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The Legal Basis for the Enforcement of Administrative Court Judgments

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Abstract

The enforcement of final and legally binding judgments of Indonesia's State Administrative Court (*Pengadilan Tata Usaha Negara*, PTUN) is fundamental to ensuring legal certainty and protecting citizens' rights. However, enforcement remains hindered by government officials' non-compliance, ineffective coercive measures, and the absence of a dedicated enforcement institution with clearly defined authority. This study examined the legal basis for enforcing final and binding PTUN judgments and assessed the necessity of establishing a dedicated enforcement institution. Normative legal research was conducted using statutory, conceptual, and comparative approaches. Legal materials were collected through library research and analysed using descriptive qualitative techniques. The findings indicate that the legal basis for enforcing PTUN judgments is primarily governed by Articles 115 and 116 of the State Administrative Court Law. Nevertheless, enforcement remains ineffective due to inadequate implementing regulations, weaknesses in the allocation of authority, and insufficient institutional support. Continued reliance on government officials' voluntary compliance further undermines enforcement effectiveness. The study recommends issuing a Supreme Court Regulation to clarify enforcement procedures and define responsibilities among court officials, alongside legislative reform to establish a dedicated enforcement institution. These reforms could strengthen institutional authority, enhance legal accountability, and improve the enforcement of final and binding administrative court judgments, thereby reinforcing legal certainty and the protection of citizens' rights.

Keywords: Enforcement of Court Judgments; State Administrative Court; Final and Binding Judgments; Enforcement Institution; Legal Certainty

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INTRODUCTION

Law is a fundamental instrument in the administration of social, national, and state life because it serves to regulate relationships between individuals and between society and the state based on applicable legal norms and principles (Ridwan, 2019). In a state governed by the rule of law, all governmental actions must be based on statutory provisions and uphold the principles of legal certainty, justice, and utility (Supandi, 2011). This is consistent with Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which stipulates that Indonesia is a state governed by the rule of law. Consequently, the actions of government agencies or officials cannot be separated from legal oversight, particularly when such actions result in violations of the rights of members of the public. One form of legal protection for the public against governmental administrative actions is provided through the existence of the Administrative Court (*Pengadilan Tata Usaha Negara* or PTUN), which has the authority to examine, adjudicate, and resolve administrative disputes. The existence of the Administrative Court plays an important role in upholding the principle of *equality before the law* while providing members of the public with access to legal protection against decisions and actions taken by government agencies or officials that are considered contrary to statutory regulations or the General Principles of Good Governance (*Asas-Asas Umum Pemerintahan yang Baik* or AUPB). Accordingly, the Administrative Court does not merely function as an institution for resolving administrative disputes but also serves as an instrument of judicial oversight over governmental administration to ensure that it remains within the boundaries of the law (Republik Indonesia, 1945; 1986; 2009).

Administrative Court judgments that have acquired permanent legal force (*inkracht van gewijsde*) essentially impose legal obligations that must be fulfilled by government agencies or officials designated as the parties responsible under the operative provisions of the judgment. The enforcement of such judgments constitutes an inseparable component of the rule of law because justice cannot be achieved merely through judicial proceedings and the issuance of judgments by judges; rather, it must also be realized through the actual implementation of those judgments. The primary legal basis for enforcing Administrative Court judgments is stipulated in Article 116 of Law Number 5 of 1986 concerning the Administrative Court, as subsequently amended by Law Number 9 of 2004 and Law Number 51 of 2009. This provision regulates the enforcement mechanism through the delivery of copies of judgments, the loss of legal force of the disputed administrative decisions under certain circumstances, applications submitted to the Chief Judge of the Court, the imposition

of coercive monetary penalties (*dwangsom*), administrative sanctions, public announcements through mass media, and the reporting of non-compliance to the President and the legislative institutions. Furthermore, the obligation of government agencies or officials to comply with court judgments is also associated with Article 97 paragraph (9) of the Administrative Court Law and the principle of compliance with judicial decisions as reflected in Law Number 48 of 2009 concerning Judicial Power. Nevertheless, the existence of these various legal instruments has not fully guaranteed the effective enforcement of judgments, as their implementation remains highly dependent on the willingness and compliance of government agencies or officials. This problem indicates that normative regulations concerning judgment enforcement must be supported by clear, firm, and coercive implementation mechanisms to ensure that court judgments do not remain merely legal documents without practical effect (Pranoto, 2022; Faturahman, 2025).

The issue of enforcing Administrative Court judgments has become increasingly important to examine because a gap remains between the legally binding nature of court judgments and the actual fulfillment of obligations by government agencies or officials (Tjandra, 2018). One of the fundamental problems lies in the suboptimal implementation of coercive monetary penalties (*dwangsom*) and administrative sanctions as stipulated in Article 116 paragraph (4) of the Administrative Court Law, particularly because regulations concerning the amount of coercive monetary penalties, the types of administrative sanctions, and their implementation procedures have not yet been supported by adequate operational mechanisms. Research (Faturahman & Herlambang, 2025) explain that the lack of clarity in the normative regulation of *dwangsom* creates a legal vacuum that undermines the enforceability of Administrative Court judgments. This issue is also related to the limitations on coercive measures against state assets, as Article 50 of Law Number 1 of 2004 concerning State Treasury prohibits the seizure of state-owned or regional assets and funds. Consequently, the enforcement of coercive monetary penalties presents particular challenges when the responsible parties fail to make voluntary payments. Furthermore, the mechanism for reporting non-compliance to the President and legislative institutions does not automatically guarantee that the officials concerned will immediately comply with the operative provisions of the judgment. Nevertheless, recent legal developments through Constitutional Court Decision Number 280/PUU-XXIV/2026, dated October 29, 2026, have introduced significant changes to Article 116 paragraphs (2) and (3) of the Administrative Court Law by revising the time limits from 60 working days to 14 working

days and from 90 working days to 21 working days, respectively. These changes demonstrate efforts to strengthen the effectiveness of Administrative Court judgment enforcement. However, they also raise the need for further examination of whether the revised time limits and existing enforcement instruments are sufficient to ensure governmental officials' compliance or whether the establishment of an enforcement institution with specific authority is still necessary to ensure the effective implementation of court judgments (Anugrah & Alamsyah, 2025; *Mahkamah Konstitusi*, 2026).

