

RESEARCH ARTICLE



STATE ACCOUNTABILITY TOWARDS CONSTITUTIONAL TORT IN THE IMPLEMENTATION OF THE FREE NUTRITIONAL MEAL PROGRAM IN INDONESIA

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ABSTRACT

This study aims to examine whether the implementation of the Free Nutritious Meal Program constitutes a constitutional tort and to analyze the forms of state responsibility arising from its implementation. The research employs a normative legal method using statutory, conceptual, comparative, and case approaches to assess the constitutional implications of the program. The findings indicate that the implementation of MBG has generated serious concerns, including mass food poisoning incidents caused by inadequate food safety standards and weak supervision, as well as the potential misallocation of education funds. These shortcomings demonstrate the state's failure to effectively fulfill its constitutional obligations to protect and guarantee the rights to health and education. Such failure may be classified as a constitutional tort, referring to violations of constitutional rights resulting from state action or omission. In this context, state accountability extends beyond administrative responsibility to encompass constitutional and legal liability. Therefore, the state is obligated to provide effective remedies for victims, including compensation where appropriate, strengthen monitoring and food safety mechanisms, and improve policy design and implementation to prevent similar constitutional violations in the future. These measures are essential to ensure that public welfare programs are implemented in accordance with constitutional principles and the protection of fundamental rights.

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1. Introduction

A state governed by the rule of law *rechtsstaat* the Constitution as the supreme legal norm that serves as the foundation for all governmental actions and public policies. In the Anglo-Saxon legal tradition, the concept of the Rule of Law was popularized by Dicey, who emphasized the supremacy of law, equality before the law, and the protection of individual rights (Dicey, 2019). This concept was further developed by Hans Kelsen through the *Stufenbau Theory*, which explains that the legal system is hierarchically structured, requiring every lower legal norm to derive its validity from and remain consistent with higher legal norms, with serving as the fundamental norm of the legal system (Kelsen, 2024). Consequently, every public policy enacted by the government must conform to the Constitution as the supreme law of the state.

As a state governed by the rule of law, Indonesia bears a constitutional obligation to respect, protect, and fulfill the fundamental rights of its citizens. Article 28H paragraph (1) of the 1945 Constitution of the Republic of Indonesia guarantees that every person has the right to live in physical and spiritual prosperity, to enjoy a good and healthy environment, and to obtain health services. This constitutional provision imposes a positive obligation upon the state to ensure the realization of the right to health, including access to safe, nutritious, and adequate food. Furthermore, Article 31 paragraph (4) of the 1945 Constitution mandates that the state allocate at least twenty percent of both the State Budget and Regional Budgets to finance the implementation of the national education system. These constitutional mandates demonstrate that the fulfillment of the rights to health and education constitutes an inseparable constitutional responsibility that must be carried out in a balanced and proportional manner (Kavanagh, 2016).

One manifestation of this constitutional obligation is the Free Nutritious Meal Program, which aims to improve the nutritional status of schoolchildren while supporting the realization of the constitutional right to health. Normatively, the program represents a public policy instrument intended to promote social welfare. However, its implementation has raised serious constitutional concerns.

According to data released by the National Nutrition Agency, 6,517 students were affected by 75 food-related illness incidents associated with the MBG Program between January and September 2025. These incidents indicate that the state has failed to ensure adequate food safety standards and effective supervision as part of its constitutional obligation to protect the right to health (Rahmawati, 2025).

Constitutional concerns also arise from the program's financing mechanism. The Government allocated IDR 757.8 trillion to the education sector in the 2026 Draft State Budget, representing the largest education budget in Indonesia's history. Nevertheless, nearly half of this allocation was initially designated to finance the MBG Program before being revised to IDR 223.6 trillion (Irfani, 2025). This allocation has generated constitutional debate regarding its compatibility with Article 31 paragraph (4) of the 1945 Constitution, considering that the constitutional allocation for education is intended primarily to improve the quality of national education. Accordingly, the use of education funds to finance the MBG Program raises fundamental constitutional questions concerning the limits of the state's authority in allocating public finances.

