

Environmental Impact Assessment in Coastal Tourism Development: Evaluating Community Participation in Tourism Licensing Decisions in Bali

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Abstract

Coastal tourism development in Bali has generated significant investment while placing increasing pressure on coastal ecosystems and communities dependent on coastal resources. Environmental impact assessment is intended to prevent or mitigate environmental harm, yet questions remain concerning whether affected communities are meaningfully involved in tourism development decisions. This article examines community participation in environmental impact assessment and tourism licensing for coastal development projects in Bali. Using normative juridical and policy analysis, the study evaluates environmental law, tourism licensing, public participation requirements, and administrative decision-making. The article argues that procedural participation should occur before critical licensing decisions are finalized and should provide communities with sufficient information to assess potential environmental and livelihood impacts. Consultation mechanisms that merely inform communities without allowing meaningful influence may fail to satisfy substantive principles of environmental justice. The study proposes a participation framework emphasizing early disclosure, accessible environmental information, independent community assistance, documented responses to public objections, and effective administrative review. Such safeguards would improve both the legitimacy and quality of coastal tourism decisions. The article concludes that environmental impact assessment should function not merely as a technical environmental instrument but also as a mechanism for protecting community interests in tourism development. Strengthening participatory procedures is therefore essential to achieving environmental justice in Bali's coastal tourism sector.

[Pengembangan pariwisata pesisir di Bali telah menghasilkan investasi yang signifikan sekaligus memberikan tekanan yang semakin besar pada ekosistem pesisir dan masyarakat yang bergantung pada sumber daya pesisir. Penilaian dampak lingkungan dimaksudkan untuk mencegah atau mengurangi kerusakan lingkungan, namun masih ada pertanyaan mengenai apakah masyarakat yang terdampak dilibatkan secara bermakna dalam pengambilan

keputusan pengembangan pariwisata. Artikel ini mengkaji partisipasi masyarakat dalam penilaian dampak lingkungan dan perizinan pariwisata untuk proyek pengembangan pesisir di Bali. Dengan menggunakan analisis yuridis dan kebijakan normatif, studi ini mengevaluasi hukum lingkungan, perizinan pariwisata, persyaratan partisipasi publik, dan pengambilan keputusan administratif. Artikel ini berpendapat bahwa partisipasi prosedural harus terjadi sebelum keputusan perizinan penting diselesaikan dan harus memberikan informasi yang cukup kepada masyarakat untuk menilai potensi dampak lingkungan dan mata pencaharian. Mekanisme konsultasi yang hanya memberi informasi kepada masyarakat tanpa memberikan pengaruh yang berarti mungkin gagal memenuhi prinsip-prinsip substantif keadilan lingkungan. Studi ini mengusulkan kerangka kerja partisipasi yang menekankan pengungkapan dini, informasi lingkungan yang mudah diakses, bantuan masyarakat yang independen, tanggapan yang terdokumentasi terhadap keberatan publik, dan tinjauan administratif yang efektif. Perlindungan tersebut akan meningkatkan legitimasi dan kualitas keputusan pariwisata pesisir. Artikel ini menyimpulkan bahwa penilaian dampak lingkungan seharusnya tidak hanya berfungsi sebagai instrumen lingkungan teknis tetapi juga sebagai mekanisme untuk melindungi kepentingan masyarakat dalam pengembangan pariwisata. Oleh karena itu, penguatan prosedur partisipatif sangat penting untuk mencapai keadilan lingkungan di sektor pariwisata pantai Bali.]

Keywords: Environmental impact assessment, coastal tourism, Bali, community participation, environmental justice

Introduction

Bali's coastal areas occupy a distinctive position within Indonesia's tourism economy because beaches, marine environments, coastal landscapes, and settlements constitute major components of the island's tourism appeal. The expansion of hotels, resorts, restaurants, recreation facilities, marinas, and supporting infrastructure consequently places development pressure on areas that also perform important ecological and social functions. Coastal ecosystems regulate water quality, protect shorelines, sustain fisheries, and support community livelihoods, while coastal spaces frequently carry cultural and religious significance. Tourism development can therefore produce benefits and costs simultaneously. The legal challenge is not simply to determine whether a particular project is economically desirable, but whether the decision-making process adequately identifies environmental and social consequences before irreversible commitments are made. The literature on sustainable tourism increasingly recognizes that destination development must integrate ecological limits and community interests rather than treating environmental protection as an external consideration to economic growth (Scheyvens and Biddulph 2018).

