



Legal Research Concerning the Legal Status of Surat-Ijo Land Owned by the City Government of Surabaya

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Abstract

The emergence of the liberation movement for the residents of the Surat-Ijo land is a form of response to the phenomenon of injustice that has surrounded and shackled some of the people of the city of Surabaya which has been going on for a long time. The emergence of the liberation movement was encouraged and facilitated by a situation that upheld the spirit of openness and freedom of expression, namely the spirit of reform that arose in the post-New Order era. One (of the many) factors that gave rise to the liberation movement for the residents of Surat-Ijo land is the difference in understanding of the applicable laws and regulations, especially the regional land laws and regulations. This difference in views has led to different perceptions between the two parties regarding the status of state land rights that are occupied by residents. The form of conflict resolution regarding the Surat-Ijo land can occur when there is a unified understanding between the residents of the Surat-Ijo land and the City Government of Surabaya regarding land laws and regulations, both national and local. Efforts to resolve the conflict require a bold breakthrough, not just to be handled legally which only involves the two parties to the dispute, but requires the involvement of at least three ministries, namely the Ministry of Home Affairs, the Ministry of Agrarian Affairs and Spatial Planning, and the Ministry of Finance. The settlement of the Surat-Ijo land conflict must be encouraged by the spirit of upholding justice and prosperity for all Indonesian people as the goal of the proclaimed Unitary State of the Republic of Indonesia (NKRI) in 1945.

Keywords: Legal research, legal status, Surat Ijo, land owned, City Government, Surabaya

Introduction

The Surat-Ijo land case is a contemporary phenomenon that cannot be separated from the history of the Indonesian nation, especially in terms of land governance. The paradigm of land leasing in the city of Surabaya which is based on the Regional Regulation of the City of Surabaya No. 22 of 1977 concerning Land Use Permits is an indication that the spirit of colonialism was still entrenched in the independence era. The people as tenants and the

Surabaya City Government as the party that leases the land. Inevitably the legislation drew protests from residents of the Surat-Ijo land.(Aristo et al., 2022)

So, in the IPT system, there is a possibility that social justice aspects are not considered for the occupants of the Surat-Ijo land. In fact, according to residents, the IPT policy is not in accordance with existing regulations (UUPA)(Suartining & Djaja, 2023); and also not in accordance with the motto of the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency of the Republic of Indonesia: "Land for People's Welfare". The city of Surabaya still cannot get out of the Surat-Ijo problem. Land certificates and Building Construction Permits (IMB) for landholders with Surat-Ijo status are still a problem for residents. Until now, discussions on the refusal of Kota Pahlawan residents to pay Surat-Ijo rent or fees to the City Government are still rife.(Faisal et al., 2023)

Land with Land Management Rights (HPL) in Surabaya has a unique situation. Land with HPL status is usually referred to by people as Surat-Ijo land. Whereas in the Agrarian Law the term HPL, let alone 'Surat-Ijo land' is not included in the Agrarian Law. The Agrarian Law only recognizes land with ownership rights, HGB and HGU.(Made Putri Laras Sapta Ananda et al., 2022)

Existence of 'Surat-Ijo' in Surabaya

It seems as if the Surat-Ijo polemic in Surabaya has never been completed. On the green certified land, initially the Dutch built houses for employees. Due to heredity, the status of the letter became unclear. On the other hand, the Surabaya City Government stated that the land had the status of Land Management Rights (HPL) alias their property. In the Agrarian Law, Surat-Ijo has never been regulated. The law only regulates certificates of building use rights (HGB), business use rights (HGU) and ownership rights (HM). As is known, HPL land is land leased by the City Government to certain city residents. As proof of the HPL, the residents who rented the HPL land were given a statement letter with a green cover. Until now the people of Surabaya have given the name to the HPL land as "green certificate" land or Surat-Ijo.(Rut Agia Aprilliani et al., 2023)

In the Perda for Retribution for Land Use Permits "Surat-Ijo" Still Valid at the time of the Surabaya city government, 'Surat-Ijo' is equated with land use permits ("IPT") (Rahmanisa, 2020). IPT itself is regulated in the Regional Regulation of the City of Surabaya Number 3 of 2016 concerning Land Use Permits ("Perda Surabaya 3/2016").