Several previous studies have examined the implementation of the Free Nutritious Meal Program from different perspectives. Putra (2025), in *Constitutional Responsibility of the State for the Protection of the Right to Health in the Implementation of the Free Nutritious Meal Program*, concluded that the implementation of the MBG Program reveals a significant gap between the constitutional guarantee of the right to health and its practical realization due to weak regulations, fragmented institutional coordination, and ineffective accountability mechanisms. The study recommends comprehensive legal and institutional reforms grounded in a human rights-based approach. Nevertheless, most existing studies primarily focus on public policy, budget governance, program effectiveness, or food safety, without comprehensively examining the doctrine of constitutional tort as a framework for state liability arising from violations of constitutional rights (Ratnasari, 2026).

Based on these previous studies, an important research gap remains. Existing scholarship has yet to conceptualize the failures in implementing the MBG Program as a form of constitutional tort, namely a violation of constitutional rights resulting from governmental actions or omissions in fulfilling constitutional obligations. Meanwhile, recurring incidents of mass food poisoning, inadequate food safety supervision, and the controversial use of education funds demonstrate the potential infringement of the constitutional rights to health and education. This research is therefore significant because the MBG Program constitutes one of Indonesia's flagship national programs, involving substantial public expenditure while directly affecting the fulfillment of citizens' constitutional rights. Without effective supervision, adequate food safety standards, and constitutionally sound budget governance, the implementation of the program may result in constitutional harm to citizens. Accordingly, a constitutional law analysis is required to construct an appropriate framework of state accountability for constitutional violations arising from the implementation of the MBG Program.

The novelty of this research lies in its application of the doctrine of constitutional tort as the principal analytical framework for assessing the state's failure in implementing the Free Nutritious Meal Program. Unlike previous studies, which primarily focus on the right to health, public policy, or budget management, this research integrates constitutional protection of the rights to health and education, the constitutional allocation of education funding, and state constitutional accountability within a single constitutional law framework. Consequently, this study is expected to contribute to the development of the doctrine of constitutional tort in Indonesia while enriching scholarly discourse on state accountability in the implementation of social welfare programs.

Based on the foregoing discussion, this study aims to analyze state accountability for *constitutional tort* in the implementation of the Free Nutritious Meal Program and to examine the constitutional implications arising from the program's implementation. The analysis focuses on whether governmental actions or omissions in planning, budgeting, food-safety supervision, procurement, distribution, and incident response may be attributed to the state and regarded as violations of the constitutional rights to health and education. This study also examines the extent to which existing constitutional, administrative, civil, and criminal mechanisms are capable of providing accountability and effective remedies for affected citizens.

Accordingly, this research addresses two principal questions: (1) How is the state held accountable for *constitutional tort* in the implementation of the Free Nutritious Meal Program? and (2) What are the constitutional implications of *constitutional tort* arising from the implementation of the Free Nutritious Meal Program in Indonesia? By answering these questions, this study seeks to develop a more comprehensive framework of constitutional accountability that does not merely identify governmental failure, but also emphasizes prevention, institutional correction, victim recovery, and guarantees of non-repetition. The findings are expected to contribute to the development of the doctrine of *constitutional tort* in Indonesia and to provide a normative basis for strengthening the governance, supervision, and constitutional legitimacy of the MBG Program.

2. Methodology

This study employs normative juridical research, which examines legal norms, principles, doctrines, and secondary legal materials relevant to state accountability for violations of constitutional rights in the implementation of the Free Nutritious Meal Program (Program Makan Bergizi Gratis). Normative legal research places legislation, court decisions, legal principles, and scholarly doctrines as the principal objects of analysis (Marzuki, 2017). Four approaches are applied in this study. First, the statutory approach examines the 1945 Constitution of the Republic of Indonesia, the Indonesian Civil Code, the former Indonesian Criminal Code, Law Number 1 of 2023 concerning the Criminal Code, Law Number 20 of 2003 concerning the National Education System, Law Number 25 of 2009 concerning Public Services, Law Number 30 of 2014 concerning Government Administration, and Law Number 17 of 2023 concerning Health. This approach also examines Constitutional Court Decision Number 7/PUU-III/2005, Constitutional Court Decision Number 012/PUU-III/2005, and Constitutional Court Decision Number 34/PUU-XVIII/2020 insofar as they are relevant to constitutional rights, state obligations, and governmental accountability.

