

Roles & Responsibilities of National Land Agency in Efforts to Settle Land Ownership Disputes Due to Overlapping Certificates

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Abstract. *This study aims to analyze: 1) The juridical implication is the existence of overlapping land certificates issued by the Cilacap Regency National Land Agency. 2) The roles and responsibilities of the Land Agency of Cilacap Regency in efforts to resolve land ownership disputes caused by overlapping land certificates. The approach method used in discussing this research problem is a sociological juridical approach. The specification of the research used descriptive analytical research. This type of data used primary and secondary data. The data analysis method used in this research is qualitative data analysis. The results of the study concluded: 1) The juridical implications of overlapping land certificates issued by the National Land Agency of Cilacap Regency and in one of the certificates being invalid. There are administrative legal defects that can result in the invalidity of a land title certificate. In addition, overlapping land certificates also creates legal uncertainty for land certificates. The existence of administrative legal defects in the issuance of the Certificate of Ownership has been canceled based on the Decision of the State Administrative Court Number: 28/G/2021/PTUN.SMG. 2). The roles and responsibilities of the Cilacap Regency Land Agency in Efforts to Settle Land Ownership Disputes resulting from Overlapping Land Certificates is to seek solutions to land dispute resolutions based on applicable laws and regulations by taking into account a sense of justice and respecting the rights and obligations of each party. The initial steps in dispute resolution that the BPN takes are deliberation / mediation. In addition to*

seeking settlement solutions, the Cilacap Regency BPN also plays a role in minimizing land disputes. The occurrence of overlapping land ownership as the cause of land disputes is absolutely the responsibility of the Head of the National Land Agency. So in the case of the overlapping certificate dispute in Cilacap Regency based on the decision Number: 28/G/2021/PTUN.SMG, BPN Cilacap must be responsible for implementing the court's decision by revoking the State Administrative Decision in the form of Property Rights Certificate (SHM) Number: 00898 / Karangpakis Village, BPN remains responsible for implementing the Administrative Court's decision on the cancellation of overlapping certificates, despite non-litigation efforts.

Keywords: BPN; Dispute; Land; Overlapping.

1. Introduction

Land and humans cannot be separated, humans live and develop and carry out daily activities on land. Humans are mostly dependent on land, because land is a source of livelihood and human livelihoods. The rapidly increasing demand for land coupled with the increasingly limited availability of land currently has a major impact on increasing the value and price of land. This will increase the potential for conflicts and problems related to or caused by land. The increasingly complex problems of human life caused by land today, requires that there be a rule that regulates the guarantee of legal certainty in the relationship between humans and land.¹

Land law in Indonesia was dualistic prior to the enactment of the LoGA, meaning that apart from recognizing that land law was based on customary law, it was also recognized that land regulations were based on western law. After the enactment of the UUPA on September 24, 1960, the dualism of land law prevailing in Indonesia ended as a unification of land law.²Regarding land rights, the law also requires rights holders to register their respective lands. Land registration is a very important issue in the LoGA, because land registration is the beginning of the process of producing proof of ownership of land rights.³Land registration is carried out by the National Land Agency (BPN).

¹Dyara Radhite Oryza Fea. 2018. *Panduan Mengurus Tanah Rumah dan Perizinannya*. Yogyakarta: Legality.p.2

²Adrian Sutedi. 2018. *Peralihan Hak Atas Tanah dan Pendaftarannya*. Jakarta.: Sinar Grafika.p.1

³Syarifah Lia. Lathifah Hanim. *Kepastian Hukum Dalam Penyelesaian Sengketa Timbulnya Tumpang Tindih Sertifikat Hak Milik (Shm) Atas Tanah (Studi Kasus Di Kantor Pertanahan/Agraria dan Tata Ruang Kota Pontianak)*. *Jurnal Akta*. Vol. 4. No. 1. March 2017: 33 – 36. Unissula Semarang. p. 34

The background of the birth of the National Land Agency (BPN) aims to carry out government duties, in accordance with applicable laws and regulations and focuses on organizing affairs in the agrarian and spatial planning sphere in Indonesia. Based on the Presidential Regulation of the Republic of Indonesia Number 20 of 2015 concerning the National Land Agency, the task of the Land Agency is to carry out government duties in the land sector. The Land Office is a State Administration Agency or Official, has the authority to issue certificates of land rights based on the applicable laws and regulations. As a State Administration Agency or Official in carrying out their duties, they may not abuse their authority. Even so,⁴

