

Registration of Land Property Rights Results of Exchange with Village Cash Land through the Complete Systematic Land Registration Program

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Abstract. *Complete Systematic Land Registration (PTSL) is a land registration process for the first time, which is carried out simultaneously and covers all land registration objects that have not been registered in a village or sub-district area or other names equivalent to that. Land is not always located in strategic areas. There are several processes including land swaps. The aim of this research is to find out and analyze the process of registering freehold land as a result of an exchange with village treasury land through the PTSL program until the issuance of a freehold certificate in Cilacap district; To find out and analyze the obstacles and solutions faced by the Petitioner, the Regional Government of Cilacap Regency, and the Cilacap Regency Land Office in the Process of Registering Freehold Land as a result of an Exchange with Village Treasury Land through PTSL until the issuance of a Freehold Certificate in Cilacap Regency. In this study, the type of Juridical Sociological research was used, the research specifications were descriptive in nature. The data sources used by the authors were primary data and secondary data. The results of this study are The process of exchanging community land for village treasury land in Cilacap Regency complies with applicable regulations, namely in accordance with the Letter of the Cilacap Regent dated 22 December 2004 Number: 143/033/00. While the process of registering freehold land as a result of swaps with village treasury land through the PTSL Program in Cilacap Regency is in accordance with the PTSL technical instructions Number 1/Juknis-100.Hk.02.01/1/2021 and has been completed until the issuance of the Freehold Certificate. The Petitioner and the Regional Government in implementing the Registration of Freehold Land as a result of the Exchange with Village Treasury Land through the PTSL Program until the issuance of the Freehold Certificate in Cilacap Regency did not encounter any obstacles. Meanwhile, the obstacle faced by the Cilacap District Land Office is that the distance between the swap process and the very long land registration, which is 18 years, raises obstacles.*

Keywords: Exchange; Land; Registration; Village.

1. Introduction

In the history of human civilization, land is the most important factor in determining the production of each phase of civilization. Land does not only have high economic value, but also philosophical, political, social and cultural values. It is not surprising that land is a special treasure that continuously triggers various complex and complicated social problems.¹

Based on Government Regulation Number 18 of 2021 concerning Management Rights, Land Rights, Flat Units, and Land Registration, land registration is a series of activities carried out by the Government continuously, continuously and regularly, including collection, processing, bookkeeping, and presentation as well as maintenance of physical data and juridical data, in the form of maps and lists, regarding land parcels and apartment units, including the issuance of certificates of proof of title for land parcels for which there are rights and ownership rights to apartment units and other rights certain encumbrances.

Registration of land for the first time is the activity of registering for the first time a piece of land which was not previously registered according to the provisions of the registration of the land concerned.²

Complete Systematic Land Registration (PTSL) is a land registration process for the first time, which is carried out simultaneously and covers all land registration objects that have not been registered in a village or sub-district area or other names equivalent to that.³ Through this program, the government guarantees legal certainty or land rights owned by the community.

Land is not always in a strategic area for development to be carried out. To get land that is in the desired place cannot always be realized by buying and selling between parties. There are several processes including land swaps. Based on Government Regulation number 27 of 2014 concerning Management of State/Regional Property, an exchange is a transfer of ownership of regional state property carried out between the central government and regional governments, between regional governments, or between central regional governments and other parties, by receiving reimbursement in the form of goods at least with a balanced value.

Village treasury land is part of village wealth which is a potential in carrying out village household affairs. The village has the authority to carry out village

¹Benhard Limbong, 2012, Land Conflict, Magaretha Pustaka, Jakarta, p. 1.

²Boedi Harsono, 2008, Indonesian Agrarian Law print 12, Djitangan, Jakarta, p. 74.

