

## Legal Protection of Land Rights in the Settlement of Double Certificate Disputes Through Supreme Court Decisions (Study of Decision No. 212K/PDT/2020)

Fitri Camelia Ananda<sup>1</sup>, Yenny Febrianti<sup>1</sup>, Eka Ardianto<sup>1</sup>

<sup>1</sup> University of Pakuan, Indonesia

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### ARTICLE INFO

#### *Keywords:*

Dual Land Certificates;  
Legal Protection;  
Legal Certainty;  
Supreme Court Decision;  
Right of Ownership;  
Basic Agrarian Law

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#### *Article history:*

Received 2025-03-14

Revised 2026-04-17

Accepted 2026-05-22

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### ABSTRACT

Dual land certificates represent a systemic problem in Indonesian land administration that creates legal uncertainty and prolonged ownership conflicts. This study aims to analyze the legal protection provided by the Supreme Court through Decision No. 212K/Pdt/2020 in resolving dual certificate disputes, as well as to identify implementation obstacles and countermeasures. The research employs a normative juridical approach combined with an empirical approach through decision analysis, statutory review, and interviews with Notaries/PPAT as land practitioners. Findings indicate that the cassation decision successfully restored substantive legal certainty by prioritizing good faith, chronology of rights acquisition, and physical possession as the basis for determining legitimate Right of Ownership under Articles 20–27 of the Basic Agrarian Law (UUPA). However, the effectiveness of legal protection remains hindered by weak coordination between judicial institutions and the National Land Agency (BPN), protracted verification bureaucracy, and the potential misuse of criminal instruments to delay civil execution. The study recommends establishing standardized court-BPN cooperation protocols, accelerating the transition to electronic land registration, simplifying post-final decision certificate revocation procedures, and applying the *ultimum remedium* principle in criminal reporting for purely civil land disputes. Thus, legal protection must not end with normative victory but must materialize as administrative certainty genuinely enjoyed by legitimate rights holders.

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#### **Corresponding Author:**

Fitri Camelia Ananda

University of Pakuan, Indonesia; [babysexyola@gmail.com](mailto:babysexyola@gmail.com)

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## 1. INTRODUCTION

Land occupies a highly strategic position in the life of Indonesian society because it is not only viewed as an economic asset, but also as a social, cultural, and legal instrument that determines community welfare and stability. As an agrarian country, Indonesia places land as one of the most important natural resources that must be regulated and managed by the state for the greatest prosperity of the people, as mandated in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia. The increasing population growth, urbanization, infrastructure development, and expansion of investment activities have significantly increased the value and demand for land. Consequently, disputes over land ownership continue to rise and become increasingly complex. One of the most problematic forms of land disputes in Indonesia is the existence of dual or overlapping land certificates. This issue has become a persistent legal problem because it creates uncertainty regarding the legitimacy of ownership rights and often leads to prolonged litigation between parties claiming rights over the same parcel of land.

The issuance of land certificates is fundamentally intended to provide legal certainty and protection for holders of land rights. Through land registration, the government seeks to establish orderly land administration and prevent disputes regarding ownership. Government Regulation Number 24 of 1997 concerning Land Registration emphasizes that a land certificate functions as strong evidence of ownership rights as long as the physical and juridical data correspond to the information contained in the land register and measurement documents. In theory, the existence of a certificate should guarantee certainty regarding the subject, object, and status of land rights. However, in practice, the Indonesian land administration system still encounters numerous structural and administrative weaknesses that undermine the reliability of land registration. These weaknesses include inaccurate mapping systems, overlapping spatial data, incomplete archives, administrative negligence, corruption, document falsification, and poor coordination among government institutions. As a result, situations often arise in which two or more certificates are issued for the same parcel of land by the National Land Agency (Badan Pertanahan Nasional/BPN), causing legal conflicts between parties who each possess formal proof of ownership issued by the competent authority (Purba, 2025: 112–125).

Dual certificates create serious legal consequences because each certificate holder believes that their rights are legally protected by the state. In many cases, both parties acquire certificates through procedures that appear formally valid, thereby making it difficult to determine the rightful owner. The problem becomes even more complicated when the parties involved are individuals, corporations, or investors who have made substantial economic use of the disputed land. Under such conditions, the principle of legal certainty in land law becomes questionable because the state institution responsible for issuing certificates is itself the source of conflicting claims. This phenomenon demonstrates that the land registration system has not fully fulfilled its preventive legal protection function. According to Ginting (2020: 215), dual certificates generally occur due to administrative errors in land registration, inaccurate verification of physical and juridical data, misuse of authority, or intentional manipulation of land documents by irresponsible parties. In some situations, the problem is aggravated by the absence of an integrated digital land database and the lack of synchronization between central and regional land offices.