The comparison focuses on food-safety standards, institutional supervision, community participation, and accountability mechanisms to identify practices that may be adapted to strengthen the implementation of the MBG Program in Indonesia-India has issued specific food-safety and hygiene guidelines for school-level kitchens, while Brazil's PNAE is legally established under Law Number 11.947 of 2009 as part of the state's obligation to provide school meals. Fourth, the case approach examines reported mass food-poisoning incidents associated with the implementation of the MBG Program. Data published by the National Nutrition Agency and the Indonesian Education Monitoring Network are used as supporting factual materials to identify indications of inadequate supervision, governmental omission, and potential violations of the constitutional rights to health and education.

The legal materials used in this study consist of primary and secondary legal materials. Primary legal materials include the 1945 Constitution, relevant legislation, and Constitutional Court decisions relating to constitutional rights, health, education, public services, government administration, and state liability. Secondary legal materials include books, scholarly journal articles, research reports, expert opinions, and legal doctrines concerning constitutional tort, constitutional accountability, state responsibility, the rule of law, and good governance. Official reports and statistical data issued by the National Nutrition Agency, the Indonesian Education Monitoring Network, and other relevant institutions are used as supporting non-legal materials. The materials are collected through a literature review and analyzed qualitatively using prescriptive legal analysis (Soekanto & Mamudji, 2015). This analysis is conducted by interpreting, systematizing, comparing, and evaluating the relevant legal norms to formulate an appropriate model of state accountability for constitutional violations arising from the implementation of the MBG Program

3. Results and discussion

3.1 State Accountability for Constitutional Torts in the Implementation of the Free Nutritious Meal Progra

As a state governed by law, Indonesia is required to ensure that every public policy is implemented in accordance with the Constitution and the principles of accountability, transparency, and good governance. Articles 1 paragraphs (2) and (3) of the 1945 Constitution affirm that sovereignty belongs to the people and that Indonesia is a state governed by law. Consequently, governmental authority must be exercised not only lawfully but also in a manner that protects citizens' constitutional rights. The Free Nutritious Meal Program (Program Makan Bergizi Gratis) was established to improve the nutritional status of children, students, pregnant women, and other vulnerable groups (Tibaka & Rosdian, 2018). Because the program directly affects public health and education, its implementation must be supported by adequate food-safety standards, strict supervision, and clear institutional responsibility. However, recurring food-poisoning incidents indicate weaknesses in food preparation, quality control, distribution, and governmental supervision.

Article 28H paragraph (1) of the 1945 Constitution guarantees the right to health and imposes obligations upon the state to respect, protect, and fulfil that right. In the MBG Program, these obligations require the government to ensure hygienic food preparation, safe ingredients, proper distribution, regular inspection, and immediate treatment for affected beneficiaries. Constitutional Court Decision Number 7/PUU-III/2005 and Decision Number 34/PUU-XVIII/2020 further confirm that the fulfilment of the right to health must be realized through effective, safe, and accountable public policies. The MBG Program is also related to the constitutional right to education. Article 31 paragraph (4) of the 1945 Constitution requires the allocation of at least twenty percent of the State and Regional Budgets for education. The use of education funds for MBG may be justified when it supports students' health and learning capacity (Wicaksono & Hantoro, 2023).

Nevertheless, such funding must remain effective, proportionate, and consistent with educational objectives. When unsafe implementation causes illness, school absence, disruption of learning, or psychological harm, the program may interfere with both the right to health and the right to education. Reports from the Indonesian Education Monitoring Network and the National Nutrition Agency concerning thousands of affected beneficiaries indicate that the incidents cannot always be regarded as isolated technical errors. Repeated cases may reflect structural weaknesses in procurement, kitchen certification, food handling, transportation, inspection, and institutional coordination. Such weaknesses may constitute governmental omission when the state fails to prevent foreseeable risks. James Crawford's doctrine of state responsibility provides that responsibility may arise when an act or omission attributable to the state breaches a legal obligation. In the MBG context, negligence in supervision, food-quality control, and distribution may demonstrate a failure to exercise *due diligence*. This principle requires the state to undertake reasonable preventive measures to protect citizens from harm arising from public policies.

These failures may be analyzed through the doctrine of *constitutional tort*, namely a governmental act or omission that causes harm through the violation of constitutionally guaranteed rights. However, not every poisoning incident automatically constitutes a *constitutional tort*. It must be established that there was a constitutional obligation, a state act or omission, a breach of the required standard of care, actual harm, and a causal relationship between the breach and the harm. State accountability in the MBG Program may be divided into three forms. First, constitutional accountability requires the government to ensure that the program remains consistent with Articles 28H and 31 of the 1945 Constitution. This may be enforced through legislative oversight, budget evaluation, and judicial review. Second, administrative accountability may be pursued through internal inspections, audits by the Audit Board of Indonesia, Ombudsman investigations, evaluation of providers, and administrative

sanctions. Third, legal accountability may involve civil claims, administrative lawsuits, or other judicial remedies for victims.