³National Land Agency, 2017, Policy Paper for the Acceleration of Land Registration, BPN RI, Jakarta, p. 8.

autonomy based on customary provisions, has wealth in the form of customary lands. bengkok as well as various types of village bondho land. This means that the village has autonomy in the sense of being independent in managing and determining issues related to the land in its territory. This independence in management is supported by a village deliberation mechanism through "minggon" meetings (resident consultations) which function as a forum to involve as many community members as possible before the village head makes important decisions, especially those related to land.⁴

In accordance with the provisions of Article 6 paragraph (1) of the Minister of Home Affairs Regulation Number 1 of 2016 concerning Management of Village Assets, as one of the village assets, village treasury land must be certified on behalf of the Village Government. Regarding its use, crooked land can be in the form of rent, loan, use cooperation, and build-to-hand over.

Based on the description of the background mentioned above, the problems in this thesis are: 1. What is the process for registering freehold land as a result of an exchange with village treasury land through the Complete Systematic Land Registration Program until the issuance of a certificate of ownership in Cilacap Regency?; 2. What obstacles and solutions were faced by the Petitioner, the Regional Government of Cilacap Regency, and the Cilacap Regency Land Office in the process of registering freehold land as a result of an exchange with village treasury land through the Complete Systematic Land Registration Program until the issuance of a certificate of ownership in Cilacap Regency?

The objectives of this study are: 1. To find out and analyze the process of registration of freehold land as a result of an exchange with village treasury land through the Complete Systematic Land Registration Program until the issuance of a certificate of ownership in Cilacap Regency; 2. To find out and analyze the obstacles and solutions faced by the Petitioner, the Regional Government of Cilacap Regency, and the Cilacap Regency Land Office in the Process of Registering Freehold Land as a result of Exchanging with Village Treasury Land through the Complete Systematic Land Registration Program until the issuance of a Title Certificate Owned in Cilacap Regency.

2. Research Methods

This study uses the type of Sociological Juridical research, Sociological Juridical namely by finding the legal reality experienced in the field or an approach that is based on problems regarding matters that are juridical and existing facts. Sociological juridical law research mainly examines primary data as well as

⁴Sri Winarsi & Sumardji, 2005, Village Treasury Land Management in the Era of Regional Autonomy, Institute for Research and Community Service, Airlangga University, Surabaya, p. 14.

collects data sourced from secondary data. So that in this study it is more suitable to use sociological juridical, because in the formulation of the problem the data obtained is more accurate.⁵

This study uses descriptive research specifications. Descriptive research according to Soerjono Soekanto is research that is intended to provide as accurate data as possible about humans, conditions or other symptoms.⁶

The data sources to be used by the author are primary data and secondary data:
a. Primary data is data obtained or collected directly in the field by the person conducting the research or those who need it. Primary data is obtained from informant sources, namely individuals or individuals such as the results of interviews conducted by researchers with interviews.⁷ b. Secondary data is data obtained or collected by people who conduct research from existing sources.⁸

Secondary data sources were taken from references, papers, journal articles, research reports, document archives and online library data related to this research. Secondary data is grouped into 3, namely: 1) Primary Legal Materials According to Peter Mahmud Marzuki, primary legal materials are legal materials that are authoritative which means they have authority. In this case the primary legal material consists of laws and regulations, official records, or treatises on the making of laws and regulations and judges' decisions. 2) Secondary Legal Materials, legal materials that provide explanations regarding primary legal materials. Consists of books, legal journals or research materials related to land registration. 3) Tertiary Legal Materials, Tertiary legal materials are legal materials that provide instructions and explanations of primary and secondary legal materials, for example legal dictionaries, Big Indonesian Dictionary and encyclopedias.

3. Results and Discussion

3.1. The process of registering freehold land as a result of an exchange with village treasury land through the Complete Systematic Land Registration Program until the issuance of a freehold certificate in Cilacap Regency

1. Implementation of the Community Land Exchange Process for Village Treasury Land in Cilacap Regency

⁵Hilman Hadi Kusuma, 1995, *Methods for Making Working Papers or Legal Studies Thesis*, CV. Mandar Maju, Bandung, p. 7.

⁶Soerjono Soekanto, 1986, *Introduction to Legal Research*, UI Press, Jakarta, p. 32.

