



Juridical Review of The Cancellation of Electronic Land Title Certificates Based on The Regulation of The Minister of Agrarian Affairs and Spatial Planning/Head of The National Land Agency of The Republic of Indonesia Number 21 of 2020

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Abstract, A certificate serves as strong evidence of land ownership rights. In line with technological advancements, the government, through the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, has introduced a legal product in the form of an Electronic Certificate. This Electronic Certificate, also known as e-Certificate, is issued as a result of an electronic land registration process. As a legal product of the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, the Electronic Certificate constitutes valid and strong evidence of land ownership rights. However, in the process of land registration leading to the issuance of the Electronic Certificate, as well as in other related aspects, errors may occur, resulting in administrative and/or juridical defects. Moreover, the Electronic Certificate may also become an object of a court decision. Consequently, the Electronic Certificate can be subject to cancellation, which may be processed based on the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 on the Handling and Resolution of Land Cases. This study employs a normative juridical research method, utilizing a statute approach as its legal analysis framework.

Keywords: Certificate, Electronic Certificate, Certificate Cancellation

1. INTRODUCTION

The state holds the highest authority in managing land, water, and outer space. This principle is enshrined in Article 33, Paragraph (1) of the 1945 Constitution of the Republic of Indonesia, which states that: "*Land, water, and natural resources contained therein shall be under the control of the State at the highest level.*"

Furthermore, Article 1, Paragraph (2) of the Basic Agrarian Law (UUPA) grants the state the authority to:

1. Regulate and administer the allocation, use, supply, and maintenance of land, water, and outer space.
2. Determine and regulate legal relationships between individuals and land, water, and outer space.
3. Determine and regulate legal relationships between individuals and legal actions concerning land, water, and outer space.

According to Article 4, Paragraph (1) of the Basic Agrarian Law, based on the state's authority over land, various types of land rights are established. The article states: "*Based on the state's right of control as referred to in Article 2, various types of rights over*

the surface of the earth, known as land, are determined. These rights may be granted to and owned by individuals, either independently or collectively, as well as by legal entities."

Article 16 of the Basic Agrarian Law further categorizes land rights into the following types:

- a. Ownership Rights
- b. Right to Cultivate
- c. Right to Build
- d. Right to Use
- e. Right to Lease
- f. Right to Open Land
- g. Right to Collect Forest Products
- h. Other rights that are not included in the aforementioned categories, which will be regulated by law, as well as temporary rights as stipulated in Article 53.

In response to technological advancements, in 2023, the Indonesian government introduced Electronic Documents, regulated under Ministerial Regulation Number 3 of 2023 concerning the Issuance of Electronic Evidence in Land Registration Activities. Article 1, Points 8 and 9 of this regulation define Electronic Certificates (e-Certificates) for land ownership, including Ownership Rights (Hak Milik).

The utilization, management, and use of land often lead to conflicts of interest, which can result in land disputes among communities (Uktolseja et al., 2021). To prevent ownership conflicts, the government, in accordance with Law Number 5 of 1960 on Basic Agrarian Regulations (UUPA), has established various regulations related to land affairs, particularly for land registration across Indonesia (Matuankotta et al., 2022).

However, despite the implementation of land registration and the issuance of certificates as proof of ownership, disputes and conflicts over land ownership continue to occur. Numerous land-related legal cases are still being reported today.

Under Ministerial Regulation Number 21 of 2020 on the Handling and Resolution of Land Cases, provisions regarding certificate cancellation are stipulated. Article 1, Point 14 defines cancellation as: *"A decision that annuls a legal product due to administrative and/or juridical defects in its issuance, or to enforce a court ruling that has obtained permanent legal force."*

As an official legal product, Electronic Certificates (e-Certificates) are also subject to cancellation if they contain administrative and/or juridical defects. This cancellation process must adhere to applicable regulations. Based on these considerations, this study aims to provide

a juridical review of electronic certificate cancellations in accordance with Ministerial Regulation Number 21 of 2020.

2. RESEARCH METHODOLOGY

This study employs a normative juridical research method. Juridical research refers to the examination of legal aspects based on statutory regulations, while normative research focuses on identifying legal rules and doctrines to address legal issues (Marzuki, 2005).

