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Corruption and Natural Resource Governance in Indonesia: Transparency Challenges in Coal Mining Licensing in East Kalimantan

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Abstract

East Kalimantan is one of Indonesia's major coal-producing regions, making mining licensing and natural resource governance particularly important areas for anti-corruption policy. The economic value of mining licenses creates incentives for rent-seeking, conflicts of interest, political intervention, and opaque decision-making. This article examines corruption risks in coal mining licensing in East Kalimantan. Using normative juridical and governance analysis, the study evaluates licensing procedures, transparency requirements, political connections, beneficial ownership, and oversight mechanisms. The article argues that formal licensing procedures may remain vulnerable when information concerning ownership, political interests, and environmental obligations is not publicly accessible. The study proposes a transparency-centered framework requiring comprehensive beneficial ownership disclosure, open licensing data, conflict-of-interest declarations, independent environmental assessments, and post-licensing monitoring. Particular attention is given to the relationship between local political actors and private mining interests. The article concludes that anti-corruption strategies in resource-rich regions should move beyond individual criminal enforcement and address structural opportunities for rent-seeking embedded in licensing systems. Strengthening transparency and public participation can improve accountability in East Kalimantan's mining governance.

[*Kalimantan Timur merupakan salah satu wilayah penghasil batubara utama di Indonesia, sehingga perizinan pertambangan dan tata kelola sumber daya alam menjadi area yang sangat penting bagi kebijakan anti-korupsi. Nilai ekonomi dari izin pertambangan menciptakan insentif untuk praktik mencari rente, konflik kepentingan, intervensi politik, dan pengambilan keputusan yang tidak transparan. Artikel ini mengkaji risiko korupsi dalam perizinan pertambangan batubara di Kalimantan Timur. Dengan menggunakan analisis yuridis dan tata kelola normatif, studi ini mengevaluasi prosedur perizinan, persyaratan transparansi, koneksi politik, kepemilikan manfaat, dan* *mekanisme pengawasan. Artikel ini berpendapat bahwa prosedur perizinan formal dapat tetap rentan ketika informasi mengenai kepemilikan, kepentingan politik, dan kewajiban lingkungan tidak dapat diakses publik. Studi ini mengusulkan kerangka kerja yang berpusat pada transparansi yang membutuhkan pengungkapan kepemilikan manfaat yang komprehensif, data perizinan yang terbuka, deklarasi konflik kepentingan, penilaian lingkungan independen, dan pemantauan pasca-perizinan. Perhatian khusus diberikan pada hubungan antara aktor politik lokal dan kepentingan pertambangan swasta. Artikel ini menyimpulkan bahwa strategi anti-korupsi di wilayah kaya sumber daya harus melampaui penegakan hukum pidana individu dan mengatasi peluang struktural untuk praktik mencari rente yang tertanam dalam sistem perizinan. Penguatan transparansi dan partisipasi publik dapat meningkatkan akuntabilitas dalam tata kelola pertambangan di Kalimantan Timur.*]

Keywords: Mining corruption, East Kalimantan, licensing, beneficial ownership, natural resources

Introduction

Natural resource governance in Indonesia has long occupied a central position in debates concerning economic development, environmental justice, institutional accountability, and corruption. This relationship is particularly visible in East Kalimantan, where coal mining has become deeply embedded in regional political and economic structures. The province possesses substantial coal resources and has historically contributed significantly to Indonesia's national coal production, but the expansion of mining has also generated overlapping permits, environmental degradation, abandoned mining pits, land conflicts, and persistent questions concerning the integrity of licensing decisions (Dwyer and Davies 2023; Erlangga et al. 2023). These problems cannot be understood solely as failures of environmental management. They also reveal a governance problem in which administrative discretion intersects with high-value natural resources, creating incentives for political actors and private corporations to influence decisions concerning access to land and extractive rights. Where licensing information is incomplete, inaccessible, or difficult to verify, corruption risks become embedded not only in individual transactions but also in the institutional structures governing the allocation of economic opportunities.

The importance of licensing integrity becomes particularly evident when mining rights are understood as instruments that distribute access to valuable public resources. A mining license does not merely authorize a technical business activity; it may determine who can exploit land, generate substantial commercial returns, and influence local economic development. Consequently, the process through which licenses are issued, renewed, transferred, monitored, or revoked represents a critical site of public accountability. Comparative research on resource governance has repeatedly demonstrated that weak transparency can facilitate rent-seeking by concealing the identity of beneficiaries, obscuring decision-making criteria, and limiting the ability of citizens and oversight institutions to detect irregularities (Kolstad and Wiig 2009; Williams 2011; Sovacool et al. 2016). The Indonesian experience confirms that formal rules alone cannot guarantee integrity if information asymmetry allows officials or politically connected actors to exercise influence without meaningful external scrutiny. Licensing systems must therefore be assessed not only according to the existence of legal procedures but also according to whether those procedures produce verifiable, accessible, and contestable public information.

Indonesia's legal framework for mineral and coal mining has undergone significant transformation. Law No. 4 of 2009 concerning Mineral and Coal Mining was amended by Law No. 3 of 2020, while Government Regulation No. 96 of 2021 established a comprehensive framework concerning mining business activities, licensing, reporting, supervision, community development, and administrative sanctions. The legal reforms also altered the distribution of licensing authority, moving important aspects of authority from subnational governments toward the central government. This centralization was partly justified as a response to problems associated with fragmented licensing, inconsistent administrative practices, and the proliferation of permits during earlier decentralization periods (Venugopal 2014; Putri et al. 2023). Nevertheless, institutional centralization should not automatically be equated with improved integrity. A corruption risk is fundamentally reduced when decision-making becomes transparent, traceable, and subject to independent scrutiny, not merely when the location of administrative authority changes. Concentrating authority without strengthening transparency may simply relocate opportunities for influence and rent-seeking.

This article therefore examines corruption risks in coal mining licensing in East Kalimantan by focusing on transparency as a central principle of natural resource governance. The analysis adopts a normative juridical and descriptive-analytical approach by examining relevant legislation, governance literature, empirical studies of mining administration, and scholarly research concerning corruption, transparency, ownership disclosure, and environmental oversight. Rather than treating corruption exclusively as a criminal act committed after a violation occurs, the article approaches corruption prevention as a matter of institutional design. It asks whether existing legal and administrative structures make irregular conduct difficult to conceal and easy to detect. The argument advanced is that corruption prevention requires a chain of transparency extending from the initial allocation of mining rights to beneficial ownership, environmental obligations, production reporting, reclamation, and post-licensing supervision. East Kalimantan demonstrates why such an integrated approach is necessary: licensing problems are interconnected with political interests, information asymmetry, weak oversight, and environmental consequences that cannot be effectively addressed through fragmented institutional responses.

This study employs a normative juridical method combined with descriptive and institutional analysis. The normative component examines the legal framework governing mineral and coal mining, particularly Law No. 4 of 2009 as amended by Law No. 3 of 2020, Law No. 23 of 2014 concerning Regional Government, Government Regulation No. 96 of 2021, Presidential Regulation No. 13 of 2018 concerning beneficial ownership, and relevant anti-corruption and transparency legislation. The legal analysis is supplemented by academic literature addressing corruption, natural resource governance, decentralization, extractive industries, licensing, environmental accountability, and beneficial ownership. The descriptive-analytical dimension is used to connect formal legal norms with the institutional realities documented in East Kalimantan. This approach is appropriate because the effectiveness of anti-corruption regulation cannot be evaluated solely by identifying statutory provisions; it must also consider whether institutional arrangements reduce information asymmetry, constrain discretionary abuse, and enable public oversight.

The analysis is organized around three interconnected questions. First, what structural corruption risks have historically emerged from coal mining licensing in East Kalimantan? Second, to what extent do Indonesia's current legal and institutional reforms address transparency problems associated with licensing authority and corporate ownership? Third, what governance framework is necessary to convert transparency from a formal disclosure requirement into an effective anti-corruption instrument? The study does not claim to measure the total incidence of corruption or establish criminal liability for particular actors. Instead, it identifies institutional conditions that create opportunities for corruption and evaluates legal mechanisms capable of reducing those opportunities. This analytical distinction is important because the absence of a criminal conviction does not necessarily demonstrate the absence of governance risk. In high-value extractive sectors, prevention requires attention to structural vulnerabilities before they mature into bribery, collusion, illicit influence, or other forms of corruption.

Licensing as a Structural Source of Corruption Risk in East Kalimantan

The corruption risks associated with coal mining in East Kalimantan originate partly from the economic character of licensing itself. A permit allocates access to a valuable and geographically limited resource, making the licensing process susceptible to competition among private interests seeking preferential treatment. During the period of extensive decentralization, the multiplication of mining permits created substantial coordination problems between districts, provinces, and national institutions. Research on Indonesian mineral licensing has shown that decentralized authority could generate overlapping concessions, inconsistent regulatory implementation, poor information sharing, and weak accountability where subnational administrative capacity was limited (Venugopal 2014). In East Kalimantan, these institutional weaknesses were particularly significant because the province contained a large number of mining permits and experienced extensive overlap between mining, forestry, plantation, and other land uses. The resulting governance environment created opportunities for administrative discretion to operate within fragmented information systems, reducing the ability of citizens and oversight institutions to determine whether a particular license had been lawfully issued or whether its holder had complied with continuing legal obligations.

