

Responsibility of Land Deed Officials (PPAT) in Providing Unfinished Name Transfer Services

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Abstract. *This study aims to determine the responsibility of the Land Deed Official (PPAT) for unfinished name change services and to determine the legal consequences of unfinished name change services. This study uses a type of sociological or empirical legal research that includes legal identification and legal effectiveness, empirical legal research is legal research where data is obtained through primary legal data or data obtained directly in the community. Based on the research conducted, it can be seen that the responsibility of the PPAT includes Civil, Criminal, Administrative, and PPAT Code of Ethics obligations. If the Deed has been carried out in accordance with the procedure and there is a delay caused by the negligence of the PPAT, then in practice the PPAT can be sued for compensation if the delay causes losses to the parties. The legal consequences of the transfer of Land Rights that are registered late are that the Deed cannot be registered for the Transfer of Rights at the National Land Agency Office and this is the personal responsibility of the PPAT because the PPAT is obliged to comply with the registration period for the transfer of Rights, which is a maximum of seven working days from the signing of the Deed. The PPAT itself can be subject to administrative sanctions in the form of a written warning and in serious cases the PPAT can be dismissed from his position. And if force majeure occurs, the PPAT cannot be sued because it is beyond the PPAT's fault as long as all procedures required by the National Land Agency have been fulfilled.*

Keywords: PPAT; Responsibility; Service.

1. Introduction

Indonesia is a developing country with an agrarian economic structure. This is indicated by the fact that the majority of the Indonesian population works in the agricultural sector, either as farmers who own land or those who do not own

land (farm laborers). Since ancient times, land has been closely related to everyday human life and is a basic necessity of life.

A person who wants to be able to enjoy land ownership rights must first register the land which is organized by the National Land Agency (BPN), which is assisted by land deed making officials (PPAT) and other officials assigned to carry out certain activities, regarding land registration. Other officials in this case are the Sub-district Head as a temporary PPAT. The position and function of the Sub-district Head as a temporary PPAT in carrying out land registration services, it turns out that there are still problems in the field, especially in services for making land deeds. Therefore, in the implementation of land registration, it can provide legal certainty regarding land rights, namely providing clear physical data regarding the area of land, location and boundaries of the land.¹

The role of PPAT in land registration is to assist the Head of the District/City Land Office in land registration data maintenance activities in the form of making deeds of transfer of land rights or ownership rights to an apartment except for auctions, making deeds of division of joint rights, and making deeds of granting mortgage rights to land.²

In the management of land affairs in Indonesia, especially in land registration activities, the Land Deed Making Officer (PPAT) is a public official who is a partner of the BPN agency to help strengthen or confirm every legal act on land carried out by the relevant rights subject which is stated in an authentic deed.

In the provisions of national land law, namely the Basic Agrarian Law Number 5 of 1960, it is stipulated that all transfers of land rights and ownership rights to apartment units through sale and purchase, exchange, grants, income and other legal acts of transfer of rights, except for transfers of rights through auction, can only be registered if proven by a deed made by an authorized PPAT according to the provisions of applicable laws and regulations.

Republic of Indonesia Regulation Number 24 of 2016 Concerning Amendments to Government Regulation Number 37 of 1998 Concerning Regulations on Land Deed Officials explains that Land Deed Officials are appointed by the Minister of Agrarian Affairs and Spatial Planning/Head of the National Defense Agency of the Republic of Indonesia. A person who is appointed as a Land Deed Official is not solely for the interests of the person concerned, but also for the namely the Land Deed Making Officer is given the task of assisting the Head of the District/City Land Registration Office in land registration.

The main task of the Land Deed Making Officer (PPAT) is to carry out part of the land registration activities by making a deed as evidence of the carrying out of

¹ Urip Santoso, *Pejabat pembuat Akta Tanah, Kencana, Jakakarta, 2016, hlm. 61.*

² Umar Said Sugiharto, *Suratman dan Noorhuda Muchlis, Hukum Pengadaan Tanah, Setara Press, Malang, 2015, hlm. 234.*

certain legal acts regarding land rights or ownership rights to apartment units, which will be used as the basis for registering changes to land registration data resulting from said legal act.

A certificate of ownership is a document that proves the right to land for its holder to own, use, and take advantage of the land in a hereditary, strongest, and most complete manner.³ The basis for land ownership rights that is used as the basis for issuing a certificate of land ownership rights at the land office is evidence that can be used as a means of proving legal data on ownership or control of a plot of land, either in writing or based on witness statements.

