



# CORRUPTION ERADICATION IN INDONESIA'S FREE NUTRITIOUS MEALS (MBG) PROGRAMME: RISK MAPPING AND AN INTEGRITY FRAMEWORK



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## Abstract

This study examines the eradication of corruption within the Free Nutritious Meals (Makan Bergizi Gratis, MBG) programme launched as one of the national government's flagship social policies, and asks how Indonesia's anti-corruption architecture can be adapted to protect a large-scale, decentralised food-procurement scheme from systemic leakage. Employing a normative-juridical method supported by a qualitative case study and documentary analysis of statutory instruments, audit findings, and secondary literature, the research maps the typical corruption vulnerabilities of mass feeding programmes and evaluates the adequacy of existing preventive and repressive mechanisms. The findings indicate that the principal risks are concentrated in vendor selection, price mark-ups, quantity and quality manipulation, and weak beneficiary verification, and that these risks are amplified by the programme's speed of roll-out, its multi-tier disbursement chain, and fragmented oversight. The study concludes that a hybrid strategy combining digital procurement transparency, real-time beneficiary data, strengthened inter-agency coordination, and a recovery-oriented enforcement posture offers the most realistic path to safeguarding public funds without paralysing programme delivery. Its academic contribution lies in extending the doctrine of state financial loss and procurement integrity to a novel welfare context and in proposing an integrity framework that reconciles rapid social-policy implementation with the constitutional imperative of corruption eradication.

## Abstrak

Penelitian ini mengkaji pemberantasan korupsi dalam program Makan Bergizi Gratis (MBG) yang menjadi salah satu kebijakan sosial unggulan pemerintah, serta mempertanyakan bagaimana arsitektur antikorupsi Indonesia dapat diadaptasi untuk melindungi skema pengadaan pangan berskala besar dan terdesentralisasi dari kebocoran sistemik. Dengan menggunakan metode yuridis-normatif yang didukung studi kasus kualitatif dan analisis dokumen terhadap instrumen peraturan, temuan audit, dan literatur sekunder, penelitian ini memetakan kerentanan korupsi khas program pemberian makan massal dan mengevaluasi kecukupan mekanisme pencegahan dan penindakan yang ada. Temuan menunjukkan bahwa risiko utama terkonsentrasi pada pemilihan penyedia, mark-up harga, manipulasi kuantitas dan kualitas, serta lemahnya verifikasi penerima manfaat, dan bahwa risiko tersebut diperbesar



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*oleh kecepatan penggelaran program, rantai penyaluran berjenjang, dan pengawasan yang terfragmentasi. Penelitian menyimpulkan bahwa strategi hibrida yang memadukan transparansi pengadaan digital, data penerima manfaat secara real-time, penguatan koordinasi antarlembaga, dan orientasi penindakan pada pemulihan kerugian negara menawarkan jalan paling realistis untuk mengamankan keuangan publik tanpa melumpuhkan pelaksanaan program. Kontribusi akademiknya terletak pada perluasan doktrin kerugian keuangan negara dan integritas pengadaan ke konteks kesejahteraan yang baru serta pada usulan kerangka integritas yang mendamaikan implementasi kebijakan sosial yang cepat dengan imperatif konstitusional pemberantasan korupsi.*

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## INTRODUCTION

The Free Nutritious Meals (Makan Bergizi Gratis, MBG) programme is one of the most ambitious welfare undertakings in Indonesian history, targeting tens of millions of schoolchildren, pregnant women, and toddlers across the archipelago with a daily state-funded meal. A programme of this magnitude mobilises an enormous and continuous flow of public money through thousands of local kitchens, suppliers, and distribution points, touching the everyday lives of citizens in a way few policies ever do. Precisely because the sums are vast, the procurement cycle is rapid, and the delivery chain is fragmented across regions with uneven administrative capacity, the programme becomes an attractive target for rent-seeking and misappropriation. Comparative scholarship has long observed that systemic corruption flourishes where discretion is high, monitoring is weak, and accountability is diffuse (Persson, Rothstein, & Teorell, 2019), and each of these conditions is present in a nationwide feeding scheme. The social stakes are equally high: leakage in MBG does not merely waste money but directly diminishes the nutritional intake of vulnerable children, converting a corruption problem into a public-health and human-development problem. Weak transparency in public expenditure has repeatedly been shown to enable the diversion of funds intended for vulnerable populations (Rahmatian, 2021), and the rule-of-law challenges that accompany rapid state action in Southeast Asia make such settings especially precarious (Crouch, 2020). It is therefore both urgent and important to examine how the instruments of corruption eradication can be brought to bear on this programme before patterns of leakage become entrenched (Rose-Ackerman, 2018).

Although a substantial body of Indonesian and international literature addresses corruption in public procurement and in the disbursement of social assistance, that literature has not yet caught up with the specific architecture of a mass nutritious-meal programme. Existing studies tend to analyse either the institutional independence of anti-corruption agencies (Mochtar, 2019) or the doctrinal contours

of state financial loss (Hamzah & Nurdin, 2020), while comparatively little work integrates these strands to address a welfare scheme whose defining features are speed, scale, and decentralisation. The international empirical literature on corruption in developing countries more broadly has developed rigorous field-based methods for measuring leakage in public spending (Olken & Pande, 2012), but this body of work has not yet been brought into conversation with the doctrinal Indonesian scholarship on state financial loss, a gap the comparative evidence introduced in the Result section below begins to close. Research on social-assistance accountability has documented recurrent weaknesses in beneficiary targeting and reporting (Fenwick & Lindsey, 2021), and work on e-procurement has shown that digital catalogues can reduce discretion in vendor selection (Aminah & Roikan, 2021), yet these findings have rarely been synthesised into an integrity framework tailored to food procurement. The gap is not merely descriptive but conceptual: the doctrine of state financial loss, developed largely in the context of infrastructure and budgetary corruption, has not been systematically applied to a programme in which loss can take the subtle form of substituting cheaper ingredients or inflating headcounts. This study positions itself in that gap, treating MBG as a distinctive object of anti-corruption analysis rather than as one more instance of generic procurement risk (Nurdin & Suhariyanto, 2021).

