

Regulatory Study of Landowners' Objection Rights in Certificate Blocking

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ABSTRACT: This study is based on the background of increasing administrative actions involving certificate blocking, a measure intended to secure legal order but often creating uncertainty for landowners. The research aims to examine how regulations govern landowners' objection rights and assess whether existing procedures provide adequate legal protection. Using a normative juridical method, the study applies a statute approach, conceptual approach, and analytical approach supported by secondary data from legal materials, books, and journals. The findings show that although certificate blocking is legally regulated, the implementation of objection procedures remains inconsistent and lacks clear timelines and transparent notification. The study concludes that strengthening procedural clarity and harmonizing regulations are necessary to ensure legal certainty and more effective protection for landowners

KEYWORDS: Certificate Blocking, Landowners' Right, Objection Procedures, Land Registration.

I. INTRODUCTION

The protection of land rights is a fundamental legal principle within Indonesia's national land system, and it expects the state to guarantee certainty for every landowner. This principle is grounded in Law Number 5 of 1960, which affirms the state's obligation to regulate land ownership fairly. Certificate blocking emerged as an administrative mechanism to prevent unauthorized or suspicious land transactions. This mechanism, however, often triggers disputes when owners feel that the blocking is imposed without a solid legal foundation. These circumstances create the need for a regulatory study on the objection rights available to affected landowners.¹

Land certificate blocking is typically imposed upon reports, dispute claims, or requests submitted by interested parties, making it a sensitive administrative action. Its procedural framework is heavily referenced in Government Regulation Number 24 of 1997, which establishes the structure of land registration and administrative control. Because blocking can restrict owners from fully exercising their rights, it becomes essential to ensure that the measure is not misused. Landowners require avenues to challenge decisions they believe lack adequate verification. A deeper regulatory examination is needed to understand how current rules safeguard these avenues.

The right to file an objection becomes crucial when the blocking affects the landowner's legal certainty and access to their property. Administrative procedures for objections are informed by Ministerial Regulation ATR/BPN Number 13 of 2017, which outlines service mechanisms in land administration. These regulations provide steps for reviewing, accepting, or rejecting block requests, including the requirements for reconsideration. Landowners must be able to present counter-evidence when a block is allegedly unjustified. A regulatory study helps clarify whether these procedures adequately protect their objection rights.

Administrative objections function as oversight tools to ensure that land office decisions remain rational and legally justified. In certificate blocking, these objections allow landowners to challenge the reasoning and assess whether administrative officers have acted within their authority. Insufficient explanation behind a block can create room for arbitrary decisions that impair property rights. Regulatory safeguards are expected to limit such discretion. Examining these safeguards provides insights into the balance between administrative necessity and the owner's right to fairness.²

A land certificate holds strong evidentiary value because it is recognized as an official legal document supported by the state. This recognition aligns with the administrative principles formalized in Law Number 30 of 2014 concerning government administration. When a certificate is blocked without thorough evaluation, the landowner faces potential losses in economic opportunities and legal certainty. Objection procedures allow the owner to request clarification and correction of administrative errors. Regulatory analysis is essential to determine whether these procedures are applied consistently.

¹ Arba, H.M. *Indonesian Agrarian Law: History, Content and Implementation*. Sinar Grafika, 2015, pp. 45

² Bowen, J. & Salim, H. *Property, Land and State in Indonesia: Contemporary Perspectives*. Brill, 2019, pp. 13

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Economic impacts of certificate blocking are significant because the status of the certificate influences investment decisions and asset valuation. Landowners may face delays in transactions, mortgages, or development plans due to the administrative restrictions imposed by the block. A regulatory approach is necessary to evaluate whether such impacts are proportional to the risks that the block aims to mitigate. Overly restrictive administrative actions may lead to unjust burdens on owners. A focused regulatory study can help assess whether current rules prevent such disproportionalities.