⁷M. Iqbal Hasan, 2012, *Principles of Research Methodology and Its Applications*, Ghalia Indonesia, Jakarta, p. 39.

⁸Ibid.

Cilacap Regency has an area of 225,360.840 Ha, which is divided into 24 Subdistricts, 269 villages and 15 Villages, due to the large number of village areas compared to the Villages in Cilacap Regency and in order to support accelerated development in accordance with the Regional Medium Term Development Plan 2008- 2012, in order to realize the optimization of governance, development and community welfare, which is directed at empowering rural communities according to the determination of the Governor of Central Java "*Bali Ndeso Mbangun Deso*", the Regent of Cilacap issued Cilacap Regent Regulation Number 76 of 2011 concerning Guidelines for the Implementation of the "Proud to build the Village" Movement which is oriented towards rural development that is comprehensive in the fields of education, health, economy and socio-cultural environment, without leaving urban development with the principle of, by, and for the community, therefore development is so important for the welfare of villages and their people in Cilacap Regency.

In this case, village treasury land plays an important role for the welfare of the village, village treasury land is still very much needed to pay for its officials. In contrast to the villages which has been paid for by the Government.

An exchange of village treasury land for freehold land can occur, provided that the person applying for the village treasury land must also replace the land, and the land used as a substitute for the village treasury land must be more profitable for the village and may not be detrimental to the village.

In the process of exchanging village treasury land, there are several permits that need to be obtained first, including permits from the Regent and Governor. Only then can the land be processed to become private land. These permits are in the form of permits from the local village government by holding a village meeting known in Cilacap Regency as a "village discussion", namely a village meeting to obtain an agreement so that the crooked land can be released and transferred to individuals. After obtaining approval from the village, what must be completed include a Decree from the Cilacap Regent and a Decree from the governor of Central Java. The village treasury land exchange process has undergone changes in the licensing process, namely:⁹¹⁾ Prior to 1980, the initial process of transferring the status of village treasury land including village treasury land prior to 1980 was with "village deliberations", namely village meetings to obtain an agreement so that the bengkok land could be released and transferred to individuals. After a consensus was reached in the new village meeting it was submitted to the regent for follow-up and a decree from the regent was made. Prior to 1980, the only permit needed was a permit from the regent of Cilacap Regency without permission from the Governor of Central Java. Only then can it

⁹¹Interview with (Narko Upoyo), Village Analyst, Staff of the Village Government Development Division, Cilacap Regency Community and Village Empowerment Office, May 24, 2023.

be registered as freehold land at the Land Office. 2) Between 1980 – 2001, the process of converting village treasury land into privately owned land in 1980 to 2000, namely having to complete permit recommendations from the Regent and Governor. In addition to permits from the Regent and Governor, it must also be carried out beforehand, namely "village deliberations" so that there are no misunderstandings among the community. These files must be complete and there should not be any deficiencies. Because if there is a deficiency in this case the lack of documents, both the Decree from the Regent, the Governor, and from the Village, the process of transferring the crooked land cannot run. 3) 2001-2006, 2001 to 2006 in Cilacap Regency implemented a regional autonomy system. Regional autonomy, namely the right to regulate and manage the household itself. The permit needed to carry out the process of transferring village treasury land to private land is only with the permission of the Regent. In contrast to the process of transferring the status of village treasury land to ownership before 2001, which had to complete a Decree from the Governor. Between 2001-2006 the permits needed were only from the Village, namely with a Village Decree by conducting "village deliberations" and a Decree from the Regent of Cilacap only. So, from 2001 to 2006 the governor's permit was no longer needed. 4) From 2007 to the present, the process of changing the status of village treasury land to private land in Cilacap Regency, starting in 2007, again applied permits from 1980 to 2000. Apart from village decrees obtained with village consultations, there must also be a decree from the Cilacap district head and Decree of the Governor of Central Java.