An evaluation of previous scholarship reveals both its achievements and its limits, and clarifies why a fresh study is warranted. The reformist literature that followed the weakening of the Corruption Eradication Commission has rightly stressed the erosion of institutional independence and the political headwinds facing enforcement (Butt, 2019), and constitutional analyses have underscored that corruption eradication remains a foundational commitment of the Indonesian legal order (Mahfud & Zoelva, 2020). Doctrinal work on abuse of power and criminal liability has refined the elements by which misconduct is proven (Hiariej, 2019), while comparative governance research has emphasised the decisive role of political will and credible sanction in translating law into practice (Latif & Ali, 2022). These contributions are indispensable, yet they largely predate the MBG programme and therefore cannot speak to its particular vulnerabilities. Moreover, much of the prevention-focused scholarship treats transparency and digitalisation as general goods (Simanjuntak & Nasution, 2022) without specifying how they operate in a perishable-goods supply chain where quality is hard to verify after the fact. By evaluating this body of work critically, the present study identifies a clear opening: to move from general prescriptions toward a context-specific integrity design for large-scale feeding programmes, grounded in both preventive and repressive logics (Kristiyanto, 2020).

Against this background, the study is guided by three interrelated questions. First, what are the characteristic forms and drivers of corruption risk within the MBG programme, given its scale, speed, and decentralised delivery? Second, to what extent do Indonesia's existing preventive and repressive anti-corruption instruments adequately address those risks, and where do they fall short? Third, what integrity framework can reconcile the political imperative of rapid, wide-reaching programme delivery with the constitutional imperative of safeguarding public funds? The central argument advanced here is that neither a purely repressive posture nor a purely preventive one is sufficient on its own; rather, the programme requires a hybrid strategy in which digital procurement transparency, real-time beneficiary verification, strengthened inter-agency coordination, and recovery-oriented enforcement operate as mutually reinforcing components (Juwana, 2021). This argument rests on the hypothesis that corruption in mass feeding programmes is best understood as a governance problem of aligned incentives rather than merely a problem of individual criminality, and that the law's protective function is maximised when prevention and enforcement are integrated by design (Reksodiputro & Ali, 2020). The sections that follow set out the method, present the findings on risk and institutional adequacy, and develop the proposed framework in detail.

## **METHODS**

This research adopts a normative-juridical approach complemented by a qualitative case study, a combination well suited to a legal problem that is simultaneously doctrinal and institutional. The normative dimension examines the statutory and regulatory framework governing corruption eradication, public procurement, and state financial management as they apply to a nationwide social programme, while the qualitative dimension situates those norms within the concrete operational realities of the MBG delivery chain. Data were collected between January and July 2025 through documentary analysis of primary legal materials, official audit and oversight reports, programme guidelines, and a curated set of secondary sources comprising peer-reviewed journal articles and reputable policy analyses. Primary legal materials include the anti-corruption statutes and their amendments, procurement regulations, and provisions on state financial loss; secondary materials were selected for their direct relevance to procurement integrity, social-assistance accountability, and the doctrine of financial loss (Hamzah & Nurdin, 2020). The selection of sources followed a purposive logic, prioritising materials that illuminate the interaction between preventive and repressive mechanisms rather than either in isolation (Kristiyanto, 2020).

The normative corpus examined includes, at its centre, the programme's own constitutive instrument, Presidential Regulation Number 83 of 2024 concerning the

National Nutrition Agency (Badan Gizi Nasional, BGN), which establishes BGN as the lead implementing authority for MBG and allocates procurement, budgeting, and technical-supervision functions across central and regional service units (Satuan Pelayanan Pemenuhan Gizi, SPPG). This instrument is read alongside the general anti-corruption statute (Law Number 31 of 1999 as amended by Law Number 20 of 2001 concerning the Eradication of Criminal Acts of Corruption) and the government procurement regulation (Presidential Regulation Number 12 of 2021 concerning Government Procurement of Goods/Services), since it is the interaction between the programme-specific allocation of authority under the BGN Regulation and the general procurement and anti-corruption framework, rather than either read alone, that determines where legal responsibility for a given leakage point actually sits.

The materials examined were assembled into a structured corpus to support systematic rather than impressionistic analysis. Legal materials were catalogued by hierarchy and subject so that provisions bearing on selection, pricing, delivery, verification, and reporting could be retrieved and compared, while the audit and oversight documents were organised by the stage of the delivery chain to which their findings related. The secondary literature was screened for relevance and quality, with priority given to studies appearing in reputable, indexed journals addressing procurement integrity, the doctrine of state financial loss, and the accountability of social-assistance schemes (Nurdin & Suhariyanto, 2021). Because the programme is recent, the documentary record was treated as an evolving rather than a closed body of evidence, and the analysis was framed accordingly as a structured assessment of risk rather than a retrospective audit of proven cases (Fenwick & Lindsey, 2021). This design choice is consistent with the study's aim, which is to anticipate and forestall leakage in a novel programme rather than to adjudicate historical wrongdoing, and it shapes the interpretation of the findings presented below (Rose-Ackerman, 2018).

Analytically, the study proceeds in three stages designed to ensure methodological rigour and to permit replication. In the first stage, a systematic content analysis of the legal and regulatory corpus identifies the elements of corruption offences relevant to food procurement, the definition and proof of state financial loss, and the allocation of oversight responsibilities across agencies. In the second stage, a risk-mapping exercise cross-references these legal elements against the operational stages of the MBG chain - budgeting, vendor selection, ingredient procurement, meal preparation, distribution, and beneficiary verification - to locate the points of greatest vulnerability. In the third stage, the study evaluates institutional adequacy by comparing the risks identified with the preventive and repressive capacities of the existing framework, drawing on comparative governance findings regarding the conditions under which anti-corruption instruments succeed or fail

(Persson, Rothstein, & Teorell, 2019). Each stage of the chain was scored on a composite ten-point scale reflecting both the estimated likelihood of manipulation and the severity of its developmental impact, so that the mapping captures not merely where leakage is probable but where it would do the most harm (Latif & Ali, 2022).

Validity is strengthened through triangulation across statutory text, audit evidence, and scholarly analysis, while reliability is supported by an explicit and reproducible coding of risk categories that another researcher could apply to the same corpus and expect comparable results (Juwana, 2021). The composite risk scores are analytical constructs derived from the convergence of these sources rather than measurements of realised loss, and they are presented as such to avoid overstating their precision (Nurdin & Suhariyanto, 2021).