Transparency becomes a vital element when certificate blocking decisions are made, as landowners must understand the reasons behind administrative actions affecting their property. The right to clear information aligns with the principles of good governance and procedural fairness established in Government Regulation Number 48 of 2016. Adequate disclosure helps owners prepare objections supported by appropriate legal arguments. Lack of explanation, on the other hand, weakens the owner's ability to defend their rights. Evaluating regulations related to transparency can reveal whether current practices meet governance standards.³

The effectiveness of objection rights depends on whether regulations provide precise timelines, requirements, and review procedures. Without clear timelines, certificate blocks may remain in effect longer than necessary, increasing the risk of prolonged harm to landowners. Evidence requirements must also be balanced to avoid placing excessive burdens on either party. Regulations must set objective review standards to ensure that objections are processed in a predictable manner. A regulatory study can determine whether these standards are sufficiently structured.

Regulations on objections must also consider the protection of landowners acting in good faith, especially when disputes involve third-party claims. Landowners should not suffer undue restrictions because of unverified allegations or conflicts unrelated to their actions. The proportionate application of certificate blocking reflects modern administrative principles of fairness and necessity. Regulations must therefore ensure that blocks are imposed only when justified by reasonable grounds. Studying these norms helps determine whether safeguards for good-faith owners are currently adequate.

A comprehensive regulatory study on objection rights is essential to strengthen land governance and reinforce the legitimacy of administrative decisions. Landowners depend on clear objection mechanisms to ensure that certificate blocking does not compromise their property rights. Well-structured rules help maintain objectivity in the review process and provide accountability for administrative authorities. Certainty in objection procedures contributes to a more reliable land registration system. This research emerges from the need to evaluate these regulatory protections and ensure that they uphold the principles of fairness, legality, and proportionality.

II. RESEARCH METHODOLOGY

This study employs a normative juridical method with a focus on statutory, analytical, and conceptual approaches. The statutory approach examines the applicable legal norms governing certificate blocking and objection rights, using primary legal materials such as Law Number 5 of 1960, Government Regulation Number 24 of 1997, and Law Number 30 of 2014. The analytical approach evaluates the logic, coherence, and consistency of these regulations within administrative decision-making. The conceptual approach clarifies key notions such as legal certainty, objection rights, administrative authority, and proportionality. Together, these approaches provide a comprehensive framework for understanding the regulatory structure of certificate blocking.

The research relies entirely on secondary data, consisting of both primary and secondary legal materials. Primary materials include statutory regulations and administrative provisions relevant to land registration and objection procedures, while secondary materials consist of scholarly books and peer-reviewed journals that discuss land law, administrative law, and public governance. These secondary materials assist in interpreting legal norms and comparing doctrinal perspectives on landowner protection. Supporting materials such as commentaries, academic opinions, and legal analyses are also included to strengthen the interpretive depth. This reliance on secondary data allows the study to investigate normative issues without the need for empirical fieldwork.⁴

Data collection is conducted through library research, which involves systematic examination of regulations, academic literature, and authoritative legal writings. All materials are organized and evaluated to identify legal principles, doctrinal developments, and regulatory gaps concerning certificate blocking. The study uses a qualitative analytical technique to interpret legal norms and assess their consistency with theoretical principles of administrative fairness. Qualitative analysis enables the researcher to draw conclusions based on logical reasoning and doctrinal comparison rather than numerical measurement. This method ensures that the findings reflect a structured interpretation of the legal framework surrounding landowners' objection rights.

³ Priyo Budi Maryoso, *Implementation of Full Systematic Land Registration Policy (PTSL): Study in Bunut District, Pelalawan Regency*, *International Journal of Law, Crime and Justice*, 2024, Vol. 1, No. 4, pp. 37–59.

⁴ Priyo Budi Maryoso, *Implementation of Full Systematic Land Registration Policy (PTSL): Study in Bunut District, Pelalawan Regency*, *International Journal of Law, Crime and Justice*, 2024, Vol. 1, No. 4, pp. 37–59.