In this thesis, the author conducted research in Adimulya Village, Wanareja District, Cilacap Regency, exchanging village treasury land with freehold land in Adimulya Village, Wanareja District, was carried out in 2004 so that permits were only needed from the Village, namely with a Village Decree by conducting "rembug village" and a Decree from the Regent of Cilacap only. These documents must be completed before being registered as property rights at the Land Office. If one of these files cannot be completed, the process of transferring village treasury land to ownership rights cannot occur.

These permits are very important in managing the transitional process of exchanging village treasury land with freehold land because if the permits are not completed, the land office cannot process the land due to incomplete administration.

In 2004, the Adimulya Village Government of Wanareja District carried out an exchange of unproductive (frequently flooded) village treasury land of 7,863 m² (subsequently divided into 21 plots) with community land of 8,022 m² (subsequently became village treasury/bengkok village land) .

After the exchange process was completed, 21 land plots were certified for the

land that had been released to the public, but only 7 land certificates were issued, so there were still 14 other plots that had not been certified because at that time the 14 land owners did not have a certificate fee, so after With the PTSL program, land owners whose 14 plots have just registered their land through the PTSL program because there is no land certification fee and especially in Cilacap Regency the Regional Government waived the BPHTB fee for PTSL, while those that have become bengkok village land are 2 plots in Sidamulya Village, Wanareja District Cilacap Regency and 1 field in Sidamulya Village, Wanareja District, Cilacap Regency, none of them have a certificate, Previously the two villages were one village, namely Wanareja Village, which was later split into three villages.¹⁰

The people who own 14 plots of land as a result of the exchange feel helped by the PTSL program, after waiting 18 years without having land certificates and unclear land status, they have now received land ownership certificates as a legal certainty as stated in Article 2 of Ministerial Regulation Number 6 of 2018 regarding Complete Systematic Land Registration (PTSL), that "The purpose of implementing a complete systematic land registration is to realize the provision of legal certainty and legal protection of community Land Rights based on the principles of simple, fast, smooth, safe, fair, equitable and open and accountable, so that increasing the welfare and prosperity of society and the country's economy, as well as reducing and preventing land disputes and conflicts"

Van Kant said that "law aims to safeguard the interests of every human being so that these interests are not disturbed. That the law has the duty to guarantee legal certainty in society."¹¹

2. Implementation of Complete Systematic Land Registration in Cilacap Regency

The current land registration policy refers to Ministerial Regulation Number 6 of 2018 concerning Complete Systematic Land Registration in which the ATR/BPN ministry targets 126 million plots of certified land throughout Indonesia by 2025.

Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 6 of 2018 concerning Complete Systematic Land Registration Article 2 states that this Ministerial Regulation is intended as a guideline for the implementation of PTSL activities carried out village by village in regency areas and sub-district by sub-district in urban areas covering all parcels of land throughout the territory of the Republic of Indonesia. Complete Systematic Land Registration aims to realize the provision

¹⁰Interview with (Novyan) Secretary of Adimulya Village, Wanareja District, Cilacap Regency, May 9 2023.

¹¹CST Kansil, 2002, Introduction to Indonesian Law and Legal Studies, Balai Pustaka, Jakarta, p. 44.

of legal certainty and legal protection of community Land Rights based on the principles of simple, fast, smooth, safe, fair, equitable and open and accountable, so as to increase the welfare and prosperity of society and the country's economy, as well as reduce and prevent land disputes and conflicts

Complete Systematic Land Registration (PTSL) in the territory of the Republic of Indonesia is a land registration process for the first time, which is carried out simultaneously and covers all land registration objects that have not been registered in a village or sub-district area or other names equivalent to that. In addition to targeting community land that has not been registered/certified, the Complete Systematic Land Registration Program (PTSL) also targets waqf lands, government lands and village asset lands that have not been registered/certified. Through this program, the government guarantees legal certainty or land rights owned by the community.

