



The Effectiveness of the Working Area of the Land Deed Making Officer Based on Government Regulation Number 24 of 2016 in One Bali Province

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ABSTRACT

This study examines the effectiveness of Government Regulation Number 24 of 2016 which expands the work area of PPAT from districts/cities to one province. The method uses empirical legal research by elaborating the theory of legal certainty, legal effectiveness, and legal authority. Data was obtained through observation and interviews in Badung and Bangli Regencies. The results show that the implementation has not been effective due to the absence of implementing regulations, thus causing legal uncertainty and potential conflicts of authority. This study recommends accelerating the preparation of technical regulations to support the effectiveness of land administration.

INTRODUCTION

Land ownership in Bali, in this era of globalization, has tended to be controlled by foreign investors in the tourism sector, which is due to Bali which is known as charming names such as the Island of the Gods, the Island of Paradise and also the Island of a Thousand Temples (Wesna et al., 2023). So that it invites the attention of foreign tourists. Bali is in great demand by outsiders to own property because of its unique combination of natural beauty, rich culture, and lucrative investment potential.

Although there are restrictions on land ownership for foreigners, such as the prohibition on owning titles, they still have the option to own property through a long-term lease or right-of-use system, which provides flexibility and access for them to own property in Bali (Saputra & Sudiro, 2023). Many foreign nationals are interested in owning a property in Bali as a second home or vacation spot that they can enjoy at any time. According to the Central Statistics Agency of Bali Province, 503,194 visits (59.95%) are foreign tourists to Bali in 2024, indicating that the pace of economic and tourism development in Bali is running very rapidly. The combination of all these elements makes Bali one of the top destinations for outsiders who want to own property, both for personal and investment purposes.

The data samples from the two districts that experienced the phenomenon were Badung Regency, and Bangli Regency. The phenomenon related to the working area of the Land Deed Making Officer (hereinafter referred to as PPAT) in these two districts shows significant changes after the enactment of Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning the Regulations on the Position of Land Deed Making Officials (hereinafter referred to as the Government Regulation on the Amendment PPAT Position Regulations). This regulation substantially changes the scope of PPAT's work area, which was previously limited to one district or city, to include one province as a whole. These changes not only provide new opportunities for PPAT, but also create new challenges and dynamics in the practice of land law in each region.

PPAT is one of the important professions in the Indonesian agrarian law system (Maria, 2020), especially related to the regulation, transfer, and guarantee of land rights (Edy Junaidi, 2024). In practice, land is one of the most valuable assets (Dharmawan et al., 2025; IRIANTORO & UTAMA, 2024), both for the general public and for the state (UTAMA et al., 2024). Orderly and legally valid management of land rights is needed to provide legal certainty, prevent disputes, and ensure security in sale and purchase transactions, grants, inheritances, and other forms of transfer of rights (Dwi Rahayu et al., 2023). The role of PPAT is very vital in this process.

PPAT has important authority in the land law system in Indonesia (Ida Ayu Dinda Maharani et al., 2023). PPAT is authorized to make authentic deeds related to the transfer and encumbrance of land rights, such as the Sale and Purchase Deed, Grant Deed, Exchange Act, and Dependent Rights Encumberment Act (Gaol, 2020). In addition, PPAT also has the authority to take care of the registration of land rights transfer at the National Land Agency

(hereinafter referred to as BPN) so that the change of rights is officially recorded (Anita & Widodo, 2023). In addition, PPAT is authorized to provide legal advice to parties involved in land transactions, ensuring that all processes are carried out in accordance with applicable laws and regulations (Arum Mei Sari & Edy Lisdiyono, 2024). Through the deeds it makes, PPAT plays an important role in maintaining legal certainty and preventing future land disputes (Laia et al., 2023).

An authentic deed cannot be made by just anyone, an authentic deed can only be made by certain officials who are authorized under the Laws and Regulations this is regulated in Article 1868 of the Civil Code (Lediana et al., 2023). Authentic deeds made by PPAT have characteristics in the form of a headboard containing the name of PPAT, work area, Decree (hereinafter referred to as SK) of Appointment and the address of the PPAT office. In the PPAT Appointment Decree there is a date, month and year of the issuance of the Appointment Decree. For PPAT appointed before 2016 based on Article 12 paragraph (1) of Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Making Officials, it is determined that the PPAT work area is one working area of the Regency/Municipality Land Office.

