

Juridical analysis of legal certainty regarding the role of the Batam Business Entity and the Land Office in the land certificate transfer system in Batam City

Lilis Suriyani¹, H.M. Soerya Respationo², Erniyanti Erniyanti³

Batam University, Batam, Kepulauan Riau, Indonesia^{1,2,3}

erniyanti@univbatam.ac.id³



Article History

Received on 4 May 2025

1st Revision on 30 May 2025

2nd Revision on 9 June 2025

Accepted on 11 June 2025

Abstract

Purpose: This study aims to analyze the regulations, implementation, obstacles, and solutions related to legal certainty in the transfer of land certificate ownership in Batam City, where dual authority exists between the Batam Business Agency (BP Batam) and the Land Office. The research seeks to provide a comprehensive understanding of how institutional overlaps affect legal certainty for the public and business actors in a nationally strategic economic area.

Methods: The study uses normative and empirical juridical approaches through statutory and sociological methods, collecting data from regulatory documents and interviews with BP Batam officials, land staff, and legal practitioners, analyzed under positive law, legal system, and legal certainty theories.

Results: The findings reveal regulatory disharmony and institutional overlap between BP Batam and the Land Office that hinder legal certainty. Unintegrated administrative procedures, differences in information systems, and limited public awareness create delays and confusion in the transfer process.

Conclusion: Legal certainty in Batam's land administration requires regulatory harmonization, integrated service mechanisms, and the digital integration of land administration systems. Strengthening public legal awareness is also essential for ensuring equitable and effective land services.

Limitation: This study is limited to Batam City as a case study and may not fully represent broader land administration issues in other regions of Indonesia.

Contribution: The research contributes to academic discourse and policy recommendations on resolving institutional dualism in land administration. It provides insights into harmonizing regulations and integrating digital systems to ensure legal certainty and improve public trust in land services.

Keywords: Batam Business Agency, Batam Land Office, Certificate Name Transfer, Legal Certainty

How to Cite: Suriyani, L., Respationo, H. M. S., & Erniyanti. (2025). Juridical analysis of legal certainty regarding the role of the Batam Business Entity and the Land Office in the land certificate transfer system in Batam City. *Annals of Justice and Humanity*, 4(2), 99-112.

1. Introduction

Legal certainty in land management is a critical element in ensuring economic and social stability, particularly in fast-growing areas such as Batam. As a Free Trade Zone (FTZ), Batam attracts both national and international investments, making effective and transparent land administration increasingly urgent (Iskhan, Ketut, & Hartiwiningsih, 2025). However, in practice, the land certificate

transfer system in Batam faces challenges, mainly due to the dual authority between BP Batam, the land manager, and the Land Office, the official institution responsible for land administration (Wati & Erniyanti, 2024). This dualism often causes legal uncertainty, affecting the certificate transfer process, such as procedural discrepancies, data inconsistencies and potential disputes. This uncertainty hinders the interests of individuals and businesses and obstructs government efforts to create a conducive investment climate (Andini, Warman, & Andora, 2025).

Therefore, a thorough juridical analysis of BP Batam's and the Land Office's roles is essential to establish legal certainty in the certificate transfer system (Hakim, Aminah, Idham, Milanie, & Saifannur, 2021). This study aims to identify existing juridical obstacles and propose solutions to create synergy between the two institutions, enabling a more effective, efficient, and legally sound certificate transfer process in Batam (Andini et al., 2025; Handayani, Nurkhotijah, Anatami, Suwalla, & Sunarto, 2025). A land certificate is a legal document issued by the Land Office as authentic proof of ownership of land. It is legally recognized and serves as evidence in transactions or legal disputes (Ketabahanko, Qamariyanti, & Erlina, 2023). As a form of land registration, the certificate clarifies the legal status of the land, its subject and object, and the attached rights. This function aligns with Indonesia's agrarian law principles, which aim to establish order and legal certainty in the management of agrarian resources (Harsono, 2018; Sumiati, Andriansah, & Kadaryanto, 2021).

In addition to proving ownership, land certificates protect owners from claims by unauthorized third parties. It contains verified information, such as land rights number, location, area, and owner's identity (Mohamad & Djaja, 2025). This document is fundamental for transactions such as sales, donations, or other rights transfers. Therefore, land certificates play a central role in preventing agrarian conflicts caused by unclear land statuses. Land certificates also protect the economic rights of owners. It is often used as collateral to obtain loans from financial institutions, promoting economic activities (Yasa, Sudiarawan, Dwijayanthi, & Pranajaya, 2021). Without a certificate, individuals would struggle to access formal financing that requires asset legality and certainty. This shows that land certificates provide both legal and socio-economic benefits to the owners. However, it is important to note that land certificates are only effective if they are issued in accordance with legal procedures (Mohamad & Djaja, 2025). Noncompliance with land administration regulations can result in fraudulent certificates or overlapping land rights, leading to new legal issues. Thus, certificates must be carefully and accountably administered by competent authorities.

Legal certainty in land transactions is vital for creating a safe environment for individuals and businesses to manage land assets. This certainty pertains not only to the validity of documents but also to clear and accountable administrative procedures (Widiyono & Khan, 2023). In urban areas like Batam, with rapid economic growth, legal certainty is increasingly crucial for maintaining stability and trust in land transactions (Harsono, 2018). Batam is a strategic area in Indonesia, designated as a Free Trade Zone (FTZ) under Law No. 44 of 2007. As an FTZ, Batam plays a key role in supporting national economic growth, particularly in terms of trade, industry, and logistics. Its geographic location near international shipping routes makes it an ideal trade hub between Indonesia and Southeast Asia (Aritenang, 2017). Batam enjoys various incentives as an FTZ, such as exemptions from import duties and value-added tax (VAT) on certain goods, attracting both local and foreign investors (Negara & Hutchinson, 2020). As a city designed to support economic activities, Batam also has modern infrastructure, including an international port, airport, and integrated industrial zones.

However, Batam's FTZ status also presents challenges in land management, particularly in land administration. High demand for land for industry, trade, and housing often leads to legal issues, as land management in Batam falls under a special authority distinct from other regions in Indonesia (Siallagan, Fadlan, Erniyanti, & Respationo, 2023). The Batam Authority (BP Batam) is responsible for managing and developing Batam's territory based on Presidential Decree No. 41, 1973. One of BP Batam's main functions is to manage land allocation and use according to an approved spatial plan. BP Batam grants land rights in the form of Land Management Rights (HPL), which can be subleased to third parties (Harsono, 2018). The dual authority of BP Batam and the Land Office is a major issue in Batam's land administration. BP Batam manages land through HPL, while the Land Office is responsible for issuing

land certificates based on Law No. 5 of 1960 on Basic Agrarian Principles (UUPA) (Tan, 2021). This division of authority often leads to inconsistencies in the land administration.