Based on the Decree of the Head of the Cilacap Regency Land Office Number: 5352/SK-33.01.UP.02.03/XII/2022 concerning the Sixth Revision of Determination of Complete Systematic Land Registration (PTSL) Locations in 2022, the Cilacap Regency Land Office in 2022 received a target allocation of 57,257 PTSL fields for SHAT (Land Title Certificate), 79,111 PBT plots (Land Plot Map), and 4,000 K 4 plots (Cluster 4, namely Updating land parcels that have been certified on the registration map) located in 80 villages/villages.

Through the PTSL program, the completion of land certification in the Cilacap Regency area was carried out because of the synergy between the BPN, the Regional Government, the Village Government, and the community. In the PTSL program the applicant, in this case the community is greatly facilitated in terms of requirements and land registration until the certificate is issued, in the PTSL program the applicant/community just sits back and doesn't have to bother coming to the Land Office in person to arrange land registration because BPN officers, in this case the Adjudication Committee It is PTSL that will pick up the ball to each village to carry out outreach, land registration, and distribution of certificates to each village until the certificates are in the hands of the community.

The existence of the Complete Systematic Land Registration (PTSL) program by the Cilacap District Land Office will be a means of realizing a picture of one village with a complete village information system and as a basis for processing administration of the actual and reliable land database completeness. Until now, the Cilacap District Land Office continues to strive for measurability of all land parcels in several predetermined locations and maintains physical land data. This is done in order to achieve the main target of land registration through the Complete Systematic Land Registration (PTSL), the amount of realization of which is adjusted to the amount of the budget available from the current year's

APBN.

The existence of the Complete Systematic Land Registration (PTSL) program implemented by the Cilacap District Land Office is an advantage for the Village Government, one of which is building a complete land database and map in the village and securing village assets in this case village treasury land certificates / bengkok.

In addition to providing benefits to the Village Government, Complete Systematic Land Registration (PTSL) also provides benefits to communities who have never registered their land as owners/rights holders because the program does not charge the community the slightest fee for socialization, measurement, and issuance of land certificates that are borne by the government through the State Revenue and Expenditure Budget (APBN) with the exception of pre-certificate administration fees charged to applicants such as making and installing border signs, stamp duty and so on which are determined by village council.

In order to support the smooth and successful implementation of Complete Systematic Land Registration (PTSL) activities in the Cilacap Regency area, the Cilacap Regent provided exemption from Land and Building Rights Acquisition Fees (BPHTB) which should have been collected from the process of transferring land rights as an incentive from the Cilacap Regency Government ,

By regulation, the Regional Government of Cilacap Regency has issued Regional Regulation of Cilacap Regency No. 3 of 2021 concerning the Third Amendment to Cilacap Regency Regional Regulation Number 18 of 2010 concerning Regional Taxes and Regent Regulation Number 79 of 2017 concerning Financing of Preparation for Implementation of PTSL for Communities in Cilacap Regency which was later updated with Regent Regulation Number 34 of 2019.

The land certification/asset legalization policy implemented by the Cilacap District Land Office is a small part of the agrarian reform process. Bearing in mind, the agrarian reform agenda that should have been pushed by the government before issuing legalization of land assets/certifications was to rearrange the unequal tenure, ownership and use of land to create the productive power bases of society and realize social justice as stipulated in Article 5 paragraph (1) of the TAP MPR NO: IX/MPR/2001 Concerning Agrarian Reform. We need to know that the implementation of agrarian reform is intended to improve people's welfare. There are two schemes that can be carried out by the government in implementing land reform, namely asset reform and access reform. Asset reform is carried out with the presence of the state to provide land to people who need it as well as strengthening land ownership rights to lands that have been controlled by the community, looking

at the asset legalization target data from the Cilacap Regency Land Office which shows that the strengthening of land ownership rights to land –land that has been controlled by the community is a priority. Furthermore, there is access reform as a manifestation of the presence of the state to the recipients of asset reform so that they are able to empower their land to improve their welfare so that improvement efforts are made through rearranging the structure of control, ownership, use and utilization of land into a new agrarian order will be able to guarantee justice, harmony social, productivity, and sustainability. The implementation of this access program is carried out through the distribution and redistribution of assets owned by the State for people who do not have land assets to support their daily lives. Therefore, the Cilacap Regency BPN Office needs to view Agrarian Reform as a big agenda in contributing to realizing people's welfare.

