Legal and Human Rights Analysis of the Alleged Distribution of Illegal Cosmetics by PT Eudora Global Indonesia in Batam

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Abstract
This scientific article analyzes alleged legal violations by a company in Indonesia in the case of PT Eudora Global Indonesia/Eudora Skincare Batam by examining consumer protection, occupational safety, cosmetic supervision, and business practices related to human rights as interconnected issues. The problem identified in this study is the relationship between international instruments such as the SDGs, UNGPs, UNGC, ESG, and corporate sustainability, and national legal instruments, as part of the company's accountability for the alleged distribution of cosmetic products without BPOM authorization, manipulation of expiration dates, and product information whose validity cannot be verified. This article finds that national law imposes binding obligations through the Consumer Protection Law, the Health Law, BPOM regulations, and labor/occupational safety provisions, while international instruments function only as normative standards in assessing aspects of health, human rights, governance, business integrity, and sustainability. Therefore, the case of PT Eudora Global Indonesia/Eudora Skincare Batam is not merely about sectoral administrative/criminal violations but also reflects a failure of corporate management and due diligence to prevent negative impacts on consumers and workers.

Keywords: consumer protection; cosmetics; BPOM; UNGPs; ESG; corporate sustainability.

Introduction

Eudora International Group operates in the wellness and fitness service industry and organizes beauty clinics in Singapore, Brunei Darussalam, and Indonesia. Based on job vacancy information on the Glints platform, Eudora International Group is a company consisting of 51–200 employees and oversees various beauty clinic locations in Jakarta, Medan, and Batam. In Batam City, Eudora International Group has 3 operational locations: Ruko Mahkota Raya Batam Center, Grand Batam Mall, and Batam City Square Mall. Local news coverage mentions the relevance of these locations, stating that EAC has 3 branches in Batam and faces alleged violations regarding distribution licenses and product labeling.

On May 1, 2026, two former employees reported the company to the Directorate of Special Criminal Investigation (Ditreskrimsus) of the Riau Islands Regional Police (Polda Kepri), alleging the falsification of BPOM license numbers, violations of distribution permits, and manipulation of product expiration dates. One of the two former employees had previously been ordered to erase expiration dates using acetone in a closed room and was then asked to replace them with new dates. Other similar news reports stated claims that some products lacked BPOM authorization and that expiration dates had been altered, including sunscreen, facewash, serum, toner, and creams that had already been distributed to various customers in Batam City. The informants' legal counsel stated that the filed report encompassed alleged document forgery, fraud, and violations of consumer protection, health, and trade regulations.

The news also highlighted labor-related violations, specifically the orders to erase and replace expiration dates, as well as the denial of a bonus worth Rp1,000,000, which was provided in the form of products of equivalent value rather than cash. Up until the news circulated, the company had not issued an official public rebuttal, and the regional police are still conducting further investigations. The case involving EAC has caused significant material impact through the purchase cost of products whose realized benefits do not match what was promised, medical expenses incurred to treat potential side effects, and immaterial impacts, as victims potentially face physical suffering in the form of skin damage and psychological effects such as a loss of self-confidence. This case underscores the urgency of cosmetic supervision, consumer protection, and sustainable corporate management.

Based on this background, the legal issues examined in this study are not designed merely as regional legal violations, but to address the relationship between national and international law, particularly concerning business, human rights, and consumer protection. First, how do Indonesian national legal instruments intersect with international instruments such as the SDGs, UNGPs, UNGC, ESG, and corporate sustainability regarding consumer protection, health, supervision, and corporate responsibility? Second, how should PT Eudora Global Indonesia/Eudora Skincare be held legally accountable for the alleged distribution of cosmetics without BPOM legality, the use of hazardous chemicals, invalid information, and misleading promotional claims, and how is this conduct analyzed through the principles of international instruments?

This study positions itself within existing scholarship on business and human rights by integrating national legal instruments—the Consumer Protection Law, the Health Law, BPOM regulations, and labor/occupational safety provisions—with international normative frameworks such as the UNGPs, SDGs, UNGC, ESG, and corporate sustainability. The novelty of this research lies in treating the alleged Eudora case not merely as a sectoral administrative or criminal matter, but as a comprehensive business and human rights issue reflecting a failure of corporate management and due diligence. This article aims to analyze the interconnection between national and international legal instruments in this case and to formulate accountability mechanisms and recommendations for consumer protection, occupational safety, and sustainable corporate governance.