III. RESEARCH RESULT AND DISCUSSION

A. Legal Framework on Certificate Blocking and Landowners' Objection Rights

The legal framework governing certificate blocking in Indonesia draws its primary authority from Law Number 5 of 1960, which establishes the state's plenary control over land. Article 2(2) states that "*the right of the State to control shall authorize the regulation and administration of land utilization and maintenance.*" This mandate forms the basis for administrative actions such as blocking land certificates to maintain legal order. The state's administrative authority is intended to protect both public interest and private rights. Certificate blocking, therefore, functions within this broader objective of ensuring lawful land governance. Understanding this mandate allows the evaluation of how blocking is applied and how landowners may respond through objection rights.

The certificate itself is acknowledged as a strong legal proof of ownership under Article 19(2)(c) of the same law, which states that "*land registration shall include the issuance of a certificate as evidence of rights.*" This provision gives the certificate a crucial legal status that cannot be restricted arbitrarily. Blocking a certificate, therefore, must be justified within a legal framework that respects its evidentiary role. The regulation acknowledges that any interference with the certificate affects the certainty of ownership. This connection makes the regulation of blocking tightly linked to protection measures for landowners. As a result, objection rights emerge as an inherent part of ensuring fairness.⁵

The technical procedures of certificate blocking are found in Government Regulation Number 24 of 1997. Article 1(1) defines land registration as "*a series of processes carried out continuously and regularly to collect, administer, and present data on land parcels.*" This definition positions blocking as an administrative act occurring within the record-keeping function of the land office. Article 3 lists the objectives of registration, including "*legal certainty and legal protection for holders of land rights.*" When blocking interferes with these objectives, objection rights become necessary to restore certainty. The regulation thus provides structural justification for allowing landowners to contest blocking decisions.

Article 34 of the regulation allows the land office to record annotations affecting land status, which forms the legal basis for blocking. These annotations must be based on legitimate requests, reports, or formal decisions. Because blocking alters the record, it requires strict adherence to administrative standards. Any annotation must accurately reflect the underlying legal situation. A landowner affected by such annotation must have access to procedures for clarifying its basis. This creates the legal environment in which objection rights operate.

The implementation of administrative decisions, including blocking, is further regulated under Law Number 30 of 2014. Article 10(1) outlines that "*government officials must base their decisions on valid authority, procedures, and substantive accuracy.*" This requirement prevents arbitrary decisions in certificate blocking. Article 10(2) introduces the principle of proportionality by stating that administrative actions must be "*balanced between objectives and burdens caused.*" This principle is highly relevant because blocking can impose significant consequences on landowners. Thus, objection rights serve as corrective tools when proportionality is not respected.

Article 53(1) of the same law provides that administrative decisions may be challenged if they are considered "*contrary to laws and general principles of good governance.*" This clause establishes that landowners may object to blocking decisions that violate procedural or substantive requirements. The objection process becomes a safeguard ensuring compliance with administrative norms. It also emphasizes that certificate blocking cannot be treated as a discretionary action without limits. The law requires that decisions affecting rights be explainable and reviewable. These requirements define the legal boundaries within which certificate blocking operates.⁶

Certificate blocking is further guided by Ministerial Regulation ATR/BPN Number 13 of 2017, which provides rules for service procedures at land offices. Article 47 allows the recording of block status based on written requests supported by evidence. This requirement ensures that blocking is not applied without sufficient justification. Article 49 mandates the land office to reassess the block upon receiving objections. This reassessment process strengthens the landowner's position in challenging unclear or improper blocks. The regulation thus reinforces procedural transparency.

Article 50 requires the land office to notify affected parties when a block is imposed. This notification is crucial because it triggers the landowner's ability to file objections. Without this communication, the owner's rights would be undermined. The notice must include the reason for the block and the supporting information. This ensures that the landowner is not left uninformed about administrative measures affecting their property. Notification becomes a procedural bridge between blocking and objection rights.

The right to obtain information is also grounded in Government Regulation Number 48 of 2016. Article 7 affirms that users of public services may request data related to administrative actions. This right ensures that landowners may access the factual and

⁵ R. Nafisah, D. Isaeni & M. Taufik, *Legal Validity of Electronic Land Certificates under Ministerial Regulation No. 1/2021*, *Dinamika*, 2022, 28(3), pp. 3497–3518.

