

## The Legal Position of Land Ownership Certificates Issued Not In Accordance with Administrative Procedures

Devi Nurfadillah Abas<sup>\*)</sup> & Bambang Tri Bawono<sup>\*\*)</sup>

<sup>\*)</sup> Faculty of Law, Sultan Agung Islamic University (UNISSULA), E-mail: [devinurfadillah96@gmail.com](mailto:devinurfadillah96@gmail.com)

<sup>\*\*)</sup> Faculty of Law, Sultan Agung Islamic University (UNISSULA), E-mail: [bambang@unissula.ac.id](mailto:bambang@unissula.ac.id)

**Abstract.** *The purpose of this research is to find out: 1). To find out and analyze the legal position of land ownership certificates that were issued not in accordance with administrative procedures at the Office of the National Land Agency in Bau-Bau City. 2). To find out and analyze the responsibilities of the Head of the Land Office of Bau-Bau City for the issuance of land ownership certificates that are not in accordance with the procedure. The approach method used in discussing the problem of this research is a sociological juridical approach. The research specifications used are analytical descriptive research. Types of data using primary and secondary data obtained through interviews and literature. The data analysis method used is qualitative. The results of the study concluded: 1). The legal position of the certificate of ownership rights to land that is issued is not in accordance with administrative procedures, namely the certificate of ownership rights can be canceled, either through the administrative settlement route by the National Land Agency or through the dispute resolution pathway by the court and of course must go through the existing procedures and also the applicant must be able to prove that the object is indeed his property. The position of the certificate plays a very important role in land disputes, because the certificate is a strong documentary evidence in various matters, especially for land disputes. The legal force of land title certificates is a guarantee of legal certainty for the certificate holder. Because this is a strong proof of ownership, meaning as long as it is not proven otherwise by other parties who feel entitled and have evidence to prove it, in this case the certificate has material legal certainty (negative publication with positive elements) which is adhered to in national land law. , but on the other hand the certificate also has formal legal certainty (positive publication), namely the legal certainty of a certificate containing written provisions contained in laws or other regulations is absolute, meaning it cannot be contested. 2). The response from the head of the Bau-Bau City Land Office is in accordance with PMNA/Head of BPN provisions No. 21 of*

*2020 concerning the handling and settlement of land cases by a decision of the Head of the National Land Agency or by delegating it to the Regional Office or a designated official. According to Article 29 paragraph (1) letter b states that "BPN RI is obliged to implement a court decision that has obtained permanent legal force, unless there is a valid reason not to carry it out". So BPN is obliged to implement the court's decision regarding the cancellation of the certificate or revoke the certificate.*

*Keywords: Administration; Certificate; Procedure.*

## **1. Introduction**

Land and nature (natural resources) have a special meaning in an agrarian and maritime society like Indonesia, namely as a form of existence, socio-cultural roots, symbols of existence and socio-economic status.<sup>1</sup> To support and drive development, natural resources are needed, both production natural resources and land as the foundation for development.<sup>2</sup> In Indonesia, issues regarding natural resources are regulated in the Basic Agrarian Law (UUPA No. 5 of 1960, hereinafter referred to as UUPA). In Article 2 paragraph (1) of the Basic Agrarian Law which states "Earth, water and space including the natural wealth in it at the highest level is controlled by the state as the organization of the power of all the people". What is meant in Article 2 paragraph (1) of the Basic Agrarian Law is that the state has the power to regulate land that is already owned by a legal subject, whether a person or legal entity or land that is not yet owned by a legal subject, whether the person or legal entity will be directly controlled by country.<sup>3</sup> The Basic Agrarian Law states that the state determines the types of land rights that are granted to legal subjects, both individuals and legal entities. The Basic Agrarian Law regulates the types of land rights in both civil and administrative aspects, which have the aim of creating a unification of land law in Indonesia.<sup>4</sup>

History before the enactment of the Basic Agrarian Law, only for lands subject to Western law, for example Eigendom Rights, Erpacht Rights, Opstal Rights.<sup>5</sup> This land registration is known as Recht Cadastral. As for land registration which is subject to customary law, land registration is not carried out, this land registration is called Fiscal Cadastral.<sup>6</sup> The formal definition of a certificate in Article 19 paragraph (2) of the Basic Agrarian Law emphasizes that a certificate is a "letter of proof of land rights which is valid as a strong means of proof". A certificate as proof of title, which is issued for the benefit of the right holder, is

---

<sup>1</sup>Bernhard Limbong, Land Acquisition for Development, Margaretha Pustaka, Jakarta, 2011, p. 1.