The emergence of dual certificates also reflects broader institutional weaknesses within the Indonesian agrarian governance system. The National Land Agency, which is entrusted with administering land registration and maintaining land records, often faces criticism for its inability to prevent overlapping certificates. Although technological modernization and digitization efforts have been introduced in recent years, land administration in many regions still relies heavily on manual documentation and fragmented archival systems. Consequently, discrepancies between physical land conditions and juridical records frequently occur. Moreover, weak supervision and limited accountability mechanisms contribute to recurring administrative errors. In many instances, overlapping certificates remain undetected for years until one party attempts to transfer, sell, develop, or utilize the land, thereby triggering disputes and litigation.

From a legal perspective, the existence of dual certificates directly contradicts the purpose of land registration as stipulated in Government Regulation Number 24 of 1997. Article 3 of the regulation states that land registration aims to provide legal certainty and protection to land rights holders. However, when multiple certificates exist for the same parcel of land, the certificate loses its function as a reliable instrument of legal certainty. This condition weakens public trust in the land administration system and creates insecurity among landowners and investors. In addition, overlapping certificates frequently lead to social conflict, economic losses, and delays in development projects. Land disputes arising from dual certificates can escalate into prolonged legal battles involving civil courts, administrative courts, and even criminal proceedings when allegations of forgery or fraud are involved.

When preventive legal protection through land registration fails, the affected parties inevitably seek repressive legal protection through judicial mechanisms. Litigation becomes the primary means of resolving disputes concerning overlapping certificates. In this context, the judiciary, particularly the Supreme Court of the Republic of Indonesia, plays a critical role in restoring legal certainty and determining the legitimate holder of land rights. The court is expected to examine the validity of certificates, assess the good faith of the parties, evaluate procedural compliance in the issuance of certificates, and provide a final and binding resolution to the dispute. However, resolving dual certificate cases through litigation is often time-consuming, costly, and complicated because judges must analyze extensive documentary evidence, historical land records, witness testimonies, and administrative procedures conducted by BPN.

One of the significant cases illustrating the complexity of dual certificate disputes is Supreme Court Decision Number 212K/Pdt/2020 involving PT Equator Majapura Raya. This case demonstrates the juridical difficulties faced by courts when two parties possess certificates issued by the same state institution over the same parcel of land. The decision raises several important legal questions concerning the validity of land registration, the principle of good faith acquisition, the responsibility of BPN in issuing certificates, and the effectiveness of judicial protection for land rights holders. The Supreme Court, as the highest judicial authority, was required to determine which certificate should be recognized as legally valid and whether the administrative actions of BPN complied with applicable laws and regulations.

The concept of good faith becomes highly relevant in disputes involving overlapping certificates. In Indonesian land law, good faith refers to the honest belief of a person acquiring land rights without knowledge of defects or disputes related to the land. Courts frequently consider whether a certificate holder obtained the land through proper procedures, conducted due diligence, and had no intention to violate the rights of others. Nevertheless, determining good faith is often difficult because both parties may claim to have acted honestly and relied on official documents issued by BPN. This creates a legal dilemma in which the court must balance the principles of legal certainty, justice, and utility in resolving the dispute. Gulau (2025: 89) notes that overlapping certificate cases reveal the tension between formal legality and substantive justice, particularly when administrative errors by government institutions cause losses to private citizens.

Although Supreme Court decisions are final and binding (*inkracht van gewijsde*), the implementation of such decisions often encounters substantial obstacles in practice. Winning a court case does not necessarily guarantee effective execution in the field. In many land disputes, the National Land Agency adopts a passive approach after the court decision is issued, especially when the decision requires cancellation or revocation of a certificate previously issued by BPN. Bureaucratic hesitation, unclear execution procedures, and fear of subsequent lawsuits frequently delay the implementation of judicial decisions. Saragih (2025: 45) explains that BPN officials often avoid taking decisive administrative actions because revoking a certificate may expose the institution to civil liability or administrative lawsuits before the State Administrative Court (*Pengadilan Tata Usaha Negara*). As a result, court decisions that should restore legal certainty may instead generate new administrative disputes and prolonged uncertainty.