Most people want to make an effort to change the name on the Certificate of Ownership that they have for various reasons, for example because the land is an inheritance from their parents. Changing the name is a procedure for changing the name of ownership in the Certificate of Ownership (SHM) of a property from the name of the seller to the name of the buyer. In Article 54 paragraph (2), and the provisions of Article 55 which regulate that PPAT is personally responsible for the implementation of his duties and positions in every deed making.

Based on the provisions of Article 55, the responsibility imposed on the PPAT is greater because the PPAT can be requested his personal responsibility for carrying out his duties and position in every deed, but in the Regulation of the Head of the National Land Agency Number 1 of 2006, it does not explain in detail what is meant by formal data as stated in the provisions of Article 54 paragraph (2), and the provisions of Article 55 also do not explain what is meant by the personal responsibility of the Land Deed Making Officer for carrying out his duties and position in every deed.

If the provisions of Article 54 paragraph (2) and Article 55 of the Regulation of the Head of the National Land Agency Number 1 of 2006 are connected to the implementation of the duties and position of the PPAT in making deeds, then the question will arise, whether it is something that is appropriate and fair, legally the PPAT is a medium for creating a document that has the power as authentic evidence for legal acts carried out by the parties and as a medium for the PPAT to receive honorarium services, not the transaction price and the PPAT deed which is a party deed (a deed made before an official authorized for that purpose) in accordance with the provisions of Article 1870 of the Civil Code (*Burgerlijk Wetboek*) must have its legal responsibility delegated to the PPAT.

In carrying out his/her position as a PPAT, a PPAT must always adhere to professional ethics, always remember all of his/her professional oaths, obey the applicable legal provisions, must know the limits of his/her authority and be able to choose what may be done and what may not be done and be able to be responsible for all of his/her actions in carrying out his/her position as a PPAT in making deeds. Thus, In carrying out his duties and position as a PPAT, a PPAT will

³ Chandra, *Sertifikat Kepemilikan Hak Tanah*, Grasindo, Jakarta, 2005, hlm. 22

be faced with 4 (four) responsibilities, namely responsibility in terms of Professional Ethics, Administrative Law, Civil Law and Criminal Law.

Based on the background above, the author is interested in conducting research related to the RESPONSIBILITY OF LAND DEED OFFICIALS (PPAT) TOWARDS UNFINISHED NAME TRANSFER SERVICES

2. Research Methods

The type of research used in this study is a type of sociological or empirical legal research, empirical legal research is legal research where data is obtained through primary legal data or data obtained directly in the community.⁴ The specifications of this study use descriptive analysis, namely research that in addition to providing a description, writing and reporting an object or an event will also draw general conclusions from the problems discussed. Data sources come from primary data and secondary data. Data collection methods include interviews. Document Study or Library Materials. The data analysis method used in analyzing data is qualitative analysis

3. Results and Discussion

3.1. Not quite enough answer Official maker deed land (PPAT) toun finished name change service

The implementation of Law No. 5 of 1960, also known as UUPA, namely Article 19, is intended to provide a framework for ensuring clarity of land law.

Land registration is a process carried out by the government to determine and document ownership of registered land. Once completed, individuals are issued a land title certificate, which serves as substantial evidence of their ownership rights to the land.

In addition to the National Land Agency (BPN), the party that plays an important role in land order is the PPAT. PPAT is a government official appointed by the government and given the authority to create legal documents for transactions of ownership of land rights and certain flats. This is based on Article 1 Paragraph (1) of PP No. 24 of 2016 which amends PP No. 37 of 1998 which regulates the rules for officials responsible for creating land deeds.⁵

Based on Article 2 of PP Number 37 of 1998, the main task of PPAT is land registration as evidence in the legal process regarding apartment units, ownership rights, or rights to apartments. This evidence becomes the basis for

⁴ C.S.T Kansil, 1989, Pengantar Ilmu Hukum Dan Tata Hukum Indonesia, Balai Pustaka Jakarta hal. 40.

