



Ambiguity of Norms in the Confiscation of Assets as Implementation of Administrative Sanctions in the Marine and Fisheries Sector

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Abstract

The administrative seizure of assets in the marine and fisheries sector under Article 23(1) of PermenKP No. 31 of 2024 is carried out by the Minister, Governor, or Regent/Mayor according to their respective authorities. However, this provision conflicts with Article 23(5), which states that confiscation must be conducted following the applicable laws and regulations governing procedures governing seizures. This norm conflict creates legal uncertainty (ambiguity). This study aims to determine and analyse whether there is ambiguity in Article 23 Paragraph (5) of PermenKP No. 31 of 2021 and to determine the procedure for confiscating assets in the context of imposing administrative sanctions. This research method is non-physical and uses a literature study approach. Data and information are obtained from scientific articles, books, journals, and other relevant documents.

The study results show ambiguity in the legal norms of Article 23 of PermenKP No. 31 of 2021 due to unclear authority regarding confiscation responsibilities. Article 23, Paragraph (1) states that confiscations are conducted by the Minister, Governor, and Regent/Mayor, while Paragraph (5) specifies that the implementation of confiscation must adhere to the provisions of laws and regulations concerning procedures governing seizures. This study concludes that Article 23, Paragraph (5) is ambiguous because of uncertainty about the authority to confiscate assets. The procedure for confiscating assets when imposing administrative sanctions should be clearly regulated to ensure fairness, legal certainty, and protection of individual rights. Therefore, it is necessary to establish new legal norms that specify the confiscation procedure more clearly and in greater detail.

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1. Introduction

Article 33, paragraph (3) of the 1945 Constitution of the Republic of Indonesia stipulates, "The land and water, and natural resources contained therein shall be controlled by the state and used for the greatest prosperity of the people." Based on this provision, using natural resources for the prosperity of the people is carried out through sustainable development activities.

The Indonesian people have been blessed by God Almighty with abundant natural resources on land, water, and air, constituting the basic capital for national development in all fields. These natural resources must be protected, preserved, sustained, and utilized optimally for the welfare of the Indonesian people in particular and the quality of human life in general, in a manner that ensures harmony, balance, and equilibrium between humans and their Creator, between humans themselves, and between humans and their environment.

The living and non-living natural resources in the Fisheries Management Area of the Republic of Indonesia represent enormous potential that can be directly exploited while supporting marine and fishery resources throughout Indonesian waters.

The importance of the marine sector for national development is demonstrated by the following factors:

1. The large number of fishermen who depend on fishing for their livelihoods.
2. Significant foreign exchange earnings, which tend to increase from year to year.
3. Ability to meet the demand for animal protein.
4. Creating jobs for the new workforce is expected to reduce unemployment.
5. The enormous potential of Indonesia's fisheries sector [21].

The FAO reports that, in 1950, total global marine fisheries production was 16.7 million tons; by 1980, it increased to 62 million tons; in 2000, it reached 86.8 million tons; and in 2005, it declined to 79.9 million tons [9]. The statistics above show a decrease in production, reflecting the growing problem of overfishing internationally, with 16% of stocks over-exploited and 44% fully exploited [6].

Overexploitation of fishery resources in these areas is the leading cause of Illegal, Unregulated, and Unreported Fishing (IUU Fishing). Illegal refers to fishing activities conducted without proper authorization from the coastal state within its territorial waters or Exclusive Economic Zone (EEZ). Unregulated means failing to follow existing regulations set by the coastal state. Unreported refers to legal fishing activities that do not accurately report catch data, including vessel operations, as well as the quantity and specifications of the catch [7]. The losses to the state due to IUU Fishing are also significant, totaling approximately Rp. 80 trillion annually. This amount includes the loss of 25% of fisheries potential due to theft, valued at Rp. 30 trillion, and the potential revenue lost from the non-tax sector (PNBP), estimated at around Rp. 50 trillion [8].

Indonesia has a strong interest in protecting its waters from IUU fishing. After the enactment of Law No. 11 of 2020 on Job Creation, enforcing a regulation can take various forms, including sanctions, which may be criminal, civil, or administrative. Sometimes, civil or administrative sanctions in enforcing a legal regulation can be a more suitable and effective choice than criminal sanctions [34].