The issue of ineffective implementation of court decisions also raises concerns regarding the authority and dignity of judicial institutions. Article 4 of Law Number 48 of 2009 concerning Judicial Power clearly states that judicial decisions must be respected and implemented by all state institutions and citizens. Failure to execute court decisions undermines the rule of law and weakens public confidence in the legal system. In the context of overlapping land certificates, ineffective execution may result in continued occupation of disputed land, resistance from losing parties, and administrative stagnation within land offices. Consequently, the objectives of legal protection and dispute resolution are not fully achieved despite the existence of a final judicial ruling.

Theoretical discussions regarding legal protection provide an important framework for understanding the dual certificate phenomenon. According to Hadjon (1987: 25–28), legal protection consists of preventive and repressive mechanisms. Preventive protection aims to prevent disputes before they occur through effective regulations, transparent administration, and proper supervision. Meanwhile, repressive protection seeks to resolve disputes after violations or conflicts arise through judicial and administrative remedies. In the context of overlapping certificates, preventive protection has clearly failed because the land registration system was unable to prevent the issuance of multiple certificates over the same land. Consequently, affected parties must rely on repressive legal protection through lengthy litigation processes that consume significant time, energy, and financial resources.

The persistence of dual certificate disputes indicates the urgent need for institutional reform in Indonesia's land administration system. Strengthening coordination between judicial institutions and land administration authorities is essential to ensure that court decisions can be effectively implemented. In addition, improving data integration, digitizing land records, enhancing verification mechanisms, and increasing accountability within BPN are necessary steps to prevent overlapping certificates in the future. The development of a transparent and integrated electronic land registration system may reduce administrative errors and facilitate public access to accurate land information. Furthermore, clearer legal procedures regarding the cancellation of certificates following court decisions are needed to avoid bureaucratic uncertainty and institutional reluctance.

This study therefore becomes important because it examines not only the legal considerations contained in Supreme Court Decision Number 212K/Pdt/2020, but also the broader implications of overlapping certificates for legal certainty, institutional coordination, and public trust in land administration. By analyzing the form of legal protection provided by the Supreme Court and identifying obstacles to the implementation of judicial decisions, this research seeks to contribute to the development of Indonesian agrarian law and the improvement of land governance practices. Specifically, the study aims to: (1) analyze the form of legal protection provided by the Supreme Court through Decision Number 212K/Pdt/2020; and (2) identify obstacles to the implementation of the decision and formulate an effective coordination model among relevant institutions to ensure legal certainty and protection of land rights.

Academically, this research is expected to enrich theoretical discussions regarding legal protection, land registration, and judicial enforcement in Indonesian agrarian law. Practically, the findings of this study may provide recommendations for policymakers, judicial institutions, and land administration authorities in strengthening coordination mechanisms and improving the effectiveness of land dispute resolution. Through stronger institutional synergy and more reliable land administration, Indonesia can move closer toward achieving legal certainty, justice, and sustainable land governance for all citizens (Antari, 2024: 156).

## 2. METHOD

This study uses a juridical-normative method combined with an empirical approach. The approaches used include: (1) *Statute Approach*, through the review of UUPA No. 5 of 1960, Government Regulation No. 24 of 1997, and the Judicial Power Law; (2) *Conceptual Approach*, using Hadjon's legal protection theory, Radbruch's theory of legal certainty, and Property Rights norms Articles 20–27 of the

UUPA; and (3) *Case Approach*, through an in-depth analysis of Supreme Court Decision No. 212K/Pdt/2020 and related decisions (Rosidi, 2020: 55).

The research data consisted of primary data (structured interviews with Notaries/PPAT) and secondary data (primary, secondary, and tertiary legal materials) (Soekanto, 2010: 51–52). The analysis technique is carried out qualitatively through legal interpretation, systematization of norms, and triangulation between decision considerations, regulations, and field findings. The research period was carried out for two months (February-March 2026) in the jurisdiction of the South Jakarta District Court and the Bogor Notary Office.

### 3. FINDINGS AND DISCUSSION

#### **Protection of Repressive Law and Restoration of Substantive Legal Certainty**

Supreme Court Decision Number 212K/Pdt/2020 represents a concrete manifestation of repressive legal protection aimed at restoring rights that were violated due to the failure of the preventive legal protection system within land administration. In principle, preventive legal protection is expected to prevent disputes from arising through accurate land registration procedures, transparent verification mechanisms, and orderly administrative systems. However, when overlapping certificates are issued over the same parcel of land, the preventive function of land registration fails to provide certainty and protection to the rightful owner. In such circumstances, the affected parties must rely on repressive legal protection through litigation processes in court to seek justice and legal certainty. According to Hadjon (1987: 25), repressive legal protection functions as a mechanism to resolve disputes and restore rights after a legal violation has occurred. Therefore, the Supreme Court decision in this case serves not merely as a formal judicial ruling, but as an important instrument to restore substantive justice for the rightful holder of land rights.