In practice, this dual authority can cause overlapping land rights, especially when BP Batam's and the Land Office's data are not synchronized. Such conflicts often complicate the certificate transfer process, hinder property transactions, and even trigger legal disputes (Hanum, Fithriyatirrizqoh, & Gusthomi, 2024). This highlights the need for synergy between the two institutions to create a more effective and efficient land-administration system. This issue is further exacerbated by the public's lack of understanding of land management in Batam, which differs from that in other regions. Many people are confused about the land administration procedures involving both BP Batam and the Land Office (Andini et al., 2025). Therefore, regulatory harmonization between the two institutions is crucial to ensure legal certainty and foster a healthy investment climate in Batam.

Moreover, legal conflicts can arise when land use overlaps occur. In some cases, land allocated by BP Batam for specific purposes is certified for other purposes by the Land Office. This situation often leads to disputes that require court resolution, prolonging the settlement process and increasing costs for the parties involved. To reduce the potential for legal conflicts, better coordination between BP Batam and the Land Office is required. Harmonized regulations and an integrated administrative system are crucial steps toward creating transparency and legal certainty in Batam's land management. One fundamental issue in Batam's land certificate transfer system is the lack of clarity in the regulations governing this process. Existing regulations often do not provide sufficient detail regarding the authority of each institution, namely BP Batam and the Land Office. This causes confusion at the implementation level, both among the public and government officials.

The absence of clear regulations also results in inefficiencies in land administration. The complex procedures and the requirement for numerous documents often slow down the transfer process. This not only undermines public trust in government institutions but also hinders investment in the region. To address this issue, regulatory revisions are needed to align the roles of BP Batam and the Land Office. Simpler, transparent, and more accessible regulations will provide better legal certainty, enabling the public and businesses to operate without significant administrative challenges. Based on the above issues, the author is interested in conducting this research in the form of a thesis titled "Juridical Analysis of Legal Certainty in the Role of BP Batam and the Land Office in the Land Certificate Transfer System in Batam."

2. Literature review

2.1. Theoretical Framework

2.1.1. BP Batam's Authority in Land Management

The conceptual framework serves as an operational guide for developing concepts for the research process. In both normative and empirical legal research, it is possible to create this conceptual framework and define the terms that guide data collection, processing, analysis, and construction (Asmara, 2025). Authority refers to the right to exercise power granted to an official or institution, according to applicable provisions. Authority also involves the competence to take legal action based on formal procedures; thus, it represents the formal power held by an official or institution. Authority plays an important role in both constitutional and administrative law. F.A.M. Stroink and J.G. Steenbeek considers it a core concept in constitutional and administrative law.

Philipus M. Hadjon states that every government action must be based on legal authority. Authority is derived from three sources: attribution, delegation, and mandates. Attribution is usually outlined through the distribution of state power in the constitution, whereas delegation and mandate involve power transfer from one entity to another. Hadjon differentiates between delegation and mandates. Delegation involves transferring authority from one governmental body to another via legislation, where the responsibility shifts to the delegate. The delegator cannot exercise the delegated authority unless revoked, following the principle of "contrarius actus." However, a mandate refers to routine delegations in a superior-subordinate relationship, where the responsibility remains with the mandator, who can always exercise the delegated authority.

2.2. General Overview of BP Batam

Batam Island is strategically located on the busy international shipping route of the Malacca Strait, the second busiest in the world after the Dover Strait in the UK. Its proximity to Singapore just 20 km or 12.5 nautical miles makes it an ideal trade hub for Singapore. Batam is the largest of the 329 islands in the Riau Archipelago, covering 415 km², or 67% of Singapore's area. To transform Batam into a national development locomotive and a center for industrial development, President BJ Habibie, also the third Head of the Batam Authority, developed the Bareleng (Batam Rempang Galang) concept. This concept connected six islands through Bareleng bridges, expanding Batam to 715 km², 13% larger than Singapore, aiming for Batam to be self-reliant and competitive with Singapore. Batam's development is inseparable from the role of President Soeharto. During his New Order regime, Soeharto prioritized economic development while focusing mainly on agriculture. He also focused on the industrial sector.

During its development, Soeharto designated Batam as part of the Riau Province. During his administration, Batam's development received continuous attention from the central government. Batam has now become an "industrial city" with significant appeal to investors. In 1960, the capital of Riau Province was moved to Pekanbaru from Tanjung Pinang, and Tanjung Pinang became the capital of the Riau Islands Regency, including Batam, which was part of the Pulau Buluh district in 1965. The policy of appointing the Mayor of Batam as the ex officio Head of the Batam Authority was criticized. This policy, introduced in 2019 through Government Regulation No. 62/2019 on Changes to the Free Trade Zone and Free Port Zone Batam, stipulated that "The Head of the Batam Free Trade Zone and Free Port Authority shall be the ex-officio Mayor of Batam."

2.3. BP Batam's Authority in Land Management

BP Batam has authority over land management in Batam, Indonesia. This includes building, business, and usage rights, as per Government Regulation No. 40 of 1996 on Land Rights. However, Ownership Rights cannot exist above Land Management Rights because they conflict with the nature of Ownership Rights. To determine the legal status of land certificates, BP Batam submits the necessary documents, which are then registered with the Land Office. The procedure for granting land rights is typically carried out individually, directly in the applicant's name, starting with the land measurement. Additionally, in accordance with BP Batam's Head Regulation No. 27 of 2017 on Land Allocation, creditors are protected as mortgage rights do not expire, in line with BP Batam's regulations (Putra, 2020).