Research Method

This study employs a normative (doctrinal) legal research method with a qualitative descriptive-analytical approach. The research design combines a statutory approach, examining national legal instruments such as the 1945 Constitution, the Consumer Protection Law, the Health Law, BPOM regulations, and labor/occupational safety legislation, with a conceptual approach drawing on international business and human rights instruments, namely the UNGPs, the SDGs, the UN Global Compact, ESG principles, and the concept of corporate sustainability. The object of the study is the alleged case of distribution of illegal cosmetics by PT Eudora Global Indonesia/Eudora Skincare Batam.

The data used in this research are secondary data obtained through document analysis of laws and regulations, official institutional publications, and credible online news reports concerning the Eudora case, supplemented by company information available on public platforms such as LinkedIn and Glints. Data collection was carried out through library research and online tracing of legal documents and news coverage, which were then verified for consistency across sources to ensure the reliability of the chronology and factual basis of the case.

The data analysis technique applied is qualitative legal reasoning through the statutory and conceptual approaches, in which the facts of the case are systematically confronted with the relevant national legal provisions and international normative instruments. This analytical process is conducted to identify the interconnection between national and international legal obligations and to derive legal and non-legal recommendations relevant to consumer protection, occupational safety, and corporate accountability.

Results and Discussions

National and International Legal Framework

The 1945 Constitution states through Article 27 paragraph (2) the guarantee of the right to work and a decent living, and through Article 28H paragraph (1) the guarantee of the right to live in physical and spiritual prosperity and to obtain proper healthcare

services. Both articles prioritize workers and consumers as part of fundamental citizenship rights. Furthermore, Law Number 8 of 1999 concerning Consumer Protection (UUPK) regulates various consumer rights to comfort, security, and safety in consuming goods and services; the right to absolute truth, clarity, and honesty regarding information; the right to be heard; and the right to compensation if the goods/services received are not appropriate. From the company's perspective, the UUPK mandates good faith through providing valid information and treating consumers honestly. The UUPK also prohibits businesses from trading goods/services that do not meet standards, do not match labels, have falsified expiration dates, or contain other label discrepancies.

Law Number 17 of 2023 concerning Health states that cosmetics, as pharmaceutical preparations, have a legal basis for supervision, safety, quality, and health product benefits. Several specific provisions by BPOM emphasize that the manufacturing and distribution process of cosmetic goods must undergo administrative supervision, encompassing distribution, administrative documentation, labelling, marking, marketing, and advertising. Law Number 13 of 2003 concerning Labor regulates workers' rights to occupational safety and health, moral and social well-being, and treatment in accordance with human dignity. Law Number 1 of 1970 concerning Occupational Safety obligates entrepreneurs to ensure a safe working environment free from chemical hazards or other processes that could impair the health and psychological well-being of workers.

Government Regulation (PP) Number 35 of 2021 structures the rules for employment relationships, working hours, rest periods, and termination of employment (PHK) as workers' rights, while PP Number 36 of 2021 regulates Wages and Salaries, which have undergone amendments, wage protection, payment methods, and components factored in for workers. Excluding administrative and civil norms, the alleged falsification of legal permit numbers, alteration of expiration dates as a data manipulation measure, or invalid information on labels directly intersect with criminal norms—specifically within the UUPK, the Health Law, and the Criminal Code (KUHP) enforced since January 2, 2026. Although this requires complex proof regarding elements of action, fault, causal relationships, and corporate liability by authorized officials.

At the international level, the UNGPs serve as the global standard for protecting business and human rights through three pillars: the state's duty to protect human rights, the corporate responsibility to respect human rights, and the right to access remedy for human rights victims. The UNGPs apply internationally across all countries and all companies, regardless of size, sector, location, ownership, or structure. Companies become responsible through policy commitments, human rights due diligence, integrating findings and addressing them internally, tracking the effectiveness of actions, communicating with all stakeholders, and providing remediation when validated to have contributed to negative impacts.

The SDGs present a sustainable development context which, when applied to this case, contributes directly to SDG 3 (Good Health and Well-being), SDG 8 (Decent Work and Economic Growth), SDG 12 (Responsible Consumption and Production), and SDG 16 (Peace, Justice, and Strong Institutions). The UN Global Compact operationalizes the UNGPs in handling human rights through 10 core principles, including respecting and

supporting human rights, preventing complicity in human rights abuses, upholding labor principles and workers' rights, environmental responsibility, and anti-corruption efforts. In terms of ESG, the EAC case falls within the social aspect (consumer and worker safety), Governance (licensing, valid labels, internal oversight, and anti-manipulation controls), and Environmental (managing expired products and chemicals, specifically acetone).