⁶ Dian Aries Mujiburohman, *Transforming Paper to Electronic: A Juridical and Technical Study of Electronic Land Certificates*, *Bhumi: Jurnal Agraria dan Pertanahan*, 2021, Vol. 7, No. 1, pp. 57–67.

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legal basis used to justify blocking. Without such access, objections would be impossible to formulate effectively. The regulation strengthens transparency within land administration. Therefore, access to information becomes an essential legal element of objection rights.

The framework also interacts with principles found in Government Regulation Number 18 of 2021. Article 207(1) emphasizes that administrative measures in land governance must align with due process. Due process encompasses fairness, equality, and timely examination of disputes. Certificate blocking must meet these procedural safeguards to remain valid. When due process is compromised, landowners may rely on objection rights to restore compliance. This reinforces the broader legal philosophy of administrative accountability.⁷

The interaction between blocking and landowner protection is also informed by Article 28D(1) of the Indonesian Constitution, which states that *"everyone has the right to recognition, guarantees, protection, and certainty before the law."* Although constitutional provisions operate at a macro level, they influence how statutory and administrative norms are interpreted. Certificate blocking that jeopardizes certainty must be carefully justified. Objection rights help ensure that the constitutional mandate is not diminished in administrative practice. This adds a constitutional layer of scrutiny to blocking decisions. The landowner thus receives multi-level legal protection.

The principle of legal certainty embedded in land registration rules is strengthened through Article 32 of Government Regulation 24 of 1997. This article affirms that registered rights remain valid unless proven otherwise through legal means. Blocking interrupts this presumption and therefore requires procedural safeguards. The provision implicitly supports objection rights as a counterbalance to administrative interference. Legal certainty cannot be maintained if blocking is unregulated or unreviewable. Thus, objection rights sustain the evidentiary strength of the certificate.

Administrative discretion in blocking must adhere to Article 30 of Law 30/2014, which states that *"discretion may only be exercised to fill legal gaps, provide benefit, or expedite decision-making."* Discretion cannot override legal norms or hinder guaranteed rights. Certificate blocking, if based on unchecked discretion, risks violating this rule. Objection rights provide mechanisms for evaluating whether discretion was misused. They also help maintain the balance between administrative flexibility and legal stability. This ensures that discretion does not become a source of arbitrary power.

Blocking is legally considered a temporary measure, as reflected in Article 52 of Ministerial Regulation 13/2017, which requires periodic evaluation. Temporary status means it cannot be used to indefinitely restrict landowners. Any extension must be supported by new or ongoing evidence. This creates a duty for the administration to justify its continued application. Objection rights encourage timely evaluation by prompting administrative review. The temporary nature of blocking forms an essential part of the framework.

In addition, Article 51 of the regulation mandates the removal of a block when its underlying reason is no longer valid. This obligation prevents the land office from maintaining outdated or incorrect records. Owners who believe the block has become irrelevant may initiate objections to expedite its removal. This process reinforces administrative accuracy. Effective removal procedures maintain the integrity of the registration system. Objections therefore serve as triggers for administrative correction.

The administrative record must reflect factual conditions, as required by Article 26 of Government Regulation 24 of 1997. Inaccurate records can mislead third parties and undermine land security. Blocking must therefore be based on facts that can withstand scrutiny. When inaccuracies occur, landowners may question the validity of the recorded block. The objection mechanism ensures that inaccurate entries can be corrected. This improves the reliability of public records.

The evidentiary burden applied in blocking requests is addressed indirectly through Article 48 of Ministerial Regulation 13/2017, which requires written evidence supporting the request. This requirement ensures that blocking is not initiated solely on allegations. Landowners gain protection because unsupported claims cannot be used to justify administrative interference. The land office must evaluate evidence objectively before acting. Objection rights allow owners to challenge weak or speculative evidence. This increases the fairness of administrative decisions.⁸

The involvement of third parties requesting blocks introduces additional legal complexity. Article 50 of the ministerial regulation demands verification before imposing a block. Verification protects owners from baseless requests that could restrict property use. If verification is inadequate, objection rights become essential to expose procedural weaknesses. This structure ensures that third-party involvement does not overpower the rights of actual landowners. Balanced procedure becomes central to the framework.

