

RECONSTRUCTION OF PADDY FIELD CONVERSION CONTROL UNDER PRESIDENTIAL REGULATION NO. 4 OF 2026: STRENGTHENING PREVENTIVE PROTECTION THROUGH PPAT-BASED LSD VERIFICATION

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ARTICLE HISTORY

Received : 12-07-2026

Revised : 26-08-2026

Accepted : 17-09-2026

KEYWORDS

*Lahan Sawah
Dilindungi, Paddy
Field Coverio, PPAT,
Preventive Legal
Protection,
Presedential
Regulations No. 4 of
2026*

ABSTRACT

The conversion of paddy fields to non-agricultural uses poses a significant challenge to Indonesia's national food security. This study aims to analyze the paddy field conversion control system under Presidential Regulation No. 4 of 2026 and reconstruct a preventive mechanism to strengthen paddy field protection. This normative legal research employs statutory, historical, and conceptual approaches, using Lawrence M. Friedman's legal system theory, Roscoe Pound's interest theory, and Philipus M. Hadjon's concept of preventive legal protection as analytical frameworks. The findings indicate that Presidential Regulation No. 4 of 2026 strengthens conversion control through the protection of Lahan Sawah Dilindungi (LSD), intersectoral coordination through an Integrated Team, and integration with spatial planning. However, the regulation does not explicitly connect LSD protection with land-right transfer procedures conducted before the execution of a PPAT deed, leaving a regulatory gap in preventive verification of protected-land status. This study proposes PPAT as a preventive verification point through the examination of LSD status based on official land and spatial data. This proposal does not confer authority upon PPAT to determine or prohibit land conversion, but connects officially established land-protection information with the land-right transfer process. Its implementation requires a clear legal basis, integrated data access, verification procedures, and follow-up mechanisms within the existing limits of PPAT authority. This construction strengthens preventive legal protection by connecting governmental paddy field control with land transactions in support of national food security.

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INTRODUCTION

Food security is one of the strategic pillars of national development because it is closely related to the fulfillment of the right to food and the sustainable welfare of society. Within Indonesia's agrarian legal framework, land is not merely regarded as an object of economic interest but also has a social function aimed at achieving the greatest prosperity of the

people, as affirmed in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia and Article 6 of Law Number 5 of 1960 concerning Basic Agrarian Regulations. In this context, paddy fields constitute a strategic resource because they serve as a primary basis for national food production. Their uncontrolled conversion into non-agricultural uses may reduce the availability of productive land and consequently affect food production. Therefore, controlling paddy field conversion constitutes an important component of maintaining national food security (Manalu et al., 2022)

Pressure on paddy-field availability remains a significant challenge. Based on Decree of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 446.1/SK-PG.03.03/V/2024, the nationally standardized paddy-field area in 2024 was 7,384,341 hectares (Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, 2024). Separately, government data reported that 554,615 hectares of paddy fields underwent conversion during 2019–2025, including 144,255.1 hectares within Sustainable Food Agricultural Land (LP2B) areas (Coordinating Ministry for Food Affairs, 2026). These figures are based on different periods and measurement bases and therefore should not be treated as a direct reduction from the 2024 standardized paddy-field area. Nevertheless, they demonstrate continuing pressure on paddy fields and the need to strengthen conversion control as part of national food security protection.

The existence of legal protection does not, by itself, guarantee effective control over paddy field conversion. The protection of sustainable agricultural land continues to encounter institutional, spatial-planning, supervisory, and policy-coordination problems. The effectiveness of land protection therefore depends not only on the existence of legal norms but also on the capacity of government institutions to implement their respective authorities and coordinate policies across sectors. Local government responsibility, harmonization between sustainable agricultural land protection and spatial planning, and the influence of social, economic, and legal-cultural factors are important dimensions in determining the effectiveness of paddy field protection (Akadir et al., 2019; Pitaloka, 2020; Suhadi et al., 2024). The need for policy reformulation is further demonstrated by the persistence of cross-sectoral policy inconsistencies and overlapping institutional authorities in controlling paddy field conversion. Strengthening policy integration, planning coherence, and institutional coordination is therefore necessary to prevent regulatory fragmentation from undermining national food security (Kholik et al., 2024).