In Article 1 number 7 of the Surabaya Regional Regulation 3/2016 it is explained that IPT is a permit granted by the mayor or an appointed official to use land and is not the granting of usufructuary rights or other land rights as stipulated in the UUPA. The use of land is permitted by parties who need it or actually control it, both individuals and entities, as long as the local government does not use it alone. Every Indonesian citizen or entity that will use the land must first obtain an IPT from the mayor whose authority is delegated to the Head of the Surabaya City Land and Building Management Office.

IPT is distinguished as follows:

- a. Long-term IPT, which is valid for 20 years and can be extended any time for a maximum of 20 years specifically for businesses and residences;

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- b. medium-term IPT, which is valid for five years and can be extended any time for a maximum of five years;
- c. Short-term IPT, which is valid for two years and can be renewed every time for a maximum of two years.

IPT holders have obligations, namely:

- a. pay fees in accordance with applicable regulations;
- b. use the land according to the designation and/or use as stated in the IPT;
- c. obtain written approval from the Head of the Surabaya City Building and Land Management Office, if the building on land that has been issued by an IPT will be used as collateral for a loan or will be transferred to another party.

IPT holders are prohibited from:

- a. transfer the IPT to another party without written approval from the Head of the Surabaya City Building and Land Management Office;
- b. abandoned land for up to three years since the issuance of the IPT,
- c. handing over control of land that has been issued by an IPT to another party with or without an agreement.

Based on the description above, a formulation of the problem can be drawn as follows:

1. What is the legal basis and legal principles used by the City Government to be able to control the IPT land which is recognized as an asset by the Surabaya City Government?
2. What is the legal basis for the community holding the IPT to fight against the law with the aim of relinquishing the City Government's land rights for the community to own?
3. Can IPT land be owned by the community?

Literature Review

Types of Land Rights

In general, the types of land rights are regulated in Law Number 5 of 1960 concerning Basic Agrarian Regulations (“UUPA”). Article 16 paragraph (1) letters a and c of the UUPA explains that land rights, among other things, are property rights and building use rights.(Sudiarto, 2021)

Property rights are hereditary, strongest and fullest rights that people can have over land, bearing in mind the provisions in Article 6 of the UUPA. Only Indonesian citizens can have property rights. Meanwhile, Building Utilization Right is the right to construct and own buildings on land that is not their own, with a maximum period of 30 years. At the request of the right holder and taking into account the needs and condition of the buildings, this period can be extended for a maximum period of 20 years. Those who can have building use rights are Indonesian citizens and legal entities established according to Indonesian law and domiciled in Indonesia.(SARI, 2021)

Building use rights occur against:

- a. regarding land directly controlled by the state, because of a government stipulation;

- b. regarding private land, because of an authentic agreement between the owner of the land in question and the party who will obtain the right to use the building, which intends to give rise to said right.

Research Method

The research method in this study uses normative juridical research methods, Normative juridical research methods are approaches used in legal research to analyze legal regulations and other legal documents. This method focuses on the analysis of existing legal norms and the use of legal arguments to understand and explain the legal issue under study.

In normative juridical research, researchers collect data from relevant legal sources, such as laws, regulations, court rulings, constitutional documents, and legal literature. Then, the data is critically analyzed using theoretical approaches and legal arguments to explore the meaning, purpose, and impact of existing legal regulations.