BP Batam's Head Regulation No. 27 of 2017 on Land Allocation governs the following key matters: This regulation defines various terms related to land allocation, such as BP Batam, Land Management Rights, Land, Land Rights, Land Allocation, Applicants, Land Users, Land Allocation, Annual Contribution Fees (UWT), Land Allocation Announcements, and Land Allocation Applications. The regulation also covers the management of land allocation related to services such as Land Allocation, Land Allocation Extension or Renewal, Land Rights Recommendations, Rights Transfer Permits, Subdivision and Consolidation of Land Management Rights, Land Allocation Document Changes or Replacements, Land Allocation Cancellations, and Mortgage Rights Imposition Approval (Ilham., 2018). BP Batam is authorized to manage Land Management Rights, including planning the allocation and use of specific land portions from Land Management Rights, using the land for BP Batam's functions and tasks, and assigning the use of parts of specific land fields to Land Users under conditions and requirements set by BP Batam, aimed at maintaining a conducive business climate and providing legal certainty for business operations, as well as receiving compensation or indemnities.

BP Batam has specific mechanisms for carrying out its supervisory functions. This includes routine inspections of project sites, document checks, and direct interactions with HPL holders to monitor their progress and compliance with the law. Additionally, BP Batam receives periodic reports from rights holders detailing activities, developments, and challenges faced. All this information is then analyzed to ensure that rights holders operate under the agreed conditions. When violations or deviations from the applicable provisions are found, BP Batam not only has the authority to intervene but also to impose sanctions. The type of sanction varies depending on the violation's severity and nature. These can range from written warnings and fines to the revocation of Land Management Rights. The highest sanction,

the revocation of rights, is typically applied in cases of severe or repeated violations. With these sanctions, BP Batam ensures that every HPL holder has a strong incentive to comply with the regulations and maintain the quality standards of land management.

2.4. Mechanism for Land Certificate Transfer Based on Positive Law

Land certificate transfer is an administrative process that changes the name of the landowner listed on the certificate to the new owner's name, usually due to transactions such as sales, donations, or inheritance. In Indonesian positive law, this process is regulated by Government Regulation No. 24 of 1997 on Land Registration. The purpose of land certificate transfer is to provide legal certainty to the new owner regarding the land rights obtained legally (Purwanti, Syavitri, Hasyim, & Abimanyu, 2024). The land certificate transfer process is part of the land registration system, which serves to provide legal protection to landowners. By registering the new owner's name on the certificate, land rights are legally strengthened. According to Suryaningsih and Zainuri (2021), a good land registration system must clarify the legal status of the land, its subjects and objects, and the rights attached to the land.

The transfer mechanism is consensual and based on an agreement between the parties involved in the transaction. The transferred land certificate is valid and legally binding in court. In practice, the Land Office has the full authority to carry out the administrative procedures for name changes after the required documents are submitted by the applicant (Effendi, 2018). Another obstacle is the lack of coordination between the PPAT, the Land Office, and other related institutions. The certificate transfer process often involves multiple parties, and misalignment of workflows between agencies can cause significant delays. Moreover, the administrative system, which is not fully integrated digitally, hinders the acceleration of the process (Rania, 2025). To address this issue, public education, improvements in land administration systems, and better integration of information technology are needed. Additionally, the synergy between the PPAT and the Land Office should be improved to ensure the smooth running of the land certificate transfer process.

2.5. The Authority of the Land Office in Issuing Land Certificates and Its Relationship with BP Batam

The Land Office is a government institution under the National Land Agency (BPN) responsible for land administration, including the issuance of land certificates (Purnama & Khasanah, 2024). The issuance of land certificates is part of the land registration process, which aims to provide legal certainty to landowners based on Article 19 of Law No. 5 of 1960 on Basic Agrarian Principles (UUPA) (Aulia & Hernawan, 2024). The Land Office's authority includes initial land registration, changes in land registration data, and the issuance of land certificates as proof of valid ownership. This process requires administrative checks to ensure the validity of the submitted documents, such as proof of land acquisition and tax payment receipts (Haspada, 2025). The issued land certificate has binding legal force and serves as the strongest proof of land ownership (Hermansyah, 2017).

In carrying out its duties, the Land Office is responsible for maintaining the accuracy of land registration data through land books, survey letters, and registration maps. This accuracy is essential for preventing overlapping land claims (Djabbarudin, 2020). The Land Office must ensure that the certificates issued do not contradict the data in the land-administration system (Suwardi, 2016). However, in practice, obstacles such as limited human resources and an incomplete administrative system often pose challenges to its implementation. This results in delays in issuing certificates and creates legal uncertainty for applicants (Nurdiana, 2019). The relationship between BP Batam and the Land Office in land management in Batam is complex, as both institutions have distinct but interconnected authorities. BP Batam manages land in the form of Land Management Rights (HPL), while the Land Office is responsible for issuing land certificates based on the data provided by BP Batam.

BP Batam's authority includes granting land-use permits for specific purposes, such as residential, commercial, or industrial use. Once the permit is granted, the related land data are submitted to the Land Office for certificate issuance (Eling & Djaja, 2023). However, data discrepancies between the two institutions often cause problems, particularly in land certificate transfers. In administrative law theory, the principle of good governance can be used to address dualism in authority (Zaenuddin, 2025). This

principle emphasizes the importance of coordination, accountability, and transparency in the implementation of government duty. By applying this principle, inter-institutional conflicts can be minimized and public services improved (Rajagukguk, 2015). In Indonesia, dualism in land management authority often creates obstacles to legal certainty in land ownership. This requires a comprehensive legal approach, including regulatory revisions, system integration, and strengthening the institutional capacity.

3. Methodology

3.1. Type of Research

This thesis, titled "Juridical Analysis of BP Batam and the Land Office's Role in Ensuring Legal Certainty in the Land Certificate Transfer System in Batam" applies normative juridical analysis and empirical juridical research methods. Normative juridical analysis (library research) is used to analyze regulations related to BP Batam's and the Land Office's authority and the land certificate transfer system. An empirical approach was used to gather field data on the implementation of regulations, challenges, and administrative practices in Batam. This descriptive-analytical study aims to provide a detailed understanding of the roles and authorities of both institutions and analyze the barriers and solutions to ensuring legal certainty. This research not only explains the existing legal facts but also evaluates the effectiveness of law enforcement in the context of land administration in Batam. The main focus of this research is as follows: 1) To analyze the roles and authority of BP Batam and the Land Office in the land certificate transfer system in Batam. 2) To identify the legal and administrative challenges in implementing related regulations. 3) To formulate juridical and administrative solutions to create a more efficient system and ensure legal certainty for the public.

3.2. Research Approach

This study adopts a normative juridical approach to analyze relevant laws and regulations related to the research (Soekanto & Mamudji, 2023). The normative juridical approach is used to analyze the existing legal framework and its relevance to the research subject. Qualitative analysis will then be applied to the data from case studies, interviews, and relevant literature to obtain a real picture of this research by adopting an empirical juridical approach.

