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TRANSFORMATION OF ELECTRONIC LAND RIGHTS TRANSFER: A CRITICAL EVALUATION OF THE NORMATIVE GAP IN PPAT DEEDS AND CYBER LAW HARMONIZATION IN THE PERINTIS POLICY OF THE MINISTRY OF ATR/BPN

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Abstract

Ministerial Regulation of ATR/BPN No. 3 of 2023 mandates electronic reporting of PPAT deeds, yet authentic deeds remain physical. This duality creates a broken chain of trust from a Cyber Law perspective. The urgency intensified after the launch of the PERINTIS 10-Day Policy on 17 August 2026. This article analyzes the normative gap and evaluates the policy response through the 2026 PHPT Service Re-engineering document. Using normative-evaluative legal research, the study finds that the main bottleneck of PERINTIS is stemmed from the hybrid system and manual verification. The policy's introduction of Electronic Deed Summary, AI automation, positive fiction, FIFO, geotagging, and host-to-host integration represents Cyber Law harmonization. As of October 2026, the service has expanded to 131 Land Offices. The main recommendation is the acceleration of Qualified Electronic Signature (QES) and born-digital deeds

Keywords: Cyber Law, Electronic PPAT Deed, Electronic Land Rights Transfer, Broken Chain of Trust, PERINTIS Policy.

INTRODUCTION

Digital transformation in the Indonesian land system is a strategic response to the demands for efficiency, transparency, and legal certainty in the era of the Industrial Revolution 4.0 and Society 5.0. Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 3 of 2023 concerning the Issuance of Electronic Documents in Land Registration Activities is an important milestone in the modernization of land services that requires all land registration processes, including the transfer of rights, to be carried out electronically through an integrated digital system. This Regulation of the Minister of ATR/Head of the National Land Agency Number 3 of 2023 is an important milestone by requiring the electronic reporting of PPAT Deeds no later than 7 (seven) working days after signing.[1]

However, this regulation creates a paradox. On the one hand, it requires digital reporting; on the other hand, PPAT deeds are still physically prepared with a wet signature, as stipulated in Article 1868 of the Civil Code and the PPAT Position Regulations. [2]This dualism creates a broken chain of trust: the document's integrity cannot be technically verified from the outset. The implementation of Regulation of the Minister of ATR/Head of BPN Number 3 of 2023 creates a quite serious normative paradox. On the one hand, the regulation requires electronic data reporting no later than 7 (seven) working days after the deed is signed; on the other hand, the basic instrument, the PPAT deed, is still issued in physical format with a wet signature.

[1]Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 3 of 2023 concerning the Issuance of Electronic Documents in Land Registration Activities, Article 25 paragraph (3)
[2]Article 1868 of the Civil Code; Government Regulation Number 37 of 1998 in conjunction with Government Regulation Number 24 of 2016

According to Makarim (2021), digital transformation in public services is not simply a change in document format, but rather a fundamental paradigm shift that demands a redefinition of the concepts of authenticity, proof, and trust within the legal ecosystem. Furthermore, Rosadi (2022) emphasized that technology integration in the agrarian legal system must be balanced with a strengthened regulatory framework that guarantees legal certainty and protects the digital rights of all parties. Yusuf (2024) added that this transformation is not simply a change in document format, but rather a paradigm shift toward e-government that demands real-time data integration.

Legal certainty is a fundamental principle in the Indonesian land system which adheres to a system of negative publication with a positive tendency as regulated in Article 19 paragraph (2) of Government Regulation Number 24 of 1997 concerning Land Registration. In the context of the transfer of land rights, the PPAT deed has perfect evidentiary power (volledig bewijskracht) as regulated in Article 1870 of the Civil Code, and plays a central role as a " **legal bridge** " between the private transactions of the parties and the state's public administration. The paradox reached a tipping point on August 17, 2026, when the Ministry of ATR/BPN launched the 10-Day Integrated Rights Transfer (PERINIS) Policy through Decree of the Minister of ATR/Head of BPN Number 1803/SK/HR.01/VIII/2026. [3]This service was piloted at 17 Land Offices with a target Service Level Agreement (SLA) of a maximum of 10 working days.