Remedies should not be limited to compensation. The state must also provide medical treatment, rehabilitation, policy correction, stricter safety standards, transparent investigations, sanctions for responsible actors, and guarantees of non-repetition. Criminal liability may arise when individual negligence causes death or serious injury, but it does not eliminate the broader constitutional, administrative, and civil responsibilities of the state. Therefore, repeated food-poisoning incidents in the MBG Program may constitute a *constitutional tort* when they result from state action or omission that violates the constitutional duties to protect health and guarantee education. The program must therefore be accompanied by stronger food-safety standards, effective supervision, transparent budget governance, and accessible remedies for victims.

3.2 Constitutional Implications of Constitutional Torts in the Implementation of the Free Nutritious Meal Program

A *constitutional tort* occurs when an action or omission attributable to the state causes harm to constitutionally guaranteed rights and consequently creates an obligation to provide remedies. In the implementation of the Free Nutritious Meal Program (*Program Makan Bergizi Gratis*), the principal constitutional implications concern the right to health under Article 28H paragraph (1) and the right to education under Article 31 paragraph (4) of the 1945 Constitution. These provisions require the state not only to respect citizens' rights but also to actively protect and fulfil them through safe, effective, and accountable public policies (Fitryantica, 2026). The MBG Program is intended to improve students' nutrition, health, participation, and learning capacity. Previous studies confirm that properly designed school feeding programs can reduce short-term hunger and support children's health and educational outcomes. The found that school feeding programs in developing countries generally have positive potential for improving nutritional conditions, school participation, and educational performance, although their effectiveness depends heavily on program design and implementation quality.

These findings demonstrate that school meal programs are closely connected to both health and education rights. However, their constitutional legitimacy cannot be assessed solely from their objectives. The state must also guarantee the safety and quality of the food provided. The showed that food-safety and nutrition interventions in schools can improve students' knowledge and practices, indicating that food provision must be supported by education, hygiene standards, and risk-prevention mechanisms. Bliznashka et al., (2024), also emphasized that assessments of school feeding programs should include food safety, storage, hygiene, operational feasibility, and cost efficiency. Therefore, the absence of adequate standards in food preparation, storage, transportation, and distribution may transform a welfare program into a source of harm.

Repeated food-poisoning incidents in the MBG Program may indicate that the state has failed to undertake reasonable preventive measures. Such failure may be characterized as a *constitutional omission* when the government knew, or should reasonably have known, of the risks but failed to establish or enforce adequate safeguards. The resulting harm is not limited to illness. Food poisoning may cause school absence, disrupt teaching and learning, create psychological distress, and reduce public confidence in both educational institutions and government programs. Consequently, unsafe implementation may simultaneously interfere with the rights to health and education.

The financing of MBG also raises constitutional implications. Article 31 paragraph (4) of the 1945 Constitution requires at least twenty percent of national and regional budgets to be allocated to education. The use of education funds for school meals may be justified when it contributes directly to students' attendance, health, concentration, and learning outcomes. Delbiso et al., (2021), demonstrated that school meals may support student retention and reduce absenteeism. Nevertheless, the allocation must remain proportional and must not weaken essential educational expenditure,

including teacher quality, learning facilities, infrastructure, and educational access. Accordingly, the constitutional problem does not arise merely because education funds are used for MBG. It arises when a substantial allocation is not accompanied by measurable educational benefits, transparent budget governance, or adequate safety standards. If the program causes widespread harm while reducing resources available for core educational needs, the policy may create a double constitutional injury: endangering students' health and weakening the fulfilment of their right to quality education.

Comparative research also shows that the success of school feeding programs depends on institutional capacity and policy design. The emphasized that the effects of such programs vary according to targeting, meal quality, implementation arrangements, and local conditions. Likewise, found that different delivery models involve trade-offs in feasibility, costs, safety, and perceived benefits. These studies support the argument that governments must assess not only the availability of meals but also the entire delivery system, including procurement, kitchen conditions, hygiene, storage, transportation, monitoring, and complaint mechanisms.