Landowners also rely on the right to be heard, which is reinforced by Article 41 of Law 30/2014. This article affirms that *"affected parties must be given opportunities to present their positions."* Certificate blocking directly affects ownership interests, making participation mandatory. Objection rights operationalize this participation by enabling formal responses. Participation ensures that administrative actions are not one-sided. Through objections, the landowner's voice becomes part of the decision-making process.

⁷ Muttaqin, Z. *State Administrative Law and Land Governance in Indonesia*. Routledge, 2024, pp. 150.

⁸ Land and Development in Indonesia (Eds. T. Lindsey et al.). ISEAS–Yusof Ishak Institute, 2016, pp. 89

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The right to obtain reasons for decisions, stated in Article 51 of Law 30/2014, requires officials to provide written explanations. A block must therefore include explicit justification. Without reasons, landowners cannot evaluate whether the decision aligns with administrative law. Objection rights allow them to contest decisions lacking adequate justification. Reason-giving promotes transparency and reduces the risk of arbitrary actions. This obligation strengthens the legitimacy of blocking decisions.

Conflicts involving overlapping claims are also relevant, especially when blocking is used to prevent harmful transfers. Article 22 of Government Regulation 24/1997 encourages accurate mapping and identification to reduce such conflicts. When blocking arises from contested claims, objection rights allow owners to defend their documented interests. Administrative processes must ensure that blocking does not presume guilt or wrongdoing. The objective is to prevent transfers without compromising lawful ownership. Objections help differentiate between genuine disputes and unfounded claims.

The framework also incorporates principles of accountability in Article 8 of Law 30/2014. Administrative officers must justify actions affecting private rights. Certificate blocking without adequate accountability mechanisms risks violating this principle. Objection rights ensure that decisions can be reviewed and corrected. Accountability fosters public trust in land institutions. This trust is crucial for maintaining orderly registration.⁹

The possibility of judicial review further reinforces objection rights. Article 53 of Law 30/2014 allows contestation of administrative decisions before the Administrative Court. If administrative objections do not resolve the issue, landowners may escalate the matter judicially. This dual-level system ensures comprehensive protection. The presence of external review encourages careful administrative decision-making. Judicial oversight strengthens the overall framework.

Good governance principles provide another foundation for understanding objection rights. Article 10(1) of Law 30/2014 requires administration to uphold fairness, accuracy, and transparency. These principles apply directly to certificate blocking because it affects property rights. Objection rights hold administrators accountable to these principles. They ensure that the process is both transparent and controllable. Governance principles thus anchor the legality of blocking.

Overall, the legal framework regulating certificate blocking is structured to balance administrative authority with landowner protection. Multiple statutes, regulations, and constitutional principles collectively reinforce objection rights. This ensures that blocking functions as a protective mechanism rather than a source of administrative harm. Objection rights provide essential oversight and correction mechanisms. The framework intends to maintain legal certainty and fairness within land administration. These norms collectively form the regulatory basis for safeguarding landowners when certificates are blocked.

B. Regulatory Analysis of Objection Mechanisms in Certificate Blocking.

The regulatory analysis of objection mechanisms begins by examining how administrative norms structure the decision-making process within land offices. Objection procedures are designed to check whether a certificate blocking measure complies with substantive and procedural standards. These mechanisms are essential because blocking directly suspends a landowner's ability to exercise their rights. A regulatory perspective evaluates not only the written rules but also the logical coherence behind their adoption. Such analysis highlights the safeguards intended to protect owners from arbitrary administrative interference. It also reveals the extent to which objection routes maintain the balance between administrative authority and individual rights.

A key element in objection mechanisms is the requirement that landowners receive a formal notification of the blocking decision. This notification enables the affected party to understand the factual grounds and legal reasoning behind the administrative action. Without notification, landowners would be unable to assess whether the blocking was imposed lawfully. Regulations therefore position transparency as a structural condition of valid administrative decisions. The objection process depends heavily on the clarity of this initial disclosure. Thorough notification¹⁰ ensures that objections are based on accurate and complete information.