This indicates that the PPAT work area is only limited to a Regency/City, if you make a deed or land registration outside the work area, it will violate the regulations that have been set so that the deed can be said to be null and void. Meanwhile, based on Article 12 paragraph (1) of the Government Regulation on PPAT Position Regulations, it is determined that the PPAT Work Area is a Provincial area.

This causes PPAT to be able to make deeds in all districts in one province where its office is located. However, in reality, land registration carried out by PPAT to the National Land Agency Office outside the city or district area of its work area still cannot be carried out in accordance with existing regulations because Tanah does not want to accept land registration from PPAT outside the city or district. This makes for a misalignment between the rules and the practice.

With the expansion of the scope of the work area, PPAT in Regencies/Cities can now serve clients throughout the province of Bali. This makes it possible to reach more customers and increase the potential. For example, with the development projects that continue to grow in Bali, such as hotels, villas, and other infrastructure, the need for land deeds and related legal documents is increasing. PPATs that are able to operate throughout the province can take advantage of this situation and provide more comprehensive services to clients (Harsono, 2007).

However, these changes also bring challenges that cannot be ignored. One of the main challenges is the difficulty in contacting the National Land Agency (BPN). With differences in procedures and regulations between regions, PPAT often faces obstacles in the registration and ratification process of deeds. For example, each county may have different policies and requirements regarding required documents, which can lead to confusion and delays in service.

Although the opportunity is quite large, the implementation of this change has not been carried out optimally. Many PPATs are still struggling to adjust to new regulations and address emerging challenges. Therefore, further efforts are needed from the government and relevant agencies to provide the necessary training, socialization, and support for PPAT to operate effectively and efficiently within this wider scope of the region. Thus, it is hoped that PPAT can provide better services to the community and contribute to the development of the land sector in Bali (Santika, 2017).

LITERATURE REVIEW

Legal Certainty Theory

The theory of legal certainty is an important basis in assessing the extent to which the rule of law is able to provide clarity and stability in the implementation of PPAT's duties. Gustav Radbruch explained that legal certainty is one of the three main values of law, in addition to justice and utility, which demand that written law be enforced consistently and predictably (Julyano & Sulistyawan, 2019; Manullang, 2022). According to Gustav Radbruch, a good law is one that is not only just but also certain, in which a citizen can estimate the legal consequences of his actions (Syafriada & Hartati, 2020). In the context of PPAT, legal certainty is closely related to the clarity of the limits of the authority of the work area as stipulated in the Government Regulation on the Amendment of PPAT Position Regulations. When the boundaries of the work area are not firm or multi-interpretive, legal uncertainty can arise, risking causing administrative and land law disputes. Therefore, the theory of legal certainty is the foundation in assessing whether the regulation is able to provide a clear normative basis for the implementation of PPAT's duties in the regions.

Legal Effectiveness Theory

The theory of legal effectiveness provides an analytical framework to understand the extent to which the laws and regulations governing the work area of PPAT are actually implemented in accordance with their objectives. Soerjono Soekanto stated that the effectiveness of the law is influenced by five main factors, namely the substance of the law, law enforcement officials, facilities or facilities, the people affected by the law, and the legal culture. If a regulation is not supported by consistent implementation or is not internalized by the community and law enforcement, then its effectiveness will be low (Daeng M et al., 2023; Rahman et al., 2019). Government Regulations on PPAT Position Regulations Changes need to be seen not only from the normative aspect, but also from its implementation in the field, especially in the geographical and administrative context in the Province of Bali which has unique regional characteristics. Inconsistencies between legal norms and implementation practices can lead to overlapping authority between PPAT or maladministration practices. Therefore, the theory of legal effectiveness is very relevant to measure the extent to which this policy functions optimally in regulating the PPAT's work area.