3. Implementation of the Registration Process of Freehold Land as a result of Exchange with Village Treasury Land through the Complete Systematic Land Registration Program in Cilacap Regency

Adimulya Village is one of the villages that received the 2022 Complete Systematic Land Registration Program (PTSL), in the locations affected by the Complete Systematic Land Registration Program (PTSL) there are plots of land with the status of land resulting from the exchange of village treasury land with community-owned land which have not been completed until the certification stage.

The applicant, in this case the community and the Adimulya Village Government as the party exchanging village treasury land with community-owned land, submitted an application for land registration as a result of the exchange to the Complete Systematic Land Registration Program (PTSL), and the TIM IV Registration Adjudication Committee. Complete Systematic Land The Cilacap District Land Office identified the land as a result of the exchange by checking the location and collecting land survey data to match the land conditions and PTSL measurement results.

The results of the identification that has been carried out by the TIM IV Adjudication Committee Complete Systematic Land Registration of the Cilacap Regency Land Office on the exchanged land are 21 parcels of community land resulting from the exchange and 3 plots of village treasury land resulting from the exchange, within 21 parcels of community land resulting from the exchange In exchange, there are 7 plots of land that have been certified and the remaining 14 plots that are not yet certified, therefore the 14 plots of land are registered through the Complete Systematic Land Registration Program (PTSL).

From the results of the Identification of Land Swapping of Village Treasury Land

with Land of Ownership in Adimulya Village, Wanareja District, Cilacap Regency above, it shows that there are 7 plots of land that have been certified in 2005 with Property Rights Numbers 87 to 93, 8 plots of land have changed ownership, and 6 plots land which still has the same ownership as the Decree of the Regent of Cilacap Prihal Permit for Release of Land Treasury of Adimulya Village, Wanareja District, 2004.

In the process of exchanging village treasury land, initially the Housing, Settlement Areas and Land Office of the Cilacap Regency handled it, after the existence of the Cilacap Regency Regional Government Management Organization the authority was delegated to the related Regional Apparatus Organization, namely the Cilacap Regency Community and Village Empowerment Service.

The authority regarding village treasury land in Cilacap Regency starting in 2019 is the authority of the Community and Village Empowerment Service of Cilacap Regency, but because the Adimulya Village Government sent a letter to the Cilacap Regent regarding land issues in Adimulya Village, the Cilacap Regent Disposition to the Head of the Housing, Settlement and Area Office Cilacap Regency Land Affairs to be facilitated in solving land problems in Adimulya Village and followed up with a meeting of the Cilacap Regency Land Facilitation Problem Resolution Team.

Furthermore, the Head of the Housing, Settlement Areas and Land Office of the Cilacap Regency wrote a letter to the Head of the Cilacap Regency Land Office dated 8 December 2022 regarding the follow-up to the settlement of the Adimulya Village Land problem, Wanareja District, then forwarded to the Head of the Land Acquisition and Development Section of the Cilacap Regency Land Office for processing the application for certification remaining through the Complete Systematic Land Registration program in Adimulya Village, Wanareja District.

The Head of the Land Acquisition and Development Section of the Cilacap Regency Land Office who was also at that time the Head of TIM IV Adjudication Complete Systematic Land Registration The Cilacap Regency Land Office followed up the stages of land registration through the Complete Systematic Land Registration program.

Basically the Cilacap District Land Office does not have the duties and authority in the process of exchanging village treasury land with community land because this is the duty and authority of the Regional Government and the Regent who issues permits to release the village treasury land, the Cilacap District Land Office has duties and authority in land registration which is carried out after the exchange process is completed with the requirements for application files,

documents on rights, permit documents / permission to release village treasury land, spatial information, description of village assets for village government land applicants, proof of tax deposit, Land Sector Map, then registered through the process of Application for the Granting of Rights.