The persistence of licensing problems in East Kalimantan demonstrates that corruption risk should be understood as more than an individual act of bribery. It can emerge from a broader political economy in which legal authority, business interests, and access to natural resources become mutually reinforcing. Studies of coal mining in the province have identified extensive political-economic networks surrounding the extractive sector and have emphasized the role of opaque licensing processes in limiting public scrutiny and facilitating environmentally harmful outcomes (Toumbourou et al. 2023). Under such conditions, the formal validity of a permit may conceal more fundamental questions concerning the process through which access was obtained, the identity of the economic beneficiaries, and the relationship between permit holders and political actors. This distinction is crucial because corruption prevention should not begin only after evidence of a financial transaction emerges. Institutional analysis must instead examine whether the system allows a particular interest to influence decisions while avoiding disclosure or accountability. Transparency therefore functions as a preventive mechanism by making the exercise of administrative authority observable before hidden relationships become entrenched.

The consequences of weak licensing governance extend beyond administrative legality and directly affect environmental protection. Mining permits determine the geographical expansion of extraction and may therefore influence forest conversion, water quality, land access, and reclamation obligations. Research examining East Kalimantan's coal sector has demonstrated that historical weaknesses in licensing governance contributed to extensive environmental risks and conflicts, while inadequate public disclosure complicated efforts to map the full geographical implications of coal mining permits (Dwyer and Davies 2023). Similarly, research on mining governance has found that the transfer of rights associated with forest areas can generate agency problems, information asymmetry, and moral hazard when responsibilities for supervision and reclamation are poorly coordinated (Sembiring et al. 2020). These findings demonstrate that transparency is not merely a procedural value. Information concerning licenses, concession boundaries, environmental obligations, and reclamation performance is necessary for determining whether mining companies comply with the conditions under which public authority granted them access to natural resources.

The historical record also illustrates why administrative rationalization alone cannot eliminate corruption risk. Government efforts to evaluate mining permits resulted in the revocation or invalidation of substantial numbers of licenses, including in East Kalimantan, because of expired permits, administrative deficiencies, overlapping areas, and failures to satisfy technical, environmental, or financial requirements (Nurkhalis et al. 2023). Such interventions may improve legal order, but they also reveal the depth of earlier institutional weaknesses. The existence of invalid or overlapping permits suggests that preventive controls were insufficient at the point when licensing decisions were initially made. A governance system that relies primarily on retrospective correction may remain vulnerable because economic and political interests can already have benefited from a permit before irregularities are discovered. Effective anti-corruption policy should therefore incorporate ex ante verification, continuous disclosure, and independent monitoring throughout the licensing cycle rather than treating permit evaluation as an exceptional remedial exercise.

Legal Reform, Centralization, and the Persistent Problem of Opacity

Indonesia's contemporary mining governance framework is primarily shaped by Law No. 4 of 2009 concerning Mineral and Coal Mining, as amended by Law No. 3 of 2020. One of the most significant institutional consequences of the amendment was the movement of substantial licensing authority from regional governments toward the central government. The policy reflected concerns that decentralized licensing had contributed to overlapping permits and uneven regulatory implementation. However, the legal significance of centralization should be analyzed carefully. Centralization may improve administrative consistency and facilitate the integration of national data, but it does not automatically create transparency. As Putri et al. (2023) argue, the transfer of licensing authority cannot independently eliminate the risk of bribery or illicit influence when the legal system does not sufficiently strengthen the principle of openness. The relevant question is therefore not simply which institution has authority to issue a license, but whether the reasons, procedures, beneficiaries, and consequences of licensing decisions are sufficiently transparent to permit independent verification.

Government Regulation No. 96 of 2021 provides an important legal framework for implementing mining business activities. It regulates national mineral and coal management planning, licensing, mining business permits, transportation and sales permits, reporting obligations, community development, environmental and operational requirements, and administrative sanctions. The regulation therefore establishes a broad legal architecture through which mining activities may be controlled. Nevertheless, the existence of comprehensive regulation does not ensure that information produced under the regulatory system is automatically accessible or intelligible to the public. A transparency-centered anti-corruption approach requires more than the availability of reports within government institutions. It requires interoperability between licensing data, concession maps, corporate information, environmental obligations, production reports, and enforcement actions. When these categories remain institutionally fragmented, an external observer may know that a company holds a permit but remain unable to determine who ultimately benefits from it, whether the concession overlaps with another right, or whether the company has fulfilled its reclamation obligations.