Legal Authority Theory

The theory of legal authority is used to understand the legitimacy and limits of power possessed by public officials in carrying out their duties. Philipus M. Hadjon explained that authority is the ability given by law to a person or institution to act legally (Seleky et al., 2022). Authority consists of three elements, namely attribution, delegation, and mandate, all of which must be carried out within the corridor of laws and regulations (AR et al., 2025). Within the framework of the PPAT's work area, laws and regulations are a reference in determining the formal limits of the authority of an official who makes land deeds. If a PPAT acts outside his or her work area, then the action can be qualified as an act beyond his authority and has an impact on the legal validity of the deed made. Therefore, the theory of legal authority helps to explain the legal consequences of PPAT actions that are not in accordance with the predetermined work area, and serves as a basis for evaluating the administrative validity of land deeds made.

METHODOLOGY

This type of research uses an empirical type of research (WESNA & WIJAYA, 2022) using three approaches, namely the Conceptual Approach, the Sociological Approach and the Legislative Approach. The data collection methods used are observational research methods and interviews. The data sources used in this study are primary data consisting of laws and regulations, secondary data consisting of textbooks, scientific journals. The location of this research is in 2 districts, namely Badung Regency and Bangli Regency, because Badung Regency is a very large working area and is one of the highest districts for land registration carried out by PPAT based there. Meanwhile, Bangli Regency is the Regency with the least number of PPAT among other districts, so the two locations will provide data with a significant comparison in land registration. Once the data has been collected, it will be carried out with qualitative methods such as interviews and observations, as well as quantitative methods such as surveys and statistical analysis, allowing researchers to gain in-depth insights into how the law is applied in daily life.

RESEARCH RESULT AND DISCUSSION

PPAT as a public official in carrying out its professional duties to make authentic deeds regarding certain legal acts regarding land rights or property rights to flats units must be appointed first by the government, in this case the Minister of Agrarian Affairs/Head of the National Land Agency with certain duties and authorities in order to serve the needs of the community for the deed of transfer of land rights, the Land Rights Encumbrance Act, and the Land Rights Encumbrance Act as stipulated in the applicable laws and regulations (Asshiddiqie, 2003).

The role of PPAT in carrying out some land registration activities is so important. Therefore, the accuracy, certainty and correctness of the information contained in the deed he made is very decisive for the process of registration and the provision of protection of land rights for community members. Consequently, PPAT in addition to being responsible for the certainty and

correctness of the contents of the deed, is also obliged to submit the deed and other documents to the land office within a period of 7 (seven) days from the signing of the deed.

PPAT in carrying out its position is regulated based on the Government Regulation on Changes to PPAT Position Regulations. After the existence of new regulations, in this case in Article 12 there is a change in the form of expanding the PPAT work area where in the amended Government Regulation which previously determined the work area was only limited to districts/municipalities was changed to one provincial area.

The expansion of the PPAT office area is a strategic step taken to increase the effectiveness and efficiency in land administration management in Indonesia. One of the main reasons behind this expansion is to improve the accessibility of services for the community. By expanding the work area, PPAT can provide more accessible land registration services, especially for people who live in remote areas or who were previously difficult to access. This is very important, considering that many communities need land registration services for legal ownership and transactions (Sulhan & Syahnel, 2018).

In addition, the expansion of PPAT's position area also aims to accelerate the land registration process. With the ability to handle more transactions in less time, PPAT can reduce the waiting time for people who want to register their land rights. A faster registration process not only increases public satisfaction with public services, but also contributes to legal certainty in land transactions. The public will feel more confident in making transactions because of the existence of a valid and legally recognized deed, which results from an efficient registration process (Wahid, 2008).

The process of expanding the PPAT work area is not as easy as imagined because there are various obstacles that must be faced, both from PPAT itself and from BPN. One of the main obstacles is the existence of complex regulations and policies related to land management, where the process of changing the necessary regulations is often time-consuming and involves many parties. In addition, poor coordination between PPAT and BPN and other government agencies can hinder collaboration, especially when there are policy differences at the central and regional levels.