3.3. Research Location and Data Sources

a. Research Location

This study will be conducted in the Riau Islands Province, specifically Batam City. This location was chosen based on the data that served as the object of this thesis research.

b. Data Sources

The data and sources used in this study are primary and secondary data. Secondary data include information that has been previously available and intentionally collected by the researcher to supplement the research data needs.

3.4. Data Collection Techniques

In this thesis research, data collection techniques were conducted through two main approaches: library research and field research. Library research was conducted to collect secondary data, including laws and regulations, legal literature, academic journals, official documents, and previous relevant research. This data is used to build the theoretical and normative foundation regarding BP Batam's and the Land Office's authority, as well as the principle of legal certainty in Indonesia's land administration system. Field research was conducted through semi-structured interviews with sources from related institutions, such as officials from BP Batam, the Batam Land Office, Land Deed Officials (PPAT), and the public or business actors who have gone through the land certificate transfer process.

3.5. Data Analysis

In this research, data analysis was conducted qualitatively by describing the research and then performing a comparative analysis between the data and legal theories, experts, and regulations. The analysis started with data collection, followed by data processing, and finally, data presentation. Conclusions will be drawn using a deductive method, where general data, descriptions, and opinions

are analyzed and narrowed down to specific conclusions.

4. Result and discussion

4.1. Legal Certainty in BP Batam and the Land Office's Role in the Land Certificate Transfer System in Batam

Legal certainty regarding land rights is a fundamental principle in Indonesia's agrarian law system, as emphasized in Article 33, paragraph (3) of the 1945 Constitution of the Republic of Indonesia and elaborated upon in Law No. 5 of 1960 on Basic Agrarian Principles (UUPA). In the national land system, several types of land rights are recognized, one of which is the Land Management Rights (HPL), a right that is not individual but rather a state-granted right to a legal entity or government institution to manage land usage and allocation. In Batam, BP Batam (Batam Industrial Development Authority) holds the authority of HPL over most of the land. According to Article 2A, paragraph (1) of Government Regulation No. 46 of 2007, amended by PP No. 62 of 2019, the management, development, and construction of the Batam Free Trade Zone and Free Port Zone are carried out by the Head of BP Batam. This authority includes granting land use permits (IPT) within the HPL area controlled by BP Batam, which is an important administrative step before the land certificate transfer process can be carried out by the Land Office.

Articles 2A, paragraphs (1a) through (1 g) in PP No. 62 of 2019 further state that the Head of BP Batam has the function of transferring part of the land rights to third parties in the form of building rights (Hak Guna Bangunan, HGB) on HPL. This provision serves as an important legal basis for BP Batam's authority to approve or reject land rights transfer applications, including land certificate transfers. However, this authority must be exercised in coordination with the Land Office, which often leads to complexities due to the lack of a clear division of administrative authority. Government Regulation No. 39 of 2024 on Special Economic Zones for Tourism and International Health in Batam provides a specific policy direction for regional development. However, it does not explicitly address BP Batam's role in the existing land administration. This presents a new challenge for harmonizing with previous regulations, particularly those that grant BP Batam authority over the HPL. In other words, there is a potential jurisdictional overlap between special economic zones (KEK) and the Free Trade Zone (FTZ), which requires further review in the context of land administration.

In this capacity, BP Batam is authorized to grant land allocation permits, approve land rights transfers, and issue land-use permits, all of which are prerequisites for the land certificate transfer process by the Land Office. Based on the statutory approach and positive law theory, existing regulations should provide clear and definitive guarantees for citizens or legal entities in land transactions. However, in practice, inconsistencies and overlapping regulations between BP Batam and the Land Office have led to doubts in the certificate transfer process, especially for investors, businesses, and the general public. This indicates that the principle of legal certainty is not yet optimally applied in Batam's land law system. Articles 2 and 4 of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Regulation No. 18 of 2021 on the Procedures for Determining Land Management Rights and Land Rights explain that in the HPL system, land rights such as HGB or HGU requested by individuals or legal entities still require approval from the HPL holder as the basis for the certificate issuance by the Land Office.

Furthermore, Article 19, paragraph (1) of the UUPA states, "To ensure legal certainty, the government conducts land registration throughout Indonesia as regulated by Government Regulations." This provision serves as the constitutional basis for the state's role, through the Land Office, in ensuring the legality of land rights ownership. Additionally, land registration, as a form of legal protection for land rights holders, is elaborated in Article 19 (2) of the UUPA, which states that registration includes measurement, mapping, book registration, and the issuance of proof of rights. In this context, the land certificate issued by the Land Office is a strong evidentiary tool for its holders. The name transfer process, as part of maintaining land registration data, includes changes in ownership due to transactions such as sales, gifts, or inheritance, which require changes in the land book and certificates.

Furthermore, Article 38, paragraph (1) of Government Regulation No. 24 of 1997 states that applications for the registration of rights transfer must be submitted to the Land Office, attaching an authentic deed from the Land Deed Official (PPAT) along with supporting documents such as the parties' identities, proof of tax payment, and approval from the relevant authority if required. In the context of Batam, one additional required document is the Land Rights Transfer Approval Letter (SPAH) from BP Batam, as the holder of the Land Management Rights (HPL). Although SPAH is not part of the national requirements, in Batam's local practice, this document has become an indispensable administrative prerequisite. The authority of the Land Office in the name transfer process is explicitly outlined in the Minister of Agrarian Affairs and Spatial Planning/Head of BPN Regulation No. 16 of 2021 on Electronic Certificates and previous regulations such as the Minister of ATR/BPN Regulation No. 7 of 2019 on Amendments to Regulation No. 3 of 1997 on the Implementation of Government Regulation No. 24 of 1997.

In this context, when regulations regarding the division of authority between BP Batam and the Land Office are not explicitly regulated in law or government regulations, the existence of BP Batam's administrative policy alone is insufficient to provide formal legal certainty in the land certificate transfer process. This uncertainty is exacerbated by the varying practices used to interpret procedures in the field. For example, applicants for land certificate transfers must first obtain an SPAH from BP Batam, although not all landowners understand that BP Batam is not the institution that issues certificates. When a certificate application is submitted to the Land Office without BP Batam's document, the application can be rejected, even though it meets national regulations. This situation reveals a legal gap caused by the misalignment of norms between local and national regulations, which weakens legal protection for the public.