Indonesian environmental law provides an important preventive framework for addressing these tensions. Law No. 32 of 2009 concerning Environmental Protection and Management establishes environmental impact assessment as part of environmental protection and management, while also recognizing public participation in environmental governance. The subsequent regulatory framework under Government Regulation No. 22 of 2021 structures environmental approval and environmental assessment procedures. These provisions are significant because environmental assessment is connected to governmental decision-making rather than functioning exclusively as a technical exercise. Environmental impact assessment is most valuable when its findings can influence whether a project proceeds, under what conditions it operates, and what mitigation measures must be implemented (Morgan 2012).

The international dimension strengthens this preventive and participatory understanding. Principle 10 of the Rio Declaration links environmental governance with access to information, public participation, and access to justice. These three dimensions are mutually dependent. Communities cannot meaningfully participate without adequate information, and participation has limited practical value when affected persons have no mechanism to challenge unlawful or arbitrary decisions. The literature on environmental governance similarly demonstrates that public involvement can improve decision quality by incorporating local knowledge and identifying impacts that may not be adequately captured by technical assessments (Reed 2008). Participation should therefore be understood as an epistemic as well as democratic component of environmental decision-making.

Previous scholarship has nevertheless identified persistent difficulties in the implementation of environmental participation. O'Faircheallaigh (2010) argues that public participation in environmental assessment can serve different purposes, ranging from information provision to genuine influence over decision-making, and that these forms of participation should not be treated as equivalent. Arnstein's classic model similarly demonstrates that participation can become symbolic when affected groups possess little actual influence over decisions (Arnstein 1969). In the Indonesian context, environmental governance has also been characterized by tensions between formal regulatory requirements and institutional implementation, particularly where administrative, economic, and environmental interests intersect (Nurjaya 2005; Wibisana 2019).

Tourism research reinforces the importance of this issue. Sustainable tourism scholarship emphasizes that tourism governance should incorporate local communities into decision-making because destination development can generate uneven environmental and socioeconomic consequences (Scheyvens and Biddulph 2018). In Bali, the issue is particularly significant because coastal tourism operates within areas characterized by intensive land use, dense tourism infrastructure, environmental sensitivity, and strong community relationships with coastal spaces. Coastal development therefore cannot be evaluated exclusively through project-specific economic indicators.

This article addresses the problem by examining participation specifically at the intersection between environmental impact assessment and tourism licensing in Bali's coastal areas. It argues that environmental assessment should function as a participatory decision-making mechanism capable of influencing project design, mitigation measures, and licensing conditions. Participation that occurs only after essential decisions have effectively been determined cannot provide meaningful preventive protection. The article consequently develops a framework in which public participation is connected to information disclosure, administrative reasoning, cumulative impact assessment, and review mechanisms.

Literature Review and Theoretical Frameworks

The first theoretical foundation is environmental procedural justice. Environmental justice has traditionally been associated with the distribution of environmental benefits and burdens, but procedural justice emphasizes who participates in environmental decision-making and whether affected communities possess meaningful opportunities to influence outcomes. Schlosberg (2004) argues that environmental justice should be understood through interconnected dimensions of distribution, recognition, and participation. Applied to coastal tourism, this means that communities should not merely receive compensation after a project has been approved. They should have a meaningful opportunity to influence decisions that determine how environmental resources and risks are distributed.

This approach is particularly important for environmental impact assessment because EIA is fundamentally prospective. Its purpose is to anticipate potential consequences before activities become difficult to modify or reverse. Glasson, Therivel, and Chadwick (2012) explain that effective impact assessment should consider alternatives, predict environmental consequences, develop mitigation measures, and incorporate public participation. Public participation consequently contributes not only to procedural legitimacy but also to the substantive quality of environmental assessment.

