

## MEASURING THE ONLINE SINGLE SUBMISSION SYSTEM IN PP NUMBER 24 OF 2018 AS THE Embodiment of ENVIRONMENTAL PROTECTION

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**Abstract:** License is an instrument of environmental resource management. Law No. 32 of 2009 on Environmental Protection and Management (UU-PPLH) states that environmental permits are integration of various previously separate permits. In order to accelerate licensing including the environmental sector, the government issued PP Number 24 Year 2018 on Electronically Integrated Business Licensing Service (PP OSS). The PP is published in the frame of reorganization of the One Door Integrated Service (PTSP) system through the Online Single Submission (OSS) system. However, with the presence of PP OSS does not transfer the authority and responsibility of issuance to OSS Institutions because oss institutions issue licenses for and on behalf of ministers, agency leaders, governors or regents / mayors in accordance with attribution, delegation or delegation of authority given to them. With the use of OSS system is expected to minimize gaps or potential occurrence of corruption in the field of environmental licensing which is actually one of the manifestations of environmental protection.

**Keywords:** OSS, Environmental Protection, Corruption

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### INTRODUCTION

The issuance of Government Regulation Number 24 of 2018 concerning Electronically Integrated Business Licensing Services (PP Number 24 of 2018) is in order to facilitate the investment climate in Indonesia which aims to support the ease of doing business index. The Online Single Submission (OSS) system referred to in PP Number 24 of 2018 has fundamentally changed the permit issuance system in Indonesia and is intended to make it easier for business actors to obtain legality. Article 1 number 5 of PP Number 24 of 2018 defines OSS as a business license issued by the OSS Institution for and on behalf of the minister, head of the institution, governor, or regent/mayor to business actors through an integrated electronic system. With the phrase for and on behalf of, the authority of the OSS Institution is a mandate based on the provisions of Article 1 number 24 of Law Number 30 of 2014 concerning Government Administration means the delegation of authority from higher government agencies and/or officials to agencies and/or lower government officials with

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responsibility and accountability remaining with the mandate giver. PP Number 24 of 2018 stipulates that in order to obtain a business permit, it is not required to first obtain an environmental permit in the event that:<sup>1</sup> (a) the location of the business or activity is in a special economic zone, industrial area, or free trade area and free port, (b) the business and or activity is a micro, small business, business, and or activity that is not required to have an Amdal or a business that does not must have UKL-UPL. Business actors who have obtained environmental permits from the OSS Institution are required to complete UKL UPL and Amdal documents.<sup>2</sup>

Based on the concept of dividing the affairs of the central government and regional governments as stipulated in Article 12 paragraph (3) of Law Number 23 of 2014 concerning Regional Government, it is stated that trade and industry are a form of concurrent government affairs in the form of elective government affairs. With the emergence of the OSS system, it seems as if the authority to issue business permits is withdrawn entirely from the central government, while Article 13 of Law Number 23 of 2014 states that the division of concurrent government affairs between the central government and regional governments is based on the principles of accountability, efficiency and externalities as well as national strategic interests.

Permit is an important instrument in controlling an activity or business. Some of its functions are described by Sutedi in his book as follows. First, as a controlling function, permits are useful to ensure that the places and forms of community activities/businesses do not conflict with each other. Second, as a regulatory function, to ensure that the permit is carried out according to its designation and that there is no misuse of the designation. In this case, permits are legal instruments owned by the government to regulate and encourage citizens to act in accordance with certain concrete goals desired by the government. Third, as a coaching function, it means that the permit shows an acknowledgment from the government that the permit holder has fulfilled the requirements and competencies to carry out permitted activities/businesses. Fourth, as a function of development engineering instruments, permits are part of regulations made by the government in order to provide incentives for development. Fifth, as a function of income or sources of state revenue.<sup>3</sup> In the development of environmental law, the prevention principle and the precautionary principle are known. From the perspective of administrative law, the unification of authority for issuing environmental permits to one institution will have a positive effect because it will ensure consistency in law enforcement.

The establishment of the OSS institution in PP Number 24 of 2018 cannot be separated from legal politics. According to Mahfud MD, legal politics is a legal policy or an official line of policy regarding the law that will be enforced either by making new laws or changing old laws or it can be said and it is a choice of laws that will be repealed

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<sup>1</sup> Takdir Rahmadi, *Hukum Lingkungan di Indonesia*, Edisi Ketiga, (Depok: Rajawali Pers, 2019), hal. 110.

