and free trade as a form of globalization will cause economic and political empowerment (empowerment) for upper-class economic actors at the expense of marginalized groups (the underclass).

T. Pogge stated that the coercion of the global economic order causes millions of people to die every year, mostly due to poverty. This shows injustice in the implementation of the economic order, and rich countries should take anticipatory steps to reduce economic inequality that causes severe poverty in other poor countries (Pogge, 2005). The phenomenon of globalization finally has an impact on the development of the world economy, which is mostly dominated by the capitalist system. It is inevitable that the urgency of the poor and the unable to compete in the implementation of the global economic order is inevitable. To survive, inevitably you have to follow the pattern of countries that have market power, or alternatively, look for adaptation systems outside the global economic order.

Pogge's opinion above corroborates the opinion of George Soros in his research "The Crisis of Global Capitalism" stating that free market forces if given full authority in the economy and finance will cause chaos because it overrides justice, ethics and morals. It was in this context that Prof. J.G Ruggie formulated a framework of thought on the business world and the protection of human rights known as the United Nations Guiding Principles on Business and Human Rights. These UN Guiding Principles on Business and Human Rights were presented by Prof. Ruggie to the Human Rights Council in June 2011. This principle is a business implementation guideline that aims to ensure that business practices in the international world are carried out with human rights principles. The business world is urged not only to pursue profit alone, but must be in line with efforts to protect the human rights of legal subjects as well. Indonesia adopts the principles of Business and Human Rights in Indonesia's positive law in Presidential Regulation No. 53 of 2021 concerning the Draft National Action on Human Rights for 2021-2025.

The issue of child protection in the early 20th century was actually becomes a concern. Industrialized countries do not have standards of protection for children in the business world. Children are forced to work alongside adults in conditions of injustice, unsafe and unhealthy environment for the development of the child. Indeed, the human rights of children are impliedly contained in Article 1 of the UDHR which states: every human being has the same human rights.

Therefore, since birth the child has had basic rights (child rights) which are part of human rights that must be protected and universally applicable. Article 25 of the UDHR also states: 'giving rights to mothers and children regarding 'special care and assistance' and 'social protection'. This is an international commitment to provide education and protection for all children.

As a follow-up to efforts to protect the rights of the child, an agreement was held that guarantees the rights of the child, namely the International Convention on the Rights of the Child, containing general principles of protection of children's rights in the civil, political, economic, social, health, and cultural fields, namely the United Nations Convention on the Rights of the Child (UNCRC). The UNCRC produced 4 general principles of child protection, namely the principle of non-discrimination, the principle of best interests for the child, the principle of life, survival and development, and the principle of respect for the opinion of the child. Furthermore, in the International Special Session for Children in 2002, the United Nations committed to establishing the concept of A World Fit for Children which aims to make the international world a safe and best place so that every child gets national and global priorities for access to quality basic education and opportunities to develop potential physically, psychologically, spiritually, socially, emotionally, cognitively and culturally.

As a follow-up to the protection of children's rights in the business world – Unicef, Save the Children and the United Nations Global Compact in 2012 jointly established the Children's Rights and Business Principles, a comprehensive set of guidelines for corporate policies and their implementation aimed at supporting children's rights. This guideline contains 10 points as follows:

- 1) Respect the rights of the child and commit to supporting the human rights of the child.
- 2) Efforts to eliminate child labor in all activities and business relationships.
- 3) Providing decent work for young workers, parents and caregivers.
- 4) Ensuring the protection and safety of children in business activities and facilities
- 5) Ensure the safety of service goods and use them to support children's rights
- 6) Use marketing and advertising that supports children's rights.
- 7) Support children's rights related to land utilisation and environment.
- 8) Respect and support the rights of children in the security order/safety.
- 9) Help protect children affected by emergencies/disasters.

- 10) Strengthen community and government efforts to protect and fulfil children's rights.