The Director General of Land Rights Determination and Registration, Asnaedi , explicitly acknowledged that this innovation is " **quite radical** " and requires daily evaluation to find the right formulation. This acknowledgement indicates that the current hybrid system faces considerable empirical testing. On the other hand, findings in the field indicate that Land Deed Officials (PPAT) are often delayed in reporting deeds due to waiting for tax validation (BPHTB / PPh), uploaded documents often do not match the physical documents, and there is no Service Level Agreement (SLA) for document verification so that the Land Office does not have a measurable completion time target. This condition emphasizes that the normative gap between physical deeds and digital systems is no longer just a theoretical issue, but has become an operational bottleneck that hinders the realization of world-class land services. Therefore, in this PERINIS, it is necessary to apply the principle of Positive Fiction (Fictitious Positive).

Responding to this vulnerability, the Ministry of ATR/BPN in 2026 designed a Re-engineering document for Land Title Transfer Services and First-Time Land Registration which substantially adopts Cyber Law principles , including the implementation of Electronic PPAT Deed Minutes (1 sheet), Artificial Intelligence (AI) based verification automation, standardization through E-Form and E-Stamp , the implementation of positive fictitious and First In-First Out (FIFO), the addition of geotagging requirements, and the integration of NIB-NOP between Land Plot Identification Number and Tax Object Number data with Regional Governments (Regencies/Cities). This PERINIS policy is a concrete manifestation of efforts to harmonize agrarian law and comprehensive Cyber Law . This article aims to, among other things: (1) analyze the normative gap between physical deeds and digital systems; (2) evaluate the PERINIS 10 Day bottleneck; and (3) examine the harmonization of Cyber Law principles in this policy. Fundamentally, this research is more complex and requires a critical analysis of the policy transition from a hybrid system to a fully integrated system, as described below:

1. Global and National Context of Land Digital Transformation

In Indonesia, digital land transformation is an integral part of the bureaucratic reform agenda and the acceleration of public services mandated by Article 3 of Presidential Regulation Number 95 of 2018 concerning the Electronic-Based Government System (SPBE). The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN), as the institution responsible for national land management, has responded to this demand through a series of progressive policies, starting with the digitalization of documents, electronic information, Electronic Mortgage Rights, the issuance of electronic certificates, and the integration of electronic title transfer services.

2. Land Regulatory Framework and the Central Role of PPAT

The Indonesian land system adheres to a negative publication system with a positive tendency as stipulated in Article 32 of Government Regulation Number 24 of 1997 concerning Land Registration. This is in line with Article 19 paragraph (2) of Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA), which guarantees that data in land books and certificates have strong legal force as long as there is no evidence to the

[3]Decree of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 1803/SK/HR.01/VIII/2026 concerning Integrated Rights Transfer (PERINIS) 10 (Ten) Days

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contrary. In the context of the transfer of land rights, this legal certainty is highly dependent on the instrument of transfer of rights, namely **an authentic deed** made by a Land Deed Making Officer (PPAT). According to Salim (2020), the PPAT Deed plays a central role as a " **legal bridge** " between the private transactions of the parties and the state's public administration, where its authenticity is an absolute requirement for land rights registration. The PPAT Deed has perfect evidentiary power (volledig bewijskracht) as regulated in Article 1870 of the Civil Code, which states that " an authentic deed provides between the parties and their heirs or persons who receive rights from them, perfect evidence of what is done or stated therein ." Article 1868 of the Civil Code defines an authentic deed as " a deed in a form determined by law, made by or before authorized public officials at the place where the deed is made ." In the context of PPAT, this authority is further regulated in Government Regulation Number 37 of 1998 concerning the Regulations on the Position of Land Deed Making Officials in conjunction with Government Regulation Number 24 of 2016.