<sup>2</sup> Indonesia, *Peraturan Pemerintah tentang Pelayanan Perizinan Berusaha Terintegrasi Secara Elektronik*, PP No. 24 Tahun 2018, LN No. 90, TLN No. 6215, Pasal 50.

<sup>3</sup> Adrian Sutedi, *Hukum Perizinan dalam Sektor Pelayanan Publik*, (Jakarta: Sinar Grafika, 2015), hal. 193-200.

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or enforced to achieve goals. country.<sup>4</sup> In another view, Satjipto Rahardjo emphasizes that the sociological approach raises many questions around legal politics. First, the objectives to be achieved by the existing legal system. Second, what is the right way to be used to achieve the goal? Third, when to change and through how the changes are carried out in order to achieve goals. Fourth, estimate the ways and goals that are standard and well established in achieving these goals.<sup>5</sup> Padmo Wahjono gave a definition of legal politics as part of state policy in the sense of making laws which of course as part of the policy of law formation and its application.<sup>6</sup>

Politics and law, there is a reciprocal relationship as the views of experts. In this relation, legal politics is closely related to the establishment of an OSS institution that has political interests behind its formation and the results that can be implemented as part of implementing regulations. Environmental law politics can be interpreted as state political will which is translated into state legal policy in the form of manifestations of the substance of the constitution, laws, RPJP RPJMN, implementing legislation, presidential decrees, and decisions. courts related to the protection of carrying capacity and environmental functions.<sup>7</sup>

The issuance of PP Number 24 of 2018 is one form of environmental law politics. The stipulation of PP Number 24 of 2018 is a new hope to minimize licensing corruption practices, including in the environmental field. Corruption practices are very vulnerable to occur in the field of licensing services.<sup>8</sup> The licensing process in Indonesia is complicated, convoluted, overlapping rules and sectoral arrogance between Ministries/Agencies as well as Regional Apparatuses can lead to bribery, extortion, and corruption practices by state apparatus and businessmen. Several corruption cases in the licensing sector have been handled by the Corruption Eradication Commission (KPK), such as the Regent of Kutai Kartanegara who received bribes related to the granting of a location permit for PT Sawit Golden Prima in Muara Kaman Village covering an area of 16,000 hectares and related to the issuance of SKKL, environmental permits, and Amdal. The bribery case for issuing telecommunications tower permits by the Mojokerto Regent, bribery for licensing the Meikarta project development by the Bekasi Regent, and other corruption cases show that licensing is still vulnerable to corruption.<sup>9</sup>

The government has made various efforts to minimize the potential for corruption in licensing, starting from a series of economic policy packages, integrated licensing, to the

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<sup>4</sup> Mahfud MD, *Politik Hukum di Indonesia*, Edisi Revisi, (Jakarta: RajaGrafindo Persada, 2009), hal. 1.

<sup>5</sup> Satjipto Rahardjo, *Ilmu Hukum*, Cetakan III, (Bandung: Citra Aditya Bakti, 1991), hal. 352.

<sup>6</sup> Padmo Wahjono, *Indonesia Negara Berdasarkan Atas Hukum*, (Jakarta: Ghalia Indonesia, 1983).

<sup>7</sup> Mas Achmad Santosa, "Materi Perkuliahan Politik Hukum Lingkungan pada Kelas Hukum Kenegaraan", 2020.

<sup>8</sup> Agus Widiyarta, Catur Suratnoaji, dan Sumardjijati, "Pola Perilaku Masyarakat Terhadap Penggunaan Program Surabaya Single Window (Ssw) sebagai Perizinan Online Dalam Upaya Menekan Tindakan Korupsi, Kolusi, dan Nepotisme di Surabaya, *Jurnal Perspektif Hukum*, 17 (2), hal. 231-241.

<sup>9</sup> [Rozidateno Putri Hanida, Bimbi Irawan, dan Fachrur Rozi, "Strategi Eliminasi Praktik Korupsi pada Pelayanan Perizinan dan Pengawasan Pelaksanaan Penanaman Modal, \*Jurnal Antikorupsi\*, Volume 6 \(2\) Tahun 2020, hal. 298.](#)

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issuance of PP Number 24 of 2018 concerning Electronically Integrated Business Licensing Services, better known as Online Single Submission (OSS). Licensing arrangements are important to be rearranged to be able to become a supporting element and not an obstacle in business. PP Number 24 of 2018 was issued to accelerate and improve the investment and business processes at the same time as expected to minimize corrupt practices in licensing. The OSS system can reduce direct interaction between business actors and government officials to minimize the potential for conspiracy actions in licensing management, as has been the practice so far in Indonesia.