In examining the dispute, the Supreme Court did not solely rely on the formal existence of certificates issued by the National Land Agency (BPN). Instead, the Court carefully analyzed the chronology of land ownership and the process of acquisition of rights dating from 1995 to 1997. The judges evaluated various supporting documents, including letters of relinquishment of rights, girik documents, land tax payment evidence (PBB/UN), and other administrative records that demonstrated the historical control and possession of the land. This judicial approach indicates that the Court prioritized substantive truth over mere administrative formality. Such consideration is important because, in practice, certificates may contain administrative defects if they are issued based on inaccurate data or improper procedures. By tracing the historical and juridical basis of ownership, the Court attempted to determine which party genuinely possessed legitimate rights over the disputed land.

The Supreme Court's consideration is closely related to the legal principle of *nemo plus iuris ad alium transferre potest quam ipse habet*, meaning that no person or institution can transfer rights greater than those they legally possess. In the context of land law, this principle implies that the state, through BPN, cannot validly transfer land rights to another party if those rights have already been legally transferred or controlled by a previous rights holder through procedures that fulfill material legal requirements. Consequently, if the first transfer of rights was conducted lawfully and supported by valid evidence, any subsequent issuance of overlapping certificates becomes legally flawed. Meliala (2012: 111) explains that the application of this principle is essential to maintain legal consistency and protect parties who first acquired rights in good faith.

From the perspective of Gustav Radbruch's theory of legal certainty, the Supreme Court decision can be viewed as an effort to restore certainty within a legal system previously disrupted by overlapping certificates. Legal certainty is achieved when the law is able to provide clear recognition regarding who legally owns the disputed land. Through Decision Number 212K/Pdt/2020, the Supreme Court ultimately established PT Equator Majapura Raya as the lawful rights holder through a final and binding judgment (*inkracht van gewijsde*). This ruling therefore eliminated the ambiguity that had previously existed between competing ownership claims (Radbruch, 1985: 145).

Nevertheless, legal certainty cannot be interpreted solely as the issuance of a final court judgment. True legal certainty also requires the effective implementation and enforceability of the judgment in practical terms. Mertokusumo (2009: 78) emphasizes that the value of a judicial decision lies not only in its juridical validity, but also in its executability, namely the ability of the decision to be implemented concretely and effectively in society. In many land disputes in Indonesia, including cases involving overlapping certificates, the execution stage often becomes the most difficult aspect of dispute resolution. Although the court has clearly determined the rightful owner, administrative obstacles frequently prevent the immediate realization of those rights in practice.

The results of interviews conducted in this study revealed that even after the Supreme Court decision obtained permanent legal force, the process of revoking the overlapping certificate and transferring the registration of rights at the local Land Office remained problematic. One of the major obstacles involved the existence of administrative blocking letters that were not formally recorded in the land book but nonetheless affected the administrative processing of the land status. As a result, although juridically the ownership status had been clarified through the court decision, administratively the land remained in an uncertain condition. This situation created a paradox of legal certainty in which the law formally recognized the rightful owner, yet bureaucratic obstacles prevented the practical realization of those rights (Mustaqim, 2026).

This condition illustrates the gap that often exists between judicial decisions and administrative implementation in Indonesia's land governance system. The effectiveness of judicial protection ultimately depends not only on the court itself, but also on the willingness and readiness of administrative institutions such as BPN to execute the decision consistently and promptly. When administrative agencies fail to implement court decisions effectively, the objective of repressive legal protection becomes incomplete because the winning party cannot fully enjoy or exercise their legally recognized rights.

### **Implementation Constraints and Administrative-Criminal Dimensions**

One of the most significant obstacles identified in the implementation of Supreme Court Decision Number 212K/Pdt/2020 is the weak coordination between judicial institutions and the National Land Agency (BPN). Although the court decision has binding legal force, BPN often adopts a passive and highly cautious position regarding the execution of certificate cancellation and administrative corrections. In practice, BPN officials frequently argue that they are not authorized to revoke or amend certificates unless there is a specific judicial order explicitly instructing such action or unless technical guidance is issued by the central office of the institution. This bureaucratic attitude creates delays and uncertainty in the execution process because local land offices tend to avoid taking administrative responsibility independently.

