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Study of Actor Networks and Discourse in the Policy of Formation of Land Bank in Indonesia

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Abstract: This study aims to determine the actor network and discourse that work in the context of land bank formation in Indonesia. This study uses a qualitative method with a network-based discourse analysis approach (Discourse Network Analysis) to understand the pattern of actor networks and policy discourse. Data were collected from online media coverage, academic studies, and related regulations. The results of the study found that the policy actor network consists of the Government, private sector, academics, media, and civil society groups with discourses that contest between investment interests and social justice. The implications of this study indicate that land bank policies accommodate the interests of investors more than the principle of social justice in agrarian reform. Therefore, a critical evaluation of the regulation and implementation of this policy is needed so as not to ignore people's rights to land.

Keywords: Land Bank, Agrarian Reform, Public Policy

INTRODUCTION

Public policy, as seen in the ratification of Law No. 11 of 2020 on Job Creation (UU Cipta Kerja), has sparked controversy, particularly due to the regulation of the land cluster which includes the establishment of the Land Bank Agency as a sui generis institution authorized to manage land for equitable economic development (Arnowo, 2022). This policy is constitutionally linked to Article 33(3) of the 1945 Constitution, which mandates that land be controlled by the state for the greatest prosperity of the people. The Basic Agrarian Law (UUPA) reinforces this, stating that land must serve social rather than individual interests (Article 2(3) UUPA).

However, Indonesia's growing population—275 million in 2022 with a 1.17% annual growth rate (BPS, 2023)—has intensified land demand amid limited land availability, leading to inequalities in land ownership and declining land reserves (Luthfi & Savitri, 2022). This imbalance has fueled agrarian conflicts, with 901 structural cases recorded between 2020–2023, particularly in plantation, infrastructure, and property sectors (KPA, 2022).

Although the government frames the Land Bank Agency as a solution to land inequality, critics argue it primarily facilitates land acquisition for development and investment rather than addressing the root causes of agrarian injustice. The Faculty of Law at Universitas Gadjah

Mada (2020) asserts that the land cluster in the Job Creation Law does not simplify regulation but instead benefits corporate actors in acquiring land. Suhendar (1996) warned that such policies risk commodifying land—shifting it from a public resource to a market commodity, echoing New Order-era practices.

This study examines how ideology and policy diffusion shaped land bank formation in Indonesia and assesses its alignment with agrarian reform goals and conflict resolution. KPA (2022) has raised concerns that the Land Bank Agency could dispossess indigenous and agrarian communities, reinforcing fears of marginalization.

The research is socially relevant because it incorporates perspectives from indigenous peoples, farmers, fishermen, and agrarian activists who worry that this policy prioritizes economic growth over social justice. In line with Pancasila and the 1945 Constitution, it is crucial that land policies strike a balance between development and the rights of marginalized communities.

Although numerous studies have explored land banking in Indonesia—such as conceptual studies (Noegroho, 2012), the institution's urgency for public interest land provision (Ganindha R., 2016), and its potential for equitable land asset management (Zahra, 2017)—most have focused on legal and institutional frameworks. Prianggoro & Pramono (2023) reviewed its pros and cons, while Permadi (2023) analyzed legal implications for state land management. Yet, little research has mapped the actor networks and discourses involved in shaping this policy.

Thus, this study aims to fill that gap by exploring how state and non-state actors influence the discourse and direction of land bank policy in Indonesia.

METHOD

This study uses a qualitative method, collecting empirical data from various sources such as interviews, artifacts, documents, and observations (Denzin & Lincoln, 2018). This approach combines *etic* (objective) and *emic* (based on individual perspectives) perspectives, as explained by Mostowlansky & Rota (2023). The researcher acts as an instrument that needs to reduce bias in data collection (Murchison, 2010).

The focus of the study is the pattern of actor networks and discourse. Discourse was chosen because it represents the social world through semiotic processes (Fairclough, 1989), and as a language practice in social life (Eriyanto & Ali, 2020). The main data are media coverage related to land bank policies, as well as policy documents and scientific studies.

The unit of analysis includes online news containing references to actors, experiences, and arguments about land bank policies. Secondary data were collected by searching for articles using the Google search engine, from credible online media platforms (Detik, Kompas, Tribun News, etc.), and scientific literature through Scopus and Google Scholar. Relevant data were then analyzed using Discourse Network Analyzer (DNA) software to explore social and policy interactions, and coded using code categories (Creswell & Creswell, 2018). Inductive coding was used to classify essential concepts, and Visone software was used to visualize actor affiliation networks and related discourses.

RESULTS AND DISCUSSION

Researchers collected 114 articles from national online media between 2015 and 2021, which focused on land bank policies. The articles were obtained through a programmed search engine from Google, with specific time and keyword settings. The collected data was then analyzed using the Discourse Network Analyzer (DNA) software, resulting in 239 relevant statements regarding land bank policies. The statements were interpreted into concepts or codes. Furthermore, the data was analyzed using Visone software to produce a visualization of the network pattern of actor and institutional involvement, as well as the concepts discussed in the news.