Based on the above background, further studies are needed regarding the regulation of environmental licensing that accommodates environmental protection, as well as forms of environmental protection through the Online Single Submission system represented by PP Number 24 of 2018 concerning Electronically Integrated Business Licensing Services.

## **DISCUSSION**

### **1. Permission**

Permit (vergunning) is a form of determination (beschikking), which is carried out in a manner regulated by laws and regulations – the act is a unilateral government legal action, has direct and concrete legal consequences, and is carried out by an official who has special authority to that.<sup>10</sup> The permit is a stipulation that allows certain specific actions for certain people/legal entities (concrete and individual), with the condition that these actions are generally prohibited acts or require special supervision.<sup>11</sup> The stipulation is known as a state administrative decision (KTUN) as regulated in Law Number 30 of 2014 concerning Government Administration.

Any particular business and/or activity cannot be carried out without permission from the authorized government organ. In environmental law, an environmental permit is one of the requirements for obtaining a business or activity permitted. A business permit or activity that is required to have an environmental permit is an activity or business activity for which EIA is required or UKL and UPL are required. Siti Sundari Rangkuti<sup>12</sup> stated that environmental permits include:

- a. HO Permit (Hinder Ordonnantie, Stb. 1926 No. 226, Article 1)
- b. Industrial Business License
- c. Waste Disposal Permit
- d. Operation permits for B3 waste storage, collection, monitoring, processing, and/or landfill
- e. B3 waste transportation permit

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<sup>10</sup> [H.A Muslimin, \*Beberapa Azas-Azas dan pengertian-Pengertian Pokok tentang Administrasi dan Hukum Administrasi\*, \(Bandung: Alumni, 1982\) sebagaimana dikutip oleh Dewi Tresya, Ima Mayasari, dan Abdul Azis Suhendra, "Penataan Perizinan dalam Gerakan Nasional Penyelamatan Sumber Daya Alam di Indonesia", Jurnal Antikorupsi Integritas, Volume 5 \(2-2\) Tahun 2019, hal. 16.](#)

<sup>11</sup> [\*Ibid.\*, hal. 17.](#)

<sup>12</sup> [Siti Sundari Rangkuti, \*Hukum Lingkungan dan Kebijakan Lingkungan Nasional\*, \(Surabaya: Airlangga University Press, 2005\), hal. 120.](#)

- f. B3 waste utilization permit
- g. B3 waste treatment equipment operating license
- h. B3 waste processing and landfill location permit
- i. Permission to do dumping
- j. Permit to conduct business and/or activities that emit emissions and/or disturbances
- k. Location permission

The environmental permit is as referred to in Law Number 32 of 2009 concerning Environmental Protection and Management (Law Number 32 of 2009).<sup>13</sup> Regarding the above permits, Law Number 32 the Year 2009 unites them into environmental permits or in other words, the Law simplifies the environmental permit system by integrating environmental permits. Business actors who will carry out business licenses or activities that have an impact on the environment are required to have an environmental permit. On the other hand, integration in one environmental permit is an effort to protect the environment because actually, one permit is related to another permit. The integration of environmental permits means simplification which is an instrument for controlling and monitoring environmental risks from various activities. Environmental permits are an effort to preserve environmental functions on the one hand and on the other hand environmental permits are considered to complicate investment activities in Indonesia. Prior to Law Number 32 of 2009, the environmental permit system used a single medium permitting approach, resulting in various permits related to environmental management.<sup>14</sup> Although the existence of permits is still regulated and recognized in the end, the law wants these permits to be integrated into environmental permits.<sup>15</sup> In other words, Law Number 32 the Year 2009 requires the environmental permit system to be regulated through an integrated approach (integrated permitting).<sup>16</sup>

## **2. Representation of Environmental Protection-Based Licensing in PP Number 24 the Year 2018**

The change in the environmental protection paradigm is represented by several regulations in the field of environmental law, including PP Number 24 of 2018. Before the issuance of PP Number 24 of 2018, Law Number 32 of 2009 has provided an integrated permit in the environmental field, although there are still various issues of integrated licensing. namely the inconsistency of various sectoral regulations, the sectoral ego of technical agencies, the strength of economic interests compared to the interests of environmental preservation and public welfare. The implementation of an integrated licensing system in the environmental sector requires the integration of

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<sup>13</sup> Helmi, *Hukum Lingkungan dan Perizinan Bidang Lingkungan Hidup Dalam Negara Hukum Kesejahteraan*, (Bandung: Unpad Press, 2010), hal. 83.