The approach used in this study is the statute approach, which involves an in-depth analysis of legislative hierarchies and legal principles in statutory regulations. According to Article 1, Point 2 of Law Number 12 of 2011, statutory regulations are defined as: *"Written regulations containing binding legal norms that are established or enacted by state institutions or authorized officials through procedures stipulated in statutory regulations."*

From this definition, statutory regulations can be broadly understood as including legislation and regulations (Marzuki, 2005).

3. RESULTS AND DISCUSSION

Electronic Certificate

Article 33, paragraph (1) of the 1945 Constitution states that "land, water, and outer space, including the natural resources contained therein, are under the highest control of the State." The State acts as an organization of power representing the entire people. The State's right to control, as stipulated in the Basic Agrarian Law (Article 1, paragraph 2), grants the State the authority to regulate and administer the designation, use, supply, and maintenance of land, water, and outer space; to determine and regulate legal relationships between individuals and land, water, and outer space; and to determine and regulate legal relationships between individuals and legal acts concerning land, water, and outer space.

Furthermore, Article 4, paragraph (1) of the Basic Agrarian Law (UUPA) explains that based on the State's right to control, various land rights are established. Article 4, paragraph (1) of the UUPA states: "Based on the State's right to control as referred to in Article 2, various types of rights over the surface of the earth, known as land, may be granted to and owned by individuals, whether independently or jointly with others, as well as by legal entities." This article grants the authority to utilize the land in question, including the subsurface and the airspace above it, as necessary for direct use of the land, within the limits set by this law and other higher legal regulations.

Legal control is based on rights protected by law, generally granting the right holder the authority to physically control the land they own. However, there are also legal controls that, despite granting the authority to control the land physically, in reality, the physical control is exercised by another party. In land law, there is also legal control that does not grant the authority to physically control the land in question (Harsono, 1993).

Every citizen, whether individually or as a group, has the right to land ownership in accordance with applicable laws. The concept of land rights in national agrarian law categorizes land rights into two forms (Supriadi, 2007):

1. Primary land rights, which are rights that can be directly owned or controlled by an individual or legal entity for an extended period and can be transferred to others or heirs, such as Ownership Rights (HM), Cultivation Rights (HGU), Building Rights (HGB), and Usage Rights (HP).
2. Secondary land rights, which are temporary rights, including pawn rights, sharecropping rights, lodging rights, and agricultural land lease rights.

The land rights mentioned in Article 4 of the UUPA are further affirmed in Article 16, paragraph (1) of the UUPA, which states that land rights include:

- a. Ownership rights
- b. Cultivation rights
- c. Building rights
- d. Usage rights
- e. Lease rights
- f. Land opening rights
- g. Forest product collection rights
- h. Other rights not included in the above categories, which will be determined by law, as well as temporary rights mentioned in Article 53.

Ownership rights in Western legal understanding are absolute, in accordance with the individualistic ideology they adhere to, where individual interests are highly emphasized, and individuals are granted complete and unrestricted power over their property. Such ownership rights cannot be disputed. Consequently, the government cannot interfere with an individual's property, even if necessary for public interest (Ruchiyat, 2004).

The government has the authority to regulate land registration across the Republic of Indonesia to provide legal certainty for landowners, as stipulated in Article 19 of Law Number 5 of 1960 concerning the Basic Agrarian Law, which states:

1. To guarantee legal certainty, the government shall conduct land registration throughout the Republic of Indonesia following the provisions regulated by government regulations.
2. The registration referred to in paragraph (1) includes: a. Land measurement, mapping, and recording. b. Registration of land rights and their transfers. c. Issuance of certificates as proof of ownership, which serves as strong legal evidence.
3. Land registration shall be carried out considering national and societal conditions, socioeconomic needs, and feasibility, as determined by the Minister of Agrarian Affairs.
4. Government regulations shall establish costs related to the registration mentioned in paragraph (1), with provisions that financially disadvantaged citizens shall be exempt from such costs (Santoso, 2012).

Land registration as stipulated in Article 19, paragraph (1) of the Basic Agrarian Law is further regulated in Government Regulation Number 24 of 1997 on Land Registration, which supports land administration in Indonesia. This regulation implements land registration through the issuance of Land Books and Land Certificates by the National Land Agency (BPN), which include copies of the Land Book and land measurement documents (Hutagalung, 2005). According to Article 21 of the UUPA, land ownership rights can be granted to:

- a. Indonesian citizens;
- b. Certain legal entities;
- c. Legal entities engaged in social and religious activities, provided the land is used for such purposes.