Experiences from India, Japan, and Brazil further illustrate different models of accountability. India reflects a predominantly reactive model, in which investigations, inspections, and compensation followed serious food-contamination incidents. Japan demonstrates a more integrated model through rapid product withdrawal, investigation, public disclosure, and shared responsibility between government and food producers. Brazil's school feeding system places greater emphasis on preventive design, food quality, local procurement, and community participation. These experiences show that accountability must include both preventive measures before harm occurs and corrective remedies after an incident. The constitutional implications of failures in the MBG Program therefore extend beyond individual cases of food poisoning. They include weakened state legitimacy, declining public trust, disruption of educational activities, inefficient use of public funds, and potential violations of constitutionally guaranteed rights. State responsibility must consequently include transparent investigations, medical and psychological recovery, compensation where appropriate, sanctions against negligent providers and officials, and institutional reforms to prevent recurrence.

Indonesia must therefore shift from a predominantly reactive approach toward a preventive, accountable, and rights-based model in implementing the Free Nutritious Meal Program. This transformation requires the protection of beneficiaries' constitutional rights to be placed at the center of every stage of the program, including policy formulation, budgeting, procurement, food preparation, distribution, supervision, and post-incident recovery. A preventive system should include standardized and certified kitchens, trained food handlers, traceable raw materials, routine inspections, laboratory testing, proper storage and transportation, and clear emergency-response procedures. The government must also establish an integrated supervisory mechanism involving the National Nutrition Agency, health authorities, educational institutions, local governments, food providers, and independent monitoring bodies. Transparent budget evaluation and public access to information concerning procurement, inspection results, reported incidents, and corrective actions are equally necessary to ensure that the program is implemented in accordance with the principles of good governance.

In addition, accessible complaint and remedy mechanisms must be provided for students, parents, teachers, and affected communities. When harm occurs, the state must ensure immediate medical treatment, psychological assistance, transparent investigation, compensation where appropriate, sanctions against negligent parties, and guarantees of non-repetition. Previous studies have demonstrated that school feeding programs can improve nutrition, school attendance, learning participation, and educational outcomes only when they are supported by effective governance, food-safety controls, institutional capacity, and consistent supervision. Therefore, the success of the MBG Program should not be measured solely by the number of meals distributed or beneficiaries reached, but also by the safety, quality, accountability, and sustainability of its implementation. Without these safeguards, recurring food-poisoning incidents and weak supervision may constitute a continuing failure

by the state to fulfil its constitutional obligations and may give rise to a *constitutional tort* through the violation of the rights to health and education.

4. Conclusion

The implementation of the Free Nutritious Meal Program (Program Makan Bergizi Gratis) represents the state's effort to fulfil citizens' constitutional rights to health and education. However, recurring food-poisoning incidents, weaknesses in food-safety supervision, and the absence of consistent operational standards indicate that the program has not been implemented in accordance with the principles of prudence, accountability, and good governance. When such failures result from actions or omissions attributable to state institutions and cause harm to students, they may be categorized as a constitutional tort because they interfere with the right to health guaranteed under Article 28H paragraph (1) and the right to education under Article 31 of the 1945 Constitution.

State accountability for these constitutional violations must be implemented through constitutional, administrative, and legal mechanisms. Constitutional accountability requires the government to evaluate the conformity of the program and its financing with the Constitution. Administrative accountability may be enforced through audits, institutional evaluations, investigations into maladministration, improvement of operational standards, and sanctions against negligent officials or providers. Legal accountability may include compensation, medical and psychological rehabilitation, civil or administrative remedies, and criminal liability where negligence results in death or serious injury. Therefore, accountability must not be limited to determining individual fault but must also address systemic weaknesses in regulation, procurement, food preparation, distribution, and supervision.

The constitutional implications of failures in the MBG Program extend beyond the health consequences suffered by beneficiaries. They may disrupt the learning process, reduce public confidence, weaken the effectiveness of education funding, and diminish the legitimacy of the state as the protector of constitutional rights. Accordingly, the government must transform the MBG Program from a predominantly reactive policy into a preventive and rights-based system by strengthening food-safety standards, certifying kitchens and providers, ensuring ingredient traceability, conducting routine inspections, establishing transparent complaint mechanisms, and providing effective remedies for victims. These measures are necessary to ensure that the MBG Program genuinely supports public welfare without creating further constitutional harm.

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