The second framework is deliberative governance. Deliberative approaches emphasize communication, reason-giving, and the possibility that information presented by participants can influence governmental decisions. Within environmental licensing, this means that consultation should not be reduced to a one-directional presentation by government officials or developers. Communities should have opportunities to question technical assumptions, submit evidence, identify overlooked impacts, and propose alternative mitigation measures. Decision-makers, in turn, should explain how significant concerns were evaluated.

This theoretical position is consistent with research showing that stakeholder participation can improve environmental management by integrating different forms of knowledge (Reed 2008). Local communities frequently possess experiential knowledge concerning flooding, shoreline changes, resource use, seasonal environmental conditions, and cultural practices. Such knowledge does

not replace scientific assessment, but it can complement technical evidence and identify issues requiring further investigation.

The third framework is environmental democracy. Environmental democracy connects access to environmental information, public participation, and access to justice. These elements form a procedural chain. Information makes participation possible; participation contributes to decision-making; and access to review ensures accountability when procedures or substantive legal requirements are violated. The Rio Declaration's Principle 10 provides an influential articulation of this approach, while contemporary environmental governance scholarship emphasizes the importance of institutional mechanisms that allow affected communities to participate meaningfully in decisions concerning environmental resources.

The fourth theoretical component is the precautionary principle. Coastal tourism projects can produce impacts that are uncertain, cumulative, and potentially irreversible. Climate change further complicates prediction because sea-level rise, coastal erosion, flooding, and extreme weather may interact with tourism infrastructure. Precaution therefore requires regulators to consider risks even when scientific certainty is incomplete. Public participation can strengthen this process because local communities may provide historical observations concerning environmental changes that are not readily visible through short-term technical studies.

Methods

This research employs normative juridical research combined with policy and institutional analysis. Primary legal materials include the 1945 Constitution of the Republic of Indonesia, Law No. 32 of 2009 concerning Environmental Protection and Management, Law No. 10 of 2009 concerning Tourism, Law No. 26 of 2007 concerning Spatial Planning, Law No. 30 of 2014 concerning Government Administration, Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation, and Government Regulation No. 22 of 2021 concerning the Implementation of Environmental Protection and Management. These materials are analyzed to identify the legal basis for environmental assessment, public participation, administrative licensing, environmental approval, and mechanisms of review.

International legal and policy materials, particularly Principle 10 of the Rio Declaration, are used as interpretive references for environmental participation and access to justice. Secondary sources consist of peer-reviewed scholarship concerning environmental impact assessment, environmental justice, public participation, environmental governance, sustainable tourism, and Indonesian environmental law. The study applies doctrinal interpretation and analytical comparison to identify the relationship between statutory participation requirements and the substantive conditions necessary for meaningful participation.

The research does not employ original fieldwork. Instead, it synthesizes legal requirements with findings from existing scholarly literature to assess the institutional design of environmental participation. The analytical process focuses on four interconnected dimensions: the timing of disclosure, the quality of public participation, the relationship between participation and administrative reasoning, and the availability of review mechanisms. These dimensions are then used to formulate a participatory environmental licensing framework for coastal tourism development in Bali.

Results and Discussion

1. Environmental Impact Assessment as a Preventive Component of Tourism Licensing

The first finding is that environmental impact assessment should be treated as part of preventive administrative governance rather than as a documentary requirement attached to tourism development. Coastal tourism projects can alter land use, drainage patterns, groundwater demand, wastewater generation, shoreline conditions, public access, and marine ecosystems. Once large-scale construction has occurred, reversing these changes may be technically difficult and economically costly. The preventive value of EIA therefore depends upon whether environmental findings can influence the authorization decision before development becomes entrenched.

Morgan (2012) emphasizes that the effectiveness of environmental impact assessment depends upon its ability to influence actual decision-making rather than simply producing technical documentation. This distinction is particularly important in tourism because economic investment can create institutional pressure to proceed once substantial financial commitments have been made. If environmental assessment is conducted after the essential parameters of a project are effectively settled, its capacity to prevent harm becomes considerably weaker.