The composite score itself follows a fixed rubric applied independently by three of the authors and reconciled by discussion. Each programme stage was rated on two five-point sub-scales - estimated likelihood of manipulation (1 = well controlled, 5 = highly exposed) and severity of developmental impact if manipulation occurred (1 = negligible, 5 = severe) - and the two sub-scores were summed to produce the ten-point composite reported in Table 1. Initial independent ratings converged within one point on both sub-scales for four of the five stages; the single divergence, on the severity sub-score for quantity and quality manipulation, was resolved through discussion and reference to the nutritional-adequacy standards in the programme's own technical guidelines. This procedure is offered as the basis on which another researcher could apply the same rubric to the same or an updated corpus and expect comparable results, consistent with the reproducibility claim made above.

The analytical framework deliberately integrates doctrinal interpretation with governance theory so that legal conclusions are disciplined by institutional realism, and the resulting risk taxonomy provides the empirical basis for the results reported in the following section (Kristiyanto, 2020). Two limitations of the method should be acknowledged at the outset: first, the recency of the programme means that the evidentiary base is weighted toward regulatory and audit documents rather than adjudicated enforcement outcomes; and second, the national scope of the analysis necessarily abstracts from the considerable variation in administrative capacity across subnational units, a variation whose implications are revisited in the discussion and conclusion (Fenwick & Lindsey, 2021).

## **RESULT AND DISCUSSION**

### ***RESULT***

#### **Forms of Corruption Risk**

The first set of findings concerns the concrete forms in which corruption risk manifests within the MBG programme. The risk mapping reveals five recurrent manifestations. The most significant is vendor and supplier manipulation, in which the selection of caterers or ingredient suppliers is steered toward connected parties through restricted competition or informal understandings, a pattern familiar from the procurement literature (Aminah & Roikan, 2021). This form of risk arises at the very first discretionary juncture of the delivery chain and therefore shapes every stage that follows it: where the pool of eligible caterers is narrowed through opaque pre-qualification, split contracting, or the informal division of territory among favoured providers, competitive pressure on price and quality evaporates and the programme becomes a vehicle for distributing rents rather than nutrition. The comparative evidence indicates that such steering is most acute where selection is conducted manually and locally, without a centralised digital catalogue that records offers and outcomes in an auditable form (Simanjuntak & Nasution, 2022), and the consequence is not merely a single inflated contract but a durable relationship in which the selected vendor faces little incentive to deliver at benchmarked cost or quality, because the threat of replacement is absent. This finding matters for the design of controls, since it implies that intervention at the point of selection yields disproportionate returns: closing the discretion that enables capture at this first node constrains the mark-up, quantity, and reporting risks that would otherwise cascade downstream (Mochtar, 2019).

Price mark-up and quantity-quality manipulation, though analytically distinct, operate as complementary techniques for extracting value once a pliant vendor is in place: mark-up inflates the nominal unit cost of inputs above the prevailing market reference, while quantity and quality manipulation reduces the real resources actually delivered against that inflated invoice, so that the margin is widened from both ends simultaneously (Hamzah & Nurdin, 2020). The perishable character of the goods is decisive here, since neither the true ingredient composition nor the exact number of meals served can be reconstructed from physical evidence after the fact, and the programme must rely on contemporaneous records that are themselves vulnerable to falsification (Simanjuntak & Nasution, 2022); the mapping accordingly assigns these forms the highest composite scores, reflecting both their probability and the severity of their developmental impact, since every diluted or missing meal falls directly on a child whose nutrition the programme exists to protect. Beneficiary-data manipulation and administrative reporting fraud complete the taxonomy. Where recipient lists are maintained in fragmented or non-interoperable systems, the reimbursable base can be expanded through duplicated, fictitious, or out-of-date entries (Fenwick & Lindsey, 2021), and reporting fraud then supplies the documentary cover for the other four

forms, as falsified delivery notes and layered intermediaries render the audit trail opaque and dilute individual responsibility across a chain of actors (Nurdin & Suhariyanto, 2021). The comparative literature associates precisely this diffusion of accountability with the persistence of systemic corruption, because no single participant can be cleanly attributed with the loss (Persson, Rothstein, & Teorell, 2019); the mapping finds these forms strategically pivotal nonetheless, since interoperable beneficiary data and an automated audit trail simultaneously raise detection probability and remove the concealment on which the pricing and quality manipulations depend (Simanjuntak & Nasution, 2022).

### **Structural Drivers**

The second set of findings concerns the factors that drive these manifestations. Three structural drivers stand out and compound one another across the length of the delivery chain. The first is the tension between speed and control: the political imperative to demonstrate rapid, visible delivery compresses the procurement cycle and weakens the deliberative safeguards that ordinarily constrain discretion, so that even well-intentioned administrators approve arrangements they have had little time to test, echoing findings that haste and high discretion are fertile ground for leakage (Rose-Ackerman, 2018). The second is fragmentation of oversight: responsibility for budgeting, procurement, delivery, and audit is dispersed across national and subnational bodies with uneven capacity and imperfect information-sharing, so that a discrepancy visible at one node - an implausible unit price, a suspicious headcount - is rarely cross-checked against the record held at another (Mochtar, 2019). The third is informational opacity in a perishable-goods supply chain, where quality and quantity are hard to verify after consumption and paper records can diverge from physical reality, lowering the base rate of detection for the whole system (Simanjuntak & Nasution, 2022). Governance scholarship suggests that under exactly these conditions - high discretion, diffuse accountability, and low detection - corruption becomes self-sustaining, since the expected penalty falls below the expected gain and honest conduct ceases to be individually rational (Persson, Rothstein, & Teorell, 2019). This diagnosis directs remedial attention toward the structural incentives rather than toward exhortation, a theme developed further below (Latif & Ali, 2022).