Looking at Land Bank Practices in Several Countries

Land Bank Practices in the United States

Land banks in the U.S. originated as state-level institutions and evolved into local entities with involvement from municipal governments and the private sector. First emerging in cities like St. Louis and Cleveland in 1976, land banks were created in response to property tax delinquencies and abandoned properties, especially during economic downturns. They acquired these properties and redistributed them to underserved communities. The second generation of land banks began managing privately owned tax-delinquent properties, with successful examples like Cuyahoga County, which saw fiscal growth and urban revitalization. Additionally, some land banks, such as the Plains Land Bank in Texas, support farmland allocation and provide agricultural loans. U.S. land banks are known for community-based governance, transparency, flexible funding sources, and localized program design.

Land Bank Practices in Europe

European land banks vary by country but generally support state goals in agriculture, infrastructure, and environmental planning. In the Netherlands, land banking operates through three models: (1) exchange land banking, (2) financial leasing, and (3) speculative development by private entities like Biro Beheer Landbouwgronden (BBL), which is regulated under the Land Consolidation Act 1954 and the Rural Area Development Act 1985. In Germany, the LMV (Landgesellschaft Mecklenburg-Vorpommern) facilitates land acquisition for infrastructure by compensating landowners. Denmark's land bank, initially established in 1919, supported agricultural expansion but was disrupted by WWII and resumed in the 1960s. France's SAFER consolidates land and facilitates leasing, with up to six-year contracts. These examples underline Europe's strategic focus on land management, consolidation, and long-term development planning.

Land Banking Practices in Asia

In Taiwan, the Land Bank of Taiwan (LBOT) was founded in 1945 to promote land rights equalization and support post-war housing and land policies. It became a legal entity in 1985 and was reorganized as a public corporation in 2003. Today, LBOT operates over 150 branches internationally. In the Philippines, the Land Bank of the Philippines (LBP) was established in 1963 to acquire and redistribute farmland. Following its restructuring in 1973, LBP expanded into a development-focused commercial bank, financing agriculture, housing, and industry. By 2020, it had significantly modernized its services through e-Banking and now operates more than 400 branches and over 2,000 ATMs. Both institutions are integral to land reform, rural finance, and improving access to land for marginalized communities.

Land Bank Practices in South Africa

The South African Land Bank was institutionalized through the Land and Agricultural Development Bank Act No. 15 of 2002. It aims to ensure equitable access to agricultural land, especially for disadvantaged and marginalized populations. Its programs focus on land redistribution, removing racial and gender bias, encouraging sustainable agricultural growth, and promoting job creation and environmental resilience. The bank also works to enhance food security and foster innovation in the sector, positioning itself as a critical instrument for agrarian reform and rural development.

Dynamics of Policy Discourse on the Establishment of Land Banks in Indonesia

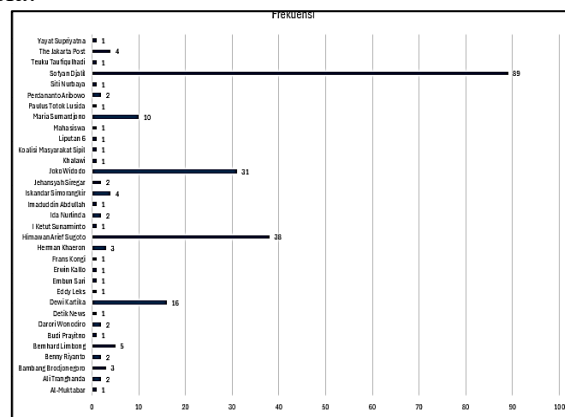
The concept of land banking in Indonesia dates back to the Dutch colonial period with *grond bedrijf* initiatives. During the 1980s–1990s, land banks resurfaced in response to urban land scarcity, with early implementations tied to Presidential Decree No. 53 of 1989 for industrial areas like JIEP and SIER. Land banks were later incorporated into the 2015–2019 RPJMN to support public-interest land provision. Policy momentum continued through the Draft Land Law (RUU Pertanahan), though it faced delays due to public protest. Nonetheless, the idea resurfaced in the Job Creation Law (UU Cipta Kerja), passed in 2020, under Article 125. While aimed at preventing speculation and easing land access, concerns remain over the bank’s broad authority and potential for land commodification, prompting criticism over the rapid legislative process.

Actor Networks and Discourse in Land Bank Establishment Policy in Indonesia

Public policy involves a sequence of stages—formulation, agenda setting, adoption, implementation, and evaluation (Widodo, 2022). Recently, **Braun et al. (2007)** introduced the concept of *policy diffusion*, which emphasizes interconnections between formulation, implementation, and evaluation. Research on land bank policy in Indonesia emphasizes these stages, particularly how actors shape policy direction and legitimacy (Buse et al., 2012; Bertscher et al., 2018). According to **Nigro (in Islamy, 2000)**, policy decisions are shaped by external pressures, institutional inertia, personal ideologies, and past experiences. The involvement of diverse stakeholders—government, civil society, and the private sector—illustrates the complex actor networks influencing the trajectory of land bank formation in Indonesia.