These 10 (Ten) Principles of the Rights of the Child and the Business World are constitutes soft laws for business entities, entrepreneurs and the community in anticipation of the adverse impact of the business world on children. This guideline also does not leave the goal of obtaining profits for companies by meeting product security and safety standards, publishing production results, increasing production capacity and human resources, developing training programs and building a solid business community.

Indonesia ratified the UNCRC in Law No. 23 of 2002 on Child Protection (Law on Child Protection) which has been amended to Law No. 35 of 2014. The general provisions of the Law on Child Protection mentioned special protection arrangements for children, including the right of children to protection against trafficking. Consequently ratifying the UNCRC, Indonesia is obliged to strive for the realization of the principles of children's rights into the implementation of state policies. The principles of the Rights of the Child and the Business World by the Indonesian government are further implemented through the Ministry of Women's Empowerment and Child Protection (“KPPPA”) with the cooperation of corporate, government and community partnerships. Its programs include establishing a company's policy of caring for children, providing child-friendly products and regulating Corporate Social Responsibility (CSR) programs for children as the responsibility of the business world.

In the business and trade, children are legally entitled to guarantees of protection and fulfillment of their rights without discrimination. Protection of children in the business world is not only limited to the discussion of children as child laborers / laborers, but also includes guaranteeing the security and safety of children when consuming products produced by producers and their relationship in marketing activities by business actors. As consumers, in addition to avoiding marketing targets alone, children must avoid the dangers of products that are not of high quality and unsafe for children.

IV. DISCUSSION

Indonesia has affirmed and adopted the principles of protecting children's rights from Unicef, Save the Children and the United Nations Global Compact. The three organizations in 2012 established the Children's Rights and Business Principles. The consequence of Indonesia ratifying these international agreements is a commitment to carry out business that is inseparable from the principles of human rights, the principles of children's rights as well as the principles of protecting children as consumers.

From the principles of the Business World and The Children's Rights and Business Principles (The Children's Rights and Business Principles), there are 4 (four) principles that can be applied to strengthen the rights of children in their position as end consumers, namely:

1. The principle of respecting the rights of the child and committing to support the human rights of the children.
2. The principle of ensuring the safety of service goods and using them to support the rights of the children.
3. Principles of using marketing and advertising that support the rights of the children.
4. The principle of strengthening the efforts of the community and the government to protect and fulfill the rights of the children.

In its implementation, the four principles derived from the Principles of the Business and the Rights of the Child (The Children's Rights and Business Principles) relating to the rights of the child in the UUPA and consumer rights in the Law on Consumer Protection, are presented as follows:

Table No. 2

Comparison And Interrelationship Of The 4 Principles Of The Business Guidelines and The Children's Rights and Business Principles With the Rights of Children as Consumers under Consumer Protection Law

Principles Of The Business And The Rights Of The Children	Rights of the Child as a Consumer Under Consumer Protection Law	Children's Rights Under Children Protection Law
Respects children's rights and is committed to supporting children's human rights.	The right to receive coaching and consumer education. The right to be treated or served properly and honestly and non-discriminative	Article 4: The right to live, grow, develop, and participate reasonably Article 9: The right to education and learning
Guarantee the safety of	The right to comfort, security, and	Article 10:

goods and services and use them to support the rights of the children.	<p>safety in consuming goods and / or services.</p> <p>The right to be heard for their opinions and complaints on the goods and / or services used.</p>	The right to express an opinion & be heard
Use marketing and advertising that supports children's rights.	<p>The right to true, clear and honest information regarding the conditions and guarantees of goods and services.</p> <p>The right to choose goods and /or services and obtain goods and / or services according to the exchange rate and the conditions and guarantees as promised.</p>	<p>Article 13 :</p> <p>Children's rights are protected against discrimination, and exploitation.</p>
Strengthen community and government efforts to protect and fulfill children's rights.	<p>The right to get compensation and / or replacement, if the goods and / or services received are not in accordance with the agreement.</p> <p>The right to advocacy, protection, and efforts to resolve consumer protection disputes appropriately</p>	

The above-mentioned comparison shows that children have human rights, which are reflected in their rights as consumers, also have a correlation with the 4 principles of the Children's Rights and Business Principles. When the Indonesian government has ratified these universally accepted principles, it should be in government institutions that have a focus on protecting and fulfilling children's rights, as well as having special responsibilities and laws and regulations that regulate the position of children as consumers, including the position of children as end consumers of toys.