The certificate is a strong means of proof, because the information in it has legal force and must be accepted as true information, as long as and as long as there is no other means of proof that proves otherwise. This is in accordance with the proof of a certificate as evidence as explained in Article 32 Paragraph (1) of the 1997 Government Regulation concerning Land Registration, which states that a certificate is a certificate of proof of rights that applies as a strong evidence, in the sense that as long as it cannot be proven otherwise, physical data and juridical data contained therein must be accepted as correct data, as long as the physical data and juridical data are in accordance with the data contained in the letter of measurement and the relevant land book.⁵

The land registration system has been regulated in government regulation No. 24 of 1997 to ensure legal certainty of land ownership. The overlapping ownership mainly occurs in unregistered lands, especially customary lands whose transfer is based on trust and there is no authentic evidence. Another aspect, namely overlapping ownership, is due to the dual land certificates issued by BPN to one object of multiple land certificates due to inaccuracies in the land registration process or other elements carried out by BPN (National Land Agency).⁶

The issue of dual land certificates occurred in Karangpakis Village, Nusawungu District, Cilacap Regency, where a certificate issued by the National Land Agency office of Cilacap Regency experienced a defect in the ownership status section where there was more than one party having authority or overlapping. The overlapping land certificates emerged after IK applied for a certificate through PRONA (National Agrarian Program) and a certificate was issued in 2017. IK is a Village Apparatus with the position of Head of Grumbul Hamlet, Karangpakis Village and when there is PRONA (National Agrarian Program) by the Village

⁴Renaldi. Pertanggungjawaban Badan Pertanahan Nasional terhadap Munculnya Sertifikat dengan Kepemilikan Ganda. *Skripsi Hukum*. 2020. Universitas Jember. p. 4

⁵Ibid.p. 80

⁶Angelia Ingrid Lumenta. Tanggungjawab Badan Pertanahan Nasional Menurut Peraturan Pemerintah Nomor 24 Tahun 1997 Terhadap Tumpang Tindih Kepemilikan Tanah. *Journal Lex Et Societatis*. Vol. VI/No. 7/Sept/2018. p.31

government given the task of helping residents who want to apply for a land certificate in the Grumbul Karangjati Hamlet, Karangpakis Village through PRONA.

It turned out that IK actually applied for a certificate in his personal name (a certificate appeared in 2017), where for the object there was previously a *waqf* land certificate from the US which on the land has been used for the public interest (built mosques and Salafiyah Islamic boarding schools). The attorney for the US heirs then filed a legal action by suing through the State Administrative Court (PTUN) regarding the submission of a land certificate that had been issued by the National Land Agency (BPN) on behalf of IK.

BPN is responsible for certificates issued in relation to the authority to issue certificates with the Head of BPN. The absolute responsibility system requires BPN to be responsible both inside and outside the court if there is a lawsuit regarding land rights. The occurrence of overlapping land ownership as the cause of land disputes is absolutely the responsibility of the Head of the National Land Agency.

2. Research Methods

This research used sociological juridical research methods.⁷ The specifications of the research conducted by the author are classified as analytical descriptive research. The methods of data collection used interview techniques and literature study. Sources of data come from primary and secondary data. The method of data analysis was descriptive qualitative analytical.

3. Results and Discussion

3.1. Juridical Implications of Overlapping Land Certificates issued by the National Land Agency of Cilacap Regency

In the case of overlapping land certificates in Cilacap Regency, the plaintiffs demanded the cancellation of the Certificate of Ownership (SHM) Number: 00898 / Karangpakis Village, December 11 2017, with a Measurement Letter Number: 00634/Karangpakis/2017 dated November 21 2017, located at RT 04 RW 02, Block 052, Karangpakis Village, Nusawungu District, Cilacap Regency, covering an area of 1.164M², on behalf of : IKSANUDIN and AHMAD SAHUDIN because the certificate of Ownership Rights Number : 00898 overlaps with part of the land belonging to the Plaintiffs as customary land owners. Letter C 1900

⁷Agus Salim. 2001. *Teori dan Paradigma Penelitian Sosial. Dari Denzin Guba dan Penerapannya*. Yogyakarta: Tiara wacana.p. 33-34.