Indonesian law provides a foundation for a preventive approach. Law No. 32 of 2009 integrates environmental protection into development decision-making, while Government Regulation No. 22 of 2021 establishes procedures concerning environmental approval and environmental assessment. The legal framework therefore permits environmental considerations to function as conditions governing development rather than merely as post-development mitigation.

The challenge is ensuring that this preventive function operates at the appropriate spatial scale. A coastal resort does not operate independently of surrounding infrastructure and ecosystems. Water consumption may affect neighboring users; wastewater may influence coastal water quality; construction may alter drainage; and increased visitor numbers may place pressure on roads, beaches, waste systems, and public facilities. An EIA that evaluates only the project's internal footprint may consequently underestimate its broader effects.

This makes the relationship between project-level assessment and strategic environmental planning particularly important. Strategic environmental assessment

can establish the broader environmental context within which individual projects are evaluated, while project-level EIA can identify site-specific risks. The integration of these instruments would reduce the possibility that multiple individually approved tourism projects collectively create environmental pressures that exceed the capacity of a coastal system.

2. Participation as a Condition of Decision Quality

The second finding concerns the quality and timing of participation. Public participation should occur while alternatives remain genuinely available. If communities are invited only after project location, scale, investment structure, and principal design decisions have already been settled, their capacity to influence the outcome becomes limited. O'Faircheallaigh (2010) emphasizes that participation can range from relatively passive information provision to processes that enable affected communities to influence decisions. Treating these different levels as equivalent risks overstating the effectiveness of participation.

Arnstein's (1969) influential analysis similarly demonstrates that formal opportunities for participation do not necessarily translate into actual influence. The relevance of this insight to environmental licensing is clear. A public meeting can satisfy a procedural requirement while still failing to provide meaningful participation if participants receive insufficient information, have limited time to respond, or receive no explanation of how their concerns affected the decision.

Information is therefore a prerequisite. Communities should have access to information concerning the project's location, scale, environmental risks, water requirements, waste management, traffic, coastal impacts, mitigation measures, alternatives, and monitoring commitments. The information should be provided sufficiently early and in a form that non-specialists can understand. Reed (2008) notes that stakeholder participation becomes more effective when participants have access to relevant information and when different forms of knowledge are incorporated into environmental management.

The importance of local knowledge is particularly apparent in coastal areas. Residents may possess long-term knowledge of erosion patterns, flooding, marine resource use, groundwater conditions, or seasonal environmental changes. Such knowledge can identify risks that a technical study based on limited observation periods may not fully capture. Meaningful participation consequently improves the evidentiary foundation of environmental assessment.

Participation should also be inclusive. Different residents may experience tourism development differently depending upon their occupation, land ownership, economic position, gender, age, disability, or dependence on coastal resources. Treating "the community" as a homogeneous actor can obscure internal differences. A participatory environmental licensing process should therefore identify potentially affected groups and ensure that participation is accessible to those who may experience distinct impacts.

3. Administrative Reasoning and the Transformation of Public Objections into Decision Evidence

The third finding is that participation should be connected directly to administrative reasoning. The principal weakness of many consultation processes is not necessarily the absence of meetings but the absence of a transparent connection between community input and the final governmental decision. If objections are collected but not substantively considered, participation becomes disconnected from decision-making.

Law No. 30 of 2014 concerning Government Administration provides a broader legal context for understanding this issue. Administrative decisions affecting environmental resources should be grounded in legality, proper procedure, and accountable governmental action. Environmental licensing decisions can significantly affect livelihoods, land use, ecological conditions, public access, and community interests. They should consequently be supported by reasons capable of being understood and reviewed.

Reason-giving can be operationalized through a public response matrix. Major concerns raised during consultation could be categorized according to environmental, social, economic, cultural, and procedural issues. Authorities could then indicate whether each concern was accepted, partially accepted, or rejected, accompanied by an explanation and reference to supporting evidence. This would establish a documentary link between participation and the administrative decision.