Configuration of Actors in the Discourse of Land Bank Establishment Policy in Indonesia

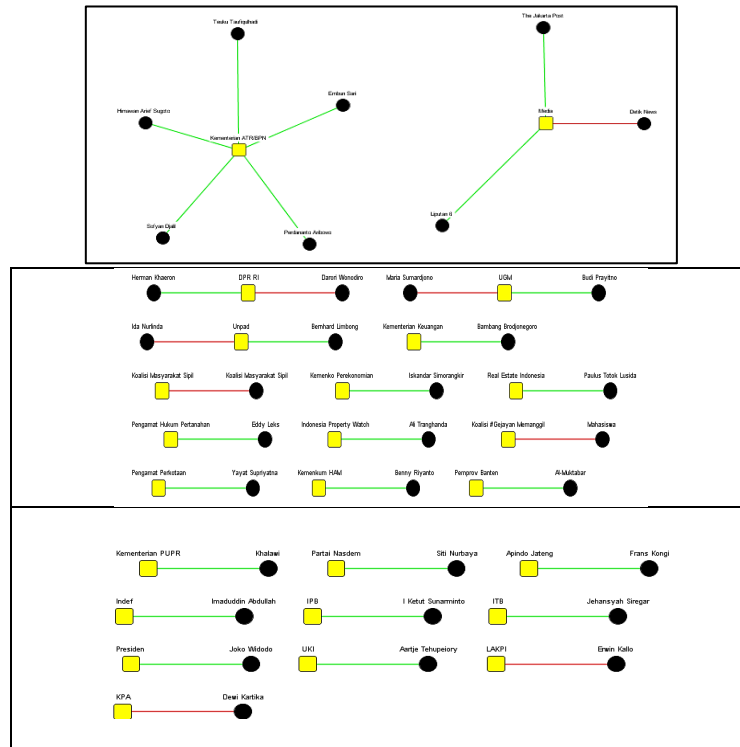
Based on the results of DNA analysis, the researcher identified 33 individual actors with various institutional backgrounds who provided statements in news articles regarding land bank policies in Indonesia.



Source: Data processed by researchers from Online Media News Articles using DNA and Gephi, 2025
Figure 1. List of Actors and Frequency of News Reporting related to the Discourse on the Policy of Establishing a Land Bank in Indonesia

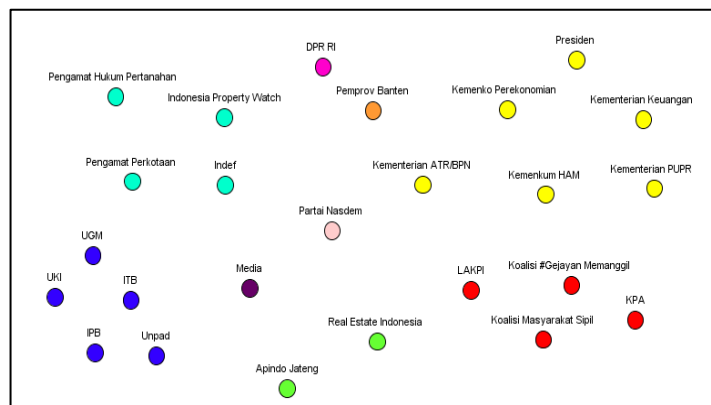
Figure 1 highlights the five most frequently mentioned individuals in media coverage of the land bank policy: Sofyan Djalil (Minister of ATR/BPN) leads with 89 statements, followed by Himawan Arief Sugoto (Secretary General ATR/BPN) with 38, President Joko Widodo with 31, Dewi Kartika (Agrarian Reform Consortium) with 16, and Maria Sumardjono (UGM Agrarian Law Professor) with 10. These figures reflect broader institutional involvement, with 25 entities in total. The Ministry of ATR/BPN dominates media discourse, cited in 131 statements, largely due to multiple active spokespersons, unlike other institutions which

typically feature only 2–3 representatives.



Source: Data processed by researchers from Online Media News Articles using DNA and Visone, 2025
Figure 2. Visualization of Individual Actors and Institutions in the Discourse of Land Bank Establishment Policy in Indonesia

In general, the institutional background that houses the actors in question can be categorized into 9 (nine) clusters, namely: 1) universities, 2) political parties, 3) legislative institutions, 4) executive institutions, 5) local governments, 6) non-governmental organizations (NGOs), 7) business associations, 8) professionals, and 9) media. The grouping of these institutions can be understood more clearly through Figure 5.



Source: Data processed by researchers from Online Media News Articles using DNA and Visone, 2025
Figure 3. Visualization of Institutional Categories of Actors in the Discourse of Land Bank Policy in Indonesia

The Ministry of ATR/BPN emerges as the most dominant institution in the discourse on land bank policy, with executive bodies like the President, Ministry of PUPR, Finance, and others also playing significant roles. In contrast, legislative participation is minimal, indicating stronger executive dominance in the policymaking process. Universities, particularly UGM, contribute through expert analysis and policy input, while NGOs like KPA and LAKPI, along

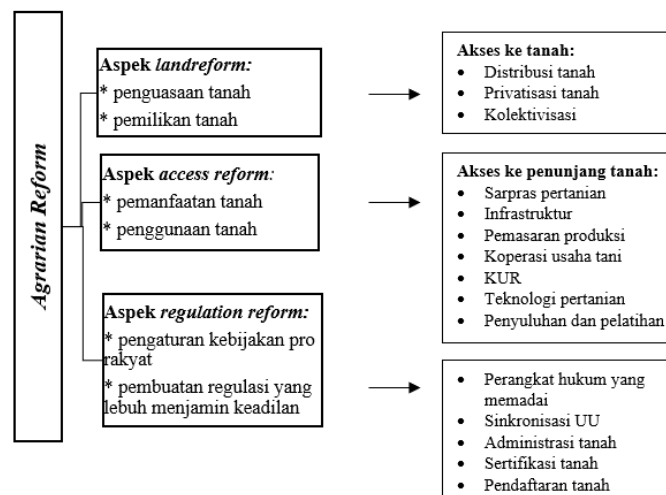
with civil society groups such as #GejayanMemanggil, actively oppose the policy. Professional experts and business associations add perspectives on law, urban planning, and investment. Meanwhile, media outlets like The Jakarta Post and Detik News play a crucial role in shaping narratives and mobilizing public support.