<sup>2</sup>Ibid., p. 1-2.

<sup>3</sup>Elza Syarief, Op. cit, p. 5.

<sup>4</sup>Ibid.

<sup>5</sup>Adrian Sutedi, Transfer of Land Rights and Registration, Sinar Graphic, Jakarta, 2006, p. 112.

<sup>6</sup>Ibid.

the same as physical data and juridical data in a measuring letter that has been registered in the land book. In Government Regulation Number 24 1997 concerning land registration, formulating a certificate is "one document as proof of rights containing physical data and juridical data on objects listed among others for land rights, for management rights, for waqf land, for property rights apartment units and for mortgage rights, each of which is recorded in the land book. The existence of a certificate of land rights as a proof of title has perfect strength. This means that if the opposite cannot be proven, namely the physical data and also the juridical data contained in the certificate must be accepted as correct data.

Land Registration like this uses a Negative Evidence system. In the system of Negative Evidence, the State only passively accepts what is stated by the party requesting registration. This causes an uncertain time for a lawsuit to occur from someone who feels entitled to the land. In many cases that occur, the right holder who has a certificate of land rights at any time without being able to lose his rights due to a lawsuit, the result is that the certificate will be cancelled.<sup>7</sup>

It is felt that land registration using a negative publication system does not provide legal certainty to people who are existing and registered as rights holders, this is because the state also does not guarantee the accuracy of the records presented, and vice versa.<sup>8</sup> Land registration is important to prove as the true owner of land rights legally.<sup>9</sup> Basically the purpose of land registration services is to improve people's welfare. In achieving this goal, the target of government is the orderly chess of land affairs. Besides that, the National Land Agency as a public organization whose duty is to serve the community, the National Land Agency should have created a service that is transparent, simple, inexpensive, and accountable to the public.<sup>10</sup>

In social life it is often found in practice and it is not uncommon for the issuance of certificates to deviate from the formal procedure. So that legally it causes the certificate that has been issued to be legally invalid and can be canceled and creates uncertainty for the holder of land rights. It's no secret that many people experience difficulties in registering their land. The process is long and requires a lot of money. The services of the land office seen from the administrative aspect have also not been able to provide the good performance expected by the community, namely services that are simple, safe, affordable and transparent. The reality is that service is still slow, the process is difficult, expensive and convoluted and allows for malpractice.

---

<sup>7</sup>Ibid., p. 113.

<sup>8</sup>Ibid.

<sup>9</sup>Adrian Sutedi, Op. cit, p. 125.

<sup>10</sup>Adrian Sutedi, Review of Land Law, Pradnya Paramita, Jakarta, 2009, p. 2.

The Head of the National Land Agency has the authority to cancel a decree granting land rights which in its issuance by the Head of the Regional Office of the Provincial National Land Agency or the Regency/City Land Office contains any legal defects.<sup>11</sup>As a control for the issuance of decrees granting rights, administrative law defects according to Article 35 of the Minister of Agrarian Regulation/Head of BPN Number 21 of 2020 concerning Handling and Settlement of Land Cases include procedural errors, misapplication of laws and regulations, legal subject errors, legal object errors, wrong types of rights, widespread miscalculations, there are overlapping land rights, incorrect juridical data/physical data, or administrative errors that can lead to disputes between the parties thus bringing legal uncertainty to the holders of land rights and can result in the certificate being canceled because it does not comply with administrative procedures and is legally flawed in its issuance in order to create legal certainty and legal protection for holders of ownership certificates.

There is one example of an agrarian case that occurred and was filed by the public to the National Land Agency, whereby issuing a certificate by the National Land Agency office, they experienced a defect in the ownership status where there was more than one party having authority or overlapping rights. to control a parcel of land or land either in part or as a whole with the parties concerned having the same letter or document as evidence in the form of a certificate. This incident can be referred to as the issuance of multiple certificates, namely a plot of land has more than one certificate and is suspected to have occurred as a result of the issuance of certificates that were not in accordance with administrative procedures.

Based on the explanation above, the authors are interested in conducting research with the aim of knowing and analyzing the legal position of land ownership certificates that are issued not in accordance with administrative procedures at the Office of the National Land Agency in Bau-Bau City. To find out and analyze the responsibilities of the Head of the Land Office of Bau-Bau City for the issuance of land ownership certificates that are not in accordance with the procedure.

## 2. Research Methods

The approach method used in this study is a sociological juridical approach. The sociological juridical approach is to identify and conceptualize law as a real and functional social institution in a real life system.<sup>12</sup>To obtain the data needed in this study. The author uses two kinds of data sources, namely, Primary Data and Secondary Data. The data collection method is carried out by means of a

---

<sup>11</sup>*ibid*, matter. 168.

<sup>12</sup>Soerjono Soekanto, Op. Cit., p.51

literature study by collecting legal materials in the form of literature and laws and regulations. Legal material obtained, then collected and studied and quoted from various sources such as literature, laws and regulations, journals, related to the title and issues that the author is researching, will then be interpreted and analyzed based on applicable legal provisions and related to the title and issues which the author examines. Analysis of the data used in the field by the authors, namely using qualitative data analysis,<sup>13</sup>

### **3. Results and Discussion**

#### **3.1. Legal Position of Certificate of Ownership of Land Issued Not in accordance with Administrative Procedures**

Certificates of ownership rights to land that are issued not in accordance with administrative procedures are usually known as legally defective certificates. A legally disabled certificate is proof of a land right that has been issued and there are things that cause it to be cancelled, because in its management there are elements of coercion, confusion, fraud and others.

Based on the reasons the applicant obtained, the background is related to the existence of a case regarding the issuance of a replacement certificate which is considered an unlawful act and is very detrimental to the applicant. One of the objectives of land registration as stipulated in Article 3 of Government Regulation Number 24 of 1997 concerning Land Registration. In order to provide legal certainty and legal protection, the right holder concerned is given a certificate of land rights.

Based on this case, the researcher is of the opinion that there are many suspicions of unlawful acts arising until the issuance of a replacement certificate. Starting with a report explaining that his certificate was lost, while the certificate was not in the name of IT but in the name of A. A also explained that he had never authorized anyone regarding the management of the certificate from the object of dispute. Then there are no files from the police regarding reports of loss of disputed objects. Of course, it is suspected that many irregularities have occurred which can be categorized as administrative defects so that certificates can be issued on behalf of IT.

Proof of land rights in the form of a land certificate is valid as a means of proof, otherwise the physical data and juridical data included in the certificate must be valid data. So often the certificates owned are no longer able to defend a person's rights to a piece of land. Settlement or resolution of problems that

---

<sup>13</sup>Lexy J. Moloeng, *Qualitative Research Methodology*, (Bandung: Young Rosdakarya, 2006), p. 6

occur due to the existence of a legal defect certificate, is usually pursued in two ways, namely:

#### 1. Administrative settlement by BPN

This settlement is done by means; complaints or objections by the public, research and data collection, prevention of mutations (implementation of the status quo), and settlement by way of deliberation. The consequence of an administrative settlement that actually has found an administrative flaw in the issuance of a certificate objected to by a person/legal entity is the revocation or cancellation of the State Administrative Decree in the field of land (land certificate) by the Head of BPN.

#### 2. Settlement through court

If a settlement through deliberation between the disputing parties is not reached, then the final settlement taken is to go through the courts. After going through the trial there is a possibility, whether the lawsuit from the plaintiff is accepted or rejected. If the lawsuit is rejected, it means that the certificate that has been issued is correct according to law and in accordance with the applicable procedures. Then the Head of BPN can also issue a decision containing the rejection of the claims of third parties who object to the certificate. As a consequence of the refusal, it means that the decision on the certificate that has been issued is still correct and valid.

Based on the results and discussion that has been described above, it can be concluded that the legal position of the certificate of ownership of land that is issued is not in accordance with administrative procedures, namely that the certificate of ownership can be canceled, either through the administrative settlement route by the National Land Agency or through the dispute resolution pathway by the court and of course it must go through the existing procedures and also the applicant must be able to prove that the object is indeed his property.

### **3.2. Responsibilities of the Bau-Bau Land Office for the Issuance of Certificates of Ownership of Land that are not in accordance with administrative procedures**

#### 1. Cancellation of Rights Certificate by Administrative Court

In social life there are always various kinds of interests from its citizens. For this purpose, the law must function according to certain functions to achieve its goals. In other words, the function of law is to regulate and regulate association in society and resolve conflicts that occur.<sup>14</sup>In Indonesia, the function of law in development is as a means of social renewal.<sup>15</sup>

Based on the theory of administrative responsibility, then the land party as an institution that oversees all management in the land sector must be responsible for mistakes from the land office. The expiration of a title certificate which is a state administrative decision can occur due to a court decision that has permanent legal force and the firmness of a state administration official.

If a court decision has passed, even though the five-year period has passed, if the basis for the lawsuit is a matter of the validity of the issuance of a certificate, then the five-year time limit is waived. Because it is necessary to prove the truth of the plaintiff's argument regarding the invalidity of the issuance of the certificate. The type of dispute resolution relates to the principle of legal preference, namely: Denial, interpretation, cancellation, and recovery. In the case of a lawsuit regarding the validity of the issuance of certificates of land rights is through the state administrative court. In the case of a lawsuit regarding the validity of the certificate of ownership, the Administrative Court judge can override the norm of Article 32 paragraph (2) of Government Regulation Number 24 of 1997 concerning Land Registration which provides a grace period for filing a lawsuit.

The assertiveness of state administrative officials in resolving certificate issuance disputes based on authority in accordance with the provisions of the Regulation of the Minister of State for Agraria/Head of the National Land Agency Number 21 of 2020 concerning the handling and settlement of land cases is carried out by decision of the Head of the National Land Agency or delegate to Regional Offices or appointed officials . The purpose of this principle is that the judicial process is not convoluted, the procedure is clear, easy to understand and the costs are easily accessible to even the grassroots community.

---

<sup>14</sup>Bernhard Limbong. 2012. National Agrarian Law. Jakarta : Margaretha Pustaka. Matter. 70

<sup>15</sup>Lawrence Friedman. 1975. Legal system. New York: Rusel Foundation. Look, Bernard Limbong. Law..., ibid

The Decree on the Granting of Rights as proof of registration of rights and issuance of certificates, the National Land Agency can automatically cancel the decisions that have been made. When referring to the provisions of Article 33 paragraph (3) of Law number 3 of 2014 concerning Government administration which states that revocation of decisions or termination of actions as referred to in paragraph (2) must be carried out by:<sup>16</sup>

- a. Government agencies and/or officials issuing decisions and/or actions; or
- b. Superiors and/or superiors of officials who issue decisions and/or actions when at the stage of completing administrative efforts.

## 2. Accountability of the Land Office for the Issuance of Title Certificates

The concept of legal responsibility is closely related to the concept of rights and obligations. That a person is legally responsible for certain acts or that he or she bears legal responsibility.<sup>17</sup>

Another opinion regarding the principle of responsibility in law, which is divided into three namely accountability, responsibility, liability. Responsibility in the sense of accountability is legal responsibility in relation to finance, for example an accountant must be responsible for bookkeeping results, while responsibility is responsibility in carrying the burden. Responsibility in the sense of liability is the obligation to bear the losses suffered.<sup>18</sup> Responsibility in the sense of responsibility is also interpreted as a moral attitude to carry out its obligations, while responsibility in the sense of liability is a legal attitude to be responsible for violations of one's obligations or violations of the rights of other parties.<sup>19</sup>

The National Land Agency (BPN) is the body responsible for canceling certificates by PTUN due to errors or negligence committed in the certificate issuance process. By looking at the duties and responsibilities of the BPN, it is clear that the BPN is not only responsible until someone seeks administrative action, but that the BPN is given the burden of carrying out PTUN decisions related to its main task, namely the issuance of title certificates. In this regard, certificates of rights that have been canceled by PTUN which have permanent legal force must

---

<sup>16</sup>Law number 3 of 2014 concerning Government administration

<sup>17</sup>Youky Surinda, The Concept of Responsibility According to the Theory of Responsibility in Law <https://id.linkedin.com/> accessed on 9 December 2022 at 19.30 WITA

<sup>18</sup>Zainal Asikin et al, Introduction to Company Law, Prenadamedia Group, 2016, Pg 252

<sup>19</sup>Ibid., p. 253



be followed up in terms of revoking or canceling the certificate. The responsibility of BPN does not end there.

"Cancellation of a decision regarding the granting of a land right because the decision contains legal defects in its issuance or implementing a court decision that has permanent legal force."<sup>20</sup>The formulation of the said cancellation of land rights is not complete because it only concerns the granting of land rights, although canceling the decision to grant land rights will, of course, also result in the registration and certificate being canceled because they are in accordance with Government Regulation No. 24 of 1997, Decree on the Granting of Rights as proof of registration of rights and issuance of certificates. The Head of the Regional Office issues a Cancellation decision due to: administrative and/or juridical defects on Legal Products issued by the Head of the Land Office; or carry out a court decision that has permanent legal force canceling a Legal Product issued by the Head of the Regional Office or the Head of the Land Office.

Based on information from the Head of the Land Office, Dr. Asmanto Mesman, S.SiT., MM namely:

*To say that the certificate that has been issued is not in accordance with the procedure, first there must be a complaint. Complaints can go directly to the land office complaint center counter or can be through an online complaint system. In this complaint again the complainant must prepare the required documents and attachments and the most important thing is that there must be a basis for his rights. So that it can be followed up, because if there is no proof of the basis of their rights, everyone can make up the ownership of their rights. After there is a complaint, we will further investigate the complaint, which proves whether or not there was an administrative defect. For the final result we will write to the applicant whether the request is granted, cannot be granted or there are other considerations.*

*If the case has entered the realm of court, our responsibility is limited to carrying out the court decision, namely the cancellation of the legal product*

---

<sup>20</sup>Article 33 paragraph (1) PMNA/KBPN No. 21 of 2020 concerning Handling and Settlement of Land Cases

*(certificate) because we are also authorized to issue it, so for cancellation it is returned to BPN.*<sup>21</sup>

The Authority of the Land Office of the City of Baubau is an institution that carries out the functions of land administration in the City of Baubau, so that the implementation of this authority must be accompanied by ethical and moral responsibility by implementing the law properly. Apart from that, if there is an erroneous action taken by BPN, the action should be corrected by realigning the proper procedure. Likewise as a result of the act of issuing land certificates in the Tomba Village, Wolio District, Baubau City. The authority to cancel land rights is regulated in the provisions of Article 30 paragraphs (1) and (2) of the Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency Number 21 of 2020 concerning Handling and Settlement of Land Cases.

Based on the results of the researcher's interview with the Members of the Land Dispute Settlement Section of the Baubau City Land Office, he said that:

*...The issue of BPN's responsibility in terms of canceling land certificates as a result of procedures not being carried out and carried out by BPN in terms of registration of land owned by the people of Tomba Village, Wolio District, Baubau City, BPN is not formally responsible in terms of compensation in the form of costs for canceling the certificate, because BPN does not have authority over that matter...*<sup>22</sup>

Based on the results of the interview as disclosed by the Head of the Land Legal Relations Section of the Land Agency, it can be concluded that the National Land Agency is not directly responsible for the cancellation of the certificate or the removal of evidence of land ownership in the form of reimbursement of costs due to administrative defects committed by the National Land Agency. The duties of the National Land Agency are only limited to annulment and abolition.

---

<sup>21</sup>Interview with the Head of the Baubau City Land Office, on Monday 12 December 2022, at 10.18 WITA

<sup>22</sup>Interview with Dwi Almushawir, SH as a member of the procurement and handling of land disputes section at the Baubau City Land Office, Monday 12 December 2022, 11.00 WITA

The Head of the Central National Land Agency said that there are at least three main things that cause land disputes:<sup>23</sup>

- a. Unclear land title administration issues.
- b. Unequal distribution of land ownership.
- c. The legality of land ownership is solely based on formal evidence (certificate), without regard to land productivity. As a result, legally (de jure), it is possible that a lot of certified land is owned by companies or large financiers, because they have bought it from farmers/land owners, but the land has been neglected for a long time.