In an ideal legal system, dualism in authority should be based on a consistent and complementary normative system. However, in Batam, no formal regulation governs the working relationship between BP Batam and the Land Office regarding the land certificate transfer process. This gap can potentially lead to administrative disputes, especially when there are differing decisions between the two institutions, such as land status, boundaries, or rights transfers. This regulatory disharmony also hinders the basic principles of positive law, such as legality, certainty and predictability. Therefore, a reformulation of regulations that are more harmonious and binding between institutions is needed. One strategic step is to establish joint regulations between BP Batam and the Ministry of ATR/BPN that outline the technical procedures for land certificate transfers in Batam. This step aims to close legal vacuums and unify previously fragmented public service procedures. Thus, strengthening legal certainty in the land certificate transfer system in Batam requires not only improving administrative procedures but also normative intervention in the form of clear and firm legal products that bind both relevant institutions.

4.2. The Implementation of Legal Certainty of BP Batam and the Land Office's Role in the Land Certificate Transfer System in Batam

The land certificate transfer process in Batam has unique characteristics compared to other regions in Indonesia due to the existence of Land Management Rights (HPL) held by the BP Batam. Based on interviews with land officers at BP Batam, the initial process of name transfer must go through land status verification to ensure that the land is part of BP Batam's HPL. After verification, the applicant must submit a Land Rights Transfer Approval Letter (SPAH), which is the main requirement before documents are submitted to the Land Office. BP Batam plays an administrative and control function, but not all the public understands this stage, causing delays and errors in the initial process.

However, several challenges remain. For example, data discrepancies between BP Batam and the Land Office regarding land boundaries or land use status often require re-verification of applications. In several interviews, applicants also expressed confusion about the role of each institution, leading to frequent errors in the order of document processing and delays. This disharmony in procedures indicates an institutional coordination gap that has not yet been effectively bridged. Although each institution's authority is regulated juridically, in terms of implementation, legal certainty is weak because of inconsistent information. Through a sociological approach, it was found that bureaucratic culture and

resistance to digital system changes also slow down public service's efficiency. The public tends to rely on intermediaries (brokers) in the name transfer process, mainly due to the lack of socialization of official procedures, even though the ultimate goal of the process is to provide legal guarantees and certainty for the landowners. In reality, long and complicated procedures only increase the chances of administrative deviation.

Thus, it can be concluded that, although the name transfer procedure in Batam is normatively based on clear legal principles, inefficiencies and unclear procedures for the general public still persist. Therefore, reforms in public service, increased procedural transparency, and better data integration between BP Batam and the Land Office are necessary as part of efforts to establish effective legal certainty in land administration in Batam. The implementation of the land certificate transfer system in Batam practically shows the dynamics of coordination between BP Batam, as the holder of Land Management Rights (HPL), and the Land Office of Batam, as a vertical institution under the Ministry of ATR/BPN. Based on interviews with an official from BP Batam's Land Directorate, it was explained that, in practice, BP Batam has a standard procedure for issuing the Land Rights Transfer Approval Letter (SPAH), which is an absolute requirement before proceeding to the Land Office. However, it was also mentioned that applicants often do not understand this obligation, leading to delays in the name transfer process due to incomplete requirements from BP Batam.

Moreover, in interviews with notaries/PPAT active in Batam, it was conveyed that not all land areas can immediately undergo a name transfer at the Land Office, as it depends on the type of land rights attached to it. In the case of HGB on HPL, PPAT must ensure that the rights transfer has been approved by BP Batam beforehand. In some cases, SPAH applications were rejected because they did not comply with the Regional Spatial Plan (RTRW) or because land use had not been carried out according to regulations. This means that even if a private transaction has been made, the state still delays legal recognition by issuing a new certificate. Sociologically, this situation illustrates the gap between the ideal legal system (law in books) and practice (law in action). The law normatively guarantees land rights and legal certainty of ownership, but in Batam, bureaucratic factors, inter-institutional coordination, and gaps in public legal knowledge are the main obstacles to its implementation. From the public's perspective, the existence of two institutions (BP Batam and the Land Office) with separate procedures causes confusion, especially when the information provided is inconsistent.

Furthermore, the case of forged land development certificates in Batam, as reported by the Riau Police, indicates weaknesses in land administration oversight. Land criminals exploit gaps in land documents, including the Land Use Approval Letter (SPAH) from BP Batam, which appears legitimate. These documents are used to convince the public that the plots are legal and ready for development purposes. In practice, many victims have paid in full for the land, only to later find out that the documents used were fake or not registered in the official system. This practice illustrates the failure to implement the principle of legal certainty in land management and certificate transfer processes in Batam. The involvement of two main institutions, BP Batam and the Land Office, should create a stringent cross-verification system. However, the lack of data integration between BP Batam, the holder of Land Management Rights (HPL), and the Land Office, which issues land ownership rights, has become a gap exploited by the land mafia. Land certificates or rights transfer documents can be forged without immediate detection because each institution operates independently.

From the perspective of Lawrence M. Friedman's legal system theory, this case shows that both the legal structure and culture have not effectively supported the rule of law. The division of the bureaucracy between BP Batam and the Land Office, without an integrated oversight system, and the public's reliance on informal channels, worsen the situation. Interviews with legal practitioners in Batam and some victims of the forged land certificates revealed a lack of understanding between HPL and SHM documents and that the name transfer process must be legally and officially recorded at the Land Office. In Batam's field practice, the name transfer process should follow strict steps, starting with the SPAH application at BP Batam, followed by verification and registration at the Land Office. However, interviews with several PPAT and land officers revealed that the public often avoids the official process because of its complexity and long duration. This opens the door for intermediaries or

brokers to offer fast services with the risk of using fake documents. A case in Tanjungpinang showed that this administrative gap became the entry point for forgery of land documents.

Moreover, the lack of digital system integration between BP Batam and the Land Office makes it difficult to verify the validity of documents. Each institution has its own database, and there is no direct online verification mechanism for the public or other institutions to access. In this context, the legal system structure, as described by Lawrence M. Friedman, has not functioned harmoniously, as there is no integration between legal substance, institutional structure, and legal culture. This misalignment weakens the control function between institutions and increases the potential for data manipulation. A sociological approach also shows that the low legal literacy of the public and distrust of formal bureaucracy reinforce the existence of land mafia syndicates. Some people find it easier to use third-party services rather than go through long official procedures. The use of fake documents directly impacts the legal certainty of land rights and creates potential conflicts, such as ownership disputes, certificate cancellations, and even criminal charges against owners unaware that their certificates were forged.