Results and Discussion

Taking into account the Regional Regulation of the City of Surabaya Number 16 of 2014 concerning Relinquishment of Land Assets of the Surabaya City Government (“Perda Surabaya 16/2014”), it is possible to change the status of IPT to become property rights or building use rights.(Pranjaningtyas & Silviana, 2016)

1. What is the legal basis and legal principles used by the City Government to be able to control the IPT land which is recognized as an asset by the Surabaya City Government?

Basic and legal principles used by the Surabaya City Government in controlling State land assets to become City Government assets (IPT / Surat-Ijo)

Legal basis:

1. Law Number 5 of 1960 concerning Basic Agrarian Regulations;
2. Law Number 28 of 2009 concerning Regional Taxes and Regional Levies;
3. Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest;
4. Regional Regulation of the City of Surabaya Number 10 of 2010 concerning Urban Land and Building Taxes;
5. Regional Regulation of the City of Surabaya Number 13 of 2010 concerning Retribution for the Use of Regional Assets as amended by Regional Regulation of the City of Surabaya Number 2 of 2013 concerning Amendments to Regional Regulation of the City of Surabaya Number 13 of 2010 concerning Retribution for the Use of Regional Assets;
6. Surabaya City Regional Regulation Number 16 of 2014 concerning Relinquishment of Land Assets of the Surabaya City Government;
7. Surabaya City Regional Regulation Number 3 of 2016 concerning Permits Land Use.
 - Article 20 paragraph (1) UUPA
 - Article 21 paragraph (1) UUPA

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- Article 35 paragraphs (1) and (2) of the UUPA
- Article 36 paragraph (1) UUPA
- Article 37 UUPA
- Article 3 paragraph (1) Surabaya Regional Regulation 3/2016
- Article 4 Surabaya Regional Regulation 3/2016
- Article 5 Surabaya Regional Regulation 3/2016
- Article 7 Surabaya Regional Regulation 3/2016
- Article 8 paragraph (1) Surabaya Regional Regulation 3/2016
- Article 2 Surabaya Regional Regulation 16/2014
- Article 5 paragraph (1) Surabaya Regional Regulation 16/2014
- Article 11 Surabaya Regional Regulation 16/2014
- Article 1 point 10 Law 28/2009
- Article 1 point 64 Law 28/2009
- Article 108 paragraph (1) Law 28/2009

Legal principles:

- The principle of people's welfare
- The principle of justice
- Social principles
- Principles of government policy
- The principle of humanity
- The principle of human rights

The Surabaya City Government (Pemkot) is trying to resolve the issue of Land Use Permits (IPT) or commonly known as "Surat-Ijo" by issuing Surabaya City Regional Regulation No. 16 of 2014, concerning the relinquishment of Surabaya City Government asset land. However, it is constrained by regulations regarding regional property, so the release of IPT must comply with government regulations or the Minister of Home Affairs Regulation (Permendagri) which regulates the management of regional property. (Sukaryanto, 2016)

Regulations for Land Use Permits (IPT) or commonly known as "Surat-Ijo" have been regulated and stipulated in the Law (UU). First, Law No. 1 of 2004 concerning the State Treasury, Government Regulation No. 27 of 2014 concerning Management of State Property (BMN), Permendagri No. 19 of 2016 concerning Guidelines for the Management of Regional Property. Fourth, Regional Regulation No. 13 of 2010 concerning Retribution for the Use of Regional Assets as amended to become Regional Regulation No. 2 of 2013. Fifth, Regional Regulation No. 16 of 2014 concerning Relinquishment of Land Assets of the Surabaya City Government. The Sixth Surabaya City Regional Regulation No 3 of 2016 Concerning Land Use Permits. (Sander & Prathama, 2021)