The Basic Agrarian Law (UUPA) contains several principles of National Agrarian Law, which serve as the foundation for implementing the UUPA and its regulations. These principles include (Muchsin, 2007):

- a. Nationalism principle
- b. The principle that the highest level of control over land, water, outer space, and natural resources is vested in the State.
- c. The principle of prioritizing national and state interests based on national unity over individual and group interests
- d. The principle that all land rights have a social function.
- e. The principle that only Indonesian citizens can have land ownership rights.
- f. The principle of equality for all Indonesian citizens.
- g. The principle that agricultural land must be cultivated wisely by its owner and must not be exploited unfairly.

Legal Basis for Land Certificates:

1. Law Number 5 of 1960 concerning Basic Agrarian Law (UUPA)
2. Minister of Agrarian Affairs/National Land Agency Regulation Number 3 of 1997
3. Government Regulation Number 46 of 2002 on Fees for Non-Tax State Revenue Applicable to the National Land Agency
4. Minister of Agrarian and Spatial Planning/National Land Agency Regulation Number 1 of 2021 on Electronic Certificates
5. Minister of Agrarian and Spatial Planning/National Land Agency Regulation Number 18 of 2021 on Procedures for Establishing Management Rights and Land Rights

Further provisions on land registration are regulated in Minister of Agrarian Affairs/National Land Agency Regulation Number 3 of 2023 on the Issuance of Electronic Documents in Land Registration Activities. Article 1, paragraph (1) explains: "Land registration is a series of activities carried out continuously, systematically, and orderly by the Government, including data collection, processing, recording, and presentation, as well as maintenance of physical and legal data in the form of maps and lists concerning land parcels, space above land, underground space, and individual housing units, including the issuance of proof of ownership documents for land parcels, space above land, underground space, and ownership rights over individual housing units and certain encumbrances."

This registration process results in the issuance of an electronic certificate, as defined in Article 1, point 9 of the Minister of Agrarian Affairs/National Land Agency Regulation Number 3 of 2023: "A certificate is a proof of ownership document as referred to in Article 19, paragraph (2), letter c of the UUPA for land rights, management rights, waqf land, ownership rights over individual housing units, and encumbrances, each recorded in the respective Land Book." This electronic registration process produces a certificate referred to as an Electronic Certificate or e-Certificate (Article 1, point 9).

The activities in land management that can lead to the issuance of electronic certificates are regulated in the Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency of the Republic of Indonesia Number 3 of 2023, Article 40, Paragraph (1), as follows:

- a. Confirmation of rights conversion or recognition;
- b. Granting of rights over state land;
- c. Granting of rights over private land;
- d. Registration of ownership rights for apartment units;
- e. Registration of waqf land;
- f. Replacement of certificates with electronic certificates;

- g. Partitioning, merging, and separation; or
- h. Issuance of electronic certificates due to changes in physical conditions.

If, during the land registration process, an error occurs in the data entry and this error is discovered after the issuance of the electronic certificate, the authorized official is obligated to correct it and issue a new edition of the electronic certificate. This is explained in Article 40, Paragraph (5).

Although recognition has been granted under the Basic Agrarian Law (UUPA), the certificate does not guarantee legal certainty of ownership because its regulations provide opportunities for third parties who feel they have rights to the land to challenge the person named in the certificate through civil litigation in the General Court or to sue the Head of the National Land Agency/Head of the relevant Land Office in the Administrative Court, or to challenge issues related to the technical administration of its issuance (Murad, 1997).

Ownership rights can be revoked according to Article 27 of the UUPA for the following reasons:

- a. The land reverts to the state due to:
 - 1. Revocation of rights;
 - 2. Voluntary surrender by the owner;
 - 3. Abandonment;
 - 4. Based on the provisions of Article 21, Paragraph (3) and Article 26, Paragraph (2) of the UUPA.
- b. The land is destroyed.