Analysis of Legal Issue 1: Conflict with National Law

a. Consumer Protection and Cosmetic Safety

If the cosmetic products are proven to lack BPOM legality, use forged permit numbers, and have erased or replaced expiration dates, this potentially violates consumer rights and the right to truthful information. Label information on cosmetic products is not mere data; it is an instrument for user safety. If manipulated, the consumer's rational risk assessment is lost. The UUPK explicitly prohibits companies from trading goods/services that do not match label information, as such violations constitute administrative and consumer protection breaches, rendering the product quality unsafe. This is particularly critical for cosmetic and beauty products, as skin exposure can cause various irritations, allergies, infections, and other health detriments, especially for products with active ingredients and sensitive compounds. Consequently, BPOM only allows cosmetics that guarantee safety, quality, benefits, clear notification/distribution licenses, and valid label markings. Therefore, violations ranging from invalid permit numbers to altered expiration info directly contradict the cosmetics regulatory regime, which can lead to administrative sanctions such as warnings, product recalls, business closures, and other sectoral civil or criminal penalties if the necessary legal elements are met.

b. Business Operator Liability and Consumer Remedy

If consumers have purchased and used products that do not comply with regulations, the company is obligated to take responsibility and provide compensation of equivalent value in accordance with the applicable UUPK. Compensation can take the form of refunds, product replacements, medical care, or cash equivalent to the loss experienced by the consumer. The fact that goods/services were sold at an official outlet does not absolve the business of this responsibility; official outlets should reassure consumers that products have undergone proper quality control and legal verification. Remedy can be implemented through various mechanisms such as complaint channels, valid numbering, public notices, refunds, guaranteeing the legality of information and product ingredients through BPOM, and medical assistance for affected consumers to minimize the risk of recurring incidents that harm consumers.

c. Labor and Occupational Safety

From the labor and occupational safety side, this is highlighted by reports from former employees who were instructed to erase expiration dates using acetone in a closed room. In this regard, the company faces not only consumer-related risks from product usage, but also worker-related risks regarding their rights to safety and comfort without being forced to perform illegal acts, mislead consumers, and endanger themselves. The Labor Law and Occupational Safety Law require companies to provide OHS (K3)

protection, as using acetone in a closed room without proper standard operating procedures can cause risks of irritation, inhalation, and fire hazards for workers; thus, these SOP instructions must be inspected and monitored as potential OHS violations. News reports also mentioned that a bonus worth Rp1,000,000 could not be cashed out and had to be taken in the form of products of similar value. Legally, it must be identified whether this bonus constitutes a voluntary incentive, a sales incentive, or a contractually promised performance-based reward component.

d. Corporate Liability and Evidentiary Proof

If the acts of manipulation were carried out by the company through orders, policies, and poor corporate management, the analysis cannot stop at ground-level workers. In a business context, workers are often in a subordinate position; therefore, authorized bodies like law enforcement, BPOM, and labor inspectors must structurally trace the chain of command. This deeper context must investigate who ordered, knew about, supplied, labeled, and approved the sales, and how the company economically profited. However, criminal charges cannot yet be finalized as strong evidence is still pending during the initial investigation, necessitating inspections, sample testing, temporary seals, and temporary product recalls.

Analysis of Legal Issue 2: Interconnection with International Instruments

a. UNGPs: State Duty to Protect Human Rights

The UNGPs state that protecting individuals against human rights abuses by third parties is a state obligation carried out through legal policies, intensive investigations, internal oversight, and effective adjudication. The state has a duty to protect through BPOM in the oversight process, the police tasked with investigating alleged criminal acts, the Labor Department inspecting working conditions and corporate environments, and the Consumer Dispute Resolution Board (BPSK) or courts in consumer dispute resolution. Thus, it can be concluded that the state must not merely receive reports but act swiftly and coordinate across agencies to safeguard consumer and worker risks.

b. UNGPs: Corporate Responsibility to Respect Human Rights

According to the UNGPs, corporate responsibility is independent, meaning companies must respect human rights even if a state's law enforcement is not maximized. If goods/services are sold without permits and labels are manipulated, the company fails to exercise human rights due diligence to prevent consumer and worker risks. Under the UNGPs framework, this is assessed across 4 main components: (1) Ineffective policy commitments. (2) Human rights risks are poorly mapped, especially within the supply and sales chain. (3) Internal reporting mechanisms are unsafe for workers. (4) No clear guarantee of health remedies for consumers.

c. UNGPs: Access to Remedy

Access to remedy, particularly for affected victims (consumers and workers), must facilitate grievances, information retrieval, and solutions. If the company remains silent, it contradicts UNGPs principles where remedies must be effective through accessibility, transparency, evidence-based practices, and non-intimidation. Remediation is not limited

to product replacement; it includes refunds, health services, and medical coverage for consumers, and for workers, it entails protecting labor rights, restoring wages/bonuses, health check-ups, and other insurance guarantees.