The Surabaya City Government has provided a solution for handling the problem of Land Use Permits. Starting from providing relief from IPT payments or relief from fees, waiving fees for the use of public facilities such as Balai RW and mosques, to providing solutions regarding the release of land use permits, however, there is a maximum limit of around 250

square meters. Moreover, the Surabaya City Government had previously conducted consultations with various parties including the Ministry of Home Affairs, so that the release of land assets would not be accompanied by 100 percent compensation. However, this was rejected, because the release of land assets must comply with Government Regulation No. 6 of 2006 and Permendagri Number 17 of 2007 (Safaruddin et al., 2018). The rules state that relinquishment of rights to compensation can be processed with consideration of benefiting the region. Second, the calculation of the estimated value of the released land is carried out by an internal appraiser or an independent institution taking into account the NJOP or local general price.(Nursasona, 2018)

2. What is the legal basis for the community holding the IPT to fight the law with the aim of releasing the City Government's land rights for the community to own?

The liberation movement emerged starting with the resistance of some residents of the Surat-Ijo land at the beginning of the 1999 reform era who were observant of the situation. They define the reform situation as the right moment to take the fight. So the reform era has actually provided space for freedom to express the aspirations of every citizen without fatal risk consequences, the law that occurred in the context of green certificate land which has become the substance of citizen dissatisfaction until now (2016) includes the burden of retribution, the legality of IPT status, the persistence of the status *eigendom/besluit* land, state land claims as regional government assets, position and management of HPL status which are far from efforts to improve people's welfare, and others

The municipal government of Surabaya insists that state land is its asset, so on the basis of a regional regulation on land use permits, it is leased out. When talking about assets under the law regarding the management of regional property. Where the so-called regional property must be clear on the basis of rights. Purchased with the regional budget or used legally," he said. So regional property, which is called an asset, must have a clear basis for its rights. So that it can be concluded that what is called state land is land owned by the central government, not the regional government.

Minister of Home Affairs Regulation (Permendagri) No. 6 of 1972 concerning Delegation of Authority for Granting Land Rights. In Article 13 Paragraph 1 of the Permendagri it is stated as follows:

“Governors/Regents/Mayors of Regional Heads are prohibited from:

- a. Giving state land with any rights even with a temporary designation
- b. Granting permission to use or control State Land unless such authority is expressly delegated.”

Based on the Permendagri, residents of Surat-Ijo land are of the opinion that the existence of IPT status on state land cannot be justified. Although Permendagri No. 6 of 1972 is no longer valid and has been replaced by Regulation of the State Minister for Agrarian Affairs No. 3 of 1999, but at least the Permendagri was valid from 1972 to 1999. In fact, according to residents of the Surat-Ijo land based on the Regulation of the Minister of Agriculture (Permenag/PMNA) No. 3 of 1999, regional heads are not given any delegation of authority over the existence of state land in their respective territories.(Husein et al., 2018)

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Apart from that, residents of the Surat-Ijo land also linked the Regional Regulation with PP No. 24 of 1997 concerning *Land Registration*, it is stated that land which has been inhabited by residents for more than 20 consecutive years, can be certified as the property of the residents. Also, Regulation of the State Minister for Agrarian Affairs or the Head of the National Land Agency No. 5 of 1998 concerning *Changes Building Use Rights or Land Use Rights for Residential Houses Encumbered with Mortgage Rights Become Property Rights*; whose essence is to provide the widest possible opportunity for changing the status of state land to become land owned by Indonesian citizens. (Larasati & Irianti, 2020)

Considering letter c of Surabaya Regional Regulation 16/2014 explains that:

" that in accordance with development and economic developments and in order to meet the needs of holders of Land Use Permits to be able to obtain land rights, it is necessary to process the disposal of land assets of the City Government of Surabaya ".

The local government, with the approval of the DPRD, has the authority to take action to release land that has been issued by an IPT based on a request from the IPT holder. IPT holders who are entitled to apply for land release are those who have a Surabaya identity card.