Based on these circumstances, the problem of enforcing Administrative Court judgments concerns not only the existence of legal provisions governing the obligation to comply with court judgments but also the institutional effectiveness of ensuring the implementation of judgments that have acquired permanent legal force. Research (Pambudi et al., 2025; Latifani, 2015), in their study on the enforcement of Administrative Court judgments, argue that the low level of awareness among administrative officials, the existence of personal interests associated with the decisions they issue, and inadequate legal understanding are factors contributing to non-compliance with court judgments. Meanwhile, (Pattipawae, 2019; Pranoto, 2022) demonstrate that the legal politics underlying amendments to the regulations governing the enforcement of Administrative Court judgments are directed toward providing legal certainty and justice for members of the public seeking legal protection through administrative justice. These two studies indicate that the enforcement of Administrative Court judgments is closely related to the construction of legal norms, the responsibilities of government officials, and the need for institutional mechanisms capable of guaranteeing the implementation of judicial decisions. Nevertheless, further examination is required regarding the legal foundations governing the enforcement of Administrative Court judgments in light of developments in statutory regulations and Constitutional Court decisions, as well as the urgency of establishing an enforcement institution as an instrument for strengthening the coercive force of court judgments. Therefore, this study aims to analyze the legal basis for enforcing Administrative Court judgments that have acquired permanent legal force and to examine the urgency of establishing an enforcement institution to ensure effectiveness, legal certainty, and the protection of public rights in the implementation of Administrative Court judgments.

METHODS

This study employs normative legal research (juridical-normative research) using a library research approach, which focuses on examining legal norms, legal principles, doctrines, statutory regulations, and court decisions relating to the enforcement of Administrative Court (*Pengadilan Tata Usaha Negara* or PTUN) judgments. This study aims to analyze the legal basis underlying the enforcement of Administrative Court judgments that have acquired permanent legal force (*inkracht van gewijsde*) and to examine the urgency of establishing an enforcement institution to ensure the effectiveness of their implementation. The approaches employed in this study consist of the statutory approach, conceptual approach, and comparative approach, particularly by examining the regulations governing the implementation of administrative court judgments in Indonesia and Japan. The legal materials used consist of primary legal materials, including Law Number 5 of 1986 concerning the Administrative Court and its amendments, Law Number 9 of 2004, Law Number 51 of 2009, Law Number 30 of 2014 concerning Government Administration, as well as other relevant regulations and court decisions. Secondary legal materials are obtained from legal books, scientific journals, research findings, theses, dissertations, and literature relating to administrative law and the enforcement of Administrative Court judgments. Meanwhile, tertiary legal materials, including legal dictionaries and encyclopedias, are used as supporting references. The use of normative legal research is based on the premise that law should be examined as a system of norms encompassing legal principles, rules, statutory regulations, and legal doctrines (Fajar & Achmad, 2017; Marzuki, 2021).

The technique for collecting legal materials is conducted through library research by identifying, tracing, and collecting various primary, secondary, and tertiary legal materials relevant to the research problems. These legal materials are subsequently analyzed using a descriptive-qualitative method through the stages of description, interpretation, evaluation, and legal systematization to obtain a comprehensive understanding of the juridical basis for enforcing Administrative Court judgments. The descriptive technique is employed to explain the legal provisions governing the obligations of government agencies or officials to implement court judgments, while interpretation is conducted by examining the legal norms relating to enforcement mechanisms, coercive monetary penalties (*dwangsom*), and administrative sanctions. Furthermore, evaluation is undertaken to assess the conformity and effectiveness of the applicable legal framework, particularly in addressing non-compliance by government agencies or officials with Administrative Court judgments that have acquired

permanent legal force. Legal systematization is then carried out by connecting various statutory provisions, legal concepts, and comparative findings concerning the regulatory frameworks in Indonesia and Japan to formulate an appropriate legal construction regarding the possibility of establishing an enforcement institution. Through these analytical stages, this study is expected to produce systematic legal arguments concerning the adequacy of the legal basis for enforcing Administrative Court judgments while providing recommendations for strengthening institutional mechanisms to ensure legal certainty and the protection of public rights (Solikin, 2021).

RESULTS

The research findings regarding the legal basis for the enforcement of Administrative Court (*Pengadilan Tata Usaha Negara* or PTUN) judgments indicate that Indonesia has established a normative legal framework governing the obligation to implement court judgments that have acquired permanent legal force (*inkracht van gewijsde*). These regulations are primarily stipulated in Law Number 5 of 1986 concerning the Administrative Court, as amended by Law Number 9 of 2004 and Law Number 51 of 2009, particularly Articles 115 and 116. These provisions regulate the binding force of judgments, the obligation of government agencies or officials to implement court decisions, and the mechanisms for supervision and coercive measures against non-compliant parties. In addition, Law Number 48 of 2009 concerning Judicial Power and Law Number 30 of 2014 concerning Government Administration further reinforce the government's obligation to act in accordance with the law and respect court judgments. However, the research findings reveal that the existence of this legal framework has not been fully supported by effective enforcement mechanisms, primarily because there is no specialized institution with independent authority to compel government agencies or officials who fail to comply with court judgments to implement them. Accordingly, the main problem does not lie in the absence of a legal basis for judgment enforcement but rather in the suboptimal technical regulations, distribution of authority, and institutional arrangements responsible for enforcing Administrative Court judgments.