<sup>14</sup> Andri Gunawan Wibisana, "Pengelolaan Lingkungan Melalui Izin Terintegrasi dan Berantai: Sebuah Perbandingan atas Perizinan Lingkungan di Berbagai Negara", *Jurnal Hukum & Pembangunan*, 48 No. 2 Tahun 2018, hal. 246.

<sup>15</sup> *Ibid.*, hal. 247.

<sup>16</sup> *Ibid.*, hal. 247.

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regulatory systems, institutions, authorities, mechanisms and requirements to realize sustainable environmental management. Thus, synchronization of regulations is needed, integration of sustainable development principles and institutional models of integrated environmental licensing systems are needed.

Looking at Indonesia's positive law, the principle of prevention is not explicitly stated in Article 2 of Law Number 32 of 2009 which discusses the applicable principles, but this principle lives on in one of the articles concerning the Analysis of Environmental Impact Problems or Amdal. Amdal is a manifestation of the principle of prevention because Amdal is a study of the significant impact of a planned business and/or activity on the environment which is required for the decision-making process regarding the operation of a business and/or activity.<sup>17</sup>

Permission is a form of decision that has the characteristics to determine. Prayudi describes permission as one of the strategies used by the government to regulate and control legal subjects under its authority to prohibit without a written letter, to legal subjects who are regulated to do/do something controlled and regulated by the government in line with the laws and regulations.<sup>18</sup> With this concept, in the licensing scheme, the government intervenes in certain activities carried out by the public.<sup>19</sup> Furthermore, he distinguishes between permission (*vergunning*) and authorization (*machtiging*) that a permit is a decision that contains a dispensation from an act that is prohibited by legislation. The prohibited act requires terms and conditions that the applicant must fulfill to obtain a dispensation.

Legal norms contained in permits are norms of prohibition and norms of authority originating from government organs that are authorized to allow the public to perform specific actions prohibited by laws and regulations. In the environmental law sector, permits are instruments of environmental policy. The environmental permit process is based on administrative decisions issued by government organs in written form and unilaterally following their authority. This type of decision is a constitutive decision that creates rights and obligations for both the applicant and the decision-maker. When the terms and conditions related to the applicant's obligations are not fulfilled and create environmental impacts or the permit has procedural or material defects, then the permit is subject to cancellation either by the decision-maker or the state administrative court.<sup>20</sup> The environmental permit as mentioned above is a permit granted to business actors/activities requiring an Amdal with the aim of protecting and managing the environment which is a prerequisite for obtaining a business/activity permit.

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<sup>17</sup> [Indonesia, Undang-Undang Perlindungan dan Pengelolaan Lingkungan Hidup, UU No. 32 Tahun 2009, LN No. 140, TLN No. 5059, Pasal 1 paragraf 11.](#)

<sup>18</sup> [Arya Rema Mubarak, "Conflict of Interest antara Usaha Perlindungan Lingkungan Hidup dengan Kemudahan Berinvestasi dalam Peraturan Pemerintah Nomor 24 Tahun 2018", JHLI Volume 5 Nomor 2 Tahun 2019, hal. 290.](#)

<sup>19</sup> [Harsanto Nursadi, Hukum Administrasi Negara Sektorial Edisi Revisi, cetakan 2, \(Depok: Badan Penerbit FH UI, 2019\), hal. 229.](#)

<sup>20</sup> [Ibid., hal. 230.](#)

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PP Number 24 of 2018 is a new thing for the business world and all those affected. For environmental law and environmental organizations that oversee various businesses and/or activities that have an important impact on the environment, knowledge about the OSS system in the PP and its consequences for environmental permits is still not available systematically. In its preamble PP Number 24 of 2018 states that the formation of this PP is to implement the provisions of Article 25 of Law Number 25 of 2007 concerning Investment and Article 6 and Article 7 of Law Number 23 of 2014 concerning Regional Government as amended by Law Number 9 of 2015 concerning Changes Second, on Law Number 23 of 2014 concerning Regional Government.<sup>21</sup> PP Number 24 of 2018 stipulates that the fulfillment of environmental permits begins with the preparation of the Amdal and RKL-RPL which is carried out no later than 30 days from the issuance of environmental permits based on commitments. This means that the announcement of business plans and/or activities, public consultations, and KA-AMDAL forms must be carried out within that period, which is emphasized in the Minister of Environment and Forestry Regulation Number 26 of 2018 that announcements of business plans and/or public consultation activities, and preparation of KA forms -AMDAL must be carried out no later than 20 working days after the issuance of the environmental permit based on the commitment.<sup>22</sup>