Configuration of Concepts in the Discourse of Land Bank Establishment Policy in Indonesia

This study not only maps the configuration of actors related to the land bank establishment policy, but also identifies 12 key concepts or issues debated in the discourse. These concepts are revealed through statements by actors in the mass media.

The study identified five main issues related to the land bank establishment policy in Indonesia based on their popularity. The issue of "land conflict solutions" was the most widely discussed, appearing 44 times. Followed by the issue of "ensuring low-income housing" which appeared 32 times and the issue of "land manager" with 25 appearances. The fourth place was filled by two issues, namely "land price control" and "land bank assetization", which each appeared 20 times. Meanwhile, the issue that ranked fifth, with a frequency of 19 times, included "adaptation of foreign policy", "ease of investment", and "ensuring national development".

Land Conflict Solution Concept



Source: (Arisaputra, 2015)

Figure 4. Concept and Scope of Agrarian Reform

Based on the data that has been collected, the researcher identified and interpreted that several statements by actors involved in the discourse on the policy of establishing a land bank have views related to the idea of establishing a land bank as a solution to land conflicts. Examples of statements by actors related to the concept of land conflict solutions can be seen in Table 1.

Table 1. Examples of Statements Related to the Concept of Land Conflict Solutions

No.	Actor	Institution	Statement
1	Bernhard Limbong	Unpad	"This land bank is a solution to land problems and conflicts due to increasing population, development progress, shifting land values, the level of legal awareness of the community, inequality in land control and ownership that drives conflict,"
2	Redaksi The Jakarta Post	Media	"Land banking could be a permanent solution in controlling the balance between land demand and availability, reasonable land prices, and efforts to integrate the government's land policies,"

3	Maria Sumardjono	UGM	Maria admitted that she did not agree with President Joko Widodo's claim that land banks are a solution to solving problems for the community.
4	Joko Widodo	President	"This is very important to guarantee public access to land and land ownership, and so far we have not had a land bank," said Jokowi
5	Sofyan Djalil	Ministry of ATR/BPN	Sofyan explained that this Land Bank will be a representative of the state in overcoming land problems. Starting from the problem of creativity, corporatization can be done by prioritizing public interests.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Concept of Guaranteeing Low-Income Housing

Housing demand is rising due to urbanization and population growth, particularly in urban areas, leading to a significant shortage of adequate housing. Before the 1992 Housing and Settlements Law, housing provision was largely handled by the private sector and state-owned enterprises like Perumnas, but the housing backlog remained. Land procurement challenges, influenced by market mechanisms, have driven up land prices, making housing less affordable. In the 2015-2019 RPJMN, the government aimed to provide decent housing for 18.6 million low-income households. To address this, policies focus on improving land management, including establishing land banks, land consolidation, and utilizing state-owned or abandoned land to lower costs and provide affordable housing.

Table 2. Examples of Statements related to the Concept of Guaranteeing MBR Housing

No.	Actor	Institution	Statement
1	Himawan Arief Sugoto	Ministry of ATR/BPN	Head of the Land Bank Formation Team Himawan Arief Sugoto explained that the need for land for development, public interest and housing for low-income communities (MBR) is relatively large.
2	Jehansyah Siregar	ITB	Without a Land Bank, he admitted that it would be rather difficult for the government to pursue the target of building one million houses that is being promoted.
3	Sofyan Djalil	Ministry of ATR/BPN	"Poor people are increasingly suffering because they live further away from the city center. That's why so that they have land there is a land bank with the mechanism owned by ATR, so that people who are less fortunate should live in the city center, those who are able to commute live outside the city," explained Sofyan.
4	Erwin Kallo	LAKPI	"For plantations and agriculture, it's still okay. But, for the provision of housing, it doesn't make sense, because the state land that will be utilized is definitely in an urban area. And it's not free, aka someone controls it," said Erwin
5	Iskandar Simorangkir	Coordinating Ministry for Economic Affairs	"The government should already have a land bank. So that people with low incomes or the lower class who live at the end of the world can have a house in the city. If now it's very expensive for them to go to the office," he explained