These conditions have encouraged the development of regulatory instruments for controlling paddy field conversion. Presidential Regulation Number 59 of 2019 concerning Paddy Field Conversion Control previously provided the principal framework for controlling conversion through the Protected Paddy Field (Lahan Sawah Dilindungi/LSD) instrument. The regulation has subsequently been revoked and replaced by Presidential Regulation Number 4 of 2026 concerning Paddy Field Conversion Control. The regulatory transition is significant because the new regulation strengthens the control framework through the establishment of an Integrated Team, verification and designation of LSD, integration of LSD information with spatial planning, and mechanisms for controlling changes in paddy field use. Accordingly, Presidential Regulation Number 59 of 2019 constitutes the previous regulatory regime, whereas Presidential Regulation Number 4 of 2026 represents the current regulatory regime and the primary object of analysis in this study.

Presidential Regulation Number 4 of 2026 does not eliminate the protection regime for Sustainable Food Agricultural Land established under Law Number 41 of 2009, as amended by Law Number 6 of 2023. LSD and LP2B therefore constitute complementary but legally distinct instruments. LSD operates primarily as a spatial-data-based control instrument within the framework of the Presidential Regulation, whereas LP2B constitutes a statutory protection regime established under Law Number 41 of 2009. This distinction is important because the Presidential Regulation cannot override statutory provisions governing LP2B. Furthermore, the amendment to Article 44 of Law Number 41 of 2009 through Law Number 6 of 2023 provides exceptions to LP2B conversion for public interest and/or National Strategic Projects, subject to the requirements prescribed by applicable laws and regulations. Consequently, the implementation of Presidential Regulation Number 4 of 2026 must remain consistent with the legal position of LP2B and the statutory requirements governing its conversion.

The effectiveness of LSD protection is also closely related to the consistency of spatial information. In practice, discrepancies between LSD maps and spatial-planning instruments may create uncertainty concerning the status and permitted use of particular land parcels. Such discrepancies may affect the implementation of paddy field protection and the realization of food security policies. The need for harmonization between protected paddy field maps, spatial plans, land data,

and other land-use instruments therefore constitutes an important element of an effective conversion-control system (Chandra & Suhadi, 2025; Dewi & Wulansari, 2024; Sari & Budhianti, 2023).

Although the regulatory framework has been strengthened, an important issue remains concerning the point of prevention before paddy field conversion actually occurs. The protected status of a land parcel may become relevant in a land-right transfer transaction because the transfer of rights may precede subsequent changes in land use. The examination of protected-land status can therefore contribute to legal certainty in land transactions. However, the transfer of land rights and land-use conversion constitute legally distinct acts. Consequently, the PPAT cannot be positioned as an authority that determines LSD status or grants permission for land-use conversion. Rather, the PPAT may function as a potential preventive verification point by examining relevant land information within the limits of its authority and the official data available under the applicable legal framework (Rangkuti et al., 2023; Sudira, 2022).

In the context of land administration, the integrity and reliability of official land data are essential because land information serves as a basis for legal certainty and the administration of land rights. Data concerning protected land status should therefore be obtained from official and validated sources rather than determined unilaterally by the parties or the PPAT. The importance of maintaining reliable and legally valid land information is also reflected in the need for proper verification, data integrity, and official procedures in land administration (Jayanti & Hardjo, 2025; Mayreista et al., 2025; Wahyuningrum & Badriyah, 2024).

This condition creates a regulatory gap that has not been explicitly addressed by Presidential Regulation Number 4 of 2026. The gap concerns the mechanism for verifying LSD status before the execution of a land deed, the official source of data to be used, the mechanism through which PPATs may access such information, and the legal consequences that follow from the verification results. Existing regulations provide mechanisms for the government to verify, designate, and control protected paddy fields, while previous studies have examined LP2B verification, spatial planning, and the role of Notaries/PPATs in transactions involving protected land. However, these studies have not specifically constructed a mechanism that connects LSD-status verification by PPAT with the paddy field conversion control system established under Presidential Regulation Number 4 of 2026. Research concerning transfers involving LSD has demonstrated the relevance of protected-land status to land transactions, while other studies have emphasized the role of Notaries/PPATs in protecting protected paddy fields (Pratiwi et al., 2026; Utomo et al., 2026).

Accordingly, the problem is not merely the absence of regulatory instruments but the absence of an integrated preventive mechanism connecting governmental control, official LSD information, spatial planning, and land-right transfers. A preventive mechanism requires a clear distinction between the authority to determine LSD status, the authority to control land use, and the authority of PPATs in preparing land deeds. The PPAT should therefore not be transformed into an official granting permission for land conversion. Instead, the PPAT may be constructed as a verification point that connects officially established land-protection information with the examination of the land object before the execution of a deed. Such a construction requires a clear legal basis concerning the scope of verification, official data sources, access to information, and the follow-up to verification results.