Cancellation of Certificates Based on Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020

The government has issued regulations regarding the cancellation of land rights, including ownership rights. The historical regulations concerning the cancellation of land rights include:

- 1. Law Number 20 of 1961 on the Revocation of Rights to Land and Objects Above It;
- 2. Presidential Instruction Number 9 of 1973 on the Implementation of the Revocation of Rights to Land and Objects Above It;
- 3. Regulation of the Minister of State for Agrarian Affairs/Head of the National Land Agency Number 9 of 1999 on Procedures for Granting and Cancelling State Land Rights and Management Rights;
- 4. Regulation of the Head of the National Land Agency of the Republic of Indonesia Number 3 of 2011 on Land Case Management and Review;

5. Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 on the Handling and Resolution of Land Cases.

As of now, the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 on the Handling and Resolution of Land Cases remains in effect. Article 1, Number 14 of this regulation emphasizes that "Cancellation is a decision that invalidates legal products due to administrative and/or legal defects in their issuance or to implement court decisions that have obtained permanent legal force."

The legal products referred to in this ministerial regulation are "Legal Products of the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, Regional Office of the National Land Agency, Land Offices according to their authority, hereinafter referred to as Legal Products, are decisions made by officials in the field of land administration" (Article 1, Number 13). One of these legal products is land ownership certificates, which, in light of current developments, includes electronic certificates.

Before cancellation, a dispute resolution process must take place as per Regulation of the Minister of ATR/BPN Number 21 of 2020, Article 6, which includes:

1. Case Review,
2. Initial Hearing,
3. Research,
4. Exposure of Research Results,
5. Coordination Meeting,
6. Final Hearing, and
7. Case Resolution.

Furthermore, in the third part of Regulation of the Minister ATR/BPN Number 21 of 2020, provisions on the Form and Follow-Up of Resolutions are set forth. The criteria for case handling according to Article 17, Criterion One (K1), if the resolution is final, include: cancellation decision; reconciliation; or a letter of rejection of the request. Article 29 outlines the basis for implementing the Cancellation of Legal Products, stating that cancellation is executed by an authorized official and occurs due to administrative and/or legal defects in the legal product, as well as products related to court decisions that have permanent legal force.

An electronic certificate with administrative and/or legal defects due to data entry errors, identified after the electronic certificate is issued, can be corrected by the authorized party, and a new edition of the electronic certificate will be issued. In this case, the previous electronic

certificate is automatically canceled, and the new edition of the electronic certificate takes effect, reflecting the changes in the data within the utilized system. This is regulated in the Regulation of the Minister ATR/BPN Number 18 of 2021 on Procedures for Determining Management Rights and Land Rights, Article 40, Paragraph (5).

Regarding the officials authorized to carry out cancellations based on Article 30, they include:

1. The Minister (Article 30, Paragraph 1 and 3):
 - For administrative and/or legal defects in legal products issued by the Ministry or Regional Offices;
 - For implementing court decisions that have permanent legal force canceling the Legal Products issued by the Ministry.
 - In certain cases, the Minister may cancel Legal Products of Regional Offices or Land Offices under the authority of the Head of the Regional Office due to administrative and/or legal defects or as a result of implementing court decisions that have permanent legal force.
2. The Head of the Regional Office (Article 30, Paragraph 2):
 - For administrative and/or legal defects in legal products issued by the Head of the Land Office;
 - For implementing court decisions that have permanent legal force canceling Legal Products issued by the Head of the Regional Office or Head of the Land Office.

The cancellation of certificates as proof of ownership over land is caused by administrative and/or legal defects. In principle, only one certificate can be issued for a piece of land unless there are regulations governing otherwise. In Regulation of the Minister ATR/BPN Number 21 of 2020, Article 35 outlines the reasons for canceling legal products due to administrative and/or legal defects, including: a. Errors in the process/procedure of issuing land rights, registering rights, and maintaining land registration data; b. Errors in the measurement process/procedure; c. Errors in the process/procedure for issuing replacement certificates; d. Errors in the process/procedure for issuing collateral certificates; e. Errors in applying laws and regulations; f. Errors regarding the subject of rights; g. Errors regarding the object of rights; h. Errors regarding the type of rights; i. Overlapping land rights; j. Overlap with forest areas; k. Errors in determining land consolidation; l. Errors in asserting land objects for land reform; m. Errors in the process of granting permission for the transfer of rights; n. Errors in the process of issuing cancellation decisions; o. Existence of criminal court decisions

with permanent legal force proving acts of forgery, fraud, embezzlement, and/or other criminal acts; p. Existence of documents or data used in the issuance process that are not from the respective agency based on statements from the relevant agency; q. Existence of court decisions that, in their legal considerations, reveal facts of administrative defects in the issuance of the ministry's legal product and/or defects in the legal acts of rights transfer but are not explicitly stated in the decision's order.