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Land Manager Concept

Table 3. Examples of Statements related to the Land Manager Concept

No.	Actor	Institution	Statement
1	Liputan 6 Editorial Team	Media	Land banks are a means of land management carried out by a number of countries due to the explosion of world population growth.
2	Himawan Arief Sugoto	Ministry of ATR/BPN	"Land Managers throughout Indonesia are Land Banks," explained Himawan
3	Sofyan Djalil	Ministry of ATR/BPN	"We do not yet have sufficient detailed data (land to be managed). But the Land Bank will regulate which land is for

			agrarian reform, industrial areas, for housing, infrastructure and others," he said.
4	Himawan Arief Sugoto	Ministry of ATR/BPN	"If the country does not have reserves, while the existing land is increasingly limited, then there will be a change in land use. Because of these conditions, the country needs to form an institution that collects, manages, and distributes land through the Land Bank."
5	Sofyan Djalil	Ministry of ATR/BPN	"Through the Land Bank, it will be much easier. For example, expired HGU can be reorganized for better land justice. Usually HGU expires, but there is no clear extension or resolution. We organize it properly according to the rules so that the goal of land redistribution can be achieved," he said.
6	Himawan Arief Sugoto	Ministry of ATR/BPN	Secretary General (Sekjen) of the Ministry of ATR/BPN Himawan Arief Sugoto said that with the formation of the Land Bank agency, the country can de facto have this control. "A solution is needed so that the government has this function as an executor by forming a Land Bank management body," said Himawan.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Land banks are seen as a solution to regulate various land affairs, from land acquisition, management, utilization, distribution, to resolving land conflicts. This concept aims to increase the availability of government-owned land through various means such as purchase, exchange, or release. However, as a land manager, land banks will face the issue of broad institutional authority. Several policy actors have suggested that land banks will be given the authority to manage all land in Indonesia, which risks causing problems related to compliance and supervision.

Land Price Control Concept

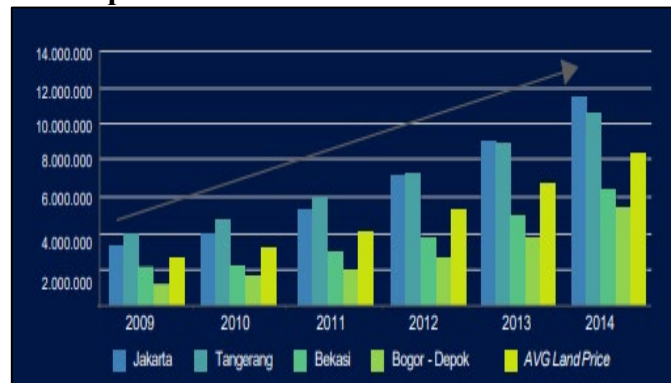


Figure 5. Land Price Increase in Jabodetabek 2009-2014
Source: Ministry of ATR/BPN, 2023

Liberalization and imperfection of the land market in Indonesia have resulted in land concentration in certain groups. To address this, the government needs to create a more effective land market, in accordance with Article 13 paragraph (2) of the PA Law which prevents monopolies in the agrarian sector. Several policy actors argue that land banks can control land prices and facilitate a sustainable land market. Land banks are considered to be able to distribute land through sales or leases to improve the overall land use structure.

Table 4. Examples of Statements related to the Concept of Land Price Control

No.	Actor	Institution	Statement
1	Sofyan Djalil	Ministry of ATR/BPN	"We will create a land bank, as I said earlier, land prices must be controlled. There have been mistakes so far regarding the management of our land," he said

2	Jehansyah Siregar	ITB	"One solution is a land bank. Land speculation must be controlled, and a housing institution must be formed to guarantee land availability and become a price controller," said Housing and Settlement observer from the Bandung Institute of Technology (ITB) Jehansyah Siregar
3	Joko Widodo	President	"This is indeed the government's mistake, why not have a land bank, land bank, so that the price of land in Jakarta is IDR 200 million-250 million, then where will the people buy it from," said Jokowi
4	Himawan Arief Sugoto	Ministry of ATR/BPN	Having a land bank can minimize land charges," said Himawan.
5	Himawan Arief Sugoto	Ministry of ATR/BPN	"The Land Bank can sell land to developers at low prices, because of funding assistance from agreements with the financial industry, as well as subsidies that are being discussed. With prices lower than the land bank, land prices on the market will not continue to soar,"

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Land Bank Assetization Concept

Table 5. Examples of Statements related to the Land Bank Assetization Concept

No.	Actor	Institution	Statement
1	Sofyan Djalil	Ministry of ATR/BPN	The acquisition of land banks can be in the form of land with abandoned or unextended Land Use Rights (HGU) that can be taken by the Government which is then fully redistributed to the community.
2	Himawan Arief Sugoto	Ministry of ATR/BPN	In an effort to obtain the land, Himawan Arief Sugoto said, there are at least 3 ways that land banks can take. "First, based on legal authority. The Minister of ATR has the authority to determine lands from former Land Use Rights (HGU), land with an expired validity period, abandoned land, and so on. There are so many. Second is the process of procuring a budget from developers and the government. It is possible that one day the developer's investment will become one. The third way land banks collect land is by forming joint participation with stakeholders." This land bank, said Dewi, was formed to accommodate, manage and transact land from unilateral claims by the state (domein verklaring/land nationalization).
3	Dewi Kartika	KPA	"There is someone's land that already has an owner but the owner is extinct, has gone abroad, the land bank takes the assets," said Sofyan
4	Sofyan Djalil	Ministry of ATR/BPN	He said that Indonesia already has a land bank at this time. Thus, the lands whose HGU and HGB certificates will be revoked will be included in the land bank list.
5	Joko Widodo	President	Statement

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Land bank assets are acquired in several ways: first, by taking over land from former Land Use Rights (HGU), expired land, and abandoned land; second, through budget procurement from developers and the government; third, land banks collect land by involving participation from various stakeholders. This process is related to the concept of assetization, namely the transformation of assets into sources of value for capital accumulation. In this context, according to Rosa Luxemburg, capital accumulation can lead to the deprivation of individual property rights in a capitalist system, where initially legitimate ownership relationships can turn into deprivation along with the development of capital accumulation.