Based on this regulatory and conceptual gap, this study formulates two research questions. First, how is the paddy field conversion control system regulated under Presidential Regulation Number 4 of 2026, and what is its position within the legal framework for agricultural land protection considering the transition from Presidential Regulation Number 59 of 2019 and Law Number 41 of 2009, as amended by Law Number 6 of 2023? Second, how can the paddy field conversion control system be reconstructed to strengthen national food security through the enhancement of the preventive function of PPATs?

The novelty of this study lies in two aspects. First, it examines the transformation of the paddy field conversion control system from Presidential Regulation Number 59 of 2019 to Presidential Regulation Number 4 of 2026 by distinguishing the respective legal bases and functions of LSD and LP2B. Although recent research has examined the principle of legal balance in the implementation of LSD policy under Presidential Regulation Number 4 of 2026 (Ramdhani et al., 2026), the present study extends the analysis by examining the effectiveness of the control system and its connection with land-right transfer transactions. Second, this study constructs PPAT as a preventive verification point through LSD-status verification, rather than merely proposing PPAT involvement at a conceptual level. This construction connects official

land and spatial information with the land-right transfer process while maintaining the legal distinction between land-right transfer and land-use conversion. The proposed reconstruction therefore focuses on establishing a preventive verification mechanism, defining the scope and source of verification, and determining appropriate follow-up within the existing limits of PPAT authority.

METHOD

This study employs normative legal research using statutory, historical, and conceptual approaches. The statutory approach is used to examine the Basic Agrarian Law, Law Number 41 of 2009, Law Number 6 of 2023, Presidential Regulation Number 4 of 2026, and regulations governing PPAT. The historical approach traces the development of paddy field conversion control from Presidential Regulation Number 59 of 2019 to Presidential Regulation Number 4 of 2026, while the conceptual approach is employed to formulate a reconstruction of the preventive legal framework.

The legal materials consist of primary legal materials, including legislation concerning paddy field conversion control, LP2B protection, spatial planning, and PPAT authority; secondary legal materials, including books and scholarly journal articles; and non-legal materials, consisting of statistical data and official information concerning paddy field areas and conversion. The materials were analyzed through norm identification and interpretation, vertical and horizontal legal harmonization, identification of the regulatory gap, and formulation of a legal reconstruction.

The analysis applies Lawrence M. Friedman's legal system theory, Roscoe Pound's interest theory, and Philipus M. Hadjon's concept of preventive legal protection. Friedman's theory is used to examine the interrelationship among legal substance, legal structure, and legal culture in controlling paddy field conversion; Pound's theory is applied to analyze the balance between the interests of landholders, the state, and society; while Hadjon's concept is used to assess the need for preventive mechanisms before conversion occurs. These analytical perspectives are employed to formulate a reconstruction of the paddy field conversion control system through LSD status verification at the stage of land-right transfer conducted before a PPAT deed is executed, while maintaining the limits of PPAT authority under the applicable legal framework.

RESULT AND DISCUSSION

Dynamics of Paddy Field Conversion and the Urgency of Legal Protection

The control of paddy field conversion involves competing legal interests, particularly the interests of land rights holders in utilizing their land, the state's interest in regulating land use, and the public interest in maintaining long-term food security. The legal issue therefore extends beyond the protection of paddy fields itself to the manner in which these interests are accommodated within a coherent legal framework. This issue is closely connected with spatial planning, local government responsibility, and institutional coordination in protecting sustainable agricultural land (Akadir et al., 2019; Pitaloka, 2020)

Article 6 of Law Number 5 of 1960 concerning Basic Agrarian Regulations establishes that land rights have a social function. This principle indicates that the exercise of land rights is not solely determined by the interests of individual rights holders but must also consider broader societal interests. In the context of paddy field conversion, the social function of land provides a legal basis for regulating land use where necessary to protect broader public interests, including food security.

This principle is reflected in the control framework established by Presidential Regulation Number 4 of 2026, which regulates Protected Paddy Fields (*Lahan Sawah Dilindungi*/LSD), cross-sectoral coordination, spatial-planning integration, and supervision. The regulation therefore seeks to strengthen preventive control over paddy field conversion rather than relying solely on measures taken after conversion has occurred. The effectiveness of this framework, however, depends not only on the existence of restrictive norms but also on the extent to which competing interests are accommodated through an effective and coordinated legal system.

Balancing Interests in Paddy Field Conversion Control

From the perspective of Roscoe Pound's theory of interests, law functions to reconcile competing interests within society. In the context of paddy field conversion, these interests include the individual interests of land rights holders, the public interests of the state in regulating land use, and the social interests of society in maintaining long-term food security. The protection of paddy fields therefore requires a legal framework capable of accommodating these interests without treating

any of them as absolute. This perspective is particularly relