

Legal Analysis of the Validity of Letter C as Evidence of Land Ownership in Resolution of Land Disputes

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Abstract. *This study aims to analyze the legality of Letter C as evidence of land ownership in resolving land disputes in Indonesia. Letter C, which is an administrative document used since the Dutch colonial era, is often considered as evidence of land ownership by the community, especially in rural areas. However, in the national land law system, Letter C is not recognized as valid evidence of ownership. This study aims to analyze the legal position of Letter C and identify obstacles and solutions to the use of Letter C as evidence in the process of resolving land disputes in Indonesia. The research method used is the legislative approach, namely legal research conducted by prioritizing researching library materials or also called secondary materials, in the form of normative law and how it is implemented in practice. This research is supported by data used in order to obtain materials for analysis related to the responsibility of Notaries in making foundation deeds for falsifying the identities of the parties. The theories used in this research are the theory of responsibility and the theory of legal certainty. The results of this study indicate that Letter C has a weak position as evidence of land ownership. Although it is still used by the community, especially in areas that have not been officially registered, the legal validity of land ownership can only be proven through a land certificate issued by the National Land Agency (BPN). Therefore, efforts are needed to increase public understanding of the importance of land certification and harmonization of regulations to provide legal certainty in land ownership.*

Keywords: *Certainty; Dispute; Legal; Regulations.*

1. Introduction

The formulation of Article 33 paragraph (3) of the 1945 Constitution of the

Republic of Indonesia was then explained in Law Number 5 of 1960 concerning Basic Agrarian Regulations, better known as the Basic Agrarian Law (UUPA), which was ratified on 24 September 1960. The enactment of this Basic Agrarian Law initiated a fundamental change. Land is a strategic asset that has a fundamental role in the lives of the Indonesian people, both from an economic, social and legal aspect.¹The complexity of land problems in Indonesia has become a crucial issue that has not been resolved, with one of the main problems being land status and ownership.²In this context, Letter C (C-Verponding) appears as a historical document that has its own significance in the land administration system in Indonesia.³Land issues in Indonesia are complex issues that have long historical roots from the colonial era to the era of independence.⁴One of the fundamental problems is the status and validity of evidence of land ownership, especially Letter C documents which are still widely circulated in society.⁵

Land disputes in Indonesia often occur due to problems related to proof of land ownership. One document that is often used as evidence is Letter C. Letter C is an administrative record in the village that contains information about land owners and land taxes in a particular area.⁶However, problems arise because Letter C is not included in the type of certificate recognized as valid proof of ownership according to the Basic Agrarian Law (UUPA).⁷In the process of resolving land disputes, Letter C is often used as evidence in court even though its validity is still being debated.⁸

The legal issue that emerged was the legal position of Letter C in the national land law system. Although Letter C does not have definitive binding legal force, practice in the field shows that this document is still often used as a reference in resolving land disputes.⁹This creates legal uncertainty and the potential for significant conflict, considering that Letter C does not meet the criteria for valid evidence of land ownership according to applicable land regulations.¹⁰

¹Maria SW Sumardjono, "Land Policy Between Regulation and Implementation" (Jakarta: Kompas, 2005), p. 45.

²Boedi Harsono, "Indonesian Agrarian Law: History of the Formation of the Basic Agrarian Law" (Jakarta: Djambatan, 2008), p. 72.

³Urip Santoso, "Registration and Transfer of Land Rights" (Jakarta: Prenada Media, 2010), p. 56.

⁴Bernhard Limbong, National Agrarian Law, (Jakarta: Pustaka Margaretha, 2012), p. 45.

⁵ Maria SW Sumardjono, Op.cit., p. 45.

⁶Effendi, M. (2012). Indonesian Agrarian Law: A Study from a Practitioner's Perspective. Jakarta: Kencana Prenada Media Group, p. 45-46.

⁷Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA), Article 19 paragraph (1), stipulates that the government is obliged to carry out land registration with the aim of guaranteeing legal certainty regarding land rights.

⁸Decision of the Supreme Court of the Republic of Indonesia No. 1234 K/Pdt/2017, which confirms that Letter C is not a certificate that has full legal force as proof of land ownership.

⁹Adrian Sutedi, "Land Disputes and Alternative Resolutions" (Bandung: Alfabeta, 2012), p. 78.

¹⁰Boedi Harsono, "Indonesian Agrarian Law" (Jakarta: Djambatan, 2008), p. 98.

The Basic Agrarian Law Number 5 of 1960 actually comprehensively regulates evidence of land ownership, with land certificates as the most authentic legal instrument.¹¹ However, the reality in society shows that many people still use Letter C as proof of ownership, especially in rural areas that have limited access to land administration.¹²

Letter C, which is historically a legacy of the land administration system during the Dutch colonial era, has become a complex and problematic land ownership documentation instrument. This document was initially created as an instrument for data collection and land tax collection, but in its development has been widely used as proof of land ownership in various regions in Indonesia.¹³ However, along with the development of national land law, the position of Letter C has become unclear from a formal legal perspective.

Empirically, the use of Letter C is still very significant in rural areas, where people have limited knowledge and access to the official land certification process.¹⁴ This shows a gap between the prevailing land law regulations and social practices that develop at the local level. This condition creates complex legal pluralism in the land ownership system in Indonesia.¹⁵

This is important because many people in rural areas still use Letter C as the only proof of ownership of their land. The unclear legal status of Letter C often causes confusion and uncertainty in the process of resolving land disputes. Therefore, a legal analysis is needed to determine the extent of the validity of Letter C as evidence of land ownership in resolving land disputes.¹⁶

The complexity of this problem is further deepened by the social and economic factors that surround it. Many communities have traditionally considered Letter C as a legal document, which in turn creates legal pluralism in land control and ownership.¹⁷ This condition not only raises legal issues, but also has the potential to trigger prolonged social conflict.¹⁸

Letter C, as an administrative document used since the colonial era, is often considered as proof of land ownership, although it is not legally recognized in the national land law system. The use of Letter C in resolving land disputes creates

¹¹Law Number 5 of 1960 concerning Basic Agrarian Principles.

¹²Urip Santoso, "Land Rights" (Jakarta: Prenada Media, 2012), p. 145.

¹³Maria SW Sumardjono, "Land Dispute Mediation" (Jakarta: Kompas, 2009), p. 112.

¹⁴Noer Fauzi Rachman, "Land Reform: From Time to Time", Sajogyo Institute, Bogor, 2012.

¹⁵Soetandyo Wignjosoebroto, "Law in Society: Development and Problems", Bayumedia Publishing, Malang, 2008.

¹⁶Ali, Z. (2008). Legal Aspects of Land Acquisition for Public Interest. Sinar Grafika, Jakarta, pp. 75-76.

¹⁷Noer Fauzi Rachman, "Land Reform: From Time to Time" (Yogyakarta: STPN Press, 2012), p. 67.

¹⁸I Gusti Ngurah Parikesit, "Land Journal: Conflict and Resolution", Volume 5 Number 2, 2015, p. 23-45.

legal uncertainty and potential conflict, because it does not meet the criteria for valid evidence according to the UUPA. The author is interested in conducting a study entitled "Legal Analysis of the Validity of Letter C as Evidence of Land Ownership in Resolving Land Disputes"

2. Research Methods

This study uses a normative legal research method with analytical descriptive specifications, using a statute approach and a conceptual approach. The data used are secondary data consisting of primary legal materials (statutory regulations), secondary legal materials (literature and journals), and tertiary legal materials (dictionaries and encyclopedias). Data collection is carried out through literature studies, while data analysis is prescriptive to provide arguments and legal assessments of the research results.

3. Results and Discussion

3.1 Legal position of Letter C as evidence of land ownership in resolving land disputes in Indonesia

Of the total land area in Indonesia, which is spread across 38 provinces, there are around 85 million plots of land or 67.5% that have certificates.¹⁹and the remaining approximately 41 million lands are not yet certified or do not have legal proof of land ownership as stated in Law No. 5 of 1960 concerning Basic Agrarian Principles, so efforts and strategies are needed to spur public awareness of the importance of certificates as one of the legal tools/proofs of land ownership in the eyes of the law. Because there are still many people in Indonesia who still consider Letter C to be legal proof of land ownership even though Letter C itself is only proof of tax payments during the colonial period. So that the obstacles and problems in the land sector are increasingly complex, both problems between communities, communities with village governments and with local governments. In addition, there are also problems concerning land rights, village treasury land and local government asset land, which need to be facilitated to be resolved.

The only legal proof of land ownership is actually a Certificate that has been regulated in Law No. 5 of 1960 concerning Basic Agrarian Principles, while Letter C, Pipil, Girik, Pethuk and others like it are proof of tax payments in ancient times, legally Letter C, Girik, Pipil, Pethuk, and other similar terms are not proof of land ownership rights, the only thing that distinguishes Letter C, Girik, Pipil, Pethuk is the term used by village communities in ancient times, Girik is the term for land whose land status has not been registered, pethuk is proof of land tax payments,

¹⁹Aisyah Sekar, "85 Million Plots of Land in Indonesia Have Been Certified), Kompas, January 18, 2023, p. 1, Online News,<https://www.kompas.com>, accessed on January 30, 2025.

and Letter C is a copy of pethuk, while pethuk is held by the land owner and Letter C itself is kept at the sub-district/village office.

The public's view of Letter C as proof of ownership arose because the tax determination letter was an official letter issued by the government at that time, the letter was considered to be able to provide a guarantee of legal certainty of ownership of land rights. In the event that a land plot has been legally issued a certificate in the name of a person or legal entity that obtained the sign in good faith and actually controls it, then other parties who feel they have rights to the land can no longer demand the implementation of these rights if within 5 years since the issuance of the certificate they do not file a written objection to the certificate holder and the Head of the Land Office concerned or do not file a lawsuit with the Court regarding land control or issuance of the certificate.

In the legal context, Letter C is considered as an administrative proof of ownership and does not have the same legal force as a land title certificate. However, in cases of dispute, Letter C can be used as supporting evidence if accompanied by other evidence, such as a deed of sale, proof of tax payment, and witnesses. Courts often consider Letter C as a basis for consideration in deciding land cases, especially if there is no stronger certificate document.

Despite having evidentiary value, landowners who only have Letter C are advised to take care of land certificates in order to obtain legal certainty. The government through the Complete Systematic Land Registration (PTSL) program encourages the community to upgrade their land ownership status from Letter C to a land title certificate in order to have stronger legal force and reduce the potential for disputes in the future.

If the community at the beginning only has girik, pethuk, or ketitir. Letter C is very important to use in the management of a certificate of land rights that are valid according to the previous Regulation, namely Law No. 5 of 1960 concerning Basic Agrarian Principles or better known as UUPA. In this context, UUPA has outlined the policy in Article 19 letter (c).

According to laws and regulations, valid and strong proof of land ownership is a land certificate in this case a Certificate of Ownership (SHM).

This is regulated in Law No. 5 of 1960 concerning Basic Agrarian Principles ("UUPA") in conjunction with PP No. 24 of 1997 concerning Land Registration ("PP 24/1997"), as follows:

Article 19 paragraph (2) UUPA:

"The registration referred to in paragraph (1) of this article includes:

1. land mapping and bookkeeping;

2. registration of land rights and the transfer of these rights;
3. provision of proof of rights, which serve as strong evidence”.

Article 1 number 20 PP 24/1997:

“A certificate is a letter of proof of rights as referred to in Article 19 paragraph (2) letter c UUPA for land rights, management rights, waqf land, ownership rights to apartment units and mortgage rights, each of which has been recorded in the relevant land book.”

Article 32 paragraph 1 PP 24/1997:

“A certificate is a letter of proof of rights that serves as a strong means of proof regarding the physical data and legal data contained therein, as long as the physical data and legal data are in accordance with the data in the measurement letter and the relevant land rights book.

Meanwhile, the Letter C Book is not proof of land ownership but only as proof of tax payment.

This is in line with the Supreme Court Jurisprudence No. 0234K/PDT/1992 :

That the village letter c book is not proof of ownership, but is only an obligation for a person to pay tax on the land they control

So based on the explanation above, the Letter C book is not proof of land ownership. Proof of valid land ownership is a certificate of ownership.

According to laws and regulations, valid and strong proof of land ownership is a land certificate in this case a Certificate of Ownership (SHM).

This is expressly regulated in Article 19 paragraph (2) letter c of Law No. 5 of 1960 concerning Basic Agrarian Principles (“UUPA”) in conjunction with Article 1 number 20 in conjunction with Article 32 paragraph (1) of PP No. 24 of 1997 concerning Land Registration (“PP 24/1997”), as follows:

Article 19 paragraph (2) UUPA:

“The registration in paragraph (1) of this article includes:

- a. land mapping and bookkeeping;
- b. registration of land rights and transfer of such rights;
- c. granting of proof of rights, which serve as strong evidence”.

Article 1 number 20 PP 24/1997:

“A certificate is a proof of rights as referred to in Article 19 paragraph (2) letter c UUPA for land rights, management rights, waqf land, ownership rights to apartment units and mortgage rights, each of which has been recorded in the relevant land book.”

Article 32 paragraph 1 PP 24/1997:

“A certificate is a proof of rights which serves as strong evidence regarding the physical data and legal data contained therein, as long as the physical data and legal data are in accordance with the data in the measurement letter and the relevant land rights book.”

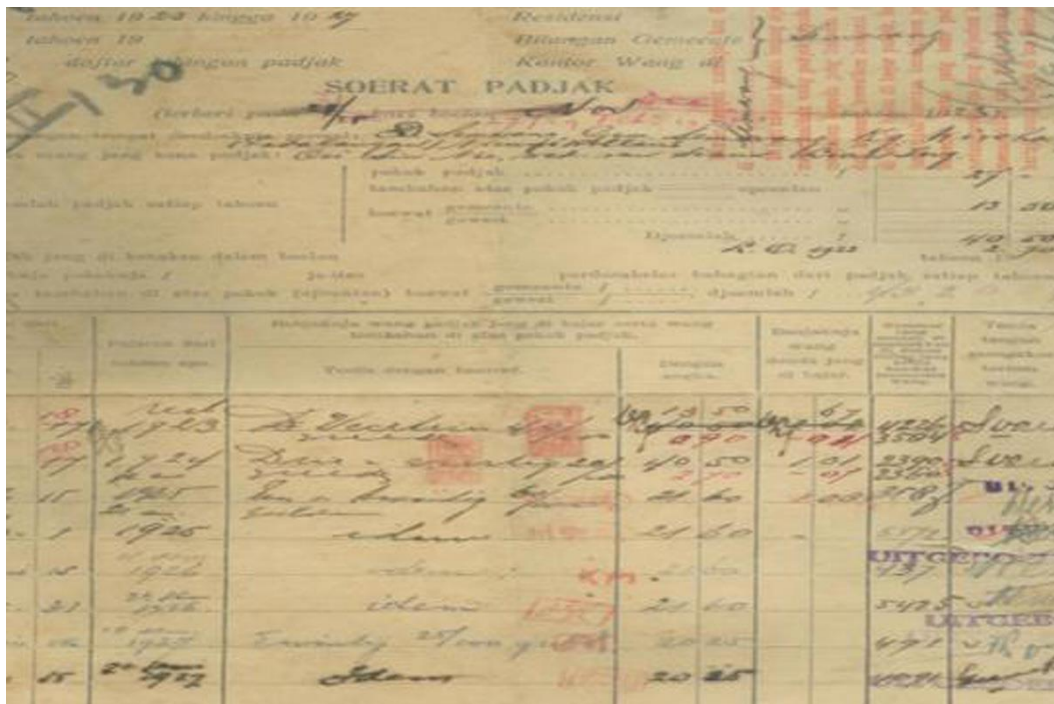
Meanwhile, the Letter C Book is not proof of land ownership, but only as proof of tax payment. This is confirmed in the Supreme Court Jurisprudence No. 0234K/PDT/1992, states:

"That the village letter c book is not proof of ownership, but is only an obligation for a person to pay tax on the land he controls"

So based on the legal basis above, it is clear that the Letter C book is not proof of land ownership. Proof of legitimate land ownership is a certificate of ownership based on Law No. Article 19 paragraph (2) letter c UUPA jo. Article 1 number 20 Jo Article 32 paragraph (1) PP 24/1997.

3.2. Types of Evidence of Land Ownership Other Than Certificates

1. Girik



Example of an original land title deed: Pontianak Tribune

Girik is a land certificate used for tax purposes.

However, some people consider this letter as proof of land ownership.

Land with this certificate is commonly known as **girik land**, or land without an official certificate.

Girik land is usually obtained through inheritance or heredity.

However, there is also a lot that is obtained from buying and selling transactions.

Due to its status as a land certificate for tax purposes, the owner of this land is still required to pay Land and Building Tax (PBB).

2. Letter C

D. MARTO DIWONGSO

S A W A H						T A N A H K						
Nomor persil dan huruf bagian persil	Kelas desa	Menurut daftar perintjian				Sebab dan tanggal perubahan	Nomor persil dan huruf bagian persil	Kelas desa	Menurut daftar perintjian			
		Luas milik		Iuran					Luas milik		Iuran	
		ha	da	R.	S.				ha	da	R.	S.
38	I	0	145	5	00	}	38	I	0	141	0	59
48	I	0	108	1	86		48	I	0	108	1	86
118	I	0	115	2	28		118	I	0	115	2	28

Example of a letter C from the village: dusunluwung.blogspot.com

Letter C is a traditional land document that has existed since the Dutch colonial era.

This document is used as a tax record and identity information for land.

Letter C land is made by the local village or sub-district apparatus.

Its status is the same as girik land, which is a land certificate from ancient times.

Therefore, if asked whether Letter C is proof of land ownership, the answer is no.

As emphasized above, the only legal proof of land and/or building ownership under Indonesian law is a certificate.

However, this document can still be used as proof of land ownership in sales and purchase transactions.

Apart from its weak legal status, another shortcoming of letter C land is that its data is considered incomplete and inaccurate.

The reason is, the examination of this letter tends to be done carelessly.

This land ownership certificate is not given directly to the community, because its status is as a village or sub-district land record.

Therefore, the original letter C for the land is kept at the local village or sub-district office.

What is given to the community or land owners is an excerpt from letter C in the form of a girik letter.

Then, is it possible to register letter C land to SHM? The answer is yes.

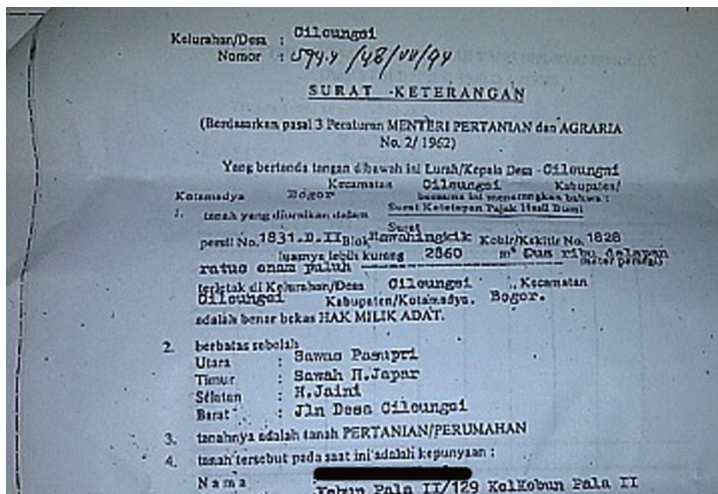
The process of registering letter C land to SHM can be done at the local ATR/BPN office.

However, before applying, please complete the following required documents first:

- Certificate of land not being disputed
- Land history certificate
- Certificate of sporadic land ownership.

So, if it is complete, then you can go to the local ATR/BPN office to register the land.

3. Petok D



Example of an original Petok D letter: blitarportal.blogspot.com

This certificate of land ownership is usually made by the local village head and sub-district head.

In the past, precisely before the UUPA was passed, petok D was proof of land ownership which was equivalent to a certificate.

Therefore, its status is also an old land certificate.

However, after the issuance of UUPA, the function of this traditional land certificate changed to proof of payment of land tax.

As for Article 3 of the Minister of Agriculture and Agrarian Regulation No.2/1962, it is stated;

“Petok D is the initial evidence to obtain legal proof of land rights, namely the land ownership certificate (SHM).”

At first glance, this Petok D is similar to the letter C, but in terms of status and function, the two documents are actually different.

The most obvious difference between letter C and petok D can be seen from their status.

Letter C is a land registration book, while Petok D is a letter that shows the legal basis for the land.

4. Green Letter



Example of a green letter: Suara Surabaya

Most Indonesian people may be unfamiliar with the term “Green Letter” or “Green Letter.”

Understandably, this letter is actually only valid in the city of Surabaya.

The Green Letter is a Land Management Right (HPL) which is given to people who rent land owned by the city government.

The reason this document is known as the “green letter” is because the letter blank is green.

The green letter can be extended as long as the leased land is not used by the Surabaya City Government (Pemkot).

5. Groundnut



Apart from girik and petok D, there is also a pipil letter which is known as one of the traditional land legality documents besides certificates.

In fact, a land certificate is a Tax Payment Certificate from before 1960, or before the issuance of the UUPA.

Land certificates are quite popular in Bali, because this document is considered as proof of ownership of customary land rights by the local community.

However, similar to girik and petok D, currently the status of pipil has changed to an informal traditional land certificate which must be converted into SHM or SHGB.

6. Details



Example of land details: Google Images

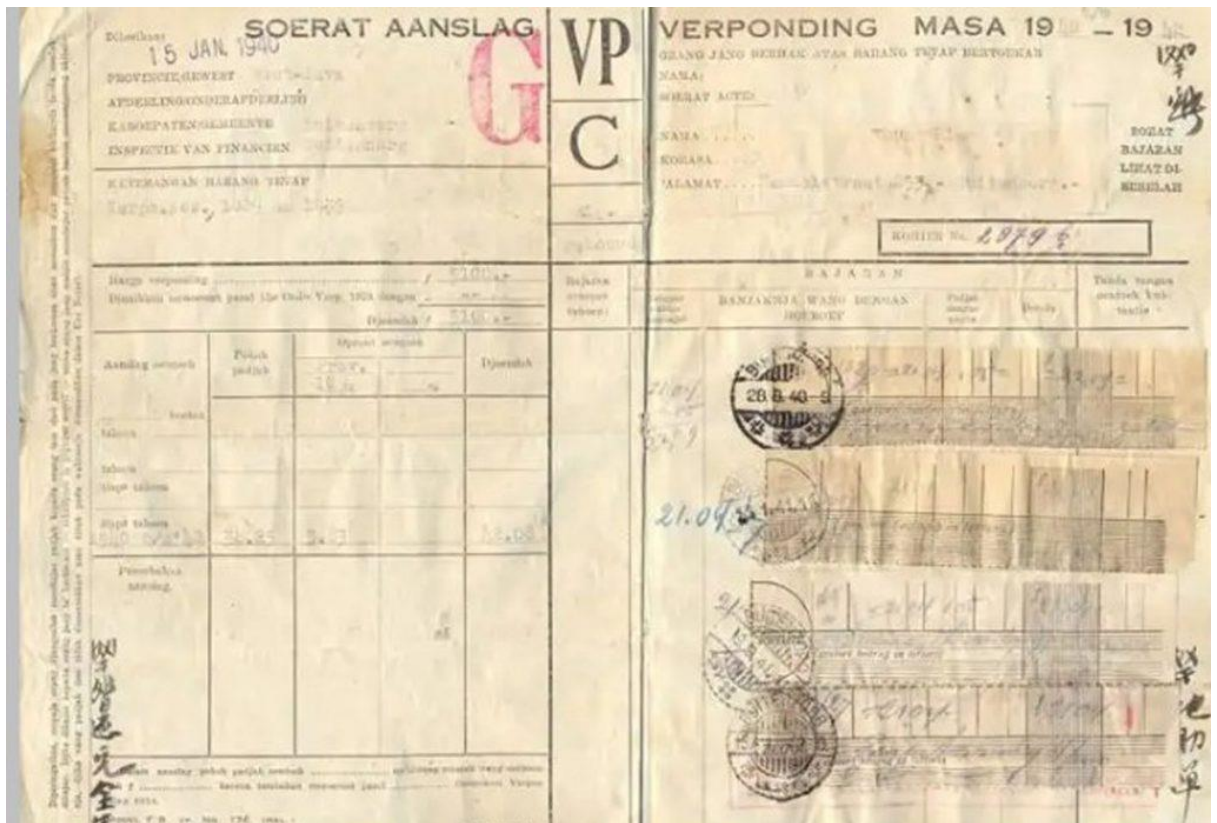
Another traditional document that is considered a sign of land ownership is the rincik.

Rincik is actually a Temporary Registration Letter for Indonesian Land that existed before 1960.

This old land certificate is quite popular in a number of areas, one of which is Makassar.

This document is considered proof of customary land control and use.

7. Ownership Provision



Example of eigendom verponding: window360.com

During the Dutch colonial era, land ownership rights were known as eigendom.

These rights are divided into two types, namely ordinary eigendom and verponding eigendom.

Property common is the land ownership rights granted to Europeans and Eastern Foreigners.

As for indigenous people, their land ownership rights are in the form of agrarian ownership.

Property ownership is the right to own land which can be proven by a tax bill.

The reason is that verponding is a letter of bill for land and/or building tax during the Dutch East Indies era.

Verification In fact, it is still used today, but the term has changed to the Land and Building Tax Payable Notification Letter (SPPT-PBB).

Apart from eigendom, there were also several land ownership rights in the Dutch era such as grondkaart, erfpacht, opstaal, and vruchtgebruik.

Even though it has the status of an old product, in fact there are still a number of...[land sale and purchase agreement](#) which uses eigendom as proof of ownership.

However, referring to Government Regulation (PP) No. 24 of 1997 concerning Land Registration, land with eigendom status can be converted to SHM.

This can be done as long as the applicant is still registered as the land rights holder in the old evidence.

8. Land Cover

OBJEK PAJAK	LUAS(M2)	KELAS	NJOP PER M2(Rp)	TOTAL NJOP
BUMI	19.255	A079	103.000	1.983.265.000
BANGUNAN	0	XXXX	0	0
	0		0	0
	0		0	0

NJOP sebagai dasar pengenaan PBB = 1.983.265.000
NJOPTKP (NJOP Tidak Kena Pajak) =
NJOP untuk penghitungan PBB = 1.983.265.000
PBB yang Terhutang = 0,1 % x 1.983.265.000

PAJAK BUMI DAN BANGUNAN YANG HARUS DIBAYAR(Rp)
SATU JUTA SEMBILAN RATUS DELAPAN PULUH TIGA RIBU DUA RATUS ENAM PULUH LIMA RUPIAH

TGL. JATUH TEMPO 26 Agustus 2013 Diserahkan tgl Surabaya, 08 Februari

Example of land cover: lokadata.id

Some of you may be unfamiliar with the term ground cover.

However, the land title is actually owned by all land and building owners.

Land tax is a Javanese term for a Land and Building Tax Payable Notification Letter (PBB SPPT).

Many people consider that a land certificate is proof of land ownership.

The reason is, through this document they are taxed on land ownership.

However, as previously mentioned, according to the UUPA, land titles are also not classified as valid proof of property ownership.

3.3. Obstacles and Solutions to the Use of Letter C as Evidence in the Land Dispute Resolution Process in Indonesia

Historically, Letter C is a systematic legacy of land registration during the Dutch colonial era, which to this day still causes fundamental problems in the national land system.²⁰This document was originally intended as a simple administrative instrument to record land ownership and use, but over time it has shown a number of significant weaknesses.²¹

Most people still use Letter C evidence in land ownership, most of the lands in rural areas are customary land/girik land, which has not been registered at the Land Office. The factors that are the reasons why people still use Letter C evidence as proof of ownership of land rights and do not process certificates because some people's understanding of the position of Letter C is still considered as proof of land ownership.²²

Letter C is proof of payment of land tax on customary land. The issuance of Letter C is for the purpose of collecting land tax and the tax is imposed on the owner in the name of the land, so that there is an assumption among the community that Letter C is proof of ownership of land rights.²³

Furthermore, in the simple view of the community, this arises because the tax determination letter is an official letter issued by the government and according to the community's view, this letter can provide a guarantee of legal certainty regarding ownership of land rights to provide a guarantee of legal certainty regarding land ownership.

lack of or minimal evidence of land ownership so that it becomes one of the causes of the minimal process of land rights registration. Another thing that is the cause is also the lack of public knowledge about the importance of evidence of land rights ownership.²⁴

For the certificate making process, they must have complete documents for the land they own, but in reality, the land owned by rural communities or indigenous communities is owned hereditarily from their ancestors, so the land ownership certificates they have are very minimal, some even have none at all.

Letter C has several weaknesses that cause legal uncertainty in land ownership. The main obstacle is the absence of binding legal force, because in the Indonesian agrarian legal system, only land certificates from the BPN are recognized as valid proof of ownership. In addition, the inconsistency of administrative data between the village and the BPN often complicates the certification process. Lack of public

²⁰Maria SW Sumardjono, "Land Policy Between Regulation and Implementation", Jakarta: Kompas, 2005.

²¹Adrian Sutedi, "Land Rights Certificate", Jakarta: Sinar Grafika, 2012.

²²Rahman, A. (2020). Girik Land and Land Law Problems in Indonesia. *Journal of Social Sciences and Humanities*, 9(2), 123-130.

²³Adrian Sutedi, 2007, *Transfer of Land Rights and Registration*, Jakarta: Sinar Grafika, page 39

²⁴Ibid. p. 40

awareness is also a problem, where many people still consider Letter C as valid proof of ownership. Other obstacles are the land certification process which is considered complicated and expensive, as well as the rampant forgery of Letter C which triggers land disputes.

To overcome these problems, the legalization of Letter C into a land certificate must be accelerated through the Complete Systematic Land Registration (PTSL) program with simpler procedures and affordable costs. In addition, the integration of a digital-based land administration system must be carried out to synchronize data between villages and the BPN to avoid overlapping ownership. Law enforcement against Letter C forgery also needs to be tightened with tighter supervision and strict legal sanctions in accordance with Article 263 of the Criminal Code concerning document forgery.

Despite having evidentiary value, landowners who only have Letter C are advised to take care of land certificates in order to obtain legal certainty. The government through the Complete Systematic Land Registration (PTSL) program encourages the community to upgrade their land ownership status from Letter C to a land title certificate in order to have stronger legal force and reduce the potential for disputes in the future.

4. Conclusion

Letter C has a weak position as proof of land ownership in resolving land disputes. Although it is still used by the community, especially in rural areas, Letter C is not recognized as valid proof of ownership in the national land law system. Only land certificates issued by the National Land Agency (BPN) have legal force based on the Basic Agrarian Law (UUPA) and Government Regulation Number 24 of 1997 concerning Land Registration. The use of Letter C often creates legal uncertainty, especially in land disputes, because it is vulnerable to claims of dual ownership, forgery, and an unintegrated administrative system.

Therefore, it is important for the public to understand that Letter C can only be used as initial evidence of land ownership and has no legal force as proof of ownership. The government needs to increase socialization and education about the importance of land certification and accelerate the asset legalization program through Complete Systematic Land Registration (PTSL). By conducting land certification, the public can obtain legal certainty over land ownership rights, reduce the potential for disputes, and protect their assets legally.

The government needs to increase socialization and education to the public about the importance of land certification and accelerate and simplify the land registration process through the PTSL Program. The integration of the land administration system from the village level to the BPN must be strengthened to avoid overlapping ownership and minimize document forgery. In addition, supervision and law enforcement against Letter C forgery must be tightened so

that it is not misused in land disputes. The community also needs to be more proactive in managing land certification to obtain legal certainty and wider economic benefits.

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