The issue of beneficial ownership represents a particularly important limitation in formal corporate transparency. Presidential Regulation No. 13 of 2018 established the principle of identifying beneficial owners of corporations as part of efforts to prevent money laundering and terrorism financing. The regulation is relevant to natural resource governance because companies may be legally owned through complex corporate structures that obscure the individuals who ultimately exercise control or receive economic benefits. In the mining sector, this opacity creates significant corruption risks when politically exposed persons, public officials, or their associates possess hidden interests in companies seeking or holding mining rights. Without reliable beneficial ownership information, conflict-of-interest rules can be circumvented because the legal owner listed in official documents may not be the person who ultimately controls the corporation. Transparency concerning corporate ownership must therefore be connected directly to licensing procedures rather than treated as an isolated corporate compliance requirement.

Beneficial ownership disclosure also has broader democratic significance. The public cannot effectively evaluate potential conflicts between political power and private extraction when information about ultimate ownership is unavailable or difficult to connect with political officeholders. International research has emphasized that resource-rich countries frequently face governance problems when secrecy and complex ownership structures prevent citizens from identifying the beneficiaries of natural resource extraction (Gillies 2011; Sovacool et al. 2016). Indonesia's legal recognition of beneficial ownership is therefore an important institutional foundation, but disclosure must be accurate, verifiable, regularly updated, and linked to sector-specific licensing information. A registry that exists formally but cannot be effectively cross-checked against mining permit data offers limited protection against concealed conflicts of interest. The anti-corruption value of ownership transparency depends on institutional connectivity: licensing authorities, corporate registries, financial intelligence institutions, environmental agencies, auditors, and law-enforcement bodies must be capable of identifying relationships that may otherwise remain hidden.

The legal framework must also be interpreted alongside broader constitutional and administrative principles. Article 33 of the 1945 Constitution places the control of natural resources within the framework of state responsibility for the greatest prosperity of the people. This constitutional principle implies that the administration of natural resources cannot be reduced to the distribution of commercial opportunities among private license holders. It requires public institutions to exercise authority in a manner consistent with welfare, accountability, and public interest. Law No. 30 of 2014 concerning Government Administration further emphasizes legality and principles of good governance, while Law No. 14 of 2008 concerning Public Information Disclosure provides an important normative basis for public access to governmental information. These legal principles should inform the interpretation of mining licensing: where a decision concerns valuable public resources and potentially significant environmental consequences, transparency should be treated as a substantive condition of accountable governance rather than a peripheral administrative obligation.

Toward an Integrated Transparency Framework for Corruption Prevention

A more effective anti-corruption strategy for East Kalimantan requires the creation of an integrated transparency system covering the entire life cycle of a mining license. The first element should be a publicly accessible licensing register containing standardized information concerning the identity of the license holder, permit status, geographical coordinates, duration, transfers, relevant approvals, and compliance history. Open information is most effective when it allows users to compare different datasets rather than merely read isolated documents. A citizen, journalist, academic researcher, or civil society organization should be able to determine whether a concession overlaps with protected land, another mining permit, or other resource rights. This approach would reduce information asymmetry between public institutions and citizens while increasing the probability that inconsistencies are detected. Research on transparency and corruption suggests that disclosure is most effective when information can be independently interpreted and used to generate accountability rather than simply released as an administrative formality (Kolstad and Wiig 2009; Lindstedt and Naurin 2010).

The second element should be mandatory integration between mining licensing and beneficial ownership disclosure. Every company applying for, renewing, transferring, or substantially modifying a mining right should disclose its ultimate beneficial owners, relevant corporate structure, and controlling interests. Such information should be subject to verification and periodic updating. The disclosure framework should also include mechanisms for identifying politically exposed persons and for examining whether public officials or politically connected individuals possess direct or indirect interests in companies receiving mining rights. This does not mean that every political connection automatically constitutes corruption. However, undisclosed relationships create a serious governance risk because they prevent the public from determining whether official decisions were influenced by private interests. Conflict-of-interest declarations should therefore accompany major licensing decisions, with decision-makers required to disclose relevant financial or family relationships and recuse themselves where impartiality may reasonably be questioned.