In the event of a proposal to cancel a certificate due to legal defects, the requirements are regulated in Article 36. The requirements to be fulfilled include: a. Application letter or complaint letter; b. Photocopy of the applicant's identity certified and the power of attorney if authorized; c. Original power of attorney if authorized; d. Photocopy of ownership/occupation evidence of the applicant's land certified; e. Physical and legal data documents proposed for cancellation; f. Handling documents; and g. Photocopies of other supporting documents certified that demonstrate or prove the existence of administrative and/or legal defects.

The cancellation of certificates with administrative and/or legal defects can be proposed to the district court and the National Land Agency (BPN) under these requirements. The cancellation process in court will proceed after obtaining a court decision, which will be followed up through the BPN, as the authority to carry out cancellations lies with the Minister and the Head of the Office.

Cancellation of certificates due to administrative defects can be carried out without a court decision only if (Hidayat, 2016):

- a. There is no dispute over rights between two parties, and if there is a dispute in a cancellation request regarding administrative disputes, rights disputes, or indications of criminal acts, then the BPN cannot carry out the cancellation because a binding court decision is required.
- b. The cancellation of defective certificates is executed administratively if changes to the registration data are no longer possible. As long as there is still a possibility for correcting the registration data, it is better to take actions limited to correcting the registration data rather than canceling the certificate.

The third part of the Regulation of the Minister ATR/BPN Number 21 of 2020 governs the Cancellation of Legal Products as Follow-Up to the Implementation of Court Decisions. Article 37, Paragraph (1) states, "The cancellation of legal products is carried out following a court decision that has permanent legal force." The cancellation of legal products cannot be executed directly but must first be followed up with changes to the registration data in accordance with the court's decision.

In the implementation of an electronic certificate, an official must pay attention to the legal certainty of the certificate. According to the Regulation of the Minister of ATR/BPN Number 18 of 2021 on Procedures for Determining Management Rights and Land Rights, Article 39, Paragraph (1) states, "The electronic certificate has the same legal standing as the land ownership certificate in paper form." Thus, it does not hinder the obligation of the official to cancel the certificate with administrative and/or legal defects according to the provisions of the applicable laws.

As a result, the electronic certificate can be canceled based on various regulations if it is found to have administrative and/or legal defects. It is important to note that land registration aims to provide legal certainty and protection of land rights based on the UUPA, which emphasizes that land is a social asset that should benefit the community, particularly the underprivileged.

4. CONCLUSION

Certificates as Strong Evidence of Land Ownership

Certificates serve as strong evidence to prove ownership of land rights. In response to technological advancements, the government has established the use of electronic documents. These electronic documents are utilized in the implementation of land registration in Indonesia, as stipulated in the Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency of the Republic of Indonesia Number 3 of 2023 concerning the Issuance of Electronic Documents in Land Registration Activities. This regulation has led to the issuance of Electronic Certificates, also referred to as Sertipikat-el, as the registration is conducted electronically, and the documents involved are processed electronically, including the Land Book, which is transformed into an Electronic Land Book, also known as BT-el.

The Electronic Certificate holds the same legal power as the analog certificate as proof of land ownership rights. An Electronic Certificate may be canceled if there are administrative and/or legal defects or a court ruling.

Cancellation of Electronic Certificates

The cancellation of Electronic Certificates can proceed based on the provisions established in the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 concerning the Handling and Resolution of Land Cases. However, an Electronic Certificate with administrative and/or legal defects due to data entry errors discovered after its issuance can be corrected by the authorized party, leading to the issuance of a new edition of the Electronic Certificate. In this case, the

previous Electronic Certificate is automatically canceled, and the new edition becomes effective, reflecting the changes in the utilized system. Generally, the cancellation process for both analog and electronic certificates is as follows:

- The cancellation of analog certificates is recorded in the Land Book and certificate, with the canceled certificate returned to the BPN (National Land Agency), followed by the issuance of a new certificate.
- The cancellation of electronic certificates is processed through the system, recorded in the electronic Land Book, and a new edition of the electronic certificate is issued.