### **Policy and Doctrinal Implications**

The third set of findings concerns the transformative implications of these risks for policy and law. If left unaddressed, the identified risks threaten not only fiscal integrity but the developmental purpose of the programme itself, since every rupiah diverted is a nutritional deficit imposed on a child; yet because the risks cluster at identifiable stages, they are amenable to targeted intervention rather than requiring

wholesale redesign (Kristiyanto, 2020). The first implication is that transparency instruments must be matched to the specific vulnerability they address rather than deployed as an undifferentiated slogan. A digital catalogue with open competition addresses vendor selection because that risk is fundamentally about who is allowed to compete and on what recorded terms (Aminah & Roikan, 2021); published unit-cost benchmarks address price mark-up because that risk is about the gap between invoiced and market cost, and a visible reference price makes anomalies immediately legible to any monitor (Simanjuntak & Nasution, 2022); real-time, interoperable beneficiary data address headcount fraud because that risk is about the divergence between claimed and actual recipients (Fenwick & Lindsey, 2021). The mapping thus supports a differentiated rather than a uniform prescription: the same word - transparency - denotes different mechanisms at different nodes, and conflating them produces controls that are simultaneously burdensome and ineffective. This finding is consistent with broader evidence that transparency reduces corruption only when it is targeted and actionable rather than general: Kolstad and Wiig (2009) show that transparency initiatives in resource-rich developing countries frequently fail to reduce corruption precisely because disclosed information is too aggregated or too remote from any actor positioned to act on it, a warning the differentiated design proposed here is intended to heed.

The second implication concerns enforcement. A posture oriented toward the recovery of state financial loss responds more directly to the programme's purpose than punishment alone, because the harm in MBG corruption is ultimately a diversion of resources away from the nutrition of vulnerable beneficiaries, so that restoration of those resources is a partial repair of the developmental injury the offence inflicts (Dewi & Prasetyo, 2022); recovery also strengthens deterrence by attaching a tangible cost to misconduct beyond the uncertain prospect of imprisonment (Hamzah & Nurdin, 2020), and the doctrine of state financial loss extends naturally to this setting once loss is understood to include the subtle forms of substitution and shortfall identified in the mapping rather than only overt diversion (Hiariej, 2019). The third implication concerns the human infrastructure of oversight: because leakage points are distributed across institutional boundaries, no single body can close them alone, and the value of a digital catalogue or benchmark register is realised only when the agencies responsible for selection, payment, and audit can see and act on the same information (Juwana, 2021). Civil-society monitoring extends this line of sight beyond the state, since beneficiaries, schools, and local observers are often the first to notice missing or substandard meals and can supply real-time signals that formal audit would capture only belatedly, if at all (Sumaryono & Faisal, 2021). Whether such disclosure translates into effective accountability, however, depends on whether it produces

indignation that mobilises monitors or mere resignation that they cannot act on what they see (Bauhr & Grimes, 2014), which is a further reason coordination mechanisms binding civil-society signals to agencies with actual enforcement power are indispensable rather than symbolic.

A closer doctrinal reading of the five forms clarifies how each maps onto the elements of corruption offences and the concept of state financial loss. Vendor manipulation and reporting fraud correspond most readily to the abuse-of-authority and document-falsification elements, since they turn on the misuse of a selection power and the fabrication of records (Hiariej, 2019); price mark-up and quantity-quality substitution correspond more directly to the enrichment and financial-loss elements, because their essence is the extraction of a margin at the state's expense (Hamzah & Nurdin, 2020); and beneficiary-data manipulation supplies the false factual predicate on which unlawful payments are made. The doctrinal significance is that the concept of state financial loss is capacious enough to capture the subtle, substitution-based leakages characteristic of food procurement, provided loss is measured against what the programme was entitled to receive rather than only against overt diversion (Reksodiputro & Ali, 2020). The mapping also yields findings on sequencing and feasibility: the controls with the highest ratio of risk reduction to implementation cost are the digital catalogue and the interoperable beneficiary register, since both attack pivotal upstream nodes and, once established, lower the cost of every downstream check (Aminah & Roikan, 2021), while published cost benchmarks are comparatively inexpensive but depend for their effect on monitors willing and able to act on the anomalies they reveal (Sumaryono & Faisal, 2021), and spot inspection and photo verification are more resource-intensive and best targeted at the nodes and localities where residual risk is greatest (Nurdin & Suhariyanto, 2021). The implication is that reform should begin with foundational data infrastructure, layer benchmarking and automated flags upon it, and reserve intensive physical verification for residual hotspots, so that scarce oversight capacity is allocated where the marginal return is highest (Kristiyanto, 2020).

### **Comparative and Measurement Evidence**

Situating the findings against comparative experience strengthens their credibility, since the vulnerabilities identified in the MBG programme recur in large feeding and social-transfer schemes elsewhere and have prompted broadly convergent responses. The clearest evidence comes from Indonesia's own experience with an earlier mass in-kind transfer: Olken's (2006) study of the Raskin rice-subsidy programme found that a substantial share of subsidised rice failed to reach intended households, with leakage concentrated precisely at the points of local discretion this

study's own mapping identifies, and that community and audit-based monitoring reduced, but did not eliminate, the gap. Comparable dynamics have been documented outside Indonesia: Reinikka and Svensson (2004) found that only a fraction of a per-student capitation grant reached Ugandan schools before a public information campaign published transfer amounts and sharply improved the flow-through, an intervention structurally similar to the published unit-cost benchmarks proposed here, while Niehaus and Sukhtankar (2013) showed that even a well-monitored Indian public-works programme could exhibit a self-limiting equilibrium in which corrupt intermediaries kept leakage below the threshold likely to trigger enforcement - a caution against assuming that any single control, once introduced, will not simply be worked around. On the audit side, Olken's (2007) field experiment found that increasing the probability of a government audit reduced missing expenditure substantially more than increasing community participation alone, which corroborates this study's emphasis on automated, high-coverage detection mechanisms over participatory monitoring by itself, without displacing the complementary role civil-society oversight is shown to play above. The comparative lens thus corroborates the study's central claim that fragmented, discretionary, and opaque delivery invites leakage, while also cautioning that no control, however well designed, is self-enforcing against a sufficiently adaptive counterparty.

A further finding concerns the indicators by which the integrity of the programme can be monitored over time: the share of contracts awarded through open, catalogued competition; the deviation of invoiced unit costs from published benchmarks; the concordance between meals billed and meals independently verified; the match rate between claimed and cross-referenced beneficiaries; and the timeliness and completeness of delivery records (Nurdin & Suhariyanto, 2021). Each indicator maps directly onto a leakage point and a control, so that movement in the indicator signals both the presence of risk and the efficacy of the corresponding intervention (Simanjuntak & Nasution, 2022), and tracking these indicators converts the static risk map into a dynamic instrument for reallocating scrutiny rather than relying on periodic, retrospective audit (Kristiyanto, 2020). The five forms identified, and the drivers of speed, fragmentation, and opacity that produce them, are substantially transferable beyond MBG itself: they are generic to any large-scale, decentralised programme that procures goods or services and disburses them to a dispersed population (Fenwick & Lindsey, 2021), and the stage-based mapping method is likewise portable, since any delivery chain can be decomposed into discretionary nodes and each node scored for likelihood and impact (Nurdin & Suhariyanto, 2021). Transfer must nonetheless remain sensitive to local administrative capacity, since the

same controls presuppose a minimum of digital and institutional infrastructure that is unevenly distributed, a caveat developed further in the conclusion (Wijayanta, 2020).