Legal Basis for the Enforcement of Administrative Court Judgments That Have Acquired Permanent Legal Force

The research findings indicate that the legal basis for enforcing Administrative Court judgments derives from several interrelated statutory provisions. From a constitutional

perspective, Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia affirms that Indonesia is a state governed by the rule of law. Consequently, all governmental actions must comply with the law, including the obligation to observe and implement court judgments. In the context of administrative justice, this obligation is reflected in Article 115 of Law Number 5 of 1986, which stipulates that only court judgments that have acquired permanent legal force may be enforced. This provision establishes that the enforcement of Administrative Court judgments must be based on the legal status of judgments that are final and binding. Furthermore, Article 116 of the Administrative Court Law, as amended by Law Number 9 of 2004 and Law Number 51 of 2009, regulates the procedures for implementing judgments, including the obligation of government agencies or officials to comply with the operative provisions of judgments, mechanisms for submitting enforcement applications, the imposition of coercive monetary penalties (*dwangsom*), administrative sanctions, and the reporting of non-compliance to the President and the House of Representatives (DPR). These provisions demonstrate that the legislature has, in fact, established several legal instruments to encourage government agencies or officials to comply with Administrative Court judgments.

More specifically, Article 116 of the Administrative Court Law contains several judgment enforcement mechanisms with distinct characteristics. First, an automatic enforcement mechanism applies to administrative decisions that are not implemented within the time limits prescribed by law. Second, an application may be submitted to the Chief Judge of the Court when a government agency or official fails to fulfill the obligations imposed by the judgment. Third, coercive measures may be imposed in the form of monetary penalties (*dwangsom*) and/or administrative sanctions to encourage the relevant officials to fulfill their obligations. Fourth, the mechanisms include publication through mass media and the submission of reports concerning non-compliance to the President and the House of Representatives as a form of oversight over governmental administration. These instruments demonstrate that the Indonesian legal system does not entirely leave the implementation of court judgments to the personal awareness of government officials but also provides mechanisms for supervision and legal pressure. Nevertheless, the implementation of these instruments continues to face challenges because comprehensive regulations have not yet been established concerning the procedures for imposing coercive monetary penalties, administering administrative sanctions, and taking concrete measures when officials continue to disregard court judgments.

In addition to the Administrative Court Law, the legal basis for enforcing judgments is also related to Law Number 48 of 2009 concerning Judicial Power. The principles governing the exercise of judicial power require court judgments to be respected and implemented by every party obligated under such judgments. Meanwhile, Law Number 30 of 2014 concerning Government Administration provides a legal foundation for governmental administration based on legal certainty, the protection of public rights, and the application of the General Principles of Good Governance (*Asas-Asas Umum Pemerintahan yang Baik* or AUPB). Accordingly, the enforcement of Administrative Court judgments is not merely a procedural obligation under administrative judicial procedural law but also a consequence of the principle of legality in governmental administration. From a technical perspective, the existence of Implementation Guideline Number 01/KM.TUN/HK2.7/Juklak/VII/2024 represents an effort to clarify the procedures for supervising and enforcing Administrative Court judgments. This implementation guideline provides internal directions for judicial personnel in carrying out enforcement mechanisms. However, its legal position cannot replace the need for stronger regulations through a Supreme Court Regulation (*Peraturan Mahkamah Agung* or PERMA), particularly when the establishment of new coercive powers over government agencies or officials is required.

Based on the inventory of statutory regulations, the legal basis for enforcing Administrative Court judgments can be presented in the following table.

Table 1. Legal Basis for the Enforcement of Administrative Court Judgments

No.	Legal Basis	Regulatory Substance
1.	Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia	Establishes Indonesia as a state governed by the rule of law, requiring governmental administration to be conducted in accordance with the law.
2.	Article 115 of Law Number 5 of 1986 concerning the Administrative Court	Stipulates that Administrative Court judgments may only be enforced once they have acquired permanent legal force.
3.	Article 116 of Law Number 5 of 1986 in conjunction with Law Number 9 of 2004 and Law Number 51 of 2009	Regulates judgment enforcement mechanisms, enforcement applications, coercive monetary penalties, administrative sanctions, publication, and reporting of non-compliance.
4.	Law Number 48 of 2009 concerning Judicial Power	Provides the legal foundation concerning judicial authority and the obligation to respect and implement court judgments.
5.	Law Number 30 of 2014 concerning Government Administration	Regulates the obligation to conduct governmental administration based on

		the principle of legality and the General Principles of Good Governance.
6.	Implementation Guideline Number 01/KM.TUN/HK2.7/Juklak/VII/2024	Provides internal technical guidelines concerning the supervision and enforcement of Administrative Court judgments.

Source: Compiled from statutory regulations and implementation guidelines relating to the enforcement of Administrative Court judgments.