⁵ Article 1 paragraph (1) of Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning Regulations on Land Deed Making Officials

the revision of land registration data that arises as a result of the legal process.⁶

The authority and responsibility of the PPAT begins from the receipt of the certificate regarding the procedures for preparing the making of the deed, and continues until the completion of the issuance of the certificate by the Land Office. The PPAT has the authority and responsibility to supervise the procedures for preparing the making of the deed, until the issuance of the certificate. Therefore, the PPAT bears responsibility for this task. If one of the parties concerned is financially disadvantaged due to freezing of the certificate, the responsibility of the PPAT cannot be delegated until the parties concerned can provide strong evidence.⁷

PPAT has successfully implemented various steps in the transfer of land rights, namely by complying with the applicable processes and protocols. PPAT is required to adhere to the principle of accuracy and caution in obtaining information from the parties and verifying their intentions. This is intended so that no party feels disadvantaged. In addition to its legal obligations, PPAT has a moral responsibility to provide services that include safe storage and careful handling of certificates, not to transfer without thinking to unrelated parties until the name change procedure has been completed. As a result, PPAT cannot ask for fees or compensation for the work carried out, namely storing certificates and letters sent by the land office. If PPAT asks for additional fees, legal or moral sanctions can be imposed based on the established PPAT professional code of ethics. The intermediary party called PPAT has the responsibility to ensure the protection of the interests of both parties involved until the completion of the land rights transfer registration procedure.

Discussion on the responsibility of PPAT in providing name change services, the analysis carried out not only includes the theory of responsibility, but also includes the idea of legal certainty. PPAT, according to authority and obligations, has the task of ensuring legal clarity on the documents it produces as evidence of the completion of certain legal transactions that correlate with land rights. The main purpose of this name change process is to ensure that there is a guarantee of certainty and legal protection for the new land rights holder.⁸

In this study, the Client based on the agreement with the PPAT demands his right to obtain a certificate that has completed the name change process. The administration of the certificate for the name change process is the responsibility of the PPAT as the authorized party in making the deed and managing the certificate related to the deed he made. The error in the management is not entirely hampered by the PPAT, but by the BPN which is authorized regarding the management of land certificates. The PPAT exercises the power to manage the making of the Sale and Purchase Deed as the basis for registering the name

⁶ See Article 2 of Government Regulation Number 37 of 1998 concerning the Main Duties of PPAT

⁷ Ibid

⁸ See Article 55 of the Regulation of the Head of the National Land Agency Number 1 of 2006

change process. At this stage, the PPAT has carried out his duties related to the management of the certificate starting from Measurement, but seen from the case, there is an overlapping of certificates in the ownership of the object where the parent certificate which is in the process of being separated into a new certificate has not been resolved and has not found a meeting point in reaching a solution and resolution between the BPN and the PPAT so that it delays the completion of the name change certificate file has not been completed. After a meeting to resolve the problem, so in the agreement the client gave a 6-month opportunity and if it is not completed then the PPAT is obliged and responsible for returning it all administration fees that have been given for processing the name change certificate.

3.2. Legal Consequences of Unfinished Name Change Services

PPAT in his position as an official who is authorized to make authentic deeds has a specified time period in carrying out his duties. PPAT is required to send the deed along with its supporting documents to the Land Office to be registered, issued, or renamed the certificate within a maximum of seven working days from the date of signing the deed in question. The time limit in question cannot be challenged because it is included in the provisions of *dwingend recht*, namely a provision of statutory regulations that have coercive power and do not allow for exceptions or deviations. Therefore, strict compliance with these requirements is a must.⁹

Service efforts implemented by PPAT. Based on laws and regulations, PPAT is given a maximum of seven days to submit the transfer of land rights, accompanied by the documents required for land rights registration, starting from the time the deed is signed at the land office.

Article 40 of PP No. 24 of 1997 concerning Land Registration, regulates provisions regarding the submission of land rights transfer deeds to the land office. Any PPAT who contradicts the provisions in this article, in accordance with the regulations stated in Article 62 of PP No. 24 of 1997, appropriate sanctions may be imposed.¹⁰ The consequences are in the form of administrative actions, ranging from written warnings to termination of employment of a person as a PPAT. The application of these sanctions does not reduce the potential for legal action against individuals or bodies that are harmed due to not heeding the provisions stated in Article 40 of PP No. 24 of 1997.¹¹

PPAT has the position as a person who is authorized and responsible for carrying out certain tasks based on applicable laws and regulations. His responsibilities include various transactions, including deeds of sale and purchase, exchange, grants, company income (*inbreng*), distribution of joint rights, granting of

⁹ Moch. Isnaeni, *Pengantar Hukum Jaminan Kebendaan*, Surabaya: Reyka Petra Media, 2014, hlm. 24