3. Digital Disruption of Electronic Document Issuance in Land Registration Activities and Normative Paradoxes

Article 25 paragraph (3) of the Regulation of the Minister of ATR/Head of BPN Number 3 of 2023 explicitly requires PPAT to submit deeds and required documents through an electronic system no later than 7 (seven) working days after signing. This obligation demonstrates the urgency of synchronizing civil legal acts and state administrative records. However, the implementation of this regulation creates a serious normative paradox. On the one hand, the regulation requires electronic data reporting; on the other hand, the basic instrument in the form of a PPAT Deed is still issued in physical format with a wet signature.

Nurfransiska (2025) in the Scientific Journal of Law and Justice 14, highlighted that " this dualism creates a double burden for PPAT and has the potential to weaken data integrity due to the manual conversion process (scanning) ." The process of scanning physical documents into passive digital files eliminates the built-in cryptographic verification mechanism, which in the Cyber Law perspective is known as **a broken chain of trust** where the integrity of the document cannot be technically verified from the beginning of its creation, making it vulnerable to manipulation, input errors, or even cyber attacks.

4. Vulnerabilities from a Cyber Law Perspective

From a cybersecurity perspective, the absence of a Qualified Electronic Signature (QES) at the deed creation stage creates vulnerability to data manipulation. Effendi (2022) asserts that " in a digital ecosystem, the validity of a document is no longer determined by the existence of paper, but rather by the integrity of the data and the technically verified identity of the signatory ." (Jhonny Effendi, Information Technology Law (Cyber Law) , 2022, p. 156). Without hashing or blockchain technology that guarantees data immutability from the beginning of creation, scanned files are vulnerable to data tampering or other cyberattacks.

Brown and Marsden (2019) from a cybersecurity perspective state that the greatest vulnerability in hybrid systems lies in the " conversion gap ," the vulnerable point where physical data is converted to digital without a cryptographic verification mechanism (Ian Brown and Christopher Marsden, 2019, p. 134). This gap creates what they call " epistemic uncertainty " in legal evidence, where the authenticity of a document cannot be technically verified from the beginning of its creation. Furthermore, this transformation touches on the fundamental issue of personal data protection. With the rise of data leaks across various sectors, the implementation of Law Number 27 of 2022 concerning Personal Data Protection (PDP Law) has become crucial. Andika (2026) argues that " managing sensitive data such as landowner identity and transaction value requires state-of-the-art security standards that are not yet fully met in the current manual upload mechanism ." (F. Andika, 2026, p. 118). Without a balance between the technical aspects of cybersecurity and civil law norms, the absolute evidentiary power of authentic deeds as guaranteed by Article 1870 of the Civil Code could collapse in the face of digital disputes.

5. Critical Points of the 10-Day Pioneer Policy and Its Implementation

In mid-2026, the Ministry of ATR/BPN launched the 10-Day PERINIS Policy, a "Integrated Rights Transfer" service with a maximum Service Level Agreement (SLA) target of 10 (ten) days. This was achieved through Decree of the Minister of ATR/Head of BPN Number 1803/SK/HR.01/VIII/2026 concerning the 10 (Ten) Day Integrated Rights Transfer (PERINIS). The Director General of Land Rights Determination and Registration (PHPT), **Asnaedi** , explicitly acknowledged that " this innovation is quite radical, which is why we are piloting it first in 17 Kantahs. The purpose of the pilot is to find the most appropriate formulation, so we are continuously evaluating it daily to identify any shortcomings and obstacles ." This acknowledgement indicates that the current hybrid system faces a significant empirical test.

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The Re-engineering of Land Title Transfer Services and First-Time Land Registration document published by the Directorate General of Land Title Determination and Registration (2026) clearly reveals the root of the problems faced previously, including: **First,** the electronic transfer currently implemented is still a hybrid or a combination of manual and only the deed reporting uses the electronic method. **Second** , there is no Service Level Agreement (SLA) for document verification so that the Land Office does not have a target completion time. **Third** , PPAT does not report deeds within a 7-day period because BPHTB/PPh has not been validated. **Fourth** , many uploaded documents do not match the physical documents, and application documents are not standard and are still in conventional form which is digitized through a scanning process.