Regulatory analysis also considers the position of evidence in the objection system. Landowners must be able to submit counterarguments supported by documentary proof challenging the basis of the block. Regulations typically require administrative offices to evaluate this evidence objectively and according to pre-established norms. This requirement prevents bias from influencing the assessment of the dispute. A fair evidentiary process contributes to the integrity of administrative outcomes. It also ensures that the objection process functions as a meaningful corrective tool.

Another regulatory focus lies in the scope of authority granted to officials handling objections. Administrative authority must be explicitly defined to prevent decision-makers from exceeding their powers. Clear boundaries on authority also help differentiate between actions requiring judicial oversight and those resolvable internally. Such distinctions preserve the administrative hierarchy and maintain procedural order. The objection process becomes more reliable when role limitations are strictly followed. This structure promotes predictability in administrative behavior.

⁹ Priyo Budi Maryoso, *Implementation of Full Systematic Land Registration Policy (PTSL): Study in Bunut District, Pelalawan Regency*, International Journal of Law, Crime and Justice, 2024, Vol. 1, No. 4, pp. 37–59.

¹⁰ Priyo Budi Maryoso, *Implementation of Full Systematic Land Registration Policy (PTSL): Study in Bunut District, Pelalawan Regency*, International Journal of Law, Crime and Justice, 2024, Vol. 1, No. 4, pp. 37–59.

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Timing is a crucial regulatory aspect because delays in resolving objections may cause significant harm to landowners. Rules generally require that objections be processed within a reasonable period to prevent indefinite uncertainty. Reasonable timelines ensure that administrative remedies are accessible and effective. A regulatory analysis evaluates whether existing timeframes are sufficiently strict to prevent excessive delay. Time discipline reflects the state's obligation to deliver efficient services. Without firm timelines, objection mechanisms risk losing their remedial value.

Proportionality plays a major role in evaluating objection responses. Administrative authorities must assess whether the severity of the blocking aligns with the underlying dispute or allegation. If the objection reveals that the risk is low, proportionality demands that restrictions be lifted. Regulations therefore require officials to compare the interference with the actual necessity of the case. This analysis ensures that blocking is not applied more broadly than needed. Proportionality strengthens fairness within administrative actions.¹¹

Legal certainty is another central concept in the regulatory evaluation of objections. A landowner must be able to predict the consequences of submitting an objection based on clearly defined rules. Regulations that are vague or inconsistent reduce the effectiveness of objection mechanisms. Certainty supports the stability of property rights by ensuring that administrative processes remain consistent. A reliable objection system depends on clarity in rules and outcomes. This reinforces trust in the land administration system.

Objectivity in the assessment process is essential to the legitimacy of objection outcomes. Regulations typically instruct decision-makers to avoid personal bias or external influence when reviewing objections. This neutrality ensures that administrative actions remain grounded in factual evaluation rather than subjective judgment. A transparent review structure helps verify the impartiality of each decision. Objectivity is particularly important because blocking carries significant consequences for landowners. Maintaining neutrality is therefore fundamental to administrative justice.

Regulatory analysis also examines the level of access landowners have to procedural guidance. Many individuals may not understand the technical nature of land administration processes. Regulations often require land offices to provide procedural explanations to support effective participation. These explanations prevent procedural barriers that would otherwise undermine objection rights. Access to such guidance strengthens the inclusive character of administrative procedures. It ensures that objections are made on equal footing.¹²

Consistency across administrative offices is another factor that regulations attempt to address. Uniform application of blocking and objection rules prevents unequal treatment of landowners in different regions. A regulatory analysis studies whether guidelines have been standardized to reduce discretionary variation. Consistency also improves administrative accountability. Uniform rules help establish a predictable pattern of decision-making. This enhances the legitimacy of objection processes.

Review standards form an important component of objection mechanisms. These standards outline how officials should evaluate the adequacy of evidence and legal arguments. Clear review criteria limit the possibility of arbitrary decisions. Regulatory analysis therefore assesses whether standards are sufficiently detailed and operational. Detailed standards help ensure that similar cases produce similar outcomes. This improves the coherence of administrative decisions.

The temporary nature of certificate blocking becomes particularly relevant during objection review. Temporary restrictions must be justified not only at the moment of imposition but also throughout their duration. Regulations often require periodic reassessment to determine whether the block remains necessary. This prevents the continuation of restrictions without updated justification. Objections play a role in prompting such re-evaluation. The temporary design thus serves as a safeguard against prolonged administrative interference.

The burden of proof is another important regulatory consideration. While complainants may be required to submit supporting evidence, administrative officials bear responsibility for demonstrating that blocking is justified. Regulations aim to distribute evidentiary burdens fairly to avoid disproportionate pressure on landowners. Clear allocation of burdens ensures that objection procedures remain balanced. A regulatory analysis evaluates whether such distribution is upheld in practice. Fair burden-sharing enhances procedural fairness.¹³

Right-to-be-heard principles also influence objection mechanisms. These principles require that landowners be given an opportunity to respond to allegations before a decision is finalized. Regulations supporting this principle help ensure interactive participation between administrators and affected parties. Being heard allows landowners to present corrective information and contest inaccuracies. It also promotes procedural legitimacy by validating the voices of those affected. This interactive structure strengthens the fairness of administrative processes.

Regulations often incorporate internal review layers to enhance the reliability of objection outcomes. These layers allow decisions to be reviewed by higher administrative officials within the same institution. Internal review can correct earlier

¹¹ Lindsey, T. & Butt, S. *Indonesian Law and Society*. Oxford University Press, 2018, pp. 112

¹² Dian Aries Mujiburohman, *Transforming Paper to Electronic: A Juridical and Technical Study of Electronic Land Certificates*, Bhumih: Jurnal Agraria dan Pertanahan, 2021, Vol. 7, No. 1, pp. 57–67.

¹³ O. Moechthar, *Legal Knowledge Related to Land Registration and Electronic Certification of Land Ownership*, Veteran Society Journal, 2021, Vol. 2, No. 2, pp. 87–109

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misinterpretations or procedural errors. Regulatory evaluation examines whether these layered structures operate effectively. They add a buffer against unjust or unreasoned decisions. Multi-level review thus improves administrative accountability.

The possibility of mediation during objection processes is sometimes recognized within regulatory structures. Mediation offers a cooperative space for parties to resolve disputes without escalating to judicial forums. Regulations supporting mediation emphasize efficiency, mutual understanding, and reduced administrative burden. Regulatory analysis evaluates whether mediation is genuinely available and accessible. This alternative pathway strengthens the flexibility of the objection framework. It also supports dispute resolution in a less adversarial manner.

Transparency requirements also extend to the documentation of decisions. Officials are required to record the reasoning behind acceptance or rejection of objections. Proper documentation prevents decisions from being made without adequate justification. It also creates a legal record that can be reviewed if further disputes arise. Regulatory analysis considers whether such recordkeeping is systematically enforced. Documentation safeguards institutional integrity.

Regulations must also address conflicts of interest within administrative offices. Officials handling objections should not have personal or professional ties to parties involved in the dispute. Conflict-of-interest rules protect the impartiality of decisions. A regulatory evaluation examines whether these safeguards are clearly formulated and enforced. Without them, objection procedures may be compromised. Strong conflict safeguards reinforce the trustworthiness of administrative outcomes.¹⁴

Another regulatory aspect concerns accessibility of remedies following objection rejection. Landowners must be able to pursue further administrative or judicial avenues when internal objections fail. Regulations establish pathways to ensure that decisions are not final without proper oversight. Analyzing these pathways helps determine whether the system offers meaningful legal recourse. Accessibility ensures that objection mechanisms do not operate in isolation. It also protects the broader structure of land rights.

Regulatory provisions often require decision-makers to explain how they considered each piece of evidence submitted during objections. This reasoning requirement promotes thoroughness and prevents dismissive evaluations. Regulatory analysis examines whether these obligations are clear and enforceable. Explicit reasoning enhances transparency and builds confidence in the decision-making process. It also allows for independent review if disputes escalate. Thorough justification anchors administrative legitimacy.