¹⁰ See Article 62 of Government Regulation No. 24 of 1997

¹¹ See Article 40, *Ibid*

building use rights/land use rights, ownership rights, and granting of mortgage rights.¹² In addition, the function of PPAT also receives additional emphasis in PP No. 24/1997. Based on this regulation, PPAT is known as a public official who is authorized to carry out acts that correlate with the transfer and assignment of land rights, as well as other acts regulated in related laws and regulations. Furthermore, PPAT also assists the Head of the Land Office in the land registration process by preparing deeds that serve as the basis for updating land registration data.¹³ Main duties and obligations PPAT, also known as PPAT, is regulated in Article 2 of PP No. 37 of 1998 concerning the Regulation of PPAT Position (hereinafter referred to as PP No. 37/1998). These responsibilities include carrying out various land registration tasks by making deeds as evidence that certain legal acts that correlate with the ownership rights of apartment units or land rights have been completed. Land registration data will be updated in accordance with this deed after the implementation of the above legal acts.

In addition to carrying out the making of land deeds in accordance with paragraph (1) of Article 37 of PP No. 24 of 1997, the main task of PPAT is to carry out various land registration activities, which include making deeds that serve as evidence of certain legal acts regarding ownership of apartment units or land rights. The deeds produced become the basis for updating land registration data in accordance with the legal acts mentioned above. The main responsibility of PPAT is to carry out Land Registration activities through the issuance of deeds that serve as evidence of the end of certain legal acts related to ownership of apartment units or land rights. These deeds become the basis for updating land registration data based on the legal acts mentioned above.¹⁴

The PPAT is required to submit the deed he has made along with the relevant documents to the Land Office to be registered no later than seven working days from the date of signing. The PPAT is required to notify the relevant parties in writing regarding the submission of the above deed. Based on the description of Article 40 paragraph (2), the PPAT is fully responsible for submitting the deed and all accompanying documents to the Land Office. After the PPAT registers the deed, everything that correlates with the deed becomes the exclusive authority of the relevant party.

The submission of these letters to the Land Office is for registration. The purpose of registering the deeds and letters is to ensure legal certainty for the community and to organize administrative order. Order is a challenging action for individuals

¹² Ester Anastasiya Komaling, "Tugas Dan Fungsi Pejabat Pembuat Akta Tanah (PPAT) Dalam Rangka Pendaftaran Tanah Menurut Peraturan Badan Pertanahan Nasional Nomor 1 Tahun 2006", VII *Lex Privatum*, 2019

¹³ Anna Ismudiyatun, "Tugas Dan Fungsi Pejabat Pembuat Akta Tanah (PPAT) Dalam Pendaftaran Tanah", Universitas Diponegoro Semarang, 2009

¹⁴ Ade Kurniady Noor, "Tugas Dan Fungsi PPAT Dalam Pembuatan Akta Jual Beli Tanah Hak Milik Dalam Rangka Mewujudkan Tertib Administrasi Pertanahan", *Jurnal Universitas Atma Jaya Yogyakarta*, 2016

who are driven by instinctive urges without relying on logic or rational thinking. Therefore, maintaining order in land administration is a difficult task, and this is the reason why the presence of professionals who are willing to assist the Land Office with full dedication and a high level of professionalism is needed. Given the importance of the role of deeds issued by public officials to provide legal certainty to the community, it is only natural that PPAT carries out this task with a professional attitude in providing services to the community.

In the field of land registration, submission of land registration documents for registration purposes is a critical matter. This obligation is carried out by the PPAT by making an authentic deed which is evidence of the legal process regarding land rights or ownership rights to the apartment units that are the basis for its establishment. The process of registering changes to land registration data arising from the judicial process is the authority absolute government. Especially in districts or cities that are in the same area as the working area of the Land Office.¹⁵

It is important to carefully consider the description and discussion of the PPAT's obligations after the original deeds have been made regarding certain legal acts regarding land rights. This obligation requires the submission of the deed to the Land Office for registration within a maximum period of seven working days from the date of signing. This timely submission is very important to facilitate the registration process which is supervised by the Head of the Land Office. In addition, the PPAT also needs to provide official notification regarding the submission of the deed to the interested parties. The main responsibility of the PPAT is limited to the submission of the deed and the accompanying documents to the Land Office. The responsibility for registering additional activities and obtaining certification lies with the interested parties themselves. The PPAT's responsibilities include the need to immediately submit the signed deed, along with its supporting documents, to the Land Office for registration. Failure to comply with this obligation may result in the imposition of penalties. Failure to immediately provide data on the transfer of land rights to the land office, as stipulated in Article 62 of Government Regulation No. 24 of 1997, may result in administrative and civil sanctions.