Article 3 of Surabaya Regional Regulation 16/2014 describes that the object of disposal is land that has been issued by an IPT with the following criteria:

- a. the designation of IPT is housing with residential use;
- b. the applicant is an IPT holder for 20 consecutive years;
- c. IPT is still valid;
- d. maximum IPT area of 250 square meters;
- e. only one parcel can be released for those who have IPT of more than one parcel;
- f. not in dispute/problem; And
- g. not included in the development planning carried out by the local government.

Applications for land release are submitted in writing to the mayor or appointed official. Furthermore, Article 6 of the Surabaya Regional Regulation 16/2014 States that:

1. For applications for land release that have obtained DPRD approval, an agreement is made between the Regional Government and the applicant.
2. The agreement referred to in paragraph (1) includes:
 - a. Compensation payment agreement;
 - b. Land release agreement.

Article 10 paragraph (2) and (3) of the Surabaya Regional Regulation 16/2014 explains that the calculation of the estimated value of the land to be released is carried out by an internal appraiser formed by decision of the mayor or can be carried out by an independent institution that is certified in the field of asset valuation. The results of the land value assessment are determined by the mayor.

For applicants whose application is granted, they are required to pay compensation within a maximum period of 24 months from the signing of the compensation payment agreement and can be extended for one year taking into account the ability of the applicant.

3. Can IPT land be owned by the community?

Based on the description above, if someone has controlled IPT land for more than 20 years, he/she can change the status of the IPT to ownership rights or building use rights. The right to build is possible, because based on the article Transfer of Land Controlled by the State, land controlled by the regional government is also land controlled by the state as referred to in the BAL as the basis for building use rights.

To change the IPT, the IPT holder must submit a written application to the mayor or official appointed and then pay an amount of money based on the value determined by the assessment team to carry out land release from the local government. Imposition of Land and Building Tax and Regional Retribution. Regarding your second question, regional taxes and levies are regulated in Law Number 28 of 2009 concerning Regional Taxes and Regional Retribution ("UU 28/2009").(Renniwatiy Siringoringo, 2018)

Regional taxes are mandatory contributions to the region owed by individuals or entities that are coercive by law, by not receiving direct compensation and used for regional needs for the greatest prosperity of the people.

While regional levies are regional levies as payments for services or granting of certain permits specifically provided and/or granted by the local government for the benefit of individuals or entities. Objects of fees are general services, business services, and certain permits.

Based on this description, one of the differences between taxes and levies is that taxes do not generate compensation directly, while levies generate compensation directly by providing services or granting certain permits by the region. What is meant by land and building tax is rural and urban land and building tax which is a tax on land and/or buildings owned, controlled, and/or utilized by individuals or entities, except for areas used for plantation, forestry, and mining. Land and building taxes in rural and urban areas are part of the taxes that are the authority of districts/cities.

In Article 5 of the Regional Regulation of the City of Surabaya Number 13 of 2010 concerning Retribution for the Use of Regional Assets it is explained that charges for the use of regional assets are classified as business service fees. IPT is one of the business service retribution objects.

Meanwhile, Surabaya City Regional Regulation Number 10 of 2010 concerning Urban Land and Building Tax regulates the imposition of urban land and building taxes. The regional regulation stipulates that tax objects that are not subject to land and building tax are tax objects that:

- a. used by the Central Government, Provincial Government and Regional Government for administering government;
- b. used solely to serve the public interest in the field of worship, social, health, education and national culture, which is not intended to gain profit;
- c. used for graves, ancient relics, or the like;
- d. constituting protected forest, nature reserve forest, tourism forest, national park, and state land that has not been encumbered with a right;

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- e. used by diplomatic representatives and consulates based on the principle of reciprocal treatment; And
- f. used by agencies or representatives of international institutions stipulated by a Minister of Finance Regulation.

Thus, IPT houses and land are not exempt from urban land and building taxes.