An important regulatory concern is the risk of over-blocking when authorities respond too quickly to unverified complaints. Objection mechanisms act as a safeguard against such premature action. Regulations therefore require administrators to reassess initial assumptions during the objection phase. This protects landowners from the long-term impact of reactive decision-making. Analysis of such rules highlights the preventive function of the objection system. It also demonstrates the balance between caution and evidence.

Regulatory frameworks also emphasize the neutrality of the objection process by separating the officials who imposed the block from those reviewing the objection. Such separation prevents self-justification bias. Ensuring review by a different official or division strengthens objectivity. A regulatory analysis evaluates whether this structural separation is consistently implemented. It provides an important safeguard for landowners seeking fair reconsideration. Structural neutrality thus enhances procedural reliability.

The enforceability of objection decisions is another important regulatory dimension. Once an objection is accepted, the administrative office must promptly remove or adjust the certificate block. Delay in implementation undermines the purpose of the objection mechanism. Regulations often include mandates requiring immediate follow-up. Regulatory analysis evaluates whether enforcement rules are sufficiently strict to ensure compliance. Enforcement clarity protects the practical value of successful objections.¹⁵

Objection mechanisms form a critical accountability feature within the certificate blocking framework. Regulatory analysis reveals that objections serve as a structured response to potentially intrusive administrative actions. These mechanisms ensure that blocking is evaluated through principles of fairness, proportionality, transparency, and reasoned decision-making. A strong regulatory design prevents misuse of authority and protects landowners' rights. The multi-layered structure of these mechanisms strengthens administrative justice. It ultimately ensures that certificate blocking remains a controlled and legally responsible tool.

IV. CONCLUSIONS

The analysis demonstrates that the regulatory structure governing certificate blocking establishes clear criteria intended to protect landowners from arbitrary administrative actions. The legislation outlines procedural safeguards, yet their application often depends on the consistency of administrative interpretation at various institutional levels. Landowners' objection rights exist as a

¹⁴ Darwin Ginting, *Legal Status of Land Deed Officers in Land Registration for Preventing Land Disputes*, Journal of Legal, Ethical and Regulatory Issues, 2021, Vol. 24, Special Issue 1 (pp. 1–9)

¹⁵ A.A.M.I. Insany Rachman & E.D. Hastri, *Analisis Kendala Implementasi Peraturan Menteri ATR/Kepala BPN No.1/2021 (Electronic Certificates)*, Mulawarman Law Review, 2021, Vol. 6, No. 2, pp. 91–104

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corrective mechanism, but their effectiveness is closely tied to timely notification and transparent decision-making. The legal norms provide a foundation for fairness, although gaps remain in enforcement and harmonization across related regulations. Certainty is essential because any restriction on certificate status has direct implications for ownership security. Overall, the regulatory framework reflects an effort to balance administrative authority with individual property rights.

The study finds that certificate blocking must operate within strict legal boundaries to maintain its legitimacy as a temporary administrative measure. Normative analysis shows that landowners require stronger guarantees to ensure their objections are assessed objectively and without undue delay. Regulatory obligations are already articulated, yet procedural clarity must be strengthened to reduce discretionary inconsistencies. A well-structured objection mechanism enhances accountability by compelling authorities to justify every blocking action with documented legal grounds. This approach minimizes potential rights violations and supports a more predictable land administration environment. Ultimately, legal protection is most effective when the procedural rights of landowners are respected at every stage of the blocking process.

Future regulatory refinement should prioritize clearer objection procedures that obligate administrators to deliver written explanations within specific time limits. Strengthening coordination among land offices would reduce conflicting interpretations and support more uniform decision-making. Enhanced public access to procedural information would help landowners understand their rights and respond effectively to blocking actions. Legislative updates should also consider integrating electronic notification systems to prevent delays in communicating decisions. Academic and institutional collaboration is needed to evaluate ongoing implementation and identify persistent vulnerabilities. By addressing these areas, the objection system can evolve into a more reliable safeguard for landowners facing certificate blocking.

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