The Concept of Adapting Foreign Policy

Table 6. Examples of Statements related to the Concept of Foreign Policy Adaptation

No.	Actor	Institution	Statement
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1	Bernhard Limbong	Unpad	Land expert from Padjajaran University, Bernhard Limbong said, in establishing a land bank, Indonesia can follow the example of countries in the European region. He said, countries such as the Netherlands, Sweden and France have had this bank for a long time.
2	Sofyan Djalil	Ministry of ATR/BPN	"In Vietnam all land is state land, so Samsung then invested there, because land acquisition is easy," said Sofyan
3	Iskandar Simorangkir	Coordinating Ministry for Economic Affairs	"For example, the city of Mogale in South Africa, they have a land bank there. So, when there is an infrastructure project, it is not a problem. "If we are doing surgery, because we don't have land, we are often hampered by expensive land acquisition problems," he explained.
4	Sofyan Djalil	Ministry of ATR/BPN	Singapore has succeeded in having many parks and green open spaces because its government has succeeded in regulating land ownership by running a land bank.
5	Imaduddin Abdullah	INDEF	"Now the government is learning from Malaysia about Felda," said Imaduddin. Felda was formed by an Act of Parliament and launched by Prime Minister Tunku Abdul Rahman in 1956. The legal basis for the establishment of Felda is Act 474 of 1956 concerning Land Development. Felda functions as a land bank. After obtaining productive land from the central government or the Kingdom of Malaysia, Felda then distributes it to farmers as plantation land.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

The concept of adaptation to foreign policy is theoretically more closely related to policy diffusion. A condition in which policies made by the Government in a particular jurisdiction are influenced by policy choices that have been made or implemented by the Government in other jurisdictions is interpreted as a policy diffusion process (Simmons, Dobbin, & Garrett, 2006). Simply put, adapting foreign policy is part of policy diffusion, namely a process of adopting new policies that are influenced by external factors (Kurniawan & Gunawan, 2021).

The Concept of Investment Ease

Table 7. Examples of Statements Related to the Concept of Investment Ease

No.	Actor	Institution	Statement
1	Sofyan Djalil	Ministry of ATR/BPN	Minister of Agrarian Affairs Sofyan Djalil said that the land bank institution was basically formed because land acquisition for investment was difficult.
2	Dewi Kartika	KPA	The government, according to him, had difficulty providing land for investment and other infrastructure development because the process was often carried out by force and eviction, so that the community was resistant to the government's plans.
3	Aartje Tehupeiory	UKI	The provision of a land bank was included in the discussion because it was important, in addition to increasing competitiveness, also for legal certainty and sustainable business security for investors.
4	Maria Sumardjono	UGM	"The background of the land bank is indeed to make it easier for investors to obtain land. Why is it suddenly juxtaposed with agrarian reform, this paradigm is indeed not compatible at all," said Maria
5	Sofyan Djalil	Ministry of ATR/BPN	"In addition to facilitating investment, the Land Bank was also formed so that there would be economic equality in the community,"

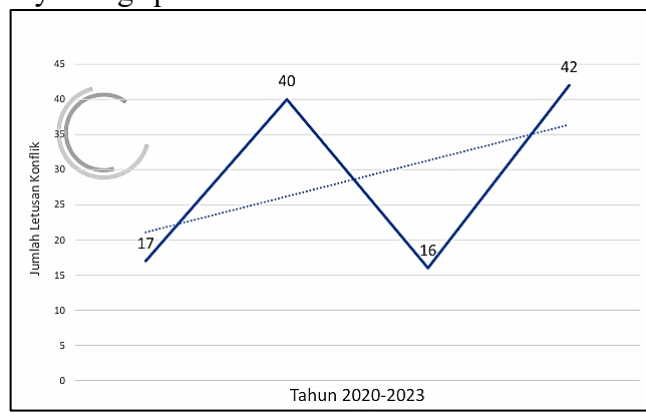
Source: Data processed by researchers from Online Media News Articles using DNA, 2025

According to Limbong (2013), land availability is a major obstacle in the investment world, both for infrastructure development and investment activities themselves. To overcome this, the Government through policies, such as the Land Bill, seeks to provide convenience for investors. Several clauses in the Land Bill that facilitate investment convenience include extending the term and area of HGU/HGB, facilitating land control, establishing a land bank,

procuring land for investment, simplifying licensing, expanding usage rights, and granting ownership rights to Sarusun for foreign nationals. However, despite the convenience, this policy also has the potential to cause problems, such as ignoring the rights of indigenous peoples, agrarian conflicts, criminalization, legal uncertainty, and centralization of land management authority.