Based on Table 1, it can be established that the legal basis for enforcing Administrative Court judgments is available across various levels of regulation, ranging from the Constitution and statutory laws to technical implementation guidelines. Articles 115 and 116 of the Administrative Court Law constitute the primary legal foundation because they directly regulate the requirements and mechanisms for enforcing judgments that have acquired permanent legal force. Meanwhile, the Judicial Power Law and the Government Administration Law reinforce the obligation to respect court judgments and uphold the principle of legal compliance in governmental administration. The existence of the 2024 Implementation Guideline also demonstrates the Supreme Court's efforts to clarify enforcement procedures within the administrative judiciary. Nevertheless, this implementation guideline remains limited because its position as an internal technical guideline does not allow it to create new coercive powers that have not been granted by statute. Therefore, stronger regulatory arrangements through a Supreme Court Regulation (PERMA) are necessary to standardize procedures and the division of responsibilities among judicial personnel, while the establishment of an enforcement institution with independent coercive authority must be provided for through statutory legislation.

The Urgency of Establishing an Enforcement Institution for the Implementation of Administrative Court Judgments That Have Acquired Permanent Legal Force

The research findings indicate that establishing an enforcement institution is an important necessity for improving the effectiveness of Administrative Court judgment enforcement. This is based on the fact that judgments that have acquired permanent legal force are not always followed by the fulfillment of obligations by the government agencies or officials acting as defendants. Under the current system, the implementation of judgments remains highly dependent on the compliance of government officials, while the Chief Judge of the Court primarily performs supervisory functions and issues orders requiring judgments to be implemented. This situation demonstrates a gap between the court's authority to

adjudicate administrative disputes and its institutional capacity to ensure that the operative provisions of its judgments are actually carried out. In fact, the success of judicial proceedings is determined not only by the quality of judges' legal reasoning but also by the ability of the judicial system to translate judgments into concrete actions. When judgments that have acquired *inkracht van gewijsde* are not implemented, the legal protection that members of the public are entitled to receive becomes ineffective, potentially undermining the authority and credibility of the judiciary.

These limitations are increasingly evident in the implementation of coercive monetary penalties (*dwangsom*) and administrative sanctions as stipulated in Article 116 of the Administrative Court Law. Normatively, coercive monetary penalties are intended to impose financial pressure on government officials to encourage them to fulfill their obligations as ordered in court judgments. However, the effectiveness of this instrument continues to face challenges concerning the mechanisms for determining, paying, and collecting such penalties when the officials concerned fail to voluntarily fulfill their obligations. Further problems arise when the implementation of coercive monetary penalties intersects with Article 50 of Law Number 1 of 2004 concerning State Treasury, which prohibits the seizure of state-owned or regional funds and assets. In addition, the implementation of administrative sanctions remains dependent on the authority of the superior officials of the individuals concerned, meaning that its effectiveness may be influenced by hierarchical relationships and the commitment to supervision within governmental institutions. In his study on the discourse surrounding state enforcement institutions in law enforcement in Indonesia, Yulius explains the importance of considering the institutional construction of enforcement mechanisms to ensure that judgment implementation is supported by clear and accountable authority. Accordingly, the coercive instruments provided under the Administrative Court Law need to be strengthened through institutional mechanisms capable of ensuring their consistent implementation.

To address these problems, the research findings indicate that the establishment of an enforcement institution should be pursued through two stages of institutional strengthening. First, the existing enforcement mechanisms should be strengthened through the enactment of a Supreme Court Regulation (PERMA) as an instrument governing technical procedures. Such a regulation is necessary to clarify enforcement application procedures, supervisory stages, the issuance of warnings to non-compliant officials, the determination of coercive monetary penalties, the imposition of administrative sanctions,

and mechanisms for reporting judgment implementation. The regulation should also clarify the division of authority among the Chief Judge of the Court, the Court Registrar, and the Bailiff to prevent overlapping responsibilities. Second, in the long term, the establishment of a specialized enforcement institution through statutory legislation needs to be examined if such an institution is to be granted independent and coercive enforcement authority over government agencies or officials. The establishment of this institution must take into account the position of judicial power, its institutional relationship with the Supreme Court, the limits of enforcement authority, and accountability mechanisms in carrying out its duties. Accordingly, establishing an enforcement institution is not merely a matter of creating an additional institution but rather an effort to develop an enforcement system supported by a clear legal basis, authority, procedures, and accountability mechanisms.

For comparative purposes, the administrative justice system in Thailand can be examined to understand how institutional support and coercive mechanisms for implementing judgments can be developed. This comparison demonstrates that the implementation of administrative court judgments cannot rely solely on the normative obligations of the losing party but requires effective supervisory mechanisms and coercive instruments. Both Indonesia and Thailand recognize instruments designed to encourage compliance with administrative court judgments, including mechanisms involving coercive monetary penalties under certain circumstances. However, differences exist in their institutional designs, procedural regulations, and the supporting authority available to ensure judgment implementation. Therefore, this comparison is not intended to directly adopt the Thai system but rather to provide a basis for evaluating an appropriate model for strengthening enforcement mechanisms within the Indonesian legal system. Institutional strengthening in Indonesia must continue to uphold the principle of judicial independence while ensuring that government agencies or officials cannot disregard court judgments that have acquired permanent legal force.

To clarify the need for establishing an enforcement institution, the research findings concerning the current conditions of Administrative Court judgment enforcement and the required forms of institutional strengthening are presented in the following table.