d. SDGs: Health, Institutions, and Partnerships

- SDG 3: The actions in this case contradict the goal of protecting public health and well-being, as products failing safety standards carry risks of dangerous chemical side effects that can affect consumer health from mild to serious irritation, running counter to the sustainable development agenda in health.
- SDG 16: This reflects a breakdown of trust in the law and public confidence due to minimal corporate and government oversight systems, impacting public perception of BPOM's performance and reducing trust in law enforcement in Indonesia.
- SDG 17: Coordination among the company, government, law enforcement, and BPOM is still not linear or operating optimally; thus, oversight mechanisms, coordination, and partnerships must be strengthened as a form of corporate compliance with prevailing regulations and laws.

e. UNGC: Human Rights and Business Integrity

Principles 1 and 2 of the UNGC are violated in the Eudora clinic case through the distribution of hazardous cosmetics and the forgery of documents/product labels, infringing on consumers' rights to safety and product utility. Based on Principle 10 of the UNGC, while falsifying expiration dates is not directly a corrupt act in the conventional or traditional sense, it is a form of fraud that stands completely opposed to the company's vision and mission.

f. ESG: Consumer Safety, Environmental Compliance, and Governance

Environmental: Products that bypass BPOM legality and undergo information forgery indicate a weakness in environmental management; because the products do not meet standards, they may contain chemicals whose environmental impacts have not been scientifically tested, creating unmonitored waste. Social: The company has failed because it prioritized short-term profit maximization at the expense of consumer loyalty and trust. Under ESG, it will be evaluated negatively across indicators of product safety, consumer protection, and business ethics. Governance: This case reflects inadequate internal control governance as part of legal compliance. A conscious management decision to falsify product information indicates serious deficiencies in corporate governance and a lack of oversight and control.

g. Corporate Sustainability: Compliance, Stakeholder Value, and Long-Term Risk

In terms of corporate sustainability, this company has failed to meet standards of integrity and legal compliance, as legal compliance is the baseline standard a business must possess to be a sustainable corporation. A sustainable company intrinsically generates value for consumers, society, and the environment not just for shareholders meaning the company cannot be judged as solely aiming to maximize profit without considering benefits and contributions to other stakeholders. This case highlights minimal corporate governance and internal oversight, particularly in managing sustainability risks.

Conclusion

The case of PT Eudora Global Indonesia/Eudora Skincare Batam demonstrates a national and international interconnection regarding consumer protection, meaning it should not be viewed strictly through formal law enforcement but through business and human rights accountability. Several previously discussed regulations, such as the UUPK, Health Law, BPOM Regulations, Labor Law, and OHS (K3) indicate that clear, binding legal obligations are required for business operators as a form of compliance. On the other side, the SDGs, UNGPs, UNGC, ESG, and corporate sustainability serve normatively in assessing corporate responsibility across priority aspects like health, human rights, business integrity, business management, and sustainability principles.

If the various allegations—ranging from falsifying BPOM permit numbers, altering expiration dates, labeling invalid information, to distributing cosmetics that bypassed proper quality control—are proven, these actions potentially violate consumer and worker rights to safety, comfort, and security. This necessitates administrative and analytical accountability by the BPOM oversight agency, civil compensation for consumer rights, and criminal prosecution if legal elements are fulfilled. Furthermore, allegations regarding pressure-based work instructions also constitute labor and OHS violations that must be examined further.

From a business and human rights perspective, this case highlights weak business integrity, a lack of legal compliance, poor internal control and oversight, and minimal consumer protection and risk management. Consequently, this matter is not merely an administrative infraction but a comprehensive business and human rights issue involving consumer protection, worker safety, corporate governance, and business sustainability. Future research is recommended to examine the outcomes of the ongoing investigation by Polda Kepri and BPOM, and to explore comparative enforcement practices in other ASEAN jurisdictions facing similar cosmetic governance challenges. This case must continue to be monitored while awaiting the evidentiary process by the competent authorities under the presumption of innocence.

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Competing Interest

During the preparation of this manuscript, the author(s) used **Claude AI** to assist with **grammar checking and language translation**. Following this process, the author(s) critically reviewed, edited, and validated the output to ensure accuracy, relevance, and scientific integrity in accordance with the objectives of this research. The author(s) take full responsibility and accountability for the final content of this manuscript. The use of artificial intelligence was limited to a supportive role in language correction and translation, and did not extend to authorship, original data analysis, or interpretation of research findings. All data collection, analysis, and interpretation presented in this study were conducted entirely by the author(s) without AI involvement, ensuring that the originality and validity of the research remain fully attributable to the human author(s).