This OSS system creates problems if the local government has not implemented the One-Stop Integrated Licensing (PTSP) system. In addition, this system will also be in vain if BKPM does not carry out its coordination function with local governments from the province to the district. This system will provide a smooth path for licensing large capital investments and direct influence with the central government, but for private companies that do not have a direct correlation with the government, implementation will be difficult.<sup>23</sup>

The environmental permit system is affected by the issuance of PP Number 24 of 2018 namely First, businesses and/or activities that require EIA or UKL – UPL are included in the OSS system as listed in Appendix I of PP Number 24 of 2018, the laws and regulations used are PP Number 24 of 2018, PP Number 27 of 2012, and Regulation of the Minister of Environment and Forestry concerning Procedures for Preparation, Assessment, and Examination of Environmental Documents to Support the OSS System. Second, businesses and/or activities that require EIA or UKL – UPL are not included in the OSS system (not listed in Appendix I of PP Number 24 of 2018, so the laws and regulations used are PP Number 27 of 2012 and Regulation of the Minister of Environment and Forestry related to the AMDAL Process, UKL – UPL, and Environmental Permits.

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<sup>21</sup> Indonesia, *Peraturan Pemerintah tentang Pelayanan Perizinan Berusaha Terintegrasi Secara Elektronik*, PP No. 24 Tahun 2018, LN No. 90, TLN No. 6215, Konsideran.

<sup>22</sup> Indonesia, *Peraturan Menteri Lingkungan Hidup dan Kehutanan tentang Pedoman Penyusunan dan Penilaian serta Pemeriksaan Dokumen Lingkungan Hidup Dalam Pelaksanaan Pelayanan Perizinan Berusaha Terintegrasi Secara Elektronik*, Permen LHK Nomor P.26/MENLHK/SETJEN/KUM.1/7/2018, LN No. 930, Pasal 18.

<sup>23</sup> Seto Sanjoyo, *et. al*, “Perizinan Berusaha Melalui *Single Online Submission* Sebagai Ketaatan Hukum Dalam Rangka Meningkatkan Investasi”, *Borneo Law Review* Volume 4 Nomor 1 Tahun 2020, hal. 72.



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Violation of the law in licensing, especially related to the environment, which is the most in the spotlight is the crime of corruption. At least since 2007, there have been 13 (thirteen) corruption cases related to licensing in the mining, forestry, and plantation sectors that have been decided by the court and have permanent legal force. The corruption case involved several regional heads such as the Governor of Riau, the Governor of Southeast Sulawesi, the Regent of Pelalawan, the Province of Riau, and the Regent of Kutai Kartanegara of the Province of East Kalimantan.<sup>24</sup> After the issuance of PP Number 24 of 2018, the licensing process can be carried out effectively for business actors who do not need infrastructure or already have the infrastructure. However, for types of businesses that require infrastructure or do not have the infrastructure, they must carry out the process of fulfilling commitments. Fulfillment of these commitments is still carried out face-to-face between business actors and government officials. This is because the permit will be effective if the process of fulfilling commitments through technical evaluation activities, and/or field reviews, and/or laboratory examinations are completed.<sup>25</sup>

In government organizations where licensing corruption is indicated, some separate rules and norms determine what can and cannot be done with the private sector.<sup>26</sup> Organisasi korupsi perizinan ini menambah pemain, selain abdi negara dan pengusaha. As the main subject, namely people and institutions as consultants or intermediaries as well as eminent persons as the emphasis.<sup>27</sup> In the licensing process, for example, the requirements for making EIA documents can be carried out by more than 1 (one) specific consultant at the request of certain officials who in addition to having the task of completing the licensing requirements, are also a mediator between business actors and authorized government officials when both need something.<sup>28</sup> It is these kinds of things that are expected to be overcome with the OSS system in PP No. 24 of 2018.

Licensing services are the first step in investment activities, but are also areas that are vulnerable to corruption cases in the natural resource management process in Indonesia.<sup>29</sup> This licensing issue is caused by the abuse of authority by unscrupulous regional heads and bureaucrats in providing convenience for mining permits, land conversion, and a series of other permits.<sup>30</sup> Corruption can also occur because of the

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<sup>24</sup> Dewi Tresya, Ima Mayasari, dan Abdul Azis Suhendra, "Penataan Perizinan dalam Gerakan Nasional Penyelamatan Sumber Daya Alam di Indonesia", Jurnal Antikorupsi Integritas, Volume 5 (2-2) Tahun 2019, hal. 16.