Government Regulation of the Republic of Indonesia Number 5 of 2021 on the Implementation of Risk-Based Business Licensing (Peraturan Pemerintah Republik Indonesia Nomor 5 Tahun 2021 tentang Penyelenggaraan Perizinan Berusaha Berbasis Risiko; hereinafter referred to as PP No. 5 of 2021), Article 317 Paragraph (1) states that every business actor who violates business licensing provisions in the marine and fisheries sector shall be subject to administrative sanctions. Furthermore, Article 317 Paragraph (2) states that the administrative sanctions referred to in paragraph (1) consist of: (a) written warning/reprimand; (b) administrative enforcement measures; (c) administrative monetary fine; (d) suspension of business licensing; and/or (e) revocation of business license [36].

The following derivative provisions are governed by the Regulation of the Minister of Marine Affairs and Fisheries of the Republic of Indonesia Number 31 of 2021 (Peraturan Menteri Kelautan dan Perikanan Republik Indonesia Nomor 31 Tahun 2021, hereinafter referred to as PermenKP No. 31 of 2021), Article 7 Paragraph (1), which states that administrative sanctions for violations of business licensing regulations in the marine and fisheries sector as mentioned in Article 3 include: (a) written warning/reprimand; (b) administrative enforcement measures; (c) administrative

monetary fines; (d) suspension of business licensing; and/or (e) revocation of business license [40].

Based on Article 19 Paragraph (5) of PermenKP No. 31 of 2021, it is stated that the administrative monetary fine referred to in paragraph (1) must be paid within a maximum period of 30 (thirty) days from the date the sanction is imposed.

The provisions of Article 20, Paragraph (5) of PermenKP No. 31 of 2021 apply to business actors who fail to pay administrative monetary fines within 30 working days.

This provision is Article 20(c) of PermenKP No. 31 of 2021, which states that business entities that fail to fulfill their obligation to pay administrative monetary fines as referred to in Article 19(1) or (3) will face sanctions: c. administrative seizure of assets. Furthermore, Article 20(c) specifies that the administrative seizure of assets shall be carried out by the Minister, Governor, or Regent/Mayor according to their respective authorities, based on the provisions of Article 23(1) of PermenKP No. 31 of 2021.

The administrative seizure of assets is carried out by the Minister, Governor, or Regent/Mayor, following their respective authorities. This conflicts with the provisions of PermenKP No. 31 of 2021, Article 23 Paragraph (5), which states that implementing asset confiscation shall follow the laws and regulations governing asset confiscation. Article 23 Paragraph (1) and Article 23 Paragraph (5) of PermenKP No. 31 of 2021 conflict with each other. Article 23 Paragraph (1) grants the authority to confiscate assets to the Minister, Governor, or Regent/Mayor, but the provisions of Article 23 Paragraph (5) regulate the administrative seizure of assets following the provisions on procedures governing seizure.

As a result, to date, officials from the Directorate General of Marine and Fisheries Resources Surveillance of the Ministry of Marine Affairs and Fisheries have never used asset confiscation as an alternative means of enforcing business actors' compliance with business licensing regulations.

Based on the above description, the author wishes to develop further the discussion in a thesis entitled "Ambiguity of Norms in the Confiscation of Assets as Implementation of Administrative Sanction in the Marine and Fisheries Sector."

2. Method

The research is non-physical because it uses a literature study approach. All data and information collected are sourced from scientific articles, journals, books, and other relevant documents. It is a normative legal study that only examines secondary data or library materials. The research specification is descriptive [51].

3. Results and Discussion

Types of Administrative Violations in Coastal Areas and Small Islands

Article 16A Coastal and Small Islands Sector, Law of the Republic of Indonesia Number 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation as Law (Undang-Undang Republik Indonesia Nomor 6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 tentang Cipta Kerja menjadi Undang-Undang; hereinafter referred to as Law No. 6 of 2023), reads as follows: Any person who utilizes coastal waters without complying with the provisions on the utilization of marine space as referred to in Article 16(2) shall be subject to administrative sanctions. Article 18 of the Coastal and Small Islands Sector,

Law No. 6 of 2023, states as follows:

In the event that the holder of the marine spatial use permit referred to in Article 16(2) fails to implement the activity within a maximum period of 2 (two) years from the issuance of the marine spatial use permit, the holder of the marine spatial use permit shall be subject to administrative sanctions in the form of revocation of the marine spatial use permit.