Table 2. Analysis of Problems and the Need to Strengthen Administrative Court Judgment Enforcement

No.	Aspect Examined	Current Conditions	Required Strengthening
1.	Legal basis	Articles 115 and 116 of the Administrative Court Law regulate judgment enforcement and coercive measures.	Harmonization and strengthening of regulations governing judgment enforcement.
2.	Enforcement mechanisms	Implementation procedures are not yet fully operational or standardized.	Establishment of a Supreme Court Regulation (PERMA) governing detailed enforcement procedures.
3.	Authority of the Chief Judge	Responsible for supervision and issuing orders for judgment implementation.	Strengthening judicial control and supervisory functions.
4.	Authority of the Court Registrar	Supports the administration and recording of enforcement proceedings.	Strengthening administrative, documentation, and enforcement reporting functions.
5.	Authority of the Bailiff	Technical duties are not yet supported by specific independent enforcement authority.	Clarification of technical enforcement functions in accordance with legal authority.
6.	Coercive monetary penalties and administrative sanctions	Their implementation continues to face operational and institutional obstacles.	Regulation of procedures for determination, payment, collection, and the imposition of sanctions.
7.	Enforcement institution	No specialized institution currently possesses independent enforcement authority for Administrative Court judgments.	Establishment of an enforcement institution through statutory legislation if specific coercive authority is to be granted.

Source: Research analysis based on the Administrative Court Law, the Judicial Power Law, the Government Administration Law, and Implementation Guideline Number 01/KM.TUN/HK2.7/Juklak/VII/2024.

Based on Table 2, it can be observed that the weaknesses in enforcing Administrative Court judgments are not limited to regulatory aspects but also involve the distribution of authority and institutional support. The Chief Judge, Court Registrar, and Bailiff essentially have functions that can be developed to strengthen judgment enforcement without immediately establishing a new institution. The Chief Judge needs to be strengthened as the judicial authority responsible for ensuring that all stages of judgment implementation proceed in accordance with applicable legal provisions. The Court Registrar should serve as the enforcement administrator, responsible for managing enforcement applications, documentation, recording developments, and reporting the implementation of judgments. Meanwhile, the Bailiff needs to have a clearly defined role as the technical executor of enforcement procedures within the limits of authority granted by statutory regulations. These functional divisions can be clarified through a Supreme Court Regulation (PERMA), thereby making enforcement procedures more structured, measurable, and accountable.

Furthermore, the research findings indicate that establishing a specialized enforcement institution has strategic importance, particularly if strengthening the internal mechanisms of the judiciary proves insufficient to overcome non-compliance by government agencies or officials. Such an institution could be designed as an entity responsible for carrying out enforcement functions based on court orders or determinations, rather than as an institution authorized to reassess the substance of court judgments. Accordingly, the authority of the enforcement institution must be limited to implementing the operative provisions of judgments that have acquired permanent legal force, including ensuring that government agencies or officials fulfill the administrative obligations ordered by the court. Its establishment must also be accompanied by regulations governing its organizational structure, coordination with the Supreme Court, supervisory mechanisms, accountability, and the limits of permissible coercive actions. Since coercive authority over government agencies or officials directly affects governmental administration and the exercise of state power, its legal foundation must be established through statutory legislation.

Reconstruction of the Enforcement Mechanism for Administrative Court Judgments

Based on the overall research findings, the reconstruction of the enforcement mechanism for Administrative Court judgments should be directed toward the gradual strengthening of both regulatory and institutional frameworks. Such strengthening is essential to ensure that judgment enforcement does not depend solely on the legal awareness of government agencies or officials but is also supported by supervisory systems and enforcement measures that can be implemented effectively. In the short term, the Supreme Court needs to develop Implementation Guideline Number 01/KM.TUN/HK2.7/Juklak/VII/2024 into a Supreme Court Regulation (PERMA) containing more comprehensive provisions concerning enforcement application procedures, warning stages, supervision, the imposition of coercive monetary penalties, and administrative sanctions. The regulation should also establish a clear division of responsibilities among the Chief Judge, Court Registrar, and Bailiff so that each stage of judgment implementation has clearly designated personnel responsible for its execution. In the long term, the legislature should consider establishing a specialized enforcement institution with the authority to implement Administrative Court judgments based on court orders. The establishment of such an institution must take into account the principles of

judicial independence, legal certainty, proportionality of authority, and the protection of public rights and state interests. This reconstruction can be illustrated through the following institutional division of responsibilities.

Table 3. Recommendations for the Institutional Reconstruction of Administrative Court Judgment Enforcement

Institutional Component	Functions to Be Strengthened	Objectives
Chief Judge of the Court	Judicial control, supervision, and issuance of orders for judgment implementation.	To ensure that enforcement is carried out in accordance with the operative provisions of judgments and applicable legal requirements.
Court Registrar	Enforcement administration, recording, documentation, and reporting.	To establish orderly administration and transparency throughout the enforcement process.
Bailiff	Technical implementation of enforcement procedures in accordance with legally granted authority.	To support the structured implementation of court orders.
Specialized Enforcement Institution	Implementation of specific enforcement powers based on court orders.	To ensure compliance by government agencies or officials with judgments that have acquired permanent legal force.

Source: Research analysis and reconstruction.

Table 3 illustrates that strengthening the enforcement of Administrative Court judgments can be pursued through two policy directions: optimizing the functions of existing judicial personnel and establishing a specialized enforcement institution. In the initial stage, strengthening the roles of the Chief Judge, Court Registrar, and Bailiff represents a more realistic approach because it can be achieved through improvements to technical regulations without immediately changing the institutional structure of the judiciary. However, if non-compliance with court judgments persists and the available instruments fail to provide sufficient coercive force, establishing a specialized enforcement institution becomes an institutional alternative that warrants consideration. Such an institution must possess clear, limited, and accountable authority so that it does not assume the judges' functions of examining and adjudicating disputes. Accordingly, this institutional reconstruction is expected to bridge the gap between court judgments that have acquired permanent legal force and the actual fulfillment of obligations by government agencies or officials.