<sup>25</sup> Rozidateno Putri Hanida, Bimbi Irawan, dan Fachrur Rozi, "Strategi Eliminasi Praktik Korupsi pada Pelayanan Perizinan dan Pengawasan Pelaksanaan Penanaman Modal", Jurnal Antikorupsi, Volumen 6 (2) Tahun 2020, hal. 299.

<sup>26</sup> Hariadi Kartodihardjo, Niken Ariati, dan Maryati Abdullah, "Kebijakan Pencegahan Korupsi Sektor Sumber Daya Alam Melalui Pendekatan Institusional dan Struktural", Jurnal Antikorupsi, Volumen 5 (2-2) Tahun 2019, hal. 41.

<sup>27</sup> *Ibid.*

<sup>28</sup> *Ibid.*

<sup>29</sup> Dewi Tresya, Ima Mayasari, dan Abdul Azis Suhendra, "Penataan Perizinan...", hal. 17.

<sup>30</sup> Muhammad Zainul Arifin dan Irsan, "Korupsi Perizinan dalam Perjalanan Otonomi Daerah" sebagaimana dikutip oleh Rozidateno Putri Hanida, Bimbi Irawan, dan Fachrur Rozi, "Strategi Eliminasi Praktik Korupsi pada Pelayanan Perizinan dan Pengawasan Pelaksanaan Penanaman Modal, Jurnal Antikorupsi, Volumen 6 (2) Tahun 2020, hal. 302.



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willingness of the public who want fast service in various matters, such as in the field of licensing. Not only that, the existence of a long, complicated, and convoluted bureaucratic process has opened a gap for some unscrupulous bureaucrats to take advantage of this condition by offering illegal actions and breaking the rules to take advantage of themselves.<sup>31</sup> One of the efforts that can be made to increase business activities and prevent corrupt practices is to simplify licensing policies.<sup>32</sup> The stipulation of PP Number 24 of 2018 is a step taken by the government in order to accelerate and increase investment and business activities, as well as to minimize corrupt practices in licensing services. Through the use of the OSS system, it is hoped that the licensing process can run quickly and without being complicated because business actors no longer have to go to the licensing office to process their business licenses, but simply do it online.

## **CONCLUSION**

For the development of a developing country like Indonesia, investment is an important thing. The importance of investment remains to pay close attention to environmental protection given that Indonesia is also one of the countries with the fastest deforestation in the world. Law Number 32 of 2009 has created a fairly good environmental protection through a mechanism for applying for environmental permits which are carried out in stages to ensure that the steps taken by business actors and authorized government officials have been carried out carefully and rigidly so that they are not harmful to the environment.

The issuance of PP Number 24 of 2018 is expected to support investment and is ideal for minimizing corrupt practices which of course also has an impact on the disruption of environmental protection. With an online system, the gap for a meeting of wills between business actors and authorized officials is closed. However, it is better than the work ethic of government officials and the deadline for business permits and environmental permits must be reformed and lest the presence of PP Number 24 of 2018 actually raises the possibility of environmental damage to be higher. It is important to find a balance between environmental protection and economic interests in a developing country like Indonesia. Another way that can be done to minimize corrupt practices in licensing is by fully utilizing technology at every stage with the aim of eliminating direct meetings between business actors and government officials.

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<sup>31</sup> Fatkhuri, "Korupsi dalam Birokrasi dan Pencegahannya", Jurnal Ilmiah Manajemen Publik dan Kebijakan Sosial, 1 (2), hal. 65-76.

<sup>32</sup> Muhammad Zainul Arifin dan Irsan, "Korupsi Perizinan dalam Perjalanan Otonomi Daerah" sebagaimana dikutip Rozidateno Putri Hanida, Bimbi Irawan, dan Fachrur Rozi, "Strategi Eliminasi Praktik Korupsi pada Pelayanan Perizinan dan Pengawasan Pelaksanaan Penanaman Modal, Jurnal Antikorupsi, Volume 6 (2) Tahun 2020, hal. 303.

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MENAKAR SISTEM *ONLINE SINGLE SUBMISSION* DALAM PP NOMOR 24 TAHUN 2018 SEBAGAI PERWUJUDAN PERLINDUNGAN LINGKUNGAN.

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