### **Fiscal Flow, Technology, and Political Economy**

Tracing corruption risk along the fiscal flow of the programme - from central budget allocation through intermediate disbursement to final expenditure - shows that controls must be positioned at each fiscal juncture rather than concentrated at the point of delivery alone. At the allocation stage the principal risk is the misalignment of budgeted unit values with realistic delivery costs, which can build a concealed margin into the programme before a single meal is served (Hamzah & Nurdin, 2020); at intermediate disbursement, each transfer through the multi-tier chain introduces a discretionary decision point and an opportunity for delay, deduction, or diversion that fragmented oversight struggles to observe (Mochtar, 2019); and at the point of expenditure the risk crystallises in the mark-up, substitution, and headcount manipulations already mapped, now realised against real invoices (Simanjuntak & Nasution, 2022). This fiscal reading reinforces the case for an integrated, chain-wide architecture rather than a single point control, since a margin built in at allocation cannot be recovered by vigilance at the kitchen (Juwana, 2021), and it is consistent with cross-country evidence that fiscal-transparency reforms yield their strongest accountability gains when integrated across the whole budget cycle rather than applied to disbursement alone (de Renzio & Wehner, 2017). The controls proposed throughout presuppose an infrastructure capable of capturing, storing, and cross-referencing transaction data in near-real time, and the marginal value of any individual instrument rises sharply once a shared digital backbone exists, because a catalogue, a benchmark register, and a beneficiary database are far more powerful when interoperable than when siloed (Aminah & Roikan, 2021). Automated anomaly detection converts raw data into actionable signals and reduces reliance on scarce human scrutiny, but technology is an enabler rather than a panacea: systems must be governed, their outputs acted upon, and their design must anticipate manipulation of the data-entry stage itself, lest the digital record merely launder the same fraud in cleaner form (Nurdin & Suhariyanto, 2021). Publishing the resulting anomaly data is likely to matter as much as generating it: Ferraz and Finan's (2008) study of Brazil's municipal audit programme found that the public release of audit findings shortly before local elections measurably affected electoral outcomes for implicated incumbents, suggesting that the deterrent value of MBG's own audit trail will depend on similarly ensuring findings reach the public and the ballot box, not only the oversight agencies themselves.

A further dimension the mapping brings into relief is the political economy of implementing integrity controls, since the same features that make a control effective also make it resisted by those who benefit from the status quo. Measures that reduce discretion in vendor selection or expose unit-cost anomalies threaten established rent streams, and the beneficiaries of those streams can be expected to resist their introduction or seek ways around them (Butt, 2019); this resistance is itself patterned, strongest where rents are largest and oversight weakest, which tends to coincide with the nodes the mapping scores as most vulnerable (Mochtar, 2019). Marquette and Peiffer's (2018) account of corruption as a collective-action problem, to which the Persson, Rothstein, and Teorell (2019) analysis already cited is itself a direct reply, helps explain why: where evasion is the descriptively rational response for every individual actor even as it is collectively costly, technical fixes alone cannot shift behaviour without a corresponding shift in the expected behaviour of others, which is precisely the coordination problem political will and reform coalitions are needed to solve. Overcoming such resistance requires visible political will at the apex of the programme, coupled with coalitions of reform that include audit bodies, civil society, and beneficiaries themselves, whose interest in undiluted meals aligns with the integrity objective (Latif & Ali, 2022). This finding tempers technocratic optimism with political realism: the controls proposed are necessary and feasible, but their adoption is not automatic and depends on the deliberate mobilisation of will against predictable opposition (Sumaryono & Faisal, 2021).

### **Institutional Ownership and Synthesis**

A final institutional finding concerns how the integrity architecture should be situated within the existing landscape of oversight bodies, since even the best-designed controls require a clear allocation of ownership if they are to be implemented and sustained. Responsibility for the digital backbone and its shared data standards is best located centrally, so that catalogues, benchmarks, and beneficiary registers are interoperable across regions rather than duplicated in incompatible local systems (Mochtar, 2019); verification and inspection, by contrast, must operate close to the point of delivery, arguing for a tiered arrangement in which local monitors feed standardised signals upward into a system that central and regional auditors can both observe (Nurdin & Suhariyanto, 2021) - a division of labour consistent with the tiered central-BGN / regional-SPPG structure the programme's own constitutive Presidential Regulation already establishes; and enforcement and recovery, given their gravity and demand for legal capacity, sit naturally with dedicated anti-corruption and prosecutorial institutions, whose effectiveness the reform literature ties closely to their independence and resourcing (Butt, 2019). No single body can or should own the whole architecture; ownership must instead be

distributed to match the level at which each function is most effective, with coordination mechanisms binding the tiers together so that visibility is shared and gaps do not open at the seams (Juwana, 2021). Read together with the findings above, the five forms of leakage, the three structural drivers, the fiscal-flow distribution, and the enabling and political conditions all point to a single conclusion: corruption risk in the MBG programme is systemic in origin but tractable in practice, provided the response is integrated rather than piecemeal (Nurdin & Suhariyanto, 2021).