Based on this description, the Surabaya city government has carried out the imposition of land and building taxes and levies on IPT on one object at a time. Taxes and levies are two different matters and are regulated in different laws and regulations. Land Eviction Intended for land acquisition in the public interest as referred to in Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest (“Law 2/2012”) .(Supit et al., 2021) Article 27 paragraph (2) of Law 2/2012 explains that the implementation of land acquisition includes:

- a. inventory and identification of control, ownership, use and utilization of land;
- b. compensation assessment;
- c. deliberations on the determination of compensation;
- d. granting of compensation; And
- e. agency land release.

So to carry out land acquisition /eviction for the sake of the public interest, the local government should first carry out the above steps.

Conclusion

Based on the discussion in the previous chapters, there are several things that need to be emphasized:

First, the emergence of the liberation movement for the residents of the Surat-Ijo land is a form of response to the phenomenon of injustice that has surrounded and shackled some of the people of the city of Surabaya which has been going on for a long time. The emergence of the liberation movement was encouraged and facilitated by a situation that upheld the spirit of openness and freedom of expression, namely the spirit of reform that arose in the post-New Order era.

Second, one (of the many) factors that gave rise to the liberation movement for the residents of Surat-Ijo land is the difference in understanding of the applicable laws and regulations, especially the regional land laws and regulations. This difference in views has led to different perceptions between the two parties regarding the status of state land rights that are occupied by residents.

Third, the form of conflict resolution regarding the Surat-Ijo land can occur when there is a unified understanding between the residents of the Surat-Ijo land and the City Government of Surabaya regarding land laws and regulations, both national and local. Efforts to resolve the conflict require a bold breakthrough, not just to be handled legally which only involves the two parties to the dispute, but requires the involvement of at least three ministries, namely the Ministry of Home Affairs, the Ministry of Agrarian Affairs and Spatial Planning, and the

Ministry of Finance. The settlement of the Surat-Ijo land conflict must be encouraged by the spirit of upholding justice and prosperity for all Indonesian people as the goal of the proclaimed Unitary State of the Republic of Indonesia (NKRI) in 1945.