Persil 33 class d1, in the name of Achmad Sadzali and Part of the *Waqf* Land as stated in the Certificate of *Waqf* Land No. 03, issued by the Cilacap Regency Land Office on 23 February 2001.

The issuance of the Certificate of Ownership (SHM) issued by the Cilacap Regency Land Office on December 11, 2017 did not take into account the provisions of Article 17 of the Government Regulation of the Republic of Indonesia Number 24 of 1997 concerning Land Registration in which the Plaintiffs are the heirs of the wakif as well as the Nadzir of the *waqf* land with Land *Waqf* Certificate No. 03, which was issued by the Cilacap Regency Land Office on February 23, 2001 and as the owner of customary land owned by Letter C 1900 Persil 33 klas d1 on behalf of Achmad Sadzali, was never involved in the delimitation of land parcels during the land registration process requested by Mr. IKSANUDIN and Br. AHMAD SAHUDIN.⁸

Article 17 Government Regulation of the Republic of Indonesia Number 24 of 1997 concerning Land Registration which states:

- In order to obtain the physical data required for land registration, the plots of land to be mapped are measured, after determining their location, boundaries and according to need, boundary markings are placed in each corner of the land parcel concerned.
- In determining the boundaries of land parcels for systematic land registration and sporadic land registration, efforts are made to arrange boundaries based on the agreement of the interested parties.

Likewise, Article 19 paragraph (1) of the Regulation of the Minister of State for Agrarian Affairs/Head of the National Land Agency Number: 3 of 1997 concerning Provisions for the Implementation of Government Regulation Number 24 of 1997 concerning Land Registration obliges the holder of rights to land parcels that have not been registered or those that have been registered but not yet registered. there is a measuring letter/drawing of the situation to show the boundaries of the land parcel in question and if there is an agreement on the boundary with the holder of the rights to the adjacent land parcel, put up boundary signs. Article 19 paragraph (1) Regulation of the State Minister of Agrarian Affairs/Head of the National Land Agency Number:

- The applicant concerned in sporadic land registration.

⁸Interview with Semarang Administrative Court Judge. February 3, 2022

- Holders of rights to land parcels that have not been registered or which have been registered but have not yet had a letter of measurement/drawing of the situation or whose letter of measurement/drawing of the situation is no longer in accordance with the actual situation, and the party who controls the plot of land in question, in systematic land registration, are required to show the boundaries of the land parcels in question and, if there is an agreement regarding these boundaries with the holders of rights to the adjacent land parcels, put up boundary signs;

Settlement of Land Cases in the Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency Number 11 of 2016 concerning Settlement of Land Cases Article 24 paragraph 7 explains as follows:

In the event that on one plot of land there are overlapping certificates of land rights, the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency or the Head of the Regional Office of the National Land Agency in accordance with their authority issues a decision to cancel the overlapping certificates, so that on the land parcel there is only 1 Certificate of legal title to land.

Cancellation of land rights certificates is a form of dispute resolution through the decision of the State Administrative Court (PTUN), namely the panel of judges issues a decision letter to the head of the local BPN to revoke the certificate of land rights. In the dispute resolution process as at the PTUN level, in that case the parties must prove that there is a link between the official or the State Administration or the land agency official who issued an authentic letter of evidence, which proves that the administrative institution can be prosecuted.

The process of canceling land rights as part of the form of dispute resolution in court as dispute cases are often handled in the Administrative Court, usually if in the case of a dual certificate dispute which has reached a decision regarding permanent legal status, the panel of judges based on a decision that has been inraht will ordered the cancellation of land rights through the head of the local land agency.⁹¹⁰There are two types of cancellation of Land Rights as usually applied by the panel of judges in the Administrative Court, namely:

⁹Ibid.