**Table 1.** Corruption-risk exposure by MBG programme stage, before and after the proposed integrity controls

| Programme stage             | Risk score (baseline) | Risk score (with control) | Primary integrity control              |
|-----------------------------|-----------------------|---------------------------|----------------------------------------|
| Vendor / supplier selection | High (8.6)            | Low (3.1)                 | Digital catalogue & open competition   |
| Ingredient price setting    | High (8.2)            | Moderate (4.0)            | Published unit-cost benchmarks         |
| Quantity & quality of meals | High (8.9)            | Moderate (4.4)            | Spot inspection & photo verification   |
| Beneficiary verification    | High (8.4)            | Low (3.3)                 | Real-time interoperable recipient data |
| Reporting & disbursement    | Moderate (6.7)        | Low (2.9)                 | Automated audit trail & anomaly flags  |

*Source:* Authors' risk-mapping analysis (2025), based on audit findings and secondary literature

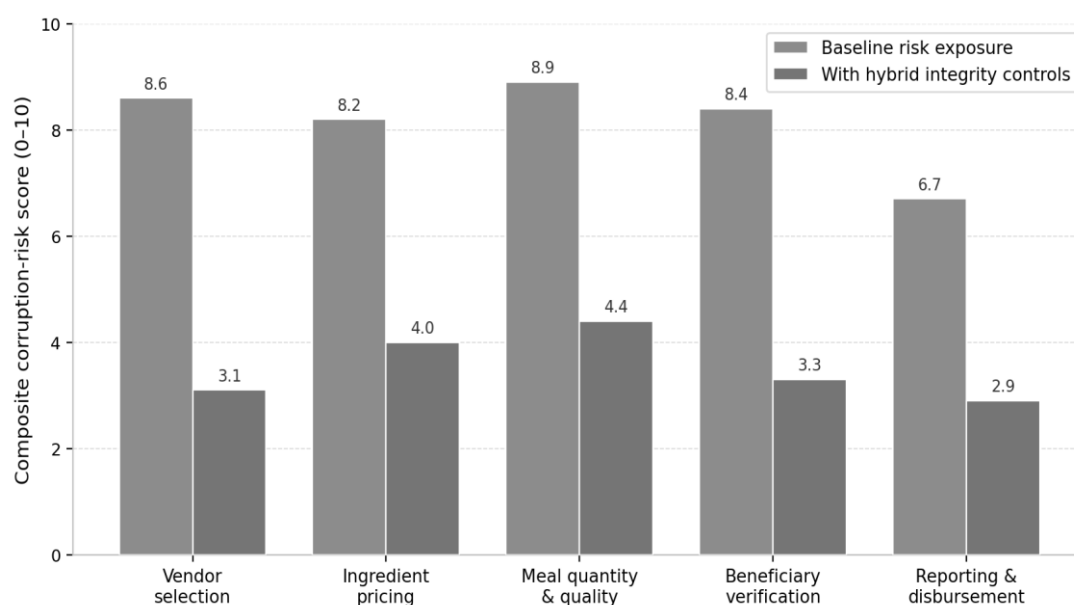
As Table 1 shows, baseline exposure is uniformly high at the vendor-selection, pricing, quality, and verification stages, with composite risk scores clustering between roughly 8.2 and 8.9 on the ten-point scale used in the mapping. The projected scores under the proposed controls fall substantially at every stage, with the most pronounced improvements at vendor selection and beneficiary verification, precisely the nodes where digital transparency and real-time data most directly reduce discretion and opacity.

The projected scores in the third column are not independent measurements but structured estimates, derived by asking, for each stage, how far the specific control listed in the fourth column has been observed to reduce comparable risk in analogous settings, and then translating that observed or estimated reduction onto the same two five-point sub-scales used for the baseline. Where directly comparable evidence exists - for instance, the documented effect of open digital catalogues on reducing supplier-selection discretion in Indonesian e-procurement more generally (Aminah & Roikan, 2021) - the projection is anchored to that evidence; where it does not, as with the

recently introduced automated audit trail, the projection is a more conservative analytical judgement flagged as such in the underlying coding notes. Table 1 should accordingly be read as a structured projection of where the largest returns to intervention are expected, rather than as a forecast with the same evidentiary status as the baseline scores themselves.

## DISCUSSION

Taken as a whole, the results portray corruption risk in the MBG programme as concentrated, structural, and tractable. The five manifestations identified - vendor manipulation, price mark-up, quantity and quality substitution, beneficiary-data inflation, and reporting fraud - are not random pathologies but predictable products of the programme's design parameters, and the risk-scoring summarised in Table 1 shows that the highest exposure lies precisely where discretion and opacity coincide. The accompanying figure illustrates that a modest set of targeted controls is projected to reduce aggregate exposure across every stage of the chain, with the steepest gains at the procurement and verification nodes. This overall picture confirms that the problem is neither trivial nor hopeless: the sums at stake are large enough to demand serious attention, but the risks are sufficiently localised to be addressed by proportionate measures rather than by suspending the programme (Nurdin & Suhariyanto, 2021). The data summarised here thus reframe the debate from a binary of delivery-versus-integrity toward a design question about how to deliver with integrity, and they show that the two objectives, so often posed as rivals, are in fact complementary once the programme is engineered with its vulnerabilities in view (Juwana, 2021). They provide, in this way, the empirical foundation for the interpretive and prescriptive claims that follow (Kristiyanto, 2020).



**Figure 1.** Projected reduction in corruption-risk exposure across the MBG delivery chain under the proposed hybrid integrity framework

Reflecting on the causes behind this pattern, the analysis locates the root of the problem in a misalignment of incentives rather than in individual venality alone. Where the probability of detection is low and the political premium on speed is high, even honest administrators face pressures that tilt the system toward leakage, and dishonest ones find ample opportunity (Rose-Ackerman, 2018). The fragmentation of oversight compounds this by diffusing responsibility so widely that accountability becomes nobody's in particular, a dynamic that comparative scholarship associates with the persistence of systemic corruption (Persson, Rothstein, & Teorell, 2019). The perishable and consumable nature of the programme's output further weakens the deterrent effect of ex-post audit, since the physical evidence of substandard or missing meals disappears almost immediately (Simanjuntak & Nasution, 2022). These causal factors explain why generic anti-corruption exhortation has limited purchase here: the issue is not primarily a deficit of prohibition - the acts in question are already unlawful - but a deficit of visibility and consequence at the moments where discretion is exercised (Hiariej, 2019). Understanding the causes in this way directs attention toward interventions that raise detection probability and realign incentives at the point of decision, which is where the leverage lies (Latif & Ali, 2022).