REFERENCES

- Arie S. Hutagalung, *Tebaran Pemikiran Seputar Masalah Hukum Tanah*, Jakarta: Lembaga Pemberdayaan Hukum Indonesia, 2005.
- Boedi Harsono, “Hukum Agraria Indonesia – Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi, Dan Pelaksanaannya”, Jakarta : Penerbit Universitas Triksakti, 1993.
- Eddy Ruchiyat, “Politik Pertanahan Nasional Sampai Orde Reformasi”, Bandung: P.T. Alumni, 2004.
- H. Muchsin, Imam Koeswahyono, dan Soimin, “Hukum Agraria Indonesia”, Bandung: PT Refika Aditama, 2007.
- Instruksi Presiden Nomor 9 Tahun 1973 tentang Pelaksanaan Pencabutan Hak-Hak Atas Tanah Dan Benda-Benda Yang Ada Di Atasnya.
- Jenny Kristiana Matuankotta, and Mahrita Aprilya Lakburlawal, “Penyuluhan Hukum Tentang Upaya Penyelesaian Sengketa Hak Milik Atas Tanah”, AIWADTHU: Jurnal Pengabdian Hukum 1, no. 1 (2022).
- Mochammad Djais, *Pikiran Dasar Hukum Eksekusi*, Semarang : Fakultas Hukum Universitas Diponegoro, 2000.
- Novyta Uktolseja, Jenny Kristiana Matuankotta, and Pieter Radjawane, “Penyuluhan Hukum Problematika Tanah Dan Penyelesaiannya Di Negeri Wotay Maluku Tengah,” AIWADTHU: Jurnal Pengabdian Hukum 1, no. 1 (2021).
- Peraturan Kepala Badan Pertanahan Nasional Republik Indonesia Nomor 3 Tahun 2011 Tentang Pengelolaan dan Pengkajian Kasus Pertanahan.
- Peraturan Menteri Agraria Dan Tata Ruang/ Kepala Badan Pertanahan Nasional Republik Indonesia Nomor 21 Tahun 2020 Tentang Penanganan Dan Penyelesaian Kasus Pertanahan.
- Peraturan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional Nomor 1 Tahun 2021 tentang Sertifikat Elektronik.

Peraturan Menteri ATR/BPN Nomor 18 Tahun 2021 tentang Tata Cara Penetapan Hak Pengelolaan dan Hak Atas Tanah.

Peraturan Menteri Negara Agraria/ Kepala Badan Pertanahan Nasional Nomor 9 Tahun 1999 Tentang Tata Cara Pemberian Dan Pembatalan Hak Atas Tanah Negara Dan Hak Pengelolaan.

Peraturan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional Nomor 3 Tahun 1997

Peraturan Pemerintah Nomor 46 Tahun 2002 tentang Tarif Atas Jenis Penerimaan Negara Bukan Pajak yang Berlaku Pada Badan Pertanahan Nasional.

Profesor Dr Peter Mahmud Marzuki, PENELITIAN HUKUM: Kencana, Surabaya, 2005.

Rozi Aprian Hidayat, “Analisis Yuridis Proses Pembatalan Sertifikat Hak Atas Tanah Pada Kawasan Hutan,” Jurnal IUS Kajian Hukum dan Keadilan 4, no. 2 (2016).

Rusmadi Murad, Administrasi Pertanahan Pelaksanaannya dalam Praktik, Cetakan I, (Bandung: Mandar Maju, 1997).

Supriadi, “Hukum Agraria” , Jakarta: Sinar Grafika, 2007.

Undang Undang Dasar 1945.

Undang-Undang Nomor 20 Tahun 1961 tentang Pencabutan Hak-Hak Atas Tanah Dan Benda-Benda Yang Ada Di Atasnya.

Undang-Undang Nomor 5 Tahun 1960 tentang Peraturan Pokok-Pokok Agraria (UUPA).

Urip Santoso, Hukum Agraria Kajian Komperhensif, Jakarta: Kencana Prenada Media Group, 2012.