¹⁰Ferdy Ananda. Akibat Hukum Terbitnya Sertifikat Hak Milik Atas Tanah Yang Bersifat Ganda (Studi Pada Kantor Pertanahan Kota Medan). *Skripsi Hukum*. Universitas Muhammadiyah Sumatera Utara Medan. 2016. p.26

- It is carried out as the implementation of court decisions, in principle a form of administrative execution regarding the status of the subject and object of disputed land, while physical executions are carried out by officials at the District Court.
- Done because there are administrative defects in the issuance process, for example there are errors in the application of laws and regulations, errors in the subject of rights, errors in the object of rights, errors in types of rights, wide calculation errors, overlapping rights, errors in physical data and juridical data, and other administrative errors. ¹¹

The juridical implication of overlapping land certificates issued by the National Land Agency of Cilacap Regency is that one of the certificates becomes invalid. The existence of administrative legal defects that can result in the invalidity of a land title certificate must be strengthened by evidence in the form of:¹²

- Court decisions that have permanent legal force;
- Research results that prove the existence of administrative law defects;
- Information from investigators regarding the criminal act of falsifying letters or information used in the process of issuing, transferring or canceling land rights certificates;
- Other documents showing administrative defects

Act No. 5 of 1960 concerning the Basic Regulations on Agrarian Principles, the cancellation of land rights is one of the reasons for the abolition of the land rights. If a decision on the cancellation of land rights has been issued, either because of a defect in administrative law or to implement a court decision, then the rights are nullified by law and the status of the land becomes land controlled by the State.

With regard to the nullification of the land rights due to the cancellation of the rights, the registration of the nullification of the rights is in accordance with the provisions of Article 131 of the Regulation of the Minister of State for Agrarian Affairs/Head of BPN No. 3 of 1997, carried out by the Head of the Land Office at the request of the interested party by attaching a decree of the competent authority stating that the right in question has been canceled or canceled, and a certificate of land rights if the certificate is not present with the applicant, a statement regarding the existence of the certificate.

¹¹Ibid. p.27

¹²Article 71 paragraphs (1) and (2) Regulation of the Head of the National Land Agency of the Republic of Indonesia No. 3 of 2011 concerning the Management of the Assessment and Handling of Land Cases

The recording of the annulled rights is carried out by crossing out in black ink in the land book and certificate (if the certificate is submitted) and crossing out the number of the right in question, then on the page of amendments provided it is written "land rights are abolished based on the decision to cancel the rights number ... date .. . , and crossed out in the list of names, letters of measurement and maps as well as the number of rights that have been deleted. Land books and certificates that have been given a note regarding the annulment of rights are declared no longer valid.¹³The role of certificates is very important, so that the power of proof does not only apply externally to broad parties, but also has internal power, namely to provide a sense of security for the holders/owners.¹⁴

The juridical implication of overlapping land certificates issued by the National Land Agency of Cilacap Regency has also resulted in legal uncertainty over land certificates. With the overlapping of Ownership Rights Certificate Number 00898/ Karangpakis Village, on December 11, 2017, it has created legal uncertainty for the holders of land rights, because they have been harmed by the issuance of the Right to Use Certificate. The existence of an administrative legal defect in the issuance of the Certificate of Ownership Number 00898/ Karangpakis Village, dated December 11, 2017 has been canceled based on the Decision of the State Administrative Court Number: 28/G/2021/PTUN.SMG which was decided in a deliberation meeting of the Panel of Judges on Tuesday the 14th September 2021. The decision was pronounced in a session open to the public.

3.2. The Roles and Responsibilities of the Cilacap Regency Land Agency in Efforts to Settle Land Ownership Disputes caused by Overlapping Land Certificates

The method of dispute resolution through mediation is the most important method suggested by the National Land Agency, which through a mediation institution, the parties can express their will and will be brought together to find the best solution through negotiations so as to produce a dispute resolution agreement that can be accepted by both parties. , and no less important are the costs that must be incurred by the parties in resolving the dispute. If in dispute resolution the disputing parties do not agree with holding a settlement through a

¹³Lubis. Mhd. Yamin and Rahim Lubis. 2008. *Hukum Pendaftaran Tanah*. Mandar Maju. Bandung.p.321

¹⁴Agnes Deslina. Analisis Yuridis Atas Tumpang Tindih I(Overlapping) Tanah Bersertifikat (Studi Iputusan Mahkamah Agung No. 81/Pk/Tun/2014). *Tesis Hukum*. Universitas Sumatera Utara Medan. 2018. p.91

mediation institution, then the disputing party can resolve the problem through other institutions such as litigation institutions or judicial institutions.¹⁵

Dispute settlement in the General Courts focuses more on civil and criminal elements in land disputes, it is different with the State Administrative Court whose dispute resolution focuses more on decrees issued by the National Land Agency or other regional officials related to land. The process of proceeding in court, one of the duties of the judge is to determine the actual legal relationship between the litigants. It is this relationship which must then be proven true in front of the court, where in this case what must be proven is all the events put forward by one of the parties whose truth is denied by the other party. The Plaintiffs were given the opportunity to prove the truth of their claim. After that, the defendant was given the opportunity to prove the truth of the argument of his denial. To prove all that, evidence is needed and each piece of evidence in the form of letters or writings has its own weight of proof and the judge will determine the weight or value of evidence for each of these pieces of evidence.