The limited number of trained human resources in the field of land is also a challenge, where many PPATs do not have adequate training to handle land transactions in a wider area. Inadequate infrastructure, such as information systems and technology, can hinder the land registration process, while resistance from certain parties, including notaries or other institutions, can create tensions that hinder implementation. The lack of socialization and public understanding of the changes that occur due to the expansion of the PPAT work area can also lead to confusion and mistrust, which in turn reduces community participation in the land registration process. In addition, Indonesia's diverse geographical and cultural challenges require an understanding of the local context in order for PPAT to provide effective services.

Finally, budget constraints for training, infrastructure development, and operations can hinder efforts to improve the capacity and quality of services provided. By understanding these barriers, relevant parties can formulate better strategies to address challenges in expanding the PPAT's work area, thereby improving public services in the land sector and providing better legal certainty for the community.

Based on the results of an interview with Mrs. Anak Agung Istri Ratna Eka Handayani as a PPAT based in Bangli Regency, Bali Province, she argued that there was no significant difference regarding land registration carried out at BPN by PPAT who was inaugurated before 2016 and after 2016, because the Government Regulation on the Amendment PPAT Position Regulation itself could not be implemented because there were no technical instructions or implementation. He also disagrees if the Government Regulation on Revised PPAT Position Regulations is implemented because it raises pros and cons in its application, one of which is that PPAT who has become a senior and has many relationships will find it easy to carry out and implement the new provision, while for newly inaugurated PPAT will find it difficult to get clients and will think that it will further narrow the opportunity to earn income with the wider the space of movement of PPAT which is already considered senior.

He emphasized that so far there have been no obstacles because the Government Regulation on the Amended PPAT Position Regulation has not been implemented so that it still uses the old regulation, namely Government Regulation Number 37 of 1998. However, transactions can still be carried out outside the city/district of the PPAT's work area by first making a Sale and Power of Attorney agreement to be used as the basis for signing the Sale and Purchase Deed in front of PPAT whose position is in accordance with the location of the land object.

This process shows that despite the limitations within the PPAT's working area, there is still a mechanism that allows land transactions to take place. The creation of PJB and Power of Attorney is an important step that must be taken by the parties to ensure that the transactions carried out have clear legal force and can be accounted for. With this agreement, the parties can avoid potential disputes in the future, as all terms and conditions have been agreed in writing.

He also gave very valuable advice for PPAT candidates, namely the importance of having many good and broad relationships in different work areas. In carrying out his duties, a PPAT is not only required to have in-depth knowledge of land registration laws and procedures, but must also be able to establish good relationships with various parties, including notaries, lawyers, and other government agencies. This good relationship will be very helpful in carrying out the tasks of PPAT, especially when dealing with transactions involving land objects outside the specified work area.

By having a wide network, a PPAT can more easily get the necessary information, as well as facilitate the transaction process that may involve various parties. For example, if there is a transaction involving land located in another district, PPATs that have good relations with PPAT in the area can easily coordinate to ensure that all necessary documents and procedures are

met. This will not only speed up the transaction process, but also increase the satisfaction of clients who use PPAT's services.

In addition, a good relationship can also help PPAT in overcoming various challenges that may arise during the transaction process. In situations where there are differences of opinion or disputes between the parties involved, a PPAT with a strong network can act as an effective mediator, helping to resolve issues in a constructive manner and benefiting all parties (Lubis & Lubis, 2012).

Thus, his advice to build good and broad relationships in different work areas is very relevant and strategic. In this increasingly complex and interconnected world, the ability to collaborate and communicate with various parties will be one of the keys to the success of a PPAT in carrying out its duties. Therefore, PPAT candidates are advised to be active in a variety of professional activities, such as seminars, workshops, and professional associations, which can help them expand their network and improve their competence in the field of land law. With this proactive approach, it is hoped that PPAT can provide better and more efficient services to the community, as well as contribute to increasing legal certainty in the management of land rights in Indonesia.

Based on the results of an interview with I Gusti Agung Putu Puspa Dewi, as a PPAT based in Bangli Regency, Bali Province who explained the same thing with Mrs. Anak Agung Wife Ratna Eka Handayani, with a note that when viewed as a whole, this change has consequences both from the administrative and practical side with more territorial limitations for PPAT but also creates a more organized and organized system in land registration. There are a few obstacles at the time of the enactment of the regulation because there are several things that are still in the transition period.

Beliau juga menegaskan ada beberapa hal yang perlu diperhatikan yaitu :

1. Flexibility in the Determination of Work Areas: Article 12 of the Government Regulation on PPAT Position Regulations Changes that limit the work area of PPAT should be given flexibility for certain situations. For example, in the case of land transactions involving parties outside the PPAT's work area, PPAT may be authorized to handle land registration outside its work area with approval or recommendation from the local land office. This will make it easier for people who need PPAT services outside the region without having to look for other PPAT further away.
2. Collaboration Between Land Offices: To overcome the limitations of the work area regulated in this article, it can be considered that there is a better coordination system between land offices in various regions. For example, if the transaction involves land located outside the PPAT area, the local land office can provide permits or recommendations so that the PPAT can register at other land offices, reducing unnecessary bureaucracy.
3. Training and Socialization for PPAT: In order for PPAT to adapt to these changes, BPN should provide periodic training or socialization related to these regulations. This will help PPAT understand how the

new system works, as well as how to handle situations that may arise due to work area restrictions. With a good understanding, PPAT can be more effective in providing services to the community.

4. Simplification of Procedures for Cases Outside the Work Area: In certain cases where a land transaction or registration needs to be carried out outside the work area of the PPAT, there should be a simpler and faster procedure to obtain permission or approval from the local land office. This will reduce administrative barriers and provide more responsive services to the community.
5. Periodic Evaluation of the Work Area Policy: In order for this policy to remain relevant to the development of community needs, it is advisable to conduct periodic evaluations related to the impact of the implementation of PPAT work area restrictions. This evaluation can include feedback from PPAT, the community, and BPN to ensure that this policy is truly effective and does not actually hinder services.

Based on the results of an interview with Ni Made Listyawati as a PPAT based in Badung Regency, Bali Province, expressed his views on the boundaries of PPAT's work area which is currently still limited to one area of the city or district land office. He emphasized that in accordance with the Attachment to the Decree of the Head of the National Land Agency of the Republic of Indonesia, the authority of PPAT in Badung Regency only covers the area and is not allowed to carry out its duties in the Tabanan Regency area, even though the two districts are in one province, namely the Province of Bali.

He referred to Article 12 of the Government Regulation on the Amendment of PPAT Position Regulations, which should provide a basis for the expansion of PPAT's authority to operate in all provincial areas. However, in reality, these restrictions create uncertainty and difficulties for PPAT in serving communities that may need land registration services outside their districts.

He emphasized that although there are hopes for better changes through new regulations, the implementation of the policy is still hampered by regulations that have not been fully drafted and implemented. This has the potential to hinder public access to wider and more efficient land services. Mrs. Listyawati hopes that related parties, including the Ministry of Agrarian and Spatial Planning and BPN, will immediately prepare clear implementing regulations, so that PPAT can carry out its duties more effectively and provide optimal services to the community in all provincial areas. Thus, it is hoped that legal certainty and ease of land transactions will be created for the people in Bali Province.

It should be based on Article 12 of the Government Regulation on PPAT Position Regulations, the change in the PPAT work area is one provincial area, but in its implementation the article is not implemented and the result is still using the old regulation that the PPAT work area is only limited to districts/cities. This means that the PPAT work area which is one province cannot be implemented in reality.

The results of the interview with the BPN of Bangli Regency, Bali Province provide important insights regarding the uncertainty that occurs in connection with the expansion of the PPAT work area to one provincial area. Mr. I Nyoman Mertayasa as a representative of BPN, explained that currently PPAT is still registering land based on the working area limited to the city or district where it is located. Although regulations governing the expansion of PPAT's authority already exist, their implementation has not been implemented effectively because there is no necessary implementing regulation.

Mr. Mertayasa emphasized that the implementing regulations should be prepared by the Minister of Agrarian and Spatial Planning and the National Petroleum Agency of the Republic of Indonesia. Without clear and detailed regulations regarding the procedures and work mechanisms that must be followed by PPAT in exercising its authority at the provincial level, the process of registering land outside the city or district where PPAT is located becomes hampered.

He added that once the Ministerial Regulation regarding the implementation of the expansion of PPAT's authority has been determined, BPN in all cities and districts in Bali Province will be ready to accept land registration carried out by PPAT outside the city or district where their land office is located. This is expected to increase public access to land registration services and provide better legal certainty in land transactions. Thus, it is important for all parties to wait and support the preparation of the necessary implementing regulations so that the goals of this reform can be optimally achieved.

The implementation of the authority of the PPAT work area in the provincial work area based on the Government Regulation on the Revised PPAT Position Regulation faces a number of challenges and has not been fully implemented, as said by I Wayan Sukiana as the BPN of Badung Regency stated more or less the same thing as I Nyoman Mertayasa, Although the regulation regarding the expansion of PPAT authority has been passed, its implementation has not been carried out optimally.

This is due to the lack of implementing regulations that should be prepared by the Minister of Agrarian and Spatial Planning and the National Land Agency. This ambiguity creates confusion among PPAT and the community, who expect ease in the land registration process.

He also added that the expansion of the PPAT work area is very important to reduce the costs incurred in making deeds for all legal actions related to land rights. With wider authority, PPAT can serve the community in various cities and districts in one province, thus avoiding additional costs that may arise due to having to change locations to get the necessary services.

Furthermore, this expansion also aims to create equal opportunities for other PPATs to register land in other cities or districts in Bali Province. Thus, it will not only increase the accessibility of land services for the community, but also provide fairer opportunities for PPAT in carrying out their duties and responsibilities.

He hopes that with the immediate drafting of clear implementing regulations, all PPATs in Bali Province can operate more efficiently and effectively, as well as provide better services to the community. This is expected to create better legal certainty in the management of land rights, as well as support economic growth and sustainable development in the region. With these steps, it is hoped that a land administration system will be created that is more transparent and responsive to the needs of the community.

The Head of the Division of Rights Determination and Registration at the Regional Office of the National Land Agency of Bali Province, Mr. I Made Sumadra explained that, it is undeniable that indeed Article 12 of the Government Regulation on Amendment PPAT Position Regulations in reality has not been implemented. BPN is committed to continuing to improve the land administration system, including providing support to PPAT so that they can function optimally in one provincial area. This is again due to the absence of implementing regulations made by the Minister of ATR/BPN. However, this has begun to be followed up and studied more deeply so that the implementing regulations for the Government Regulation on the Revised PPAT Position Regulation can be completed and implemented as appropriate.

As a result of the interview from the interviewees, it can be concluded that until now there have been no very significant obstacles related to the implementation of the expansion of the PPAT work area as stipulated in Article 12 of the Government Regulation on the Amendment of PPAT Position Regulations. However, they underlined that the realization of these changes is still hampered by the absence of further technical or implementing arrangements. Without clear and detailed guidelines on the procedures and work mechanisms that must be followed by PPAT in exercising its authority at the provincial level, the implementation of this policy becomes difficult to implement effectively.

The speakers also emphasized the importance of immediately drafting implementing regulations that can provide direction and certainty for PPAT, so that they can operate optimally in providing land registration services to the community. With adequate technical arrangements, it is hoped that the goal of this expansion of authority can be achieved, and the community can feel the real benefits of the reforms carried out in the land administration system.

The problem of implementing the expansion of the PPAT work area in one provincial area as stipulated in Article 12 of the Government Regulation on the Amended PPAT Position Regulation shows that there is a discrepancy between the applicable legal norms and actual practices in the field. In this context, the theory of legal certainty put forward by Gustav Radbruch is an important framework in analyzing how a law should provide clarity, consistency, and predictability in its implementation. When the norms have been clearly stipulated in the Government Regulation on Revised PPAT Position Regulations but are not accompanied by adequate technical instructions, a situation of legal uncertainty is created that has an impact on the doubts of PPATs in carrying out their duties outside the district/city of origin. The existence of regulations without concrete implementing instruments causes

ambiguity, where PPAT normatively has authority across districts/cities in one province, but in practice remains bound by previous administrative limits. This condition proves that legal certainty has not been fully realized, which ultimately has the potential to cause differences in interpretation and conflict of authority between PPAT and BPN.