Article 26B, Coastal Areas and Small Islands Sector, Law No. 6 of 2023, states as follows: Any person who does not have a business license to utilize small islands and the surrounding waters for foreign investment as referred to in Article 26 shall be subject to administrative sanctions.

Article 71 Coastal Areas and Small Islands Sector, Law No. 6 of 2023, reads as follows: The use of coastal waters and coastal and small island resources that do not align with the marine spatial planning activities as referred to in Article 16(2) and the business licensing as referred to in Article 19(1) shall be subject to administrative sanctions.

Types of Administrative Violations in the Fisheries Sector

Article 20 A Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who handles and processes fish that does not meet and does not apply the requirements for fish processing, quality assurance systems, and fishery product safety as referred to in Article 20 paragraph (3) shall be subject to administrative sanctions.

Article 27A Paragraph (1) Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who owns and/or operates an Indonesian-flagged fishing vessel engaged in fishing activities within the fisheries management area of the Republic of Indonesia and/or the high seas, who fails to obtain the required business license as referred to in Article 27(1), shall be subject to administrative sanctions.

Article 27A Paragraph (2) Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person operating an Indonesian-flagged fishing Vessel in the Fisheries Management Area of the Republic of Indonesia who does not carry a Business License as referred to in Article 27 paragraph (3) shall be subject to administrative sanctions.

Article 27A Paragraph (3) Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who owns and/or operates a foreign-flagged fishing vessel used for fishing activities in the Indonesian Exclusive Economic Zone (ZEEI) without obtaining the required business license from the Central Government as referred to in Article 27(2) or without carrying the business license documents as referred to in Article 27(3) shall be subject to administrative sanctions.

Article 35, Paragraph (3), Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who builds, imports, or modifies a fishing vessel without the approval of the Central Government or Local Government as referred to in paragraph (1) shall be subject to administrative sanctions.

Article 35A Paragraph (2) Fisheries Sector, Law No. 6 of 2023, reads as follows: Violations of the provisions on the use of captains and crew members as referred to in paragraph (1) shall be subject to administrative sanctions in the form of warnings, suspension of business licenses, or revocation of business licenses.

Article 36 Paragraph (3) Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who operates a fishing vessel in The Fisheries Management Area of The Republic of Indonesia and/or The High Seas without registering the fishing vessel as an Indonesian Fishing Vessel as referred to in paragraph (1) shall be subject to administrative sanctions.

Article 41 Paragraph (4) Fisheries Sector, Law No. 6 of 2023, reads as follows: Any person who owns and/or operates a fishing vessel and/or a fish transport vessel that does not unload the catch at the designated fishing port or other ports as referred to in paragraph (3) shall be subject to administrative sanctions in the form of a warning, suspension of the business license, or revocation of the business license.

Procedures and Imposition of Administrative Sanctions in the Marine and Fisheries Sector

Administrative Sanction Procedures in the Marine and Fisheries Sector

The process of imposing administrative sanctions for violations in the marine and fisheries sector begins with a report on the results of surveillance, evidence in the form of goods, documents, and documentation, minutes of questioning, minutes of field verification, and/or minutes, statements, and other supporting documents. In cases where the inspection report indicates a violation, the matter is followed up with an administrative sanction determination meeting coordinated by the Directorate of Violation Handling, attended by at least members of the Administrative Sanction Imposition Team of the Directorate General of PSDKP and the Technical Unit, the officers who conducted the inspection and/or examination related to the alleged violation, and representatives of the relevant technical directorate; and other relevant units or agencies, including: the Inspectorate General, the Legal Affairs Bureau, and the relevant Echelon I Unit. The hearing results determine the violation type and administrative sanctions ^[23].

Imposition of Administrative Sanctions in the Marine and Fisheries Sector

Administrative sanctions in the field of marine affairs and fisheries are imposed on business actors who commit the following violations: warning/written reprimand, administrative enforcement measures, administrative monetary fines, license freezing, and license revocation ^[40].