6. Re-engineering Policy Response and the Four Pillars of Improvement

Responding to the vulnerability of the hybrid system, the Ministry of ATR/BPN in 2026 designed the Re-engineering of Electronic Land Title Transfer Services which substantially adopted Cyber Law principles through four pillars of improvement, namely: **The first pillar** , Business Process Re-engineering, which includes the addition of geotagging requirements to the certificate checking process by PPAT through the Sentuh Tanahku application with a maximum distance of 10 meters on the land plot object, the Sentuh Tanahku application is available on the Google Play Store and App Store, with the condition that after being installed on the gadget the user account must be registered and verified by the Ministry of ATR/BPN system (atrbpn.go.id). Application of the First In-First Out (FIFO) and positive fictitious principles , as well as plans to implement Electronic PPAT Deeds in the form of 1 (one) sheet of Deed Minutes. **The second pillar** , Digital-Based Automation and Standardization, which includes the development of AI-based document verification automation tools and standardization of document completeness through the implementation of E-Form and E-Stamp which are integrated host-to-host with Peruri. **The third pillar** , Data-Based Monitoring, which includes the development of a PPAT and Land Office performance monitoring dashboard that can be accessed in real-time by the public through the Sentuh Tanahku application. **The fourth pillar** , Policy Collaboration, which includes an MoU/PKS for NIB-NOP integration with the Regional Government to accelerate BPHTB validation and the implementation of positive fictitious with a Service Level Agreement (SLA) of a maximum of 3 working days for validation and verification of BPHTB/PPh, then for PPAT within 2 days for the issuance/creation of PPAT Deeds (Attachment: Decree of the Minister of ATR/Head of BPN Number 1803/SK/HR.01/VIII/2026).

7. Urgency and Novelty of Research

The 10-Day Integrated Rights Transfer Policy (PERINIS) is a concrete manifestation of efforts to comprehensively harmonize agrarian law and cyber law . Werbach (2018) in his study on blockchain and the law stated that effective digital transformation requires a " trustless system " where trust no longer relies on human intermediaries, but rather on decentralized cryptographic verification . This concept is highly relevant to the Ministry of ATR/BPN's efforts to reform rights transfer services utilizing Artificial Intelligence/AI technology and electronic deeds.

The novelty of this research lies in three aspects, including: **First** , a critical analysis of the policy transition from a hybrid system to a fully integrated system that has never been studied in the Indonesian land law literature. **Second** , an empirical evaluation of the implementation of the 10-day Service Level Agreement (SLA) in the 10-Day PERINIS Policy based on up-to-date trial data at 17 Land Offices. **Third** , the formulation of a comprehensive harmonization of agrarian law and Cyber Law through the integration of the concepts of QES, hashing, AI, and blockchain into the national land regulatory framework.

This article not only critiques the Regulation of the Minister of ATR/Head of BPN Number 3 of 2023, but also evaluates the policy response through the 2026 Re-engineering document and the 10-Day PERINIS trial, to formulate normative and technical solutions that can guarantee complete legal certainty in the electronic transformation of rights transfers.

B. PROBLEMS

Based on this background, this research formulates three main problems, including:

1. How does the Regulation of the Minister of ATR/Head of BPN Number 3 of 2023 create a normative gap that gives rise to a broken chain of trust?
2. What is the root of the bottleneck of the 10 Day PERINIS service in the pilot project stage?
3. How can the Cyber Law principles in the PERINIS policy close legal loopholes and guarantee legal certainty?

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C. RESEARCH METHODS

This research uses a normative legal method that is evaluative-prescriptive with three approaches: legislation, conceptual, and case. Primary legal materials include the UUPA, the ITE Law, the PDP Law, the Civil Code, Government Regulation Number 24 of 1997, Regulation of the Minister of ATR/Head of BPN Number 3 of 2023, and Decree of the Minister of ATR/Head of BPN Number 1803/SK/HR.01/VIII/2026. Secondary materials include Cyber Law literature, the 2026 PHPT Service Re-engineering document, and PERINTIS implementation data until October 2026.