Submission of the certificate resulting from exchanging village treasury land with ownership rights through the Complete Systematic Land Registration program was submitted directly by the Adjudication Committee Team IV Complete Systematic Land Registration of the Cilacap District Land Office to the Applicant/Community by coming directly to the village, so the applicant/community receiving the certificate you don't need to bother coming to the Cilacap Regency Land Office, this is very helpful for the applicant / community considering the distance from Adimulya Village, Wanareja District, which is quite far from the Cilacap Regency Land Office, which is approximately 80 km.

According to Edi Suprayitno as one of the recipients of the certificate, with the Complete Systematic Land Registration program in Adimulya Village, the community, especially those who own land as a result of exchanging village treasury land with freehold land, feel greatly assisted both in the management of the certificate and in the cost of the certificate and the community as well. I am very happy because after waiting 18 years without having a land certificate and with an unclear land status, I have now received a land ownership certificate as a legal certainty.

3.2. Obstacles and solutions faced by the Petitioner, the Regional Government of the Cilacap Regency, and the Cilacap Regency Land Office in the Process of Registering Freehold Land as a result of an Exchange with Village Treasury Land through the Complete Systematic Land Registration Program until the issuance of a Freehold Certificate in Cilacap Regency

In implementing the registration of freehold land as a result of swaps with village treasury land through the Complete Systematic Land Registration Program until the issuance of Freehold Certificates in Cilacap Regency, the obstacles faced by the applicant can be said to be no obstacles because through the Complete Systematic Land Registration program, the applicant greatly benefits and Simplify the land registration process.

The obstacles faced by the Regional Government of Cilacap Regency, in this case the Community and Village Empowerment Service of Cilacap Regency and the Office of Housing, Settlement Areas and Land Affairs of Cilacap Regency, in general, had no problems because the village treasury land exchange process was completed in 2004.

Whereas the obstacles faced by the Cilacap Regency Land Office, in this case the Adjudication Committee for Team IV Complete Systematic Land Registration, are due to the distance between the exchange process and land registration which has been very long, namely 18 years, causing problems and solutions as follows:¹²

No.	Constraint	Solution
1.	Changed soil conditions	Matching the measurement results of Complete Systematic Land Registration in the field with the measuring area contained in the Regent's Decree and the Measurement Drawings of 7 plots of land that were already HM in 2005 at that location.
2.	Subject Rights that have changed	Requesting documents for the transfer of rights and including the history of the land in the Declaration of Physical Land Ownership.
3.	Slow land registration dossier requirements	Often coordinate and pick up the ball directly to the homes of the Community Residents / Petitioners.
4.	Lack of Human Resources in implementing the Registration of Freehold Land as a result of Exchange with Village Treasury Land through the Complete Systematic Land	Adding external assistance workforce and maximizing working time.

¹²Interview with (Budi Andoyo, A.Ptnh) Chairman of the Adjudication Committee PTSL Team IV Cilacap Regency 2022, May 4, 2023.

Registration
Program

5. The distance between the land location and the Cilacap Regency Land Office. The distance between the land location and the Regency Land Office Maximizing working time while at the location/village always coordinate by phone with the village and POKMAS.
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4. Conclusion

The Applicant and the Regional Government in the implementation of the Registration of Freehold Land as a result of the Exchange with Village Treasury Land through the Complete Systematic Land Registration Program until the issuance of the Freehold Certificate in Cilacap Regency, there were no obstacles. Whereas the obstacles faced by the Cilacap Regency Land Office are land conditions that have changed, subject rights that have been transferred, requirements for land registration documents, lack of human resources in carrying out land registration of ownership rights resulting from exchanges with village treasury land through the Complete Systematic Land Registration Program. , The distance between the land location and the Cilacap Regency Land Office. The distance between the land location and the Regency Land Office.

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