Even in positive law in Indonesia, a child's legal actions must still be represented by an adult because the child has not yet reached the position of being able to act before the law. The products consumed by children also have more specific and different characteristics than products consumed by adult legal subjects so that children have their own market potential that

can be utilized by producers and business actors. So it is necessary to be aware that children have conditions that are more vulnerable than adult consumers so that they need special arrangements.

In law enforcement, consumer complaints related to children's toy products in the last ten years have not been found in Yayasan Lembaga Konsumen Indonesia (YLKI), some Badan Penyelesaian Sengketa Konsumen (BPSK) and Badan Perlindungan Konsumen Nasional (BPKN). There have also been no lawsuits regarding the fulfillment of children's rights as toy consumers. Very minimal – even in the last five years there have been no cases of toy consumer lawsuits going to the path of litigation (court) and non-litigation (mediation, arbitration) both in the form of civil claims for losses and criminal charges caused by casualties.

In addition, there is another issue related to children's toys, the circulation of imported toys as industrial products which are international trade commodities requires the consistent implementation of the Agreement on Technical Barriers to Trade to ensure that all regulations related to product standards, testing processes and technical certification procedures do not become obstacles to trade. The implementation of the Agreement on Technical Barriers to Trade strongly supports the protection of consumers from unqualified products.

Each country has direct access and authority to be able to measure the extent to which society needs a certain level of security and order in its power. In principle, the state has stronger authority and is able to accommodate better with the policies produced for the welfare of its people. If people have a feeling of being protected, it will affect public morale in looking at a problem and thinking about the best solution with the support of the state.

V. CONCLUSION

Children are a potential market for business actors, so children as toy consumers need to be clarified and protected, including the right to information, the right to comfort, the right to security and safety of children for the use of toy products. In principle, Indonesia already has legal norms that regulate the rights of children as stated in the Law of Children Protection. Meanwhile, the legal norms governing consumer rights have been regulated in the Law of Consumer Protection - where protection of consumer rights in the UUPK is generally applied to adult consumers.

Considering that children still have limitations physically, mentally, economically and socially, thus placing them in the vulnerable consumer group, children need special legal protection. In this case, it is very necessary to socialize the strengthening of children's rights as consumers by adding legal norms that can be stated in the Law of Children Protection and Law of Consumer

Protection and toy safety laws and regulations (Mandatory SNI Toys regulation). Law on Consumer Protection does not yet have regulations regarding vulnerable consumers which include the position of children as consumers. Meanwhile, legal norms in the protection of the rights of children as consumers can be seen as originating from the principles of the United Nations Guiding Principles on Business and Human Rights which UNICEF followed up in The Children Rights And Business Principle to anticipate the adverse impact of the business world on children's rights. The existence of more certain legal norms in Law of Children Protection and Law Of Consumer Protection and other laws and regulations will increase better law enforcement efforts.

Measures to protect the rights of children as consumers can also be carried out with the synergy and support of the government and state institutions (for example by the establishment of a special commission) which has responsibility for the protection of children's rights in Indonesia, which can act as a center for information and advocacy for the community if there are unqualified products that endanger the security and safety of children as consumers. This special institution can also act as an advocacy institution if there are violations of the rights of children as consumers. It is hoped that the synergy of various government agencies and the formation of relevant regulations can realize efforts to protect the rights of children as consumers better in the future.

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