Ambiguity of the Norm in Article 23 of PermenKP No. 31 of 2021

The Directorate General of Marine and Fisheries Resources Surveillance, which is a technical directorate general that carries out the task of supervising compliance with laws and regulations in the marine and fisheries sector, has legal norms related to the imposition of administrative sanctions, namely a set of regulations in the form of PermenKP No. 31/2021. This regulatory framework governs the implementation of asset seizure for those who fail to pay administrative monetary fines. However, in some cases where administrative sanctions are imposed for unpaid administrative monetary fines, the seizure of assets is not carried out, as officials from the Directorate General of Marine and Fisheries Resources Supervision are uncertain about the legal basis for the seizure of assets as stipulated in Permen KP No. 31 of 2021. This situation has resulted in some administrative violations in the marine and fisheries sector not being fully resolved, leading to new issues. These, namely, financial reports, have become receivables for the Directorate General of Marine and Fisheries Resources Surveillance, thereby hindering performance ^[22].

PermenKP No. 31 of 2021, Article 23, outlines the procedures for confiscating assets as an administrative action against violators of laws related to marine affairs and

fisheries. The confiscation can be carried out by authorized officials, such as the Minister, Governor, or Regent/Mayor, within their respective authorities. This confiscation applies to assets owned by violators, whether at their residence, workplace, or other sites, regardless of who controls the assets. This process is crucial for ensuring compliance with relevant laws and regulations and discouraging violations. Additionally, the confiscation must be documented in an official report to prove the legality of the action.

The ambiguity of the legal norms in Article 23 of PermenKP No. 31 of 2021 is evident from the lack of clarity regarding the authority to seize assets. In paragraph (1), it is stated that seizure is carried out by the Minister, Governor, or Regent/Mayor, as administrative officials. However, in paragraph (5), confiscation must be carried out following the provisions of regulations on procedures governing seizure, which are generally carried out by judicial institutions such as judges, prosecutors, and the police in the context of criminal and civil law. This creates confusion regarding who has the authority to carry out confiscation, given that administrative officials do not have the same authority as law enforcement agencies in the context of confiscation based on court decisions.

Therefore, to overcome this ambiguity, efforts are needed to revise existing regulations or even establish new, more detailed and explicit legal norms regarding implementing confiscation in the marine and fisheries sectors. This proposed new legal norm must clarify the procedures and authority for the implementation of confiscation, to ensure that the confiscation of the assets of violators who fail to pay administrative monetary fines is carried out on a clear and accountable legal basis.

This legal ambiguity arises from inconsistencies in the regulated authorities. Confiscation, as an administrative legal action, should have clear and detailed procedures, especially if administrative officials carry it out. The provision stating that the implementation of administrative confiscation also refers to the law governing the procedures governing seizure creates confusion.

Procedure for the Confiscation of Assets in the Application of Administrative Sanctions

Clarity of procedures in implementing confiscation is essential to protecting the parties' rights and preventing abuse of authority. In the context of marine affairs and fisheries, where natural resources are often disputed, clear guidelines can help stakeholders understand the applicable legal procedures:

In the practice of administrative confiscation, other regulations are more clear and more detailed, such as Government Regulation of the Republic of Indonesia Number 24 of 2021 on Procedures for the Imposition of Administrative Sanctions and Procedures for Non-Tax State Revenue Collection from Administrative Fines in the Forestry Sector (Peraturan Pemerintah Republik Indonesia Nomor 24 Tahun 2021 tentang Tata Cara Pengenaan Sanksi Administratif dan Tata Cara Penerimaan Negara Bukan Pajak yang Berasal dari Denda Administratif di Bidang Kehutanan; hereinafter referred to as PP No. 24 of 2021), Regulation of the Minister of Finance of the Republic of Indonesia Number 61 of 2023 on Procedures for the Collection of Taxes on Outstanding Tax Liabilities (Peraturan Menteri Keuangan Republik Indonesia Nomor 61 Tahun 2023 tentang Tata Cara Pelaksanaan Penagihan Pajak atas Jumlah Pajak yang Masih

Harus Dibayar; hereinafter referred to as PermenKEU No. 61 of 2023), and Regulation of the Minister of Finance of the Republic of Indonesia Number 169 of 2017 on the Amendment to the Regulation of the Minister of Finance Number 111/PMK.04/2013 concerning the Procedures for the Collection of Import Duty and/or Excise (Peraturan Menteri Keuangan Republik Indonesia Nomor 169 Tahun 2017 tentang Perubahan atas Peraturan Menteri Keuangan Nomor 111/PMK.04/2013 tentang Tata Cara Penagihan Bea Masuk dan/atau Cukai; hereinafter referred to as PermenKEU No. 169 of 2017). These three regulations provide more systematic and concrete guidelines on who is authorized to carry out confiscation, the procedures that must be followed, and the types of goods that can be seized. These regulations also clearly specify the parties' roles in the confiscation process, reducing the misinterpretation scope.