According to Philipus M. Hadjon, legal protection is protection of dignity and recognition of human rights owned by legal subjects in a rule of law based on the legal provisions in force in that country to prevent arbitrariness.<sup>24</sup>Based on the theory of legal protection, legal protection that can be given can be preventive and repressive which includes:

1. In the provisions of Article 32 paragraph (2) Government Regulation number 24 of 1997 concerning Land Registration has provided protection.<sup>25</sup>
2. The role of the judge is very much needed in examining and ensuring the truth of the information in the certificate. The judge must prove, examine and examine the origin of the certificate.<sup>26</sup>

Based on the description above, it can be concluded that the responsibility of the Land Office as the only institution that has the authority to issue National Land Agency certificates is to be responsible for the issuance of overlapping certificates, whether done through negligence or unintentionally or intentionally. The issuance of overlapping certificates by BPN has implications for legal issues/disputes that result in losses to the landowners in dispute, BPN is not only responsible for carrying out court decisions by revoking or canceling certificates that already have permanent legal decisions, but the Head of the Baubau Land Office is also responsible administratively good. Forms of Dispute Resolution by the Bau-bau Land Office to resolve any land issues including the problem of overlapping certificates, but this authority is only limited to administrative

---

<sup>23</sup><http://enzifebrianti.blogspot.com/2013/04/pembelesaian-sengketa-tanah-dalam-uupa.html>, accessed on November 18, 2022, at 19.43 WITA

<sup>24</sup>Philipus M. Hadjon, *Op.Cit*, Hal. 205

<sup>25</sup>Adrian Sutedi, 2014, *Certificate of Land Rights*, Sinar Graphic, Jakarta, p. 194

<sup>26</sup>*Ibid.* p.195

authority, namely cancellation or revocation of a certificate issued by itself. The dispute resolution steps taken are arbitration, negotiation, mediation and deliberation.

#### **4. Conclusion**

Based on the results of the existing legal analysis, it can be said that; (1) The legal standing of the certificate of ownership of land issued is not in accordance with administrative procedures, namely the certificate of ownership rights can be canceled, either through the administrative settlement route by the BPN or through the dispute resolution pathway by the court and of course must go through the existing procedures and also the applicant must be able to prove that the object is indeed his property. The position of the certificate plays a very important role in land disputes, because the certificate is a strong documentary evidence in various matters, especially for land disputes. The legal force of land title certificates is a guarantee of legal certainty for the certificate holder. Because this is a strong proof of ownership, meaning as long as it is not proven otherwise by other parties who feel entitled and have evidence to prove it. (2) The responsibility of the head of the Bau-bau City Land Office for the issuance of certificates of land ownership rights that are not in accordance with procedural or known as administrative flaws in accordance with the provisions of the Regulation of the Minister of Agrarian Affairs/Head of BPN Number 21 of 2020 concerning the handling and settlement of land cases is carried out by decision of the Head of the National Land Agency or delegate it to the Regional Office or appointed official. According to Article 29 paragraph (1) letter b states that "BPN RI is obliged to implement a court decision that has obtained permanent legal force, unless there is a valid reason not to carry it out".

#### **5. References**

##### **Books:**

Adrian Sutedi, Review of Land Law, Pradnya Paramita, Jakarta, 2009

Adrian Sutedi, Certificate of Land Rights, Sinar Graphic, Jakarta, 2014

Bernhard Limbong, Land Procurement for Development, Margaretha Pustaka, Jakarta, 2011

Bernhard Limbong. 2012. National Agrarian Law. Jakarta : Margaretha Pustaka.

Elza Syarief, *Resolving Land Disputes Through the Special Land Court*, KPG (Gramedia Popular Library), Jakarta, 2012

Philipus M. Hadjon, *Legal Protection for the Indonesian People, Development of Science*, Surabaya, 1987

Lexy J. Moloeng, *Qualitative Research Methodology*, (Bandung: Young Rosdakarya, 2006)

Lawrence Friedman. 1975. *Legal system*. New York: Rusel Foundation

Soerjono Soekanto, *Some Legal Issues Within the Development Framework in Indonesia (a sociological review)*, University of Indonesia, Jakarta, 1999

Soerjono Soekanto, *Introduction to Legal Research*, University of Indonesia Press Publisher, Jakarta, 2005

Soerjono and H. Abdurahman, *Legal Research Methods*, Rineka Cipra, Jakarta, 2003

Zainal Asikin et al, *Introduction to Company Law*, Prenadamedia Group, 2016

**Reguation:**

Basic Agrarian Law Number 5 of 1960

Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 concerning Handling and Settlement of Land Cases

**Internet:**

Youky Surinda, *The Concept of Responsibility According to the Theory of Responsibility in Law* <https://id.linkedin.com/> accessed on 9 December 2022 at 19.30 WITA

<http://enzifebrianti.blogspot.com/2013/04/pembelesaian-sengketa-tanah-dalam-uupa.html>, accessed on November 18, 2022, at 19.43 WITA