The third element concerns environmental transparency and post-licensing accountability. Mining corruption risks may persist after a permit is issued because companies can fail to comply with production limits, environmental obligations, reclamation requirements, or community development commitments. Research in East Kalimantan has shown that supervision is institutionally complex because responsibilities are distributed among different agencies and levels of government, while limited coordination can weaken enforcement (Nurkhalis et al. 2023). Transparency should therefore include the publication of environmental assessments, reclamation plans, inspection results, violations, sanctions, and evidence of compliance. Such disclosure would enable communities directly affected by mining to monitor whether legal commitments are implemented in practice. Community participation is particularly important because local residents often possess direct knowledge concerning environmental changes that may not be immediately visible through administrative reporting.

Public participation should also be treated as a mechanism of social accountability rather than a procedural requirement. Communities, civil society organizations, universities, and independent media can contribute to corruption prevention by identifying discrepancies between official information and conditions on the ground. However, participation becomes ineffective when citizens lack access to understandable information or face retaliation for reporting suspected irregularities. Indonesia's anti-corruption framework should therefore be connected with accessible complaint mechanisms and meaningful protection for whistleblowers and public-interest reporters. The effectiveness of Law No. 31 of 1999 concerning the Eradication of Corruption, as amended by Law No. 20 of 2001, depends not only on the capacity to punish completed offenses but also on the institutional ability to detect suspicious conduct at an early stage. In the mining sector, early detection can be strengthened when citizens have legal channels through which to report undisclosed conflicts, illegal activity, falsified information, or environmental noncompliance.

The fourth element should involve independent monitoring and data-based risk analysis. Anti-corruption institutions and sectoral regulators should not rely exclusively on routine administrative reports submitted by license holders. Digital systems can be used to identify unusual patterns, including rapid changes in corporate ownership, repeated transfers of licenses, overlapping concession areas, or repeated connections between particular officials and companies. Risk-based analysis does not replace legal investigation, but it can improve the allocation of supervisory resources by identifying transactions or relationships requiring closer scrutiny. The integration of geospatial data, beneficial ownership information, licensing histories, and environmental compliance records would create a more comprehensive picture of governance risk. Such an approach is consistent with the broader principle that effective resource governance requires coordination between legal institutions, technical agencies, environmental authorities, and anti-corruption bodies.

Finally, the reform agenda should recognize that transparency has limits when it is not accompanied by consequences. Information disclosure cannot prevent corruption if false information carries minimal sanctions or if verified irregularities are not investigated. The integrated framework proposed in this article therefore requires administrative sanctions, permit suspension, revocation where legally justified, financial penalties, and criminal investigation when evidence indicates corrupt conduct. The objective should not be to treat every administrative deficiency as corruption but to establish a graduated accountability system in which the seriousness of the response corresponds to the nature of the violation. This distinction protects legal certainty while ensuring that companies and officials cannot exploit gaps between administrative, environmental, and anti-corruption institutions. Transparency is most effective when it creates a clear institutional chain from disclosure to verification and from verification to enforcement.

Conclusion

Coal mining licensing in East Kalimantan illustrates the close relationship between natural resource governance and corruption prevention. The economic value of coal extraction creates incentives for rent-seeking, while the complexity of licensing, land administration, corporate ownership, and environmental regulation can generate significant information asymmetries. Indonesia's experience demonstrates that corruption risk cannot be explained simply by the existence of individual officials willing to accept bribes. It is also produced by institutional conditions that allow politically or economically powerful actors to obtain, retain, or benefit from mining rights without sufficient public scrutiny. Historical problems involving overlapping permits, weak coordination, opaque licensing, and inadequate supervision show why a narrow law-enforcement approach is insufficient.

The transfer of substantial licensing authority toward the central government under Law No. 3 of 2020 may contribute to administrative standardization and improved coordination, but centralization should not be regarded as a complete anti-corruption solution. Government Regulation No. 96 of 2021 and Presidential Regulation No. 13 of 2018 provide important legal foundations for stronger governance, particularly regarding mining administration and beneficial ownership. Nevertheless, the effectiveness of these rules depends on whether information can be verified, integrated, and used by institutions and the public. The critical issue is therefore not only whether the state possesses data, but whether licensing decisions and their beneficiaries can be meaningfully examined by those responsible for ensuring accountability.

An effective anti-corruption strategy for coal mining should consequently adopt an integrated transparency framework linking open licensing information, verified beneficial ownership, conflict-of-interest declarations, environmental disclosure, community monitoring, whistleblower protection, independent oversight, and data-based risk analysis. Such a framework would move corruption prevention from a predominantly reactive model toward a preventive model designed to identify structural vulnerabilities before illicit influence becomes entrenched. In a resource-rich province such as East Kalimantan, transparency is therefore not merely an administrative principle. It is a necessary institutional condition for ensuring that state control over natural resources remains connected to public welfare, constitutional accountability, environmental protection, and democratic governance.

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