This case also demonstrates the need to strengthen the implementation of legal certainty in the land certificate transfer system in Batam. Efforts can include the digitalization of the integrated land system between BP Batam and the Land Office, tightening document verification mechanisms through QR codes or blockchain, and providing open access for the public to verify the status of land and certificates. These steps will increase public trust and reduce the space for land mafia operations in the region. A good legal system will only function if supported by responsive institutions, transparent administrative systems, and active public participation in maintaining document legality. Therefore, implementing legal certainty in the land certificate transfer process in Batam is not just a matter of legal formalities but part of a broader system of legal protection and citizens' constitutional rights to land. The empirical data indicate that the implementation of legal certainty in the land certificate transfer process in Batam is not optimal. This is due to the lack of an integrated information system and public service procedures between BP Batam and the Land Office. A joint technical regulation or an integrated one-stop service system is required to ensure the integration of processes and shorten bureaucratic chains. Without structural updates and institutional reforms, the potential for disputes and legal uncertainty will continue to be a latent issue in Batam's land-administration practice.

In Lawrence M. Friedman's legal system theory framework, this inefficiency can be analyzed from three key aspects: the structure, substance, and legal culture. From a structural perspective, the weak synergy between BP Batam and the Land Office reflects a significant institutional weakness. Ideally, these two institutions should have an integrated system for processing land data, allowing for the simultaneous and transparent verification and validation of documents. However, in reality, coordination between these structures is often limited to the administrative level without a comprehensive monitoring and evaluation system in place. From a substantive aspect, existing regulations are not fully harmonized and overlap, especially in regulating land status and document issuance authority. For example, Government Regulation No. 62 of 2019, Presidential Regulation No. 177 of 2024, and PP No. 39 of 2024, which revises PP 62, still leave debates in practice regarding who holds full authority over land status in Batam: BP Batam as the holder of HPL or BPN as the land registration authority. This disharmony shows that legal substance has not yet addressed the efficiency and certainty needs in administrative practices.

Meanwhile, from the legal culture aspect, the public in Batam tends to seek quick solutions through informal channels, including brokers or third parties. This is due to low legal literacy, a lack of understanding of official procedures, and distrust in the public service system, which is considered to be slow and complicated. This legal culture contributes to the proliferation of land mafia practices and document forgery, as revealed in various cases in the Riau Islands. Low public participation in asserting their rights legally indicates weak collective legal awareness. Thus, the effectiveness of implementing legal certainty in Batam's land certificate transfer system cannot be considered optimal. Procedural compliance with legal rules is insufficient without a synergistic institutional structure, harmonized legal substance, and conducive legal culture. Therefore, comprehensive reforms are needed, from land system

integration and regulatory improvements to enhanced legal education for the public. The application of Lawrence M. Friedman's legal system theory can be a suitable analytical tool to assess this effectiveness thoroughly and in-depth.

4.3. Obstacles and Legal Certainty Solutions in BP Batam and the Land Office's Role in the Land Certificate Transfer System in Batam

The main obstacle to legal certainty in the land certificate transfer process in Batam is the regulatory dissonance between BP Batam and the Land Office (BPN). Field studies revealed that staff from both institutions often have differing interpretations regarding documents and the stages of land rights transfer, especially for land with Land Management Rights (HPL) held by the BP Batam. Government Regulation No. 62 of 2019, which serves as the operational basis for BP Batam, does not explicitly regulate the procedures for coordinating with the Land Office in rights transfer and name transfer registration. In addition to the lack of regulatory harmony, there is a gap in the mechanism for technical coordination among institutions. Interviews with land service staff showed that there is still no standard procedure or memorandum of understanding governing data exchange or document verification between BP Batam and the Land Office. As a result, applicants often have to undergo duplicate verification processes, which are time-consuming and confusing. In some cases, applicants have to resubmit their applications because of discrepancies in the document completeness standards imposed by each institution.

Another prominent issue is the disparity in land information systems between BP Batam and the Land Office. Observations show that BP Batam's land system is still internal and has not been digitally integrated with the Ministry of ATR/BPN's system. When applicants receive a Land Rights Transfer Approval Letter (SPA) from BP Batam, the document cannot be automatically verified by the Land Office. This lack of data connectivity creates opportunities for document forgery or manipulation of land legitimacy. In some cases, the public has been confused by having to go through two different application processes without sufficient information from public service officers. The lack of understanding of this dual process increases the risk of involvement from third parties, such as brokers or intermediaries, which complicates the legalization of land rights. This situation is exacerbated by the low socialization of the latest government regulations to the public.

From a sociological perspective, the public tends to trust informal channels over official procedures, which are perceived as complicated and confusing. This legal culture, revealed in interviews with several applicants, reflects a response to a bureaucratic system that is unfriendly and not adaptive to public needs. This shows that legal effectiveness is determined not only by written rules but also by the public's response to and perception of those rules. Considering both empirical legal and sociological approaches, it can be concluded that the obstacles to implementing legal certainty in BP Batam and the Land Office's role are not only due to inconsistent legal norms but also institutional discoordination and low legal literacy among the public. Future solutions should focus on institutional reform, system integration, and increasing public understanding of legal rights and obligations in the land certificate transfer process.

A fundamental issue in the land certificate transfer process in Batam, involving two institutions, BP Batam and the Land Office, is regulatory dissonance and overlapping procedures. Therefore, the main solution proposed is to harmonize BP Batam's internal regulations with the national regulations of the Ministry of ATR/BPN. This harmonization can be achieved through the creation of joint technical regulations, such as a Joint Decree (SKB), detailing the division of authority and workflow in the name transfer process in a cohesive and non-overlapping manner. Integrating information systems significantly supports the principles of public information transparency and administrative efficiency. According to interviews with notaries and land applicants, many struggle because they do not know how far their applications have progressed or which documents are missing from their applications. With an integrated digital system, the process can be monitored online by applicants, reducing reliance on intermediaries and increasing public-service accountability.