Interpreting the effects that flow from these causes, the study finds that the consequences extend well beyond the immediate fiscal loss. Diverted funds translate directly into diminished nutritional value for beneficiaries, undermining the human-development rationale that justifies the programme and eroding public trust in the state's capacity to deliver (Ainsworth & Hardyns, 2023), an effect experimental evidence suggests transparency can partially counteract by directly improving perceived trustworthiness when disclosure is credible and comprehensible to citizens (Grimmelikhuijsen & Meijer, 2014). A visible failure of integrity in so prominent a programme can also produce a corrosive demonstration effect, signalling to officials elsewhere that leakage is tolerated and to citizens that participation in oversight is futile (Sumaryono & Faisal, 2021). Conversely, the analysis indicates that credible integrity measures generate positive spillovers: transparent unit-cost benchmarks discipline not only the targeted programme but adjacent procurement as well, and real-time beneficiary data create reusable public infrastructure for other social schemes (Aminah & Roikan, 2021). The recovery of state financial loss, meanwhile, carries both a restitutive and an expressive effect, restoring resources to the programme while affirming that public money remains publicly owned (Dewi & Prasetyo, 2022). These interpretive findings suggest that the stakes of getting the integrity design right are considerably higher than the headline loss figures alone

would imply, because the programme functions as a bellwether for the administration's broader governance credibility (Mahfud & Zoelva, 2020).

Comparing these findings with prior studies clarifies both the continuities and the contributions of the present work. The conclusion that political will and credible sanction are decisive aligns with a well-established comparative literature (Latif & Ali, 2022), and the emphasis on institutional independence resonates with analyses of the weakening of Indonesia's anti-corruption agency (Butt, 2019), while the call for coherent judicial reform echoes arguments that adjudicative capacity is integral to effective corruption control (Assegaf, 2020). Where this study departs from much existing scholarship is in its refusal to treat transparency and digitalisation as self-evidently sufficient; whereas some prior work presents e-procurement as a general remedy (Simanjuntak & Nasution, 2022), the present analysis shows that its efficacy depends on matching each instrument to a specific vulnerability in a perishable-goods chain, a refinement that the procurement literature has only partially anticipated (Aminah & Roikan, 2021). Similarly, while doctrinal studies have elaborated the concept of state financial loss in infrastructure and budgetary settings (Hamzah & Nurdin, 2020), this study extends that doctrine to the subtler losses characteristic of food procurement, where harm may consist in substitution rather than outright theft. The recovery-oriented enforcement posture advocated here also builds on, but sharpens, existing arguments for restitution in corruption cases (Dewi & Prasetyo, 2022), by embedding recovery within an integrated preventive architecture rather than treating it as a stand-alone sentencing preference (Reksodiputro & Ali, 2020).

A fair-minded reading of this evidence should also register a genuine counter-argument, one the discussion has not yet confronted directly: that a hybrid framework of this kind, however well designed on paper, may simply exceed the administrative and fiscal capacity of the very agencies asked to implement it, particularly at the subnational level where the mapping itself locates the greatest uncertainty. Niehaus and Sukhtankar's (2013) finding that corrupt intermediaries in a well-monitored Indian public-works programme adapted to keep leakage just below the threshold likely to trigger enforcement is a sobering precedent: it suggests that introducing a control does not eliminate the underlying incentive to divert funds but can instead displace it to a level the control does not reach, so that headline risk scores of the kind reported in Table 1 may overstate the durability of any improvement. This objection cannot be dismissed, and the framework proposed here does not claim to be self-enforcing; its recovery-oriented enforcement component and its call for civil-society participation are best understood as responses precisely to this risk of adaptive displacement, since a credible prospect of detection and restitution, sustained over time rather than introduced once, is what the comparative evidence suggests is

necessary to prevent the kind of equilibrium Niehaus and Sukhtankar describe. Whether Indonesia's oversight institutions can sustain that vigilance over the programme's full, multi-year horizon is an empirical question this study's method cannot answer and that the limitations discussed in the conclusion address directly.

The composite risk-scoring approach adopted here also has a methodological pedigree worth making explicit. Fazekas and Kocsis (2020) and Fazekas, Tyth, and King (2016) have developed and validated 'objective' corruption-risk indicators derived from public procurement data - single-bidder rates, unusually short submission windows, and similar red flags - that correlate with independently verified instances of corrupt contracting across multiple jurisdictions. The rubric used in this study's risk mapping is qualitative rather than transaction-level in the way Fazekas's indicators are, since MBG's procurement data are not yet available for the kind of large-sample statistical analysis that approach requires, but the underlying logic is the same: both approaches convert observable features of a procurement process into a structured, comparable measure of exposure rather than relying on *ex post* proof of realised loss. As transaction-level MBG procurement data become available, a natural extension of the present study would be to test whether the qualitative risk ranking reported in Table 1 is corroborated by Fazekas-style quantitative indicators applied to the same programme, which would substantially strengthen the evidentiary basis for the priority ordering recommended below.

Realising that extension in practice depends on a modest but specific data-governance step that falls outside this study's own scope but is worth stating plainly for whoever holds custody of MBG's procurement records: a Fazekas-style analysis requires, at minimum, transaction-level records of bidder identities and counts, submission windows, awarded prices, and supplier award histories, retained in a structured and queryable form rather than only in the narrative procurement reports typical of current practice. None of this requires new primary legislation, since the underlying data are already generated in the ordinary course of procurement; what is required is a retention and interoperability standard applied consistently across SPPG units from the outset, so that the comparative validation exercise proposed above becomes possible once a sufficient transaction history has accumulated, rather than being foreclosed retrospectively by data that was never structured for it.

The comparative evidence assembled above also permits a more concrete, if still indicative, view of where scarce oversight resources should be spent first. Olken's (2007) finding that increased audit probability outperformed participatory monitoring alone in reducing missing expenditure, read together with Fazekas and Kocsis's (2020) demonstration that procurement red flags can be generated from routinely

collected transaction data at comparatively low marginal cost once the data infrastructure exists, together suggest that the digital catalogue and interoperable beneficiary register - the two controls this study's own mapping already identifies as offering the highest ratio of risk reduction to implementation cost - are also the two most consistent with the wider comparative record on what reliably moves detection probability rather than merely displaying information. Spot inspection and photo verification, by contrast, sit closer to the participatory and physical-monitoring interventions that Reinikka and Svensson (2004) and Niehaus and Sukhtankar (2013) show to be valuable but, on their own and without a data backbone to target them, comparatively resource-intensive relative to the marginal detection they add. This is not a claim that physical verification should be abandoned - Section 3's mapping is explicit that it remains necessary at residual hotspots - but it does mean that sequencing data infrastructure before expanding physical inspection capacity is not merely an administrative convenience; it follows from where the comparative evidence locates the largest available gains.