Reference

- Aristo, E., Arifin, K. M., & Pangestu, N. P. (2022). Pelepasan Asset Hak Pengelolaan Pemerintah Kota Surabaya Kepada Pemegang Izin Pemakaian Tanah. *Jurnal Education and Development*, 10(1).
- Faisal, F., Mukhlis, M., Jamaluddin, J., Manfarisyah, M., & Maghfirah, F. (2023). Strengthening Zakat Rules in Indonesia: A Legal Study of the Law on Government of Aceh. *Samarah*, 7(1). <https://doi.org/10.22373/sjhc.v7i1.13993>
- Husein, F. P., Abubakar, L., & Lubis, N. A. (2018). KEPASTIAN HUKUM PENERAPAN JANGKA WAKTU PERPANJANGAN HAK GUNA BANGUNAN YANG BERAKHIR MASA BERLAKUNYA SEBAGAI OBYEK HAK TANGGUNGAN SEBELUM PERJANJIAN POKOK BERAKHIR DIKAITKAN DENGAN PERATURAN PERUNDANG-UNDANGAN YANG BERLAKU. *Acta Diurnal Jurnal Ilmu Hukum Kenotariatan Dan Ke-PPAT-An*, 2(1). <https://doi.org/10.24198/acta.v2i1.162>
- Larasati, E. I., & Irianti, L. N. (2020). Konflik Surat Ijo Berkaitan Dengan Adanya Pungutan Ganda Berupa Retribusi dan PBB. *Syiah Kuala Law Journal*, 4(2). <https://doi.org/10.24815/sklj.v4i2.17660>
- Made Putri Laras Sapta Ananda, I Nyoman Putu Budiarta, & Ni Made Puspasutari Ujianti. (2022). Penyelesaian Sengketa Penguasaan Tanah Hak Guna Bangunan di Atas Tanah Hak Pengelolaan Lahan Pemerintah Daerah. *Jurnal Konstruksi Hukum*, 3(2). <https://doi.org/10.55637/jkh.3.2.4818.316-320>
- Nursasona, D. I. (2018). IMPLEMENTASI PERMENDAGRI NOMOR 17 TAHUN 2007 DALAM RANGKA EFISIENSI PENATAUSAHAAN BARANG MILIK DAERAH. *Journal of Management Review*, 2(1). <https://doi.org/10.25157/jmr.v2i1.916>
- Pranjaningtyas, C., & Silviana, A. (2016). PENERAPAN HUKUM ATAS PERATURAN DAERAH NO.16 TAHUN 2014 TENTANG PELEPASAN TANAH ASET PEMERINTAH KOTA SURABAYA TERHADAP HAK PENGELOLAAN “SURAT HIJAU” (Studi Kasus Di Pemerintah Kota Surabaya). *Diponegoro Law Review*, 5(2).
- Rahmanisa, A. (2020). Perolehan Hak Atas Tanah Yang Berasal Dari Izin Pemakaian Tanah Kota Surabaya. *Jurist-Diction*, 3(3). <https://doi.org/10.20473/jd.v3i3.18622>
- Renniwyaty Siringoringo, I. S. (2018). Tinjauan Umum Mengenai Undang-Undang Nomor 28 Tahun 2009 Tentang Pajak Daerah Dan Restribusi Daerah Tentang Pajak Restoran. *Jurnal Cahaya Keadilan*, 6(2). <https://doi.org/10.33884/jck.v6i2.871>
- Rut Agia Aprilliani, Verlia Kristiani, & Katrine Novia. (2023). Ketimpangan Penguasaan Tanah Oleh Korporasi dan Warga Masyarakat Dalam Optik Politik Pertanahan Nasional. *Binamulia Hukum*, 9(1). <https://doi.org/10.37893/jbh.v9i1.360>
- Safaruddin, Dali, N., & Firman, L. O. (2018). Efektivitas Sistem dan Prosedur Pengelolaan Barang Milik Daerah sesuai Permendagri No. 17 Tahun 2007 pada Pemerintah Daerah Kabupaten Konawe. *Jurnal Akuntansi Dan Keuangan*, 3(17).

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- Sander, J. V. A., & Prathama, A. (2021). PUBLIC COMPLAINT HANDLING SERVICES ABOUT PUBLIC STREET LIGHTING AT THE DINAS KEBERSIHAN RUANG TERBUKA HIJAU SURABAYA CITY. *Dia*, 19(1). <https://doi.org/10.30996/dia.v19i1.5146>
- SARI, N. L. A. (2021). KONSEP HAK MENGUASAI NEGARA TERHADAP TANAH DALAM HUKUM TANAH (UUPA) DAN KONSTITUSI. *GANEC SWARA*, 15(1). <https://doi.org/10.35327/gara.v15i1.202>
- Suartining, N. K., & Djaja, B. (2023). Land Rights in the Land Law System in Indonesia According to the Basic Agrarian Law Number 5 of 1960. *Journal of Social Research*, 2(6). <https://doi.org/10.55324/josr.v2i6.903>
- Sudiarto, B. (2021). SUBYEK HAK MILIK ATAS TANAH MENURUT UUPA. *Al-Qisth Law Review*, 5(1). <https://doi.org/10.24853/al-qisth.5.1.1-43>
- Sukaryanto, S. (2016). Konflik Tanah Surat Ijo di Surabaya (Sebuah Perspektif Teoretik-Resolutif). *BHUMI: Jurnal Agraria Dan Pertanahan*, 2(2). <https://doi.org/10.31292/jb.v2i2.68>
- Supit, E. H., Lasut, R., & Oliy, A. (2021). Pengadaan Tanah Untuk Kepentingan Umum Berdasarkan Undang-Undang No. 2 Tahun 2012 Tentang Pengadaan Tanah Bagi Pembangunan Untuk Kepentingan Umum. *Lex Admi*, IX(4).