Concept of Guaranteeing National Development

The development of National Strategic Projects (PSN) is a priority for President Joko Widodo in the 2019-2024 period with the aim of improving people's welfare through growth and equitable development, in accordance with Article 33 paragraph (3) of the 1945 Constitution. PSN is implemented based on the principle of public interest, which stipulates that the Government can revoke land rights used for public interest by providing compensation through deliberation and consensus (Article 36 of Law No. 2/2012). However, the implementation of PSN is often hampered due to overlapping with agricultural land, plantations, and community living space.



Source: KPA Annual Report, 2023

Figure 6. Graph of the Number of Agrarian Conflicts Erupting in 2020-2023

In 2021, the Agrarian Reform Consortium (KPA) noted that the development of National Strategic Projects (PSN) increased agrarian conflicts by 123% compared to the previous year. From 2020-2023, there were 115 agrarian conflicts involving 516,409 hectares of land and impacting 85,555 heads of families. These conflicts occurred due to projects such as the Padang-Pekanbaru toll road, the power plant in Pinrang, mining in Wadas, and the rice field project in Kalimantan. The acceleration of PSN has caused the state to enforce citizens' land rights within a positivistic legal framework, ignoring physical and customary land control, which has resulted in some communities being considered illegal.

Table 8. Examples of Statements related to the Concept of Guaranteeing National Development

No.	Actor	Institution	Statement
1	Bambang Brodjonegoro	Ministry of Finance	Minister of Finance (Menkeu) Bambang P.S. Brodjonegoro said that the establishment of a land bank needs to be done immediately to increase government sovereignty and ensure that infrastructure projects can run properly.
2	Sofyan Djalil	Ministry of ATR/BPN	Minister of Agrarian Affairs and Spatial Planning (ATR)/Head of the National Land Agency (BPN) Sofyan Djalil stated that the Land Bank will operate this year. The existence of this Land Bank aims to ensure the availability of land for projects related to public interest.
3	Himawan Arief Sugoto	Ministry of ATR/BPN	"That's why a Land Bank is needed, because a Land Bank can guarantee the availability of land for various development needs in the future," he said.
4	Joko Widodo	President	"A Land Bank is needed to guarantee public interest, social interest, social development interest, economic equality,"
5	Maria Sumardjono	UGM	"The paradigm for such broad national development is then juxtaposed with agrarian reform, that is very incompatible," said Maria.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Sui Generis Agency Concept

The establishment of a land bank in Indonesia suggests two institutional approaches, namely a sui generis agency and a public service agency (BLU). A land bank as a sui generis agency is designed with a special nature, while a BLU is an institution that manages land with a public service orientation. The choice between these two forms is highly dependent on the desired land management objectives, whether to emphasize independent public functions or as a more flexible agency in serving land needs for various sectors. This institution will determine how the land bank manages land, distributes it, and resolves land problems in Indonesia.

Table 9. Examples of Statements related to the Sui Generis Agency Concept

No.	Actor	Institution	Statement
1	Sofyan Djalil	Ministry of ATR/BPN	"The Land Bank Organization will be a powerful organization, consisting of three people. In addition to the Minister of ATR, Mr. Jokowi will appoint someone as a committee, perhaps the Minister of Finance, Minister of Agriculture, or PUPR," he said
2	Sofyan Djalil	Ministry of ATR/BPN	"I am sure God willing, no later than the end of this year, no later than early January (2022) we will have a land bank for the first stage," said Minister Sofyan
3	Himawan Arief Sugoto	Ministry of ATR/BPN	"We have discussed it internally within the ministry, 90% of the substance is (completed). We have also circulated it to several related ministries/institutions. Three agencies have been initialed. It is hoped that this Land Bank Agency can be realized this October."
4	Perdananto Aribowo	Ministry of ATR/BPN	"The Job Creation Law (UUCK) Number 11 of 2020 and Government Regulation (PP) Number 64 already exist. The process of establishing this Land Bank is just waiting for the Presidential Decree. Hopefully this year it can be completed," said Perdananto.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

However, if observed closely, the statements that emerge basically confirm that the land bank will be realized immediately after the CK Law and its derivative regulations are issued. Based on the provisions of Article 125 of Law Number 11 of 2020 concerning Job Creation, the Land Bank Agency is a special agency (sui generis) that manages land with separated state assets. This regulation specifically provides the context that the discourse on the policy of establishing a land bank is related to the concept of a sui generis agency as referred to in the discussion of this section.

Land Consolidation Concept

Table 10. Examples of Statements related to the Land Consolidation Concept

No.	Actor	Institution	Statement
1	Bambang Brodjonegoro	Ministry of Finance	With the existence of a land bank, Bambang continued, this institution will later purchase land before the infrastructure development project begins.
2	Bernhard Limbong	Unpad	According to Limbong, the concept of a land bank is not much different from conventional banks that collect public funds in the form of checking accounts, savings deposits and deposits that are returned to people who need funds through the sale of financial services. Meanwhile, a land bank collects public land, especially abandoned land and state land that has not been used.
3	Budi Prayitno	UGM	"The government must reserve land, this PP (government regulation) on the Land Bank has almost been issued, meaning that it reserves land, freezes it," he said.
4	Sofyan Djalil	Ministry of ATR/BPN	"If you want to free [land] in a certain area, it is incredibly difficult. Therefore, we include it there. If the land is already owned by the state, the government can provide it as an incentive," explained Sofyan.
5	Joko Widodo	President	"A Land Bank is needed for land consolidation," explained Jokowi.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Abandoned land, government assets, and absentee land have significant potential for land consolidation programs. Abandoned land, which includes unused land rights, can be repurposed for community and state benefits, especially in agrarian reform or strategic projects. Government assets, both central and regional, are often underutilized, and policies are needed to optimize their use. The rise in absentee land ownership exacerbates land inequality, as corporations or individuals outside the local areas control much of the land, leaving local

communities and farmers with limited access. This contributes to social and economic disparities.