D. RESULTS AND DISCUSSION

1. Normative Gap and Broken Chain of Trust

Article 25 paragraph (3) of the Minister of ATR/Head of BPN Regulation Number 3 of 2023 requires Land Deed Officials (PPAT) to report deeds electronically. However, deeds are still produced in physical format. The scanning process creates a conversion gap: digital files do not have a hash value tied to the moment of signing.[4]

As a result, three weaknesses emerged, namely:

a. There is no cryptographic fingerprint that guarantees immutability.
b. Dualism of evidence (physical deeds vs electronic data) creates legal uncertainty during disputes.
c. Vulnerability to manipulation and human error.

From a cyber law perspective, the validity of a digital document is determined by the integrity of the data and the technically verified identity of the signatory, not simply the existence of the paper. [5]The absence of a Qualified Electronic Signature (QES) places the PPAT deed in a "half-digital" position.

2. Critical Evaluation of Bottlenecks in the 10-Day PIONEERING Policy

The PHPT 2026 Service Re-engineering document identifies four root causes of hybrid systems:

a. Only reporting is electronic, while documents are still analog.
b. There is no SLA for verification at the Land Office.
c. Dependence on manual BPHTB/PPh validation.
d. Potential for brokering practices due to the lack of certainty of time.

Trials at 17 Land Offices (starting August 17, 2026) demonstrated that AI utilization can reduce inspection time by up to 40%. [6]However, the 10-day target is difficult to achieve consistently as long as deeds still rely on physical-to-digital conversion.

The "Integrated Transfer of Rights (PERINIS) 10 Days" policy with a maximum Service Level Agreement (SLA) target of 10 days launched by the Minister of ATR/Head of BPN on August 17, 2026 and piloted in 17 Land Offices based on the Decree of the Minister of ATR/Head of BPN Number 1803/SK/HR.01/VIII/2026 dated August 12, 2026 is an empirical test of the effectiveness of the hybrid system. A critical analysis of the Re-engineering of Rights Transfer Services document reveals that the bottleneck of this service originally stemmed from four structural root problems, including: 1) The system is still hybrid, 2) No SLA for document verification **,** 3) Reliance on manual tax validation **,** 4) Reliance on manual tax validation.

Empirical data shows that the hybrid process forces manual verification by Land Office officers/KKP users, which from a Cyber Law perspective is a weak point in the chain of trust. (Effendi, Information Technology Law , p. 170). The absence of encrypted Application Programming Interface / API integration (as a connecting bridge between applications) makes the system vulnerable to human error and data manipulation at the input stage. The 10-day target will never be achieved consistently as long as the " **legal bridge " in the form of a PPAT Deed still relies on physical to digital** conversion through scanning.

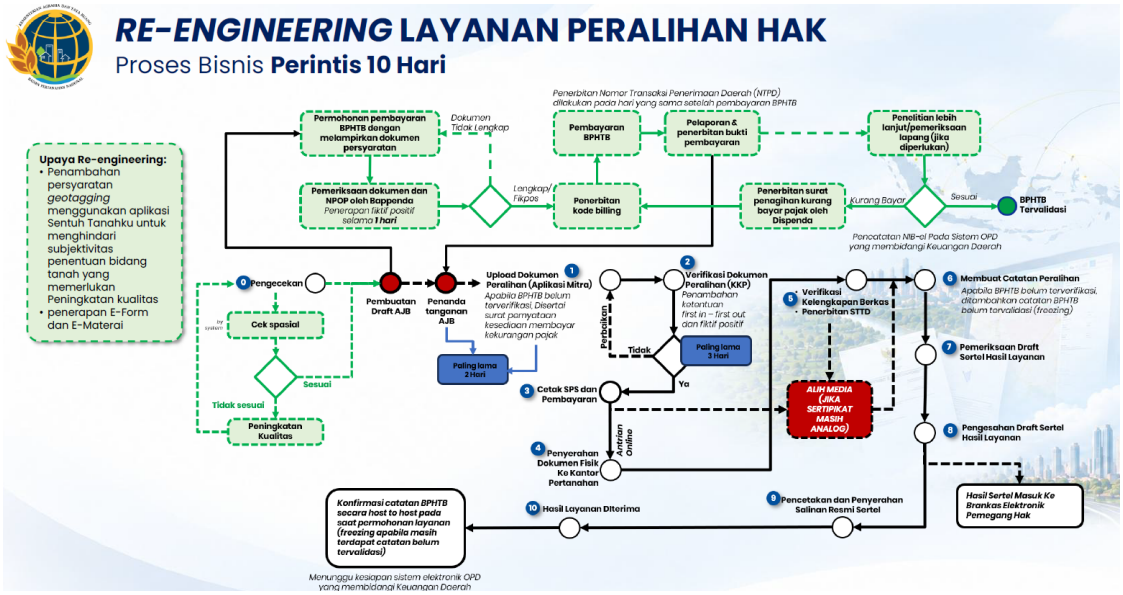
3. Harmonization of Cyber Law in the 10-Day PERINTIS Policy