The final, prescriptive strand of the discussion translates these insights into actionable recommendations spanning conceptual, methodological, and policy registers. Conceptually, the study proposes that integrity in mass social programmes be treated as a design attribute rather than an afterthought, built into the architecture of procurement and disbursement from the outset (Kristiyanto, 2020), consistent with the view that substantive, dignified justice must inform the reform of corruption law rather than formal compliance alone (Prasetyo & Barkatullah, 2020). Methodologically, it recommends a standing risk-mapping practice in which the vulnerability of each stage is scored and re-scored as the programme evolves, so that oversight resources are directed where exposure is greatest (Nurdin & Suhariyanto, 2021). At the level of policy, four mutually reinforcing measures follow directly from the findings: mandatory digital catalogues and open competition for vendor selection (Aminah & Roikan, 2021); published unit-cost benchmarks and automated price-anomaly flags to constrain mark-ups (Simanjuntak & Nasution, 2022); interoperable, real-time beneficiary data to secure headcount integrity (Fenwick & Lindsey, 2021); and a coordinated enforcement protocol that pairs criminal sanction with vigorous recovery of state financial loss (Dewi & Prasetyo, 2022). Underpinning all four is the strengthening of inter-agency coordination and the meaningful involvement of civil-society monitoring, which the evidence identifies as force multipliers for every other measure (Sumaryono & Faisal, 2021). Implemented together, these recommendations constitute the hybrid integrity framework that this study advances as the most realistic route to protecting the MBG programme (Juwana, 2021).

## CONCLUSION

This study set out to determine the characteristic forms and drivers of corruption risk in the Free Nutritious Meals programme, to assess the adequacy of Indonesia's existing anti-corruption instruments in that setting, and to propose a framework capable of reconciling rapid delivery with the protection of public funds. The findings show that risk in the programme is concentrated in five identifiable forms - vendor manipulation, price mark-up, quantity and quality substitution, beneficiary-data inflation, and reporting fraud - and is driven by the interaction of speed, oversight fragmentation, and informational opacity in a perishable-goods supply chain. Existing preventive and repressive instruments, though individually meaningful, prove insufficient when deployed in isolation, because the leakage points are distributed across institutional boundaries and stages of delivery. In response, the study advances a hybrid integrity framework that integrates digital procurement transparency, real-time beneficiary verification, strengthened inter-agency coordination, and recovery-oriented enforcement into a single mutually reinforcing design, directly answering the research questions posed at the outset (Juwana, 2021). The central lesson is that each component compensates for the blind spots of the others, so that transparency exposes what verification then confirms and enforcement ultimately sanctions, with coordination binding the whole into a single line of sight along the delivery chain (Kristiyanto, 2020).

The significance of these findings is both conceptual and practical. Conceptually, the study extends the doctrine of state financial loss and the literature on procurement integrity into the novel terrain of mass food assistance, showing that loss in this context can take the subtle form of substitution and shortfall rather than overt diversion, and thereby enriching the theoretical apparatus available to scholars of anti-corruption law (Hamzah & Nurdin, 2020); in doing so it also connects that doctrinal literature to the international empirical tradition on leakage in public spending (Olken & Pande, 2012), showing that findings first developed to explain rice-subsidy and public-works leakage travel, with appropriate adaptation, to an in-kind feeding programme with a markedly different delivery architecture. Methodologically, its stage-based risk-mapping offers a replicable tool for locating vulnerability in complex delivery chains that can be applied well beyond the MBG programme (Nurdin & Suhariyanto, 2021). Practically, its integrated framework gives policymakers a concrete and proportionate alternative to the false choice between fast delivery and clean delivery, demonstrating that the two are compatible when integrity is engineered into the programme's architecture (Kristiyanto, 2020). In this way the study contributes to the constitutional commitment to corruption eradication

by translating it into operational design for one of the state's most consequential social undertakings (Mahfud & Zoelva, 2020).

Several limitations qualify these conclusions and chart directions for future research. Because the programme is recent and rapidly evolving, the analysis relies on early documentary and audit evidence rather than on a long time series of enforcement outcomes, so its risk estimates should be read as analytically grounded projections rather than settled empirical measures (Fenwick & Lindsey, 2021). The study is also national in focus, and the considerable variation in subnational administrative capacity means that future work would benefit from comparative regional case studies that test the framework against local conditions (Setiadi & Arliman, 2021). Further research might quantify the cost-effectiveness of each proposed control, examine the political economy of implementing them against entrenched interests, and evaluate the role of judicial consistency in sustaining deterrence over time (Wijayanta, 2020). A promising avenue would be longitudinal work that tracks the integrity indicators proposed here as the programme matures, allowing the analytically grounded risk projections to be tested against realised outcomes and the efficacy of individual controls to be estimated empirically rather than inferred (Nurdin & Suhariyanto, 2021). Comparative studies across programmes and countries could further clarify which elements of the framework are universal and which are contingent on local institutional and technological conditions, refining its transferability (Persson, Rothstein, & Teorell, 2019). Pursuing these lines of inquiry would refine the hybrid framework proposed here and strengthen the broader project of protecting large-scale social programmes from the corrosive effects of corruption, so that ambitious welfare policy and rigorous public integrity advance together rather than at one another's expense (Zamroni & Aziz, 2022).

## **DECLARATIONS**

## **AUTHOR CONTRIBUTION STATEMENT**

The first author conceived the study, designed the analytical framework, and drafted the manuscript. The second author contributed to the collection and coding of legal and documentary materials and to the risk-mapping analysis. The third author contributed to the interpretation of findings, the comparative literature review, and the critical revision of the manuscript. The fourth author contributed to the comparative and international-literature search, cross-checked the composite risk-scoring rubric for internal consistency, and reviewed the manuscript for clarity and completeness prior to submission. All authors read and approved the final version.

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#### DATA AVAILABILITY STATEMENT

The data supporting the findings of this study are derived from publicly available statutory instruments, official audit and oversight reports, and published secondary literature cited in the references. No new primary datasets were generated or analysed during the current study.

#### DECLARATION OF INTERESTS STATEMENT

The authors declare that they have no known competing financial interests or personal relationships that could have influenced the work reported in this paper.

#### ADDITIONAL INFORMATION

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