The sanctions will be imposed if the delay causes losses or financial losses to other parties involved.¹⁶

The period for submission of the deed and its supporting documents by the PPAT to the Land Office for registration is set at a maximum of seven days from the date of signing the deed, work restrictions are applied based on the provisions

¹⁵ Prestiani Restuning, "Kewajiban Pejabat Pembuat Akta Tanah Untuk Menyampaikan Pemberitahuan Tertulis Mengenai Telah Disampaikannya Akta Ke Kantor Pertanahan (Pasal 40 Ayat (2) Peraturan Pemerintah Nomor 24 Tahun 1997 Tentang Pendaftaran Tanah)" *Jurnal Mahasiswa Fakultas Hukum*, 2016

¹⁶ See Article 62, *Ibid*

contained in Article 13 paragraph (1) and (3) of Permenkes No. 9/2020. This regulation specifically regulates the management of holidays, excluding strategic offices or agencies that provide important services that can be carried out remotely or online from each employee's home. Thus, only tasks that are considered truly unable to be done from home, still have to work outside the home.

This delay has the potential to be mitigated. Based on the news, the law regarding the electronic submission of documents in the context of the service of making original deeds by PPAT has been stipulated in 2019. The inclusion of electronic documents as a form of permission to submit PPAT deeds to the Head of the Land Office is clearly seen in Article 102 of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the BPN RI No. 7 of 2019. This regulation is the second amendment to the Regulation of the Minister of State for Agrarian Affairs

/Head of BPN No. 3 of 1997 concerning the implementation of PP No. 24 of 1997 concerning Land Registration (Permen ATR No. 7/2019), that the PPAT deed submitted to the Head of the Land Office can be in the form of an Electronic document.¹⁷

As required in Article 40 paragraph (2) of PP No. 24 of 1997, PPAT must immediately register the deed of transfer of rights with the Land Office. This is based on the wishes of the legislators, so it can be called (compliance). PPAT's non-compliance with the provisions above can be in the form of disobedience or deviation (deviance) as well as evasion (evasion). The definition of compliance, disobedience, deviation, and evasion is intrinsically related to the legal framework that includes prohibitions and directions. Philipus M. Hadjon as quoted by Tan Berg, stated that the application of administrative law involves the use of two important mechanisms: supervision as a proactive approach and the application of sanctions as a reactive action. Both tools are intended to ensure compliance.¹⁸

This is what must be implemented by PPAT: if late in sending the deed of transfer of rights made to the Land Office in the context of changing the name, then sanctions will be imposed by the government in accordance with Article 72 of PP No. 24/1997.¹⁰¹ Violation of Article 40 of PP No. 24 of 1997 in carrying out the responsibilities of PPAT can have administrative consequences, including dismissal from the position of PPAT. Compliance with these provisions does not reduce the possibility of lawsuits for losses from individuals who suffer financial losses due to the imposition of such sanctions.

¹⁷ See Article 102 of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 7 of 2019

¹⁸ Samia Alwi Assery, "Pelaksanaan Pendaftaran Akta Pemberian Hak Tanggungan Yang Melebihi Batas Waktu Pendaftaran (Studi Di Kantor BPN Kabupaten Malang)", *Kumpulan Jurnal Mahasiswa Fakultas Hukum*, 2015

The above is related to Article 13 paragraph (1) and (3) of the Minister of Health Regulation No. 9/2020. It is not clear what is meant by "only work that really cannot be done from home" when it comes to PPAT services.

in making authentic deeds of legal acts that correlate with land rights, which is used as an excuse for PPAT not to be present in person. They are physically in the office to provide authentic deed making services. However, PPAT was late in sending the deeds he made and the necessary letters to the Land Office for registration. In fact, Article 102 of the Decree of the Minister of ATR No. 7 of 2019 states that PPAT deeds sent to the Head of the Land Office can be in the form of electronic documents. This means that the failure of PPAT to submit the deeds he made along with their completeness to the Land Office for registration during the COVID-19 pandemic cannot be used as an excuse for not being responsible for the failure.