Overall, the research findings establish that the legal basis for enforcing Administrative Court judgments already exists, particularly through Articles 115 and 116 of the Administrative Court Law and their subsequent amendments, as reinforced by the Judicial Power Law and the Government Administration Law. Nevertheless, the existence

of this legal framework does not fully guarantee effective enforcement because weaknesses remain in technical regulations, the implementation of coercive measures, the distribution of authority, and institutional support. Establishing an enforcement institution is important as a long-term measure to ensure that Administrative Court judgments that have acquired *inkracht van gewijsde* are genuinely implemented, particularly when government agencies or officials fail to fulfill their legal obligations. Before such an institution is established, strengthening the Supreme Court Regulation (PERMA) and optimizing the functions of the Chief Judge, Court Registrar, and Bailiff constitute initial measures that can be undertaken to improve enforcement mechanisms. Accordingly, the effectiveness of Administrative Court judgment enforcement requires an integrated framework comprising legal certainty, clear procedures, strengthened judicial authority, and an enforcement institution supported by a strong legal foundation.

DISCUSSION

The enforcement of Administrative Court (*Pengadilan Tata Usaha Negara* or PTUN) judgments constitutes an important component of efforts to realize legal certainty, justice, and the protection of public rights in governmental administration. Court judgments that have acquired permanent legal force (*inkracht van gewijsde*) should not merely possess formal binding force but must also be translated into concrete actions by the government agencies or officials obligated to implement them. In this context, the legal basis for enforcing Administrative Court judgments is primarily stipulated in Articles 115 and 116 of Law Number 5 of 1986 concerning the Administrative Court, as amended by Law Number 9 of 2004 and Law Number 51 of 2009. Article 115 establishes that Administrative Court judgments may only be enforced once they have acquired permanent legal force, while Article 116 regulates the mechanisms for implementing judgments and the instruments designed to encourage compliance by government agencies or officials. These provisions demonstrate that the legislature has established a normative legal foundation for judgment enforcement. However, the existence of legal norms does not automatically guarantee their effective implementation. The fundamental problem lies in the gap between the legal obligations already established and the capacity of the judicial system to compel the implementation of judgments when the losing party demonstrates non-compliance (Pratama, 2023; Antasiyah & Kartika, 2023). Accordingly, the enforcement of Administrative Court judgments should

be understood as a problem of administrative law enforcement effectiveness rather than merely a procedural matter arising after a judgment has been delivered.

These weaknesses can be analyzed through three aspects: legal substance, legal structure, and legal culture. From the perspective of legal substance, Article 116 of the Administrative Court Law recognizes mechanisms involving coercive monetary penalties (*dwangsom*), administrative sanctions, publication through mass media, and the reporting of non-compliance to the President and the House of Representatives (DPR). Nevertheless, these provisions have not fully clarified the procedures for their implementation, the amount of coercive monetary penalties, the collection mechanisms, and the legal consequences when government officials continue to disregard court judgments. From the perspective of legal structure, there is no specialized institution with independent enforcement authority to ensure the implementation of court judgments against government agencies or officials who refuse to comply. Meanwhile, from the perspective of legal culture, the implementation of judgments remains influenced by the awareness and willingness of government officials to submit to court decisions. This problem is consistent with the research conducted by (Yulius, 2018), who explains that obstacles to enforcing Administrative Court judgments originate from the lack of clarity in the legal norms governing judgment implementation and the non-compliance of government agencies or officials. Yulius also demonstrates that an enforcement structure relying solely on bailiffs and the supervisory authority of the Chief Judge has not been sufficiently effective in guaranteeing the implementation of judgments. These findings indicate that strengthening enforcement mechanisms cannot be achieved merely by introducing additional normative provisions but must also be accompanied by institutional restructuring to establish a responsible framework for implementing court judgments.

The limitations in applying coercive measures are also evident in the research conducted by (Dewa Krisna Prasada et al., 2017), which examines Article 116 of Law Number 51 of 2009 concerning the Administrative Court. Their study found that the implementation of coercive monetary penalties and administrative sanctions faces obstacles because adequate regulations have not yet been established concerning the amount of coercive monetary penalties and the types of administrative sanctions that may be imposed on officials who fail to implement court judgments. Furthermore, additional obstacles may arise from the formulation of the operative provisions of judgments, the position of regional heads as political officials, and issues concerning the authority of government officials acting

as defendants. These findings reinforce the results of the present study, demonstrating that the existence of Article 116 of the Administrative Court Law has not fully provided legal certainty regarding the implementation of coercive instruments. In other words, regulations concerning coercive measures should not merely specify the possibility of imposing monetary penalties and administrative sanctions but must also establish procedures clarifying who has the authority to impose them, how they are to be implemented, and what consequences arise when officials continue to fail to comply. In this context, developing Implementation Guideline Number 01/KM.TUN/HK2.7/Juklak/VII/2024 into a Supreme Court Regulation (*Peraturan Mahkamah Agung* or PERMA) represents a relevant measure for clarifying supervisory and enforcement procedures. A PERMA may regulate the stages of enforcement applications, the issuance of warnings, the recording of non-compliance, reporting procedures, and the division of responsibilities among judicial personnel. However, a PERMA cannot be used to create new coercive powers that should instead be established through statutory legislation. Accordingly, regulatory strengthening must be carried out in stages to ensure consistency between the technical needs of the judiciary and the limits of authority in the formation of statutory regulations (Prasada et al., 2017).