While waiting for a decision that has permanent legal force (*In Kracht Van Gewijsde*), the documents of evidence provided in the form of a certificate of land rights are said to be a strong means of proof, this means that the information contained in the certificate has legal force and must be accepted as true information by the judge as long as it cannot be proven otherwise by other parties. If the other party can prove otherwise, then the court is the one who has the authority to decide which means of proof is correct.

In the case of overlapping certificate disputes in Nusawungu Village, Cilacap Regency, Ahmad Sadali's heirs filed a lawsuit at the State Administrative Court, so that the end of this dispute was the cancellation of the certificate on behalf of Ikhsanudin which was issued through Prona in 2017. The role of the Cilacap Regency National Land Agency in Land disputes, especially the problem of overlapping certificates, are seeking solutions to land dispute resolutions based on applicable laws and regulations by taking into account a sense of justice and respecting the rights and obligations of each party. The initial steps in dispute resolution that the BPN takes are deliberation / mediation.

In practice, the settlement of land disputes is not only carried out by the National Land Agency but can also be resolved by the General Courts and State Administrative Courts. If the general court focuses more on civil and criminal matters in land disputes, it is different with the state administrative court which resolves land disputes related to decrees issued by the National Land Agency or other regional officials related to land.¹⁶

In addition to seeking settlement solutions, the Cilacap Regency BPN also plays a role in minimizing land disputes in this case overlapping certificates, including:

¹⁵Gede Agus Marta Dinata. Anak Agung Sagung Laksmi Dewi .Luh Putu Suryani. eran Mediasi dalam Penyelesaian Sengketa Sertipikat Gandadi Badan Pertanahan Nasional (BPN) Kabupaten Klungkung. *Jurnal Analogi Hukum*. Volum 3 No. 2 2021. p. 154

¹⁶Angela Ingrid Lumenta. Op.cit. p. 34

- Reviewing and managing data to resolve cases in the land sector.
- Accommodating lawsuits, preparing response memory materials, preparing appeal memorandum, memory/counter memory of cassation, Memory/counter memory of cassation review on cases filed through court against individuals and legal entities that are detrimental to the state.
- Collect data on land issues and disputes.
- Reviewing and preparing draft decisions regarding Settlement of disputes over land.

BPN is normatively the only institution or institution in Indonesia that is given the authority to carry out the mandate in managing the land sector, in accordance with Presidential Decree Number 10 of 2006 concerning the National Land Agency which states that BPN carries out tasks in the land sector on a regional and sectoral basis. Even through the same process, the government has also strengthened the role and position of BPN by establishing Deputy V who specifically reviews and resolves land disputes and conflicts.¹⁷

The National Land Agency, apart from being given the task and responsibility to carry out land administrative activities, from data collection to the issuance of certificates, is also given the obligation to carry out TUN court decisions. This task seems very odd because in the event of a TUN case, especially with regard to certificates, BPN is the only Agency or Institution that must be responsible (the defendant) in the event of a dispute. However, this task must be carried out because considering that BPN is the agency authorized to issue certificates, the revocation or cancellation must also be by BPN. Furthermore, Article 55 describes in detail the responsibilities of BPN for the implementation of the certificate cancellation decision by the PTUN as follows:

- Actions to implement court decisions that have permanent legal force can be in the form of:
 - Implementation of all decisions;
 - Implementation of some of the decision orders; and/or
 - Only carry out orders that are expressly written in the decision.
- Court decisions that have obtained permanent legal force, relating to the issuance, transfer and/or cancellation of land rights, include:
 - Order to cancel land rights;
 - Declaring void/invalid/does not have legal force on land rights;
 - Stating that the proof of right is invalid/not legally enforceable;
 - Orders to record or write off in the land book;
 - Order to issue land rights; and

¹⁷Ibid. p. 33

- Amar which means to cause legal consequences for its issuance, transfer or cancellation.