The consequences considered are acts regulated by statutory regulations, while the acts carried out are legal acts, namely acts that are relevant to the relevant statutory regulations.¹⁹ The losses mentioned above are legal consequences that are being discussed in order to overcome the situation. If losses occur, PPAT can be subject to administrative sanctions and legal action for financial restitution. PPAT who carries out acts that are contrary to the responsibilities as referred to in Article 40 paragraph (1) of PP No. 24 of 1997, including not fulfilling the obligations stipulated in statutory regulations such as Article 12 paragraph (2) of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the BPN RI No. 2 of 2018 concerning Development and Supervision of Land Deed Making Officials (Permen ATR No. 2/2018).²⁰ Based on the description and discussion, the letter of transfer of rights made before the PPAT must be immediately submitted to the Land Office within a maximum period of 7 (seven) days after its implementation. The document can be presented in the document format as referred to in Article 102 of the Regulation of the Minister of ATR No. 7/2019. In the event that the PPAT does not submit the deed of transfer of rights and other required documents to the Land Office within the specified period resulting in financial losses, legal action can be taken against the PPAT to obtain compensation. This legal action is based on the reason for carrying out an unlawful act, in addition to the potential for administrative sanctions as stated in Article 62 of Government Regulation Number 24 of 1997. Based on the provisions contained in Article 62 of PP No. 24 of 1997, it states "does not mitigate the risk of legal efforts to request compensation from parties who are harmed due to ignoring this provision." Including parties who are harmed by the PPAT but do not immediately submit a deed of transfer of rights to the Land Office so that the certificate of ownership can be changed from the seller's name

¹⁹ Moch. Isnaeni, *Ibid.*

²⁰ See Article 12 paragraph (2) of the Regulation of the Minister of Agrarian Affairs and Spatial Planning Number 2 of 2018

to the buyer's name.

The issue of compensation arising from unlawful acts carried out by PPAT, especially his negligence in immediately registering the deed of transfer of rights, can be resolved through a process of deliberation to reach a consensus on the amount of appropriate compensation. However, if the deliberation does not produce satisfactory results, then the party who is harmed due to the negligence of the PPAT in complying with the provisions of Article 40 of PP Number 24 of 1997 has the option to continue the legal process in the District Court. By doing so, they can request compensation for the costs that have been given. Costs refer to the total expenditure or financial obligations that have been legally incurred by a certain party. Related to the provision of compensation for failure to achieve performance objectives due to force majeure, as regulated in Article 1246 BW

In the Civil Code itself, there are two articles that discuss force majeure, which can be concluded as a situation where an agreement cannot be implemented due to unexpected events,²¹ resulting in the PPAT himself being unable to fulfill his obligations due to the unexpected events and cannot be held accountable to the PPAT because these events are beyond the PPAT's fault.

In the presidential regulation, force majeure is referred to as force majeure, where the article states: "force majeure is a condition that occurs beyond the will of the parties to the contract and cannot be predicted in advance, so that the obligations stipulated in the contract cannot be fulfilled."

4. Conclusion

The responsibilities of the PPAT include Civil, Criminal, Administrative and PPAT Code of Ethics obligations. If the Deed has been executed in accordance with the procedures and there is a delay caused by the negligence of the PPAT, then in practice the PPAT can be sued for compensation for the delay if the delay causes losses to the parties. The legal consequences of the transfer of Land Rights that are registered late are that the Deed cannot be registered for the Transfer of Rights at the National Land Agency Office and this is the personal responsibility of the PPAT because the PPAT is obliged to comply with the registration period for the transfer of Rights, which is a maximum of seven working days from the signing of the Deed. The PPAT himself can be subject to Administrative sanctions in the form of a written warning. And in severe cases the PPAT can be dismissed from his position. And if force majeure occurs, the PPAT cannot be sued because it is beyond the PPAT's fault as long as all procedures required by the National Land Agency have been fulfilled. For PPAT, PPAT should be more careful in reviewing the applicable regulations and all related regulations, because the laws and regulations are always changing and may increase. PPAT must carry out their

²¹ Aldy Mukhaerin Adnan, Skripsi: "Tinjauan Yuridis Terhadap Penundaan Kontrak Karena Force Majeur (Analisis Terhadap Dampak Pandemi Covid 19)", (Makassar: UIN Alauddin Makassar, 2022). Hal. 40

duties in accordance with the provisions of applicable law, and must not violate the applicable provisions. For the community, they should be more active in the transfer of land rights, entrusting all matters for the file process to PPAT, this is to avoid disputes or problems in the future. The community should also start to open themselves to learning about land science so that later the community will not be confused when dealing with problems of transferring land rights at the Land Office.

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1997 Concerning Land Registration)" Journal of Law Faculty Students,
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