Furthermore, from the perspective of the legal force of judgments, enforcement constitutes an inseparable consequence of the Administrative Court's authority to provide legal protection to members of the public. Judgments that have acquired permanent legal force essentially possess binding force, evidentiary force, and enforceability in accordance with their characteristics and operative provisions. Research (Soleh, 2018) explains that one of the fundamental problems in enforcing Administrative Court judgments is the absence of an enforcement institution capable of exercising effective coercive authority. Consequently, the implementation of judgments remains dependent on the good faith of government agencies or officials acting as defendants. This perspective is relevant to the findings of the present study because it demonstrates that normative enforceability does not necessarily result in actual implementation when adequate institutional instruments are unavailable. In this regard, a distinction must be made between the legal force of a judgment and the effectiveness of its implementation. Permanent legal force indicates that a judgment is final and must be respected, whereas enforcement effectiveness refers to the extent to which the obligations stipulated in the operative provisions of a judgment are actually fulfilled by the responsible parties. Therefore, the existence of supervisory mechanisms and institutions

responsible for implementing judgments constitutes an important necessity for bridging these two aspects.

This issue is also related to the importance of maintaining the authority of judicial institutions and respecting the public's right to justice. Through his research on the urgency of criminalizing *contempt of court* in the implementation of Administrative Court judgments, (Suhariyanto, 2019; Putri et al., 2024) explains that the mechanisms involving coercive monetary penalties and administrative sanctions provided under the Administrative Court Law have not been fully effective because some government officials continue to disregard court judgments. Such non-compliance not only obstructs the implementation of judgments but may also result in the neglect of the constitutional rights of members of the public who have previously obtained legal protection through judicial proceedings. The study offers a perspective on strengthening compliance through the proposal to criminalize acts of defiance against the judiciary. Nevertheless, this proposal must be distinguished from the establishment of an enforcement institution because the two approaches have different characteristics and legal consequences. Criminalization concerns criminal liability for certain acts, whereas an enforcement institution is oriented toward implementing specific obligations established in the operative provisions of court judgments. In the present study, the establishment of an enforcement institution is primarily intended as an institutional instrument to ensure that Administrative Court judgments that have acquired *inkracht van gewijsde* are effectively implemented, without disregarding the possibility of imposing other sanctions in accordance with applicable law. Accordingly, strengthening the coercive force of judgments must continue to observe the principles of proportionality, legal certainty, human rights protection, and the respective limits of authority of each state institution.

The urgency of establishing an enforcement institution has been specifically discussed by (Ramadhan & Sastrawati, 2022) in their study entitled *Urgensi Pembentukan Lembaga Eksekutor dalam Eksekusi Putusan Pengadilan Tata Usaha Negara* (The Urgency of Establishing an Enforcement Institution for the Enforcement of Administrative Court Judgments). Their research demonstrates that the absence of an enforcement institution specifically responsible for implementing court judgments is one of the factors contributing to the continued non-implementation of Administrative Court judgments by government agencies or officials. Furthermore, the existing mechanism, which relies on the President's authority to order the implementation of judgments, has not fully produced effective results. Therefore, the two researchers emphasize the need to establish an enforcement institution

responsible for ensuring and supervising the implementation of court judgments by government authorities. These findings are directly relevant to the second research question of the present study, namely the importance of establishing an enforcement institution for implementing Administrative Court judgments that have acquired *inkracht van gewijsde*. However, the establishment of such an institution must not merely be based on the desire to create an additional state institution but must be grounded in genuine legal needs, clearly defined authority, and accountability mechanisms. The enforcement institution must have a clearly established position within the constitutional system, particularly concerning its institutional relationship with the Supreme Court and the government agencies or officials obligated to implement court judgments. Accordingly, the establishment of an enforcement institution should be directed toward filling the institutional gap in judgment implementation rather than taking over the authority of judges to examine and adjudicate administrative disputes.

Nevertheless, establishing an enforcement institution does not automatically constitute the only solution for improving the implementation of Administrative Court judgments. Existing mechanisms must also be strengthened to ensure that the establishment of a new institution does not create overlapping authority or institutional inefficiency. In this regard, the division of functions among the Chief Judge, Court Registrar, and Bailiff needs to be clarified through more comprehensive technical regulations. The Chief Judge may be strengthened as the judicial controller responsible for supervising the stages of judgment implementation, issuing orders within the scope of their authority, and ensuring that officials subject to the obligations receive proper notifications and warnings. The Court Registrar serves as the enforcement administrator, managing applications, recording developments in judgment implementation, documenting non-compliance, and preparing reports for the Chief Judge. Meanwhile, the Bailiff may be strengthened in performing technical functions, including delivering notifications, warnings, and enforcement documents in accordance with the authority granted by statutory regulations. This division of functions is important to ensure that each stage of enforcement has clearly designated and accountable personnel. The research conducted by (Ramadhan & Sastrawati, 2022) on the establishment of an enforcement institution, together with (Yulius, 2018; Siallagan et al., 2019) study, similarly demonstrates the importance of institutional support in ensuring the effective enforcement of Administrative Court judgments. Therefore, strengthening the functions of judicial

personnel through a Supreme Court Regulation (PERMA) may serve as an initial measure before establishing a specialized enforcement institution through statutory legislation.