PP No. 24 of 2021, PermenKEU No. 61 of 2023, and PermenKEU No. 169 of 2017 not only clarify authority but also emphasize the importance of systematic procedures in implementing confiscation.

Based on PP No. 24 of 2021, the Minister exercises the authority to confiscate assets related to the imposition of administrative sanctions. According to PermenKEU No. 61 of 2023, the authority to seize assets related to the imposition of administrative sanctions in the field of taxation is granted to the Tax Enforcement Officer appointed and removed by the official designated by the Minister of Finance. Under PermenKEU No. 169 of 2017, the authority to confiscate assets related to the imposition of administrative sanctions in the field of Customs and Excise is granted to Customs and Excise Enforcement Officers who are responsible for enforcing customs and excise collection actions, including immediate and simultaneous collection, notification of a Writ of Execution, Confiscation, and Detention, who are appointed and removed by an official designated by the Minister of Finance.

Establishing new legal norms will provide a specific opportunity to address current challenges and needs in the marine and fisheries sectors, enabling regulations to be more responsive, clear, and consistent with the existing legal context. The marine and fisheries sectors have unique characteristics that often differ from other sectors, including resource challenges, sustainability, and law enforcement. In the new norms, include details of the confiscation procedure, including the steps to be followed, time limits, and conditions to be met. Furthermore, establishing new legal norms will enable more detailed and precise regulation of confiscation procedures. Establishing new legal norms in the context of confiscation in the marine and fisheries sector is a strategic and necessary step. By formulating regulations that are more in line with the characteristics of this sector, we can create a legal framework that is responsive, effective, and fair. This will not only enhance law enforcement but also provide better protection for all parties involved and promote sustainability and compliance in managing marine and fisheries resources.

4. Conclusions and Recommendations

Article 23 Paragraph (5) of PermenKP No. 31 of 2021 is ambiguous due to the lack of clarity regarding the authority of administrative officials to confiscate assets, while the implementation must follow the provisions of the law on procedures governing seizures. The procedure for confiscating assets in the context of imposing administrative sanctions should be clearly defined to ensure fairness, legal

certainty, and the protection of individual rights. Therefore, the establishment of new legal norms is necessary to enable the regulation of more detailed and clear confiscation procedures.

Immediately establish new legal norms that specifically regulate the procedure for confiscating assets in the context of administrative sanctions. This will provide clear guidelines for authorized officials and ensure that the confiscation process is transparent and fair. The establishment of new legal norms is necessary to address the ambiguity that exists in the current provisions on seizure. The new norms will allow for more detailed and clear regulations on confiscation procedures, thereby reducing the risk of abuse of authority and increasing legal certainty for all parties. With clear norms in place, law enforcement can be carried out more effectively, transparently, and accountably, thereby increasing public trust in the existing legal system.

In the new norm, include details of the confiscation procedure, including the steps to be followed, time limits, and conditions to be met. This will reduce ambiguity and provide clarity for all parties involved, including: the administrative seizure of assets for the purpose of imposing administrative sanctions is carried out by an official appointed by the Minister; the administrative seizure of assets is carried out after a confiscation order has been issued; a confiscation report is prepared containing the identity and condition of the confiscation assets; Confiscation is carried out on movable and/or immovable property; Confiscation is carried out until the value of the confiscation property is estimated to be sufficient to settle the administrative monetary fine; in the event the administrative monetary fine is not settled, the confiscation property is auctioned through an auction office; If the auction sale has reached an amount sufficient to settle the administrative monetary fine, the auction is terminated and the remaining confiscation property is returned to the owner; the proceeds from the auction sale are used to pay the administrative monetary fine; furthermore, the Minister must establish and appoint an auctioneer for the administrative seizure of assets in the implementation of administrative sanctions in the field of marine affairs and fisheries.

After implementing the new norms, conduct regular evaluations and monitoring to ensure effectiveness and compliance with established procedures. This will help adjust the norms to practical needs in the field and maintain the integrity of the legal process.

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