Additionally, increasing the socialization of legal procedures for the public is a crucial cultural solution. Observations show that low legal literacy makes the public vulnerable to intermediary practices and misinformation on land ownership. Regular outreach must be conducted to reach various segments of society, from developers and notaries to the general public, who are involved in land transactions. In parallel, establishing a one-stop integrated service for land matters in Batam is recommended. This service would consolidate the functions of BP Batam and the Land Office at a single service counter, with officers from both institutions coordinating to provide the services. This would make the name transfer process more efficient without requiring applicants to move from one office to another. These solutions are relevant for analysis through the theory of legal certainty, as proposed by Sudikno Mertokusumo, which emphasizes the importance of predictable, non-discriminatory laws that are consistently enforced by law enforcement. When regulations are not harmonized, institutions are not coordinated, and information systems are not synchronized, the principle of "rechtszekerheid" (legal certainty) is not fulfilled. However, legal certainty is the foundation of agrarian transactions and directly impacts an individual's civil rights.

From a socio-legal perspective, this issue not only concerns normative legal aspects but also reflects the social dynamics of Batam, which is evolving as an investment hub with high urbanization. Land system reforms in Batam must be sensitive to the public's social needs for quick, transparent, and equitable services. Therefore, solutions must be cross-sectoral and address the root problems of both legal and social behaviors. By integrating these normative and sociological approaches, solutions to legal certainty obstacles in Batam's name transfer system will not only improve the formal legal aspects but also strengthen the legitimacy of the law in the public's eyes. Implementing the right solutions will reduce potential disputes, increase public trust, and foster a fair, efficient, and just land system in the country.

5. Conclusion

5.1. Conclusion

Based on the discussion in the previous section, the following conclusions can be drawn:

1. The regulation of legal certainty regarding the roles of the Batam Industrial Authority (BP Batam) and the Land Office in the land certificate name transfer system in Batam still shows dualism in authority stemming from regulatory differences, where BP Batam acts as the holder of Land Management Rights (HPL) under Government Regulation No. 62 of 2019, while the Land Office holds administrative authority over land rights registration under the Basic Agrarian Law and its implementing regulations, which is contradictory. This normative disharmony is not accompanied by explicitly integrated technical regulations, resulting in legal gaps that affect the certainty and effectiveness of public-land services.
2. The implementation of legal certainty in the roles of BP Batam and the Land Office in land certificate name transfers in Batam is still not optimal because of procedural differences, non-integrated information systems, and ineffective inter-institutional coordination. Despite formal efforts by each institution to exercise its authority, the name transfer process on the ground often leads to public confusion, administrative delays, and opportunities for intermediary practices. The inconsistency between formal procedures and actual practices indicates that the land service system does not yet fulfill legal certainty.
3. The main obstacles to achieving legal certainty in the roles of BP Batam and the Land Office in the land certificate name transfer system in Batam include regulatory disharmony, the lack of a formal coordination mechanism, differences in land data systems, and limited public understanding of the dual procedures in place. To address this, regulatory harmonization is needed through the development of joint technical norms, establishment of integrated services and coordination forums between institutions, digital integration of land information systems, and increased public outreach to strengthen the legal culture. This approach is expected to create land services that are more certain, transparent, and accountable than before.

5.2. Recommendations

1. The central government, through the Ministry of ATR/BPN and BP Batam, must immediately

- develop harmonized and synchronized technical regulations in the form of joint regulations or technical guidelines that clearly govern the coordination mechanisms in the land certificate name transfer process in Batam to avoid legal overlaps and strengthen legal certainty for the public.
2. The establishment of a one-stop integrated service between BP Batam and the Land Office for land certificate name transfers is necessary to expedite services, simplify procedures, and ensure clear administrative steps that are accessible and transparently monitored by the public.
 3. It is important for both institutions, BP Batam and the Land Office, to build and integrate a connected digital land information system and conduct widespread and continuous outreach to the public regarding name transfer procedures and regulations to reduce administrative.

References

- Andini, M., Warman, K., & Andora, H. (2025). Land Registration for the Community in the Kampung Tua Area, Batam City. *Journal of Law, Politic and Humanities*, 5(6), 4442-4451. doi:<https://doi.org/10.38035/jlph.v5i6.2179>
- Aritenang, A. (2017). Special Economic Zone at the Crossroads: The Case of Batam. *Jurnal Ilmu Sosial dan Ilmu Politik*, 21, 132. doi:<http://dx.doi.org/10.22146/jsp.30438>
- Asmara, G. Y. P. (2025). Konstruksi Pengaturan Penyidikan terhadap Tenaga Medis yang Berkeadilan. *Jurnal Ilmiah Hukum dan Hak Asasi Manusia*, 5(1), 49-66. doi:<https://doi.org/10.35912/jihham.v5i1.4379>
- Aulia, N., & Hernawan, D. (2024). Legal Certainty for Land Rights Holders Due to the Issuance Certificates Overlap of Certificates (Overlapping) on Property Rights Certificate No. 60 Certificate Issued in 1956 and Certificate of Ownership No. 01729 Published in 2019 is Linked to Government Regulation No. 24 of 1997 on Land Registration. *Journal of Law, Politic and Humanities*, 5, 963-973. doi:<http://dx.doi.org/10.38035/jlph.v5i2.983>
- Djabbarudin, A. (2020). Cadastral Surveyor in Land Registration System in Indonesia: A Current Developments. *Journal of Law and Legal Reform*, 1(4), 705-722. doi:<http://dx.doi.org/10.15294/jllr.v1i4.39889>
- Effendi, M. (2018). *Kepastian Hukum dalam Sistem Administrasi Pertanahan Indonesia*. Jakarta: RajaGrafindo Persada.
- Eling, E., & Djaja, B. (2023). Issuance of Land Legality By The Batam Concession Agency Against Complete Systematic Land Registration Program Certificates Issued In Batam. *Edunity: Social and Educational Studies*, 2(6), 739-745. doi:<https://doi.org/10.57096/edunity.v2i6.105>
- Hakim, H. A., Aminah, P., Idham, I., Milanie, F., & Saifannur, A. S. (2021). Juridical Analysis of Rights Registration Process on Land and Ownership Status to Confirm Legal Assurance: Studyresearch in the Agency Office National Land Batam City. *International Journal of Educational Review, Law and Social Sciences (IJERLAS)*, 1(1), 10-25. doi:<https://doi.org/10.54443/ijerlas.v1i1.7>
- Handayani, S., Nurkhotijah, S., Anatami, D., Suwalla, N., & Sunarto, D. (2025). Juridical Analysis of Reclaimed Land Rights in Batam City–Case Studies PT. Pasifik Karya Sindo. *Melayunesia Law*, 9(1), 33-43. doi:<https://doi.org/10.30652/26g6qj57>
- Hanum, A., Fithriyatirrizqoh, & Gusthomi, M. (2024). Blurring the Lines: An Analysis of Jurisdictional Overlap between General Courts and State Administrative Courts in Indonesia. *Arkus*, 11, 713-726. doi:<http://dx.doi.org/10.37275/arkus.v11i1.663>
- Harsono, B. (2018). *Hukum Agraria Indonesia: Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi, dan Pelaksanaannya*. Jakarta: Djambatan.
- Haspada, D. (2025). The Legal Validity of Electronic Certificates as Evidence of Legitimate Land Ownership. *European Journal of Law and Political Science*, 4(2), 22-27. doi:<https://doi.org/10.24018/ejpolitics.2025.4.2.169>
- Hermansyah. (2017). *Administrasi Pertanahan di Indonesia: Tantangan dan Solusi*. Jakarta: Gramedia.
- Ilham., B. (2018). *Badan Pengusahaan Batam: Sejarah dan Kewenangan*. Yogyakarta: Andi Offset.
- Iskhan, H., Ketut, I. G. A., & Hartiwiningsih. (2025). The Current State of Legal Governance in the Batam Free Trade Zone: Opportunities for Improvement. *International Journal of Research and Innovation in Social Science*, 9(5), 454-468. doi:<https://doi.org/10.47772/ijriss.2025.90500039>