Furthermore, the existence of legal norms that cannot be implemented effectively can also be reviewed through the theory of legal effectiveness from Soerjono Soekanto. According to Soekanto, the effectiveness of the law is determined by factors such as the legal structure, legal substance, legal culture, and the readiness of the apparatus and the community. The ineffectiveness of the implementation of Article 12 of the Government Regulation on Revised PPAT Position Regulations can be seen from the lack of preparation of implementing regulations by the Minister of Agrarian and Spatial Planning/BPN. In addition, the resistance of some senior PPATs and the unpreparedness of new PPATs also illustrate obstacles at the level of legal culture and readiness of perpetrators. These obstacles show that legal norms have not been able to encourage the behavior and governance changes that are expected substantively. The absence of technical regulations also results in the Land Office in each district/city not having clear guidelines for accepting registration from PPAT outside its work area, even though the norm of expansion has been passed. Thus, the theory of legal effectiveness highlights that a legal norm will only be effective if it is supported by all readiness and understanding of all aspects and can be applied consistently.

In addition to the aspects of certainty and effectiveness, the issue of authority is a crucial point that needs to be analyzed through the theory of legal authority as stated by Philipus M. Hadjon. Philipus M. Hadjon emphasized that authority is legal legitimacy derived from laws and regulations and must be carried out in accordance with the principles of attribution, delegation, and mandate. In this context, the granting of authority to PPAT to work in one provincial area through Article 12 of the Government Regulation on PPAT Position Regulations Juridically has fulfilled the element of attribution. However, in practice, the implementation of this authority is hampered by the absence of implementing norms, so that PPAT is still limited by the old provisions that have been functionally replaced but have not been operationally implemented. When officials are unable to exercise the authority legally given to them, there is an administrative dysfunction that can lead to violations of the principles of legality and due process of law. This has the potential to raise doubts about the validity of deeds made by PPAT outside its jurisdiction. Therefore, the theory of authority emphasizes the importance of implementing regulations that not only provide formal legitimacy, but also create certainty and accountability in the implementation of the expanded authority of PPAT.

CONCLUSIONS AND RECOMMENDATIONS

The implementation of the expansion of the PPAT work area based on Article 12 of the Government Regulation on the Revised PPAT Position Regulation has not been able to run optimally. Legal uncertainty arises due to

the lack of implementation regulations that are the technical basis for operations, so that the norms that have been set cannot be implemented effectively. In addition, from the point of view of legal effectiveness, structural, cultural, and administrative obstacles have caused the regulation to not be implemented comprehensively. In terms of authority, although PPAT has been normatively given the authority to operate in one provincial area, the absence of implementing regulations makes this authority unable to be exercised legally and accountably. Therefore, it is necessary to accelerate the preparation of technical regulations so that legal norms can function effectively and provide certainty and legal protection for all parties involved in land administration.

In order to implement the Government Regulation on the Amendment PPAT Position Regulation, it is very important to immediately prepare a clear and comprehensive implementing regulation. This implementing regulation will be a guideline for PPAT in carrying out its duties and authority, so that every regulatory change made can be realized immediately and optimally. Without detailed regulations, there will be legal uncertainty that can hinder the land registration process and the transfer of rights, as well as cause confusion among the community and the PPAT itself. With the implementation regulations, it is hoped that all parties can understand the procedures and mechanisms that must be followed, so as to increase efficiency and effectiveness in land administration. In addition, this regulation will also provide better legal certainty for the community, so that they can feel safe in conducting land transactions. Therefore, quick steps in the preparation of implementing regulations are urgently needed to support successful implementation.

ADVANCED RESEARCH

In compiling this study, we acknowledge that there are still many shortcomings in this study, which are caused by the limitations of researchers. Therefore, we welcome criticism and recommendations that can help us in future efforts related to this research, both similar and different.

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