The unclear procedural flow regarding the implementation of judicial decisions often causes copies of court judgments to become stalled during internal verification processes within BPN. Administrative officials may repeatedly review the same documents, request additional clarification, or postpone action while waiting for instructions from higher authorities. Consequently, the implementation of rights that have already been confirmed by the court becomes unnecessarily prolonged. Antari (2024: 160) explains that the absence of a clear coordination mechanism between courts and land administration authorities contributes significantly to delays in land dispute resolution. Even when a dispute has been resolved judicially, the administrative process may continue for months or even years before the land status is formally corrected within the registration system.

This phenomenon supports Harahap's view (2012: 23) that the execution of court decisions in land disputes is highly dependent on the readiness and responsiveness of land registration institutions in translating judicial rulings into concrete administrative action. In other words, judicial certainty alone is insufficient if administrative institutions fail to operationalize the court's decision. The effectiveness of legal protection therefore depends on institutional synergy between the judiciary and executive agencies responsible for land administration.

In addition to administrative obstacles, land disputes involving overlapping certificates often contain criminal dimensions that further complicate the execution process. Based on interviews with notaries and Land Deed Officials (PPAT), criminal reports are frequently used not purely as instruments of law enforcement, but also as strategic tools to pressure opposing parties or delay the implementation of civil judgments (Mustaqim, 2026). For example, one party may report allegations of document forgery, fraud, or unlawful occupation to the police shortly before the execution of a civil judgment. Although such reports may not ultimately result in criminal convictions, the existence of ongoing criminal investigations often creates hesitation among administrative officials and law enforcement agencies.

This practice activates the principle of *prejudicieel geschil*, namely the assumption that civil or administrative proceedings should be suspended until criminal matters related to the same object are resolved. While this principle is intended to maintain consistency between legal proceedings, in practice it is often abused as a litigation strategy to delay or obstruct the execution of civil judgments. Harahap (2013: 610–615) notes that the misuse of criminal reporting in civil land disputes has become increasingly common and can lead to abuse of process within the legal system.

To address this issue, Supreme Court Circular Letter (SEMA) Number 3 of 2018 instructs judges not to automatically suspend civil proceedings merely because a criminal report has been filed. Judges are encouraged to conduct preliminary assessments regarding whether the alleged criminal elements are substantively connected to the core object of the dispute. This policy is intended to prevent parties from using criminal complaints strategically to hinder civil justice processes. However, despite this guideline, implementation in practice remains problematic. Administrative officials and law enforcement authorities often adopt defensive approaches in order to avoid institutional risk or allegations of procedural mistakes.

As a consequence, a condition described as “pseudo-legal certainty” emerges. Formally, judicial decisions may exist and legal procedures may appear to function, yet the actual realization of rights remains obstructed by overlapping administrative and criminal processes. According to Radbruch (2018: 135), legal certainty should not merely exist in formal procedural terms, but must also guarantee substantive justice and effective legal protection. When bureaucratic caution and procedural overlap prevent the implementation of valid judicial decisions, the legal system fails to fully protect the legitimate rights holder. This prolonged uncertainty can create financial losses, emotional stress, and social conflict for the parties involved.

### **Systemic Reform and Institutional Coordination**

The persistence of obstacles in implementing court decisions concerning overlapping land certificates demonstrates the urgent need for systemic reform within Indonesia’s land administration and dispute resolution system. Such reform must be based on the recognition that land ownership rights constitute one of the strongest forms of rights recognized under Indonesian agrarian law. Article 20 paragraph (1) of the Basic Agrarian Law (UUPA) of 1960 defines ownership rights (*hak milik*) as hereditary, strongest, and fullest rights that individuals may possess over land. Consequently, the state has an obligation to ensure that these rights receive effective legal protection through both judicial and administrative mechanisms.

The first reform measure needed is the establishment of an official cooperation protocol between judicial institutions, particularly district courts and the Supreme Court, and the National Land Agency. Currently, the absence of standardized coordination procedures creates uncertainty regarding how court decisions should be implemented administratively. A formal cooperation mechanism should therefore establish clear responsibilities, communication procedures, and time limits for administrative execution following a final court judgment. For example, BPN could be required to complete verification and certificate revocation procedures within a maximum period of 30 working days after receiving an *inkracht* decision. Such a mechanism would reduce bureaucratic delays and improve accountability in the implementation process.

Second, accelerating the transition toward an electronic land registration system (e-land registration) is essential to minimize the occurrence of overlapping certificates in the future. Minister of ATR/BPN Regulation Number 6 of 2022 concerning electronic land services provides an important legal basis for digital transformation within land administration. Through digital registration systems, land records can be integrated into centralized databases that enable more accurate verification of physical and juridical data. Electronic systems also provide trail audit mechanisms that record every administrative action taken regarding a parcel of land, thereby reducing opportunities for manipulation, duplication, or unauthorized changes to land data.

In addition, digital land registration systems can improve transparency and accessibility for the public. Real-time access to land information enables prospective buyers, investors, and government institutions to verify land status more effectively before conducting transactions. This reduces the likelihood of overlapping claims and strengthens preventive legal protection within the land registration process. Furthermore, integrated digital mapping systems can minimize discrepancies between physical land conditions and administrative records.

Third, reforms are needed regarding administrative procedures for certificate cancellation following judicial decisions. At present, many BPN officials are reluctant to implement certificate revocations because they fear being sued personally or institutionally for administrative actions taken in response to court decisions. Therefore, legal protection mechanisms should be provided for BPN officials who execute judicial decisions in good faith and in accordance with applicable procedures. Sjaifurrachman (2011: 45) argues that excessive bureaucratic caution often sacrifices legal certainty for rightful landowners because officials prioritize institutional safety over effective implementation of justice. By providing clearer procedural guidelines and legal safeguards for administrative officers, the government can encourage more decisive and efficient execution of court rulings.

Finally, the principle of *ultimum remedium* should be emphasized in handling criminal reports related to pure civil land disputes. Criminal law should function as a last resort rather than a strategic instrument to delay or obstruct civil execution. Law enforcement authorities should carefully distinguish between genuine criminal conduct and civil disputes disguised as criminal allegations. If criminal reporting continues to be misused as a litigation tactic, the effectiveness of civil justice and land administration will remain compromised. Therefore, stronger coordination among courts, police institutions, prosecutors, and BPN is necessary to prevent overlapping legal processes from creating prolonged uncertainty.

Overall, systemic reform and stronger institutional coordination are essential to ensure that judicial decisions concerning overlapping certificates can be implemented effectively. Without improvements in administrative procedures, digital infrastructure, and inter-agency cooperation, legal certainty in Indonesia's land sector will remain vulnerable to recurring disputes and bureaucratic inefficiency.

#### 4. CONCLUSION

Based on the analysis, two main conclusions were obtained. **First**, legal protection in Supreme Court Decision No. 212K/Pdt/2020 has been substantively realized through a repressive approach and the restoration of legal certainty. The Supreme Court places good faith, the chronology of the acquisition of rights, and physical control as indicators of determining legal Property Rights, in line with Articles 20–27 of the UUPA and Radbruch's theory of legal certainty. However, the protection is still corrective and has not been accompanied by explicit normative directions to BPN to improve the administrative mechanism to prevent the recurrence of double certificates. **Second**, the implementation of the verdict faces structural obstacles in the form of weak judicial-BPN coordination, protracted bureaucracy, and misuse of criminal instruments. The necessary countermeasures are systemic: the preparation of standardized cooperation protocols, the acceleration of *e-land registration*, the simplification of certificate revocation procedures, and the enforcement of *ultimum remedium* in criminal reporting.

Based on this conclusion, suggestions were proposed: (1) BPN/Ministry of ATR needs to accelerate the implementation of *e-land registration* as a whole and issue internal regulations that regulate the 30-working day deadline for the implementation of *the inkracht decision*; (2) The Supreme Court and the judicial environment are recommended to contain normative recommendations in the decision that instruct BPN to carry out further administrative actions, as well as to prepare an integrated MoU for execution monitoring; (3) Notaries/PPAT need to improve preventive verification standards by tracing physical possession history and *comprehensive due diligence* documentation ; (4) Further research is suggested to examine the effectiveness of the Minister of ATR/Head of BPN No. 6 of 2022 as well as the judicial-BPN coordination model in other jurisdictions as a comparative study.

**Acknowledgments:** The author would like to thank the Head of the Master of Law Study Program at Pakuan University, Dr. Iwan Darmawan, S.H., M.H., and Supervisor I, Dr. Yenny Febrianty, S.H., M.Hum., M.Kn., and Supervisor II, Dr. Eka Ardianto Iskandar, S.H., M.H., for constructive academic guidance. Thank you also to Mr. Mustaqim, S.H., M.Kn. (Notary/PPAT) who has taken the time to provide valuable empirical data, as well as all parties who have supported the completion of this research.

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