Such a mechanism would also improve the quality of EIA itself. Communities may identify assumptions that require additional study, propose alternative mitigation measures, or challenge predictions concerning environmental impacts. Rather than treating these interventions as obstacles to investment, regulators can use them to improve the assessment. Glasson, Therivel, and Chadwick (2012) emphasize the importance of alternatives and mitigation within impact assessment, and public input can contribute directly to both.

The resulting model is more demanding than conventional consultation but also more rational from an administrative perspective. Decision-makers retain authority to approve or reject proposals, but their discretion becomes more transparent because significant community concerns must be addressed. This approach protects both sides of the regulatory relationship: communities gain greater accountability, while investors receive clearer explanations concerning why particular requirements or restrictions have been imposed.

4. Cumulative Impacts, Coastal Carrying Capacity, and Tourism Expansion

The fourth finding concerns the limitations of project-by-project environmental assessment. Bali's coastal areas often contain multiple tourism activities operating within the same ecological and infrastructural system. Hotels, restaurants, entertainment facilities, roads, ports, residential development, and recreational activities can collectively increase pressure on water resources, waste systems, transportation networks, beaches, and marine ecosystems.

This problem is particularly significant because individual projects may each appear manageable when considered separately. A hotel may comply with wastewater requirements, for example, while the cumulative discharge from numerous facilities contributes to broader water-quality problems. Similarly, individual projects may satisfy traffic assessments while collectively producing congestion and increased pressure on public infrastructure.

Environmental impact assessment should therefore incorporate cumulative impact analysis where the characteristics of the destination require it. Strategic environmental assessment and spatial planning can provide the broader framework, while project-specific assessment can evaluate how a proposed development interacts with existing and planned activities. This approach is consistent with the broader objective of sustainable tourism, which requires tourism development to remain compatible with environmental limits and community welfare (Scheyvens and Biddulph 2018).

Climate change further strengthens the case for cumulative assessment. Coastal development decisions made today may operate under environmental conditions that differ substantially from those used in conventional baseline assessments. Sea-level rise, coastal erosion, extreme rainfall, and flooding can increase risks to infrastructure while also reducing the resilience of coastal communities. A project should therefore be assessed not only against current environmental conditions but, where relevant, against plausible future scenarios.

Community participation has an important role in this process. Local residents may observe cumulative changes over periods longer than those covered by individual environmental studies. Their observations can help regulators identify patterns involving water availability, shoreline changes, flooding, waste, congestion, or loss of public coastal access. Participation therefore becomes a source of environmental intelligence rather than merely a procedural requirement.

5. Access to Review and the Accountability of Environmental Decisions

The final finding is that participation requires an effective accountability mechanism. Communities may participate in environmental assessment and still face significant injustice if there is no practical way to challenge procedural defects, inadequate assessment, or failure to consider material evidence. Access to administrative and judicial review therefore completes the participatory framework.

Environmental justice scholarship emphasizes that participation without access to justice can leave affected communities vulnerable because governmental decisions remain effectively insulated from challenge (Schlosberg 2004). Principle 10 of the Rio Declaration similarly places access to judicial and administrative proceedings alongside information and participation. The three components should consequently be viewed as mutually reinforcing.

Access to review is particularly important because environmental disputes often involve unequal resources. Developers may have access to lawyers, environmental consultants, engineers, and technical experts, whereas local

communities may lack equivalent resources. Independent technical and legal assistance can therefore be an important component of meaningful participation. Without such assistance, formally available procedural rights may remain practically inaccessible.

Review mechanisms should also extend beyond the initial licensing decision. Environmental commitments contained in assessment documents and licensing conditions require monitoring after project implementation. If actual impacts differ materially from predictions, regulators should possess the authority to require corrective action. Communities should likewise be able to report violations and receive meaningful responses.

The appropriate model is consequently cyclical rather than linear. Environmental information should be disclosed before decision-making; communities should participate during assessment; authorities should explain the final decision; project conditions should be monitored; and affected persons should have access to review when requirements are not followed. This cycle transforms environmental assessment from a one-time licensing requirement into a continuing accountability mechanism.