Responding to the challenges of Land Service Transformation, the Ministry of ATR/BPN designed Re-engineering through four pillars of improvement that substantially adopted the principles of Cyber Law and

[4]Ian Brown and Christopher Marsden, Regulating Code: Good Governance and Better Regulation in the Information Age (Cambridge: MIT Press, 2019), p. 134..
[5]Jhonny Effendi, Information Technology Law (Cyber Law) (Jakarta: Rajawali Pers, 2022), p. 156.
[6]Directorate General of Land Rights Determination and Registration, Re-engineering of Land Rights Transfer Services, 2026, pp. 1–2.

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Algorithmic Governance , based on the explanation of the Directorate General of PHPT in the implementation of the 10-Day Integrated Rights Transfer Policy (PERINTIS), Re-Engineering is needed with the following Business Processes:



Source : Directorate General of PHPT, 2026

This PERINIS policy is built on 4 (four) pillars of improvement which comprehensively address the challenges of normative gaps as follows:

a. **Pillar 1** : **Re-engineering Business Processes with Digital Fictio Juris Mechanisms**

This policy introduces the implementation of FIFO (First In-First Out) and Positive Fiction which is measured algorithmically.

b. **Pillar 2: Digital-Based Automation and Standardization**

The development of AI-based document verification automation tools focuses on four activities: land information verification, PPAT deed reporting, land title transfer applications (HAT), and mortgage and roya rights. AI works by screening and providing a summary of the compliance of checkpoints, overcoming human limitations such as decreased concentration and mood fluctuations that affect the validity of decisions. From a cyber law perspective , automation using artificial intelligence (AI) aligns with the principles of smart contracts and automated compliance , where the system algorithmically reads metadata and document integrity. The implementation of artificial intelligence (AI) in land document verification is a concrete manifestation of this principle.

c. **Pillar 3: Data-Based Monitoring and Strict Supervision of Land Deed Officials**

This policy develops a real-time performance monitoring dashboard that can be accessed through the Sentuh Tanahku application. PPAT performance assessment is now based on 9 comprehensive indicators: (1) File checking, (2) Compliance with BPHTB completion before signing, (3) Deed reporting time, (4) Deed quality (rejection rate), (5) PNBP payment period, (6) Physical submission of documents, (7) Legal compliance sanctions, (8) Productivity rating clustering, and (9) Community Satisfaction Index (IKM). dashboard can be accessed in real time through the Sentuh Tanahku app , creating transparency and accountability previously impossible with manual systems. From a cyber law perspective , this dashboard embodies the principle of transparency by design , a key pillar of good digital governance.

d. **Pillar 4: Policy Collaboration and Inter-Agency Integration**

The 10-Day PERINIS policy encourages the integration of NIB-NOP and the use of Land Value Zone Maps (ZNT) as an effort to accelerate BPHTB validation and the implementation of positive fictitious. The MoU/PKS with the Regional Government (Regency/City) stipulates a Service Level Agreement (SLA) for BPHTB validation within 3 working days, with the provision that if the time period is exceeded, the PPAT Deed making activity will continue, and after the Deed is reported to the Land Office through the PPAT Partner Application, an inspection and validation