- Ketabahanko, H., Qamariyanti, Y., & Erlina, E. (2023). Position of Deed of Land Deed Official on Legal Certainty for Ownership of Certificates. *International Journal of Social Science and Human Research*, 6. doi:<http://dx.doi.org/10.47191/ijsshr/v6-i7-91>
- Mohamad, A., & Djaja, B. (2025). Effectiveness of Legal Protection for Land Rights Certificate Holders Against Unlawful Third-Party Claims. *Awang Long Law Review*, 7, 402-409. doi:<http://dx.doi.org/10.56301/awl.v7i2.1564>
- Negara, S. D., & Hutchinson, F. (2020). Batam: Life after the FTZ?. *Bulletin of Indonesian economic studies*, 56(1), 87-125. doi:<https://doi.org/10.1080/00074918.2019.1648752>
- Nurdiana. (2019). *Reformasi Administrasi Tanah di Era Digital*. Yogyakarta: Kanisius.
- Purnama, D., & Khasanah, D. D. (2024). The Role of the National Land Agency in Preventing and Setting Land Disputes in Indonesia. *Journal of Law, Politic and Humanities*, 4(4), 943-954. doi:<https://doi.org/10.38035/jlph.v4i4.543>
- Purwanti, T. H. N., Syavitri, A. I., Hasyim, F., & Abimanyu, P. (2024). Upaya Peralihan Sertifikat Kepemilikan Tanah Apabila Tidak Diketahui Keberadaan Penjualnya dalam Perspektif PTUN. *Terang: Jurnal Kajian Ilmu Sosial, Politik dan Hukum*, 1(4), 155-162. doi:<https://doi.org/10.62383/terang.v1i4.631>
- Putra, I. (2020). *Badan Pengusahaan Batam dalam Konteks Otonomi Daerah*. Yogyakarta: Pustaka Pelajar.
- Rajagukguk, E. (2015). *Prinsip Good Governance dalam Administrasi Negara*. Jakarta: RajaGrafindo Persada.
- Rania, G. (2025). Implementasi E-Kinerja terhadap Penilaian Kinerja PNS di Kabupaten Banyuwangi. *Jurnal Studi Ilmu Sosial dan Politik*, 4(1), 39-52. doi:<https://doi.org/10.35912/jasispol.v4i1.4106>
- Siallagan, J., Fadlan, Erniyanti, & Respationo, S. (2023). Juridical Analysis of the Obligations Batam Free Trade Zone and Free Port Enterprise Agency (BP BATAM) to Problematic Land Allocation Recipients. *International Journal of Sustainability in Research*, 1, 283-300. doi:<http://dx.doi.org/10.59890/ijsr.v1i4.723>
- Soekanto, S., & Mamudji, S. (2023). *Penelitian Hukum Normatif suatu Tinjauan Singkat*. Jakarta: Radja Grafindo Persada.
- Sumiati, H., Andriansah, & Kadaryanto, B. (2021). Kepastian Hukum Sertifikat Hak Milik atas Tanah Dalam Hukum Pertanahan Indonesia. *YUSTISIA MERDEKA: Jurnal Ilmiah Hukum*, 7, 135-145. doi:<http://dx.doi.org/10.33319/yume.v7i2.111>
- Suryaningsih, & Zainuri. (2021). Proses Penerbitan Sertipikat Hak Atas Tanah. *Jurnal Jendela Hukum*, 8(2), 1-12. doi:<https://doi.org/10.24929/fh.v8i2.1574>
- Suwardi. (2016). *Pendaftaran Tanah dalam Perspektif Hukum Agraria*. Jakarta: RajaGrafindo Persada.
- Tan, W. (2021). The Problems And Concepts of the Land Management Rights Improvement in Batam City. *Syariah: Jurnal Hukum dan Pemikiran*, 21. doi:<http://dx.doi.org/10.18592/sjhp.v21i2.4036>
- Wati, D. K., & Erniyanti, E. (2024). Juridical Analysis of Legal Certainty of Property Rights to Management Rights in Batam City (Research Study at Batam City Land Office). *UNES Law Review*, 6(4), 12342-12348. doi:<https://doi.org/10.31933/unesrev.v6i4.2243>
- Widiyono, T., & Khan, M. (2023). Legal Certainty in Land Rights Acquisition in Indonesia's National Land Law. *Law Reform*, 19, 128-147. doi:<http://dx.doi.org/10.14710/lr.v19i1.48393>
- Yasa, P. G. A. S., Sudiarawan, K. A., Dwijayanthi, P. T., & Pranajaya, M. D. (2021). Legal Politics of Land Rights Certification in the Indonesian Context: Between Agrarian Conflicts and Demands for Legal Certainty. *International Journal of Criminology and Sociology*, 10(1), 897-905. doi:<https://doi.org/10.6000/1929-4409.2021.10.106>
- Zaenuddin, M. (2025). How to Achieve the Integration From the Dualism of Institutional Conflicts? Lesson Learned From Batam, Indonesia. *Sage Open*, 15. doi:<http://dx.doi.org/10.1177/21582440251365467>