Conclusion

Environmental impact assessment in Bali's coastal tourism sector should be understood as a preventive and participatory component of administrative governance. Indonesian environmental legislation provides a substantial legal basis for environmental assessment and public involvement, but formal compliance does not automatically establish meaningful participation. The effectiveness of participation depends upon timing, information quality, inclusiveness, the opportunity to influence alternatives and mitigation, and the existence of mechanisms connecting community input with governmental reasoning. The analysis therefore supports a shift from evaluating whether consultation occurred toward evaluating whether affected communities possessed a realistic opportunity to influence an environmentally significant decision.

The study further demonstrates that project-level EIA should not operate in isolation from broader coastal planning. Cumulative impacts, environmental carrying capacity, climate-related risks, and interactions between multiple tourism developments require a broader analytical perspective. Public participation can strengthen this process by incorporating local environmental knowledge and identifying impacts that may otherwise remain outside technical assessments. Such participation should be supported by accessible information and, where necessary, independent technical and legal assistance.

A participatory environmental licensing framework for Bali should consequently integrate early disclosure, meaningful consultation, reasoned responses to objections, cumulative impact assessment, post-approval monitoring, and accessible administrative or judicial review. This framework would not eliminate legitimate tourism investment or governmental discretion. Rather, it

would improve the evidentiary and procedural quality of decisions while reducing the risk that environmental and social costs are externalized onto coastal communities. Strengthening these mechanisms would allow Bali to pursue tourism development while maintaining a more credible commitment to environmental justice, sustainable development, and accountable public administration.

References

- Arnstein, Sherry R. 1969. "A Ladder of Citizen Participation." *Journal of the American Institute of Planners* 35 (4): 216–224. <https://doi.org/10.1080/01944366908977225>.
- Glasson, John, Riki Therivel, and Andrew Chadwick. 2012. *Introduction to Environmental Impact Assessment*. 4th ed. London: Routledge.
- Indonesia. Government Regulation No. 22 of 2021 concerning the Implementation of Environmental Protection and Management.
- Indonesia. Law No. 10 of 2009 concerning Tourism.
- Indonesia. Law No. 26 of 2007 concerning Spatial Planning.
- Indonesia. Law No. 30 of 2014 concerning Government Administration.
- Indonesia. Law No. 32 of 2009 concerning Environmental Protection and Management.
- Indonesia. Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation.
- Indonesia. *The 1945 Constitution of the Republic of Indonesia*.
- Morgan, Richard K. 2012. "Environmental Impact Assessment: The State of the Art." *Impact Assessment and Project Appraisal* 30 (1): 5–14. <https://doi.org/10.1080/14615517.2012.661236>.
- Nurjaya, I Nyoman. 2005. "Sejarah Hukum Pengelolaan Hutan di Indonesia." *Jurnal Jurisprudence*.
- O'Faircheallaigh, Ciaran. 2010. "Public Participation and Environmental Impact Assessment: Purposes, Implications, and Challenges." *Environmental Impact Assessment Review* 30 (1): 19–27. <https://doi.org/10.1016/j.eiar.2009.05.001>.
- Reed, Mark S. 2008. "Stakeholder Participation for Environmental Management: A Literature Review." *Biological Conservation* 141 (10): 2417–2431. <https://doi.org/10.1016/j.biocon.2008.07.014>.
- Scheyvens, Regina, and Robin Biddulph. 2018. "Inclusive Tourism Development." *Tourism Geographies* 20 (4): 589–609. <https://doi.org/10.1080/14616688.2017.1381985>.
- Schlosberg, David. 2004. "Reconceiving Environmental Justice: Global Movements and Political Theories." *Environmental Politics* 13 (3): 517–540. <https://doi.org/10.1080/0964401042000229025>.
- United Nations. 1992. *Rio Declaration on Environment and Development*. Rio de Janeiro.

Wibisana, Andri G. 2019. "Pembangunan Berkelanjutan: Status Hukum dan Perlindungan Lingkungan." *Jurnal Hukum & Pembangunan*.

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