No	Nama	Korporasi / Hektare	Rakyat / Hektare
1	Kalimantan	24.735.733	1.070.350
2	Sumatra	11.938.344	910.968
3	Papua	8.589.282	169.665
4	Maluku	2.274.567	227.888
5	Sulawesi	2.211.698	342.233
6	Jawa-Bali-Nusa Tenggara	682.380	60.313

Source: <https://databoks.katadata.co.id/datapublish/2022/08/16/walhi-948-lahan-indonesia-dikuasai-korporasi>

Figure 7. Comparative Data on Land Area Controlled by Corporations and the People in 2022

The data on land control figures by corporations above show that absentee land ownership is very high, because of course the corporations as the rights holders of the lands are not the local community.

Fourth, erfpacht land which is former plantation land. Former erfpacht land has legally become state land since the state since 1980. Since the implementation of this regulation, the subsequent allocation policy should depend on the policy of the Government as the party that manages the state, including for land consolidation objects.

Concept of Land Bank Management Rights (HPL)

Table 11. Examples of Statements related to the Land Bank HPL Concept

No.	Actor	Institution	Statement
1	Himawan Arief Sugoto	Ministry of ATR/BPN	"Because the land will later have HPL status, the control rights granted by this agency, then we can place rights on it. If for buildings, settlements HGB, if plantations HGU. HGU above HPL, HGB above HPL, or rights of use. Indeed, there are regulations that must be synchronized," he said.
2	Sofyan Djalil	Ministry of ATR/BPN	"So later HPL land that is utilized by other parties, in the form of HGB, HGU, or rights of use, they will pay for the utilization of the land," said Sofyan
3	Dewi Kartika	KPA	"The colonial government gave 75 years, Sir! That has made the sons and daughters of the country suffer for 350 years. Now in this era of independence, Sir, you want to add 15 more years!" said Dewi.
4	Dewi Kartika	KPA	In colonial times, similar land management rights were known as erfpacht rights. This right allows entrepreneurs to manage land for up to 75 years.

Source: Data processed by researchers from Online Media News Articles using DNA, 2025

Concept of Public Service Agency

The concept of sui generis agency and public service agency (BLU) in land bank institutions is an important topic in discussions between policy actors. Although the concept of sui generis agency is not discussed explicitly, the concept of BLU is discussed clearly by policy actors through several statements.

Table 12. Examples of Statements related to the Concept of Public Service Agency

No.	Actor	Institution	Statement
1	Bambang Brodjonegoro	Ministry of Finance	Finance Minister Bambang Brodjonegoro said that currently, the government continues to discuss the formation of a land bank in the form of a Public Service Agency (BLU) with the House of Representatives (DPR).
2	Sofyan Djalil	Ministry of ATR/BPN	"We are in the process of preparing a PP for a land bank. We will form a BLU land bank. The target is to start this year," he said

3	Sofyan Djalil	Ministry of ATR/BPN	"Presidential Regulation, BLU (Public Service Agency). In the Law, we will include stronger land bank provisions," said Sofyan.
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Source: Data processed by researchers from Online Media News Articles using DNA, 2025

The fundamental difference between the concept of a *sui generis* body and a BLU in the institutional design of a land bank lies in the discussion period. The idea of a land bank as a BLU was discussed more often before the CK Law and its derivative regulations, while the idea of a special body emerged after the CK Law was issued. BLU, according to Law Number 1 of 2004, is a government agency that provides services to the community with the principles of efficiency and productivity, without prioritizing profit, but remains within the framework of state financial management. The selection of this institutional form will affect the work patterns and benefits of the land bank for the public.

CONCLUSION

The study identifies several key conclusions. It found that 33 individual actors from 25 institutions are involved in the formation of land bank policies. Through discourse network analysis, two main narratives emerged: the pro-land bank narrative, which argues that land banks will accelerate land acquisition for national development, improve land governance, and enhance the investment climate, and the counter-land bank narrative, which criticizes the policies for facilitating land commodification, threatening community rights, exacerbating inequality in land ownership, and potentially worsening agrarian conflicts.

The network of affiliations between actors and discourses shows the dominance of pro-investment actors in the land bank policy discourse. The Ministry of ATR/BPN and the President play central roles, advocating for economic growth. Business associations support the policy as it benefits the property and industrial sectors, and mainstream media portrays land banks as a modern solution. In contrast, academics and civil society coalitions dominate the counter-narrative, arguing that land banks prioritize investment interests over agrarian reform and social justice.

Additionally, the study found a diffusion process in the policy establishment, reflecting ideological influences from the previous New Order government, which continues to shape current policy-making regarding land banks in Indonesia.

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