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of the land registration documents will be carried out by Land Office officers (KKP users) no later than 3 days, if it has passed within that time, an SPS will automatically be issued and after the PNBP payment has been made, the HAT transfer can be carried out (positive fictitious). Furthermore, the BPN will record the HAT transfer without BPHTB validation, with the additional requirement of a statement of willingness to pay the underpayment, as well as freezing HAT certificates issued without BPHTB validation, and the **Owed BPHTB record** will automatically be stated on the issued Electronic Certificate. To address the tax validation bottleneck, a Joint Circular Letter (SEB) was issued between the Ministry of ATR/BPN and the Ministry of Home Affairs. This Joint Circular Letter stipulates a maximum of 3 working days for complex cases (unreasonable values, requiring field reviews, or in island areas), and a maximum of 1 working day for areas already electronically integrated. If the deadline is exceeded, a positive fictitious approach is implemented in the form of issuing billing codes and NTPD, with a certificate freezing mechanism by the BPN if there is later proven underpayment. The use of Land Value Zone Maps (ZNT) is also integrated as a reference parameter for fair value.

4. Update on PERINIS Implementation until October 2026

Cyber Law principles in the 10-Day Pioneer Policy has significant implications for legal certainty and personal data protection. One of these is the planned implementation of Electronic Land Deeds (PPAT) with Qualified Electronic Signatures (QES) certified by BSrE, which will guarantee that birth certificates are in digital format and cryptographically signed, not simply scanned paper. This closes the gap in the broken chain of trust and restores the full evidentiary power of authentic deeds as guaranteed by Article 1870 of the Civil Code.
Since the launch on August 17, 2026, the policy has been expanded in stages, in the following phases:

- Phase 1 (17 August 2026): 17 Kantah.
- Stage 2 (24 September 2026): to 95 Kantah.
- Phase 3 (10 October 2026): total becomes 131 Kantah.[7]

Preliminary data shows a significant reduction in average service duration. In some locations, the process was completed in 3.8–5.6 days, well below the 10-day target. Public and Land Deed Officials (PPATs) responded generally positively due to the certainty of time. However, challenges remain: some Land Deed Officials (PPATs) are unfamiliar with geotagging, and the system remains hybrid because Electronic Deed Minutes have not yet been fully implemented.

E. CONCLUSION

Based on the analysis and discussion above, it can be concluded that:

1. Regulation of the Minister of ATR/Head of BPN Number 3 of 2023 creates a normative gap that gives rise to a broken chain of trust because the deeds are still physical while the reporting is digital.
2. PERINIS bottlenecks stem from hybrid systems, the absence of a Service Level Agreement (SLA), and a reliance on manual validation.
3. The four pillars of PERINIS have adopted Cyber Law principles and have proven effective in reducing service times. The expansion to 131 Regency/City Land Offices by October 2026 shows positive progress, but complete legal certainty will only be achieved with the full implementation of digital-born deeds and QES.

F. RECOMMENDATIONS

Based on the above conclusions, this study recommends the following strategic steps:

1. Accelerate the issuance of regulations requiring Electronic PPAT Deeds (born-digital) with QES and hashing.
2. Strengthen host-to-host integration of NIB-NOP and utilization of Land Value Zones across regions.
3. Conduct massive education to PPAT regarding geotagging and positive fictitious mechanisms.
4. Optimize the role of MPPW/MPPD in enforcing the “3 Deed Limitation” mechanism and assessing the nine indicators.
5. Develop a clear scaling-up roadmap towards national implementation by 2027, along with resolution of the backlog of documents.
6. Appoint a Data Protection Officer and ensure all API integrations meet PDP Act standards.

[7]Antara News, “BPN says 10-day PERINIS service now available at 131 Land Offices,” October 13, 2026; Pantau.com, “ATR/BPN Expands 10-Day PERINIS Service to 131 Land Offices,” October 13, 2026.

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