From a comparative legal perspective, the administrative justice system in Thailand can serve as a basis for evaluating how the relationship between the obligations of government agencies or officials and the mechanisms for implementing court judgments is structured. Such a comparison should focus on comparable elements, including the legal basis for enforcement, judicial authority, forms of coercive measures, the role of enforcement institutions, and supervisory mechanisms concerning non-compliant officials. The findings of the present study indicate that both Indonesia and Thailand recognize instruments designed to encourage compliance with administrative court judgments, including the use of coercive monetary penalties under certain circumstances. However, differences in institutional design demonstrate that the effectiveness of judgment implementation is determined not only by the existence of sanctions but also by the clarity of the institutions responsible for carrying out and supervising the implementation of judgments. In the Indonesian context, lessons from Thailand cannot be directly adopted because the two countries have different governmental structures, judicial systems, and legal traditions. Therefore, such a comparison is more appropriately used to identify institutional elements that may be adapted while taking into account the principles of the rule of law and the judicial power system in Indonesia. Accordingly, the establishment of an enforcement institution in Indonesia should be formulated based on national needs while considering the experiences of other countries as a reference for legal development.

Based on the overall discussion, the legal basis for enforcing Administrative Court judgments has essentially been established through Articles 115 and 116 of the Administrative Court Law and their subsequent amendments, supported by the principles embodied in the Judicial Power Law and the Government Administration Law. However, the remaining problems lie in the suboptimal enforcement mechanisms, the lack of clarity in the division of technical authority, and the absence of a specialized institution with independent enforcement authority to ensure compliance by government agencies or officials. Therefore, enforcement mechanisms need to be strengthened by developing the 2024 Implementation Guideline into a Supreme Court Regulation (PERMA) that comprehensively regulates supervision, enforcement procedures, administration, and the division of functions among the Chief Judge, Court Registrar, and Bailiff. Subsequently, if these improvements prove insufficient and independent coercive authority is required, the

establishment of a specialized enforcement institution must be provided for through statutory legislation. Such an institution must possess authority limited to implementing the operative provisions of judgments that have acquired permanent legal force, operate within a clearly defined supervisory system, and refrain from assuming the judicial functions of judges. Accordingly, establishing an enforcement institution constitutes a strategic necessity for strengthening the effectiveness of Administrative Court judgment enforcement, while regulatory improvements and the optimization of judicial personnel serve as initial measures to ensure that court judgments genuinely provide legal certainty, justice, and protection for members of the public.

CONCLUSION

Based on the research findings and discussion, it can be concluded that the legal basis for the enforcement of Administrative Court (Pengadilan Tata Usaha Negara or PTUN) judgments that have acquired permanent legal force (*inkracht van gewijsde*) has essentially been established in statutory regulations, particularly Law Number 5 of 1986 concerning Administrative Courts, as amended by Law Number 9 of 2004 and Law Number 51 of 2009, especially Articles 115 and 116. These provisions affirm that Administrative Court judgments that have acquired permanent legal force must be enforced and provide enforcement mechanisms through voluntary compliance, the imposition of coercive monetary penalties (*dwangsom*), administrative sanctions, publication through mass media, and the reporting of non-compliance to the President and representative institutions. Nevertheless, the existence of this legal framework does not fully guarantee the effectiveness of judgment enforcement, as weaknesses remain in the aspects of legal substance, enforcement procedures, the division of authority, and enforcement institutions. The absence of a dedicated enforcement institution with clearly defined operational authority and coercive powers means that the enforcement of judgments remains heavily dependent on the compliance of government officials or agencies that are parties to the dispute. Therefore, the establishment of an enforcement institution is essential to strengthen legal certainty, ensure compliance with court judgments, and prevent government officials from neglecting their legal obligations. In the short term, the enforcement mechanism can be strengthened through the issuance of a Supreme Court Regulation (Peraturan Mahkamah Agung or PERMA) that provides more detailed provisions concerning the stages of judgment enforcement and the division of responsibilities among the Chief Judge of the Court, the Court Registrar, and the Bailiff.

Meanwhile, the establishment of an enforcement institution with independent coercive authority should be based on a statute to ensure that it possesses strong legitimacy, authority, and accountability mechanisms.

This research contributes to the development of administrative law scholarship, particularly concerning the enforcement of Administrative Court judgments that have acquired permanent legal force. Theoretically, this research clarifies the relationship between the legal basis for judgment enforcement, the obligation of government officials to comply with court judgments, and the need to strengthen institutional arrangements within the administrative justice system. Practically, this research proposes directions for strengthening enforcement mechanisms through more comprehensive technical regulations in the form of a Supreme Court Regulation (PERMA), particularly with regard to the stages of judgment enforcement and the division of authority among the Chief Judge of the Court, the Court Registrar, and the Bailiff. Furthermore, this research provides legal arguments regarding the importance of establishing a dedicated enforcement institution with authority conferred by statute. Accordingly, the findings of this research are expected to serve as a consideration for legislators, the Supreme Court, and other stakeholders in developing a more effective and measurable system for enforcing Administrative Court judgments that provides legal certainty for members of the public seeking justice.

Future research is recommended to examine the enforcement of Administrative Court judgments more comprehensively through empirical studies conducted at several Administrative Courts in Indonesia. Such studies would provide an overview of actual judgment enforcement practices, the level of compliance among government officials, and the obstacles encountered by court personnel during the enforcement process. Further research should also comparatively analyze the judgment enforcement systems of administrative courts in Indonesia and Thailand, using relevant statutory regulations and institutional practices as the basis for comparison. In addition, studies on the institutional design of an enforcement body should be further developed by taking into account its institutional position, sources of authority, coordination mechanisms with the courts and government, supervisory mechanisms, and forms of legal accountability. Subsequent research may also examine the possibility of establishing more measurable regulations governing coercive monetary penalties (*dwangsom*) and administrative sanctions so that these instruments can be effectively imposed on government officials who fail to comply with court judgments.

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