The National Land Agency (BPN) is absolutely responsible for overlapping land ownership as a result of the inaccurate land registration system. The Head of BPN is responsible for the certificates issued in relation to the authority to issue certificates with the Head of BPN. The absolute liability system requires BPN to be responsible both in and out of court in the event of a lawsuit regarding land rights. The occurrence of overlapping land ownership as the cause of land disputes is absolutely the responsibility of the Head of the National Land Agency. So in this case of overlapping certificate disputes in Cilacap Regency, based on the decision Number: 28/G/2021/PTUN.SMG,

BPN is not only responsible until someone tries to make administrative efforts, but BPN is given the burden to carry out the PTUN decisions related to its main task, namely the issuance of certificates. In this regard, the certificate that has been canceled by the PTUN which has permanent legal force must be followed up in terms of revocation or cancellation of the certificate.

The issuance of dual certificates by BPN has implications for legal issues/disputes that result in losses to the land owners in dispute, BPN is not only responsible for implementing court decisions by revoking or canceling certificates that already have a permanent legal decision, but BPN is also responsible both administratively, civilly or criminally.¹⁸In order to avoid overlapping issuance of certificates, BPN can take preventive measures by:

- Checking the plot map of the land parcel before submitting an application for land registration, this is done by the measurement department.
- Take cadastral measurements. If there is a problem, namely, in this case, a certificate or other rights base has been issued on the land, then the process of issuing a field map cannot be issued.

Based on the description above, BPN has a role to provide a solution in the form of a settlement if there is a dispute over overlapping certificates caused by BPN's own inaccuracy in issuing land certificates. The form of dispute resolution by the BPN is only limited to administrative authority, namely the cancellation or revocation of a certificate issued by the BPN itself. BPN must also be responsible for the consequences resulting from defects in the issued land certificate. In addition, BPN is also responsible for implementing the Administrative Court's decision on the cancellation of overlapping certificates, even though there are non-litigation efforts.

4. Conclusion

¹⁸Hirwansyah. Pertanggungjawaban Hukum Badan Pertanahan Nasional Terhadap Adanya Penerbitan Sertifikat Ganda. *Jurnal Hukum Sasana*. Vol. 7. No. 1. June 2021. p.17

The juridical implication of the existence of overlapping land certificates issued by the Cilacap Regency National Land Agency is that one of the certificates becomes invalid. There are administrative legal defects that can result in the invalidity of a land title certificate. In addition, overlapping land certificates also creates legal uncertainty for land certificates. With the overlapping of Ownership Rights Certificate Number 00898/ Karangpakis Village, on December 11, 2017, it has created legal uncertainty for the holders of land rights, because they have been harmed by the issuance of the Right to Use Certificate. The existence of an administrative legal defect in the issuance of the Certificate of Ownership Number 00898/ Karangpakis Village, dated December 11, 2017 has been canceled based on the Decision of the State Administrative Court Number: 28/G/2021/PTUN.SMG. The role of the Cilacap Regency Land Agency in Efforts to Settle Land Ownership Disputes caused by overlapping Land Certificates is to seek solutions to land dispute resolutions based on applicable laws and regulations by paying attention to a sense of justice and respecting the rights and obligations of each party. The initial steps in dispute resolution that the BPN takes are deliberation / mediation. In addition to seeking settlement solutions, the Cilacap Regency BPN also plays a role in minimizing land disputes. So in this case of overlapping certificate disputes in Cilacap Regency, based on the decision Number: 28/G/2021/PTUN.SMG, BPN Cilacap must be responsible for implementing the court's decision by revoking the State Administrative Decision in the form of a Certificate of Ownership (SHM) Number: 00898 / Karangpakis Village, December 11 2017, with a Measurement Letter Number: 00634/ Karangpakis/2017 dated November 21 2017, located at RT 04 RW 02, Block 052, Karangpakis Village, Nusawungu District, Cilacap Regency, covering an area of 1,164 M², on behalf of: IKSANUDIN and AHMAD SAHUDIN. BPN remains responsible for implementing the Administrative Court's decision on the cancellation of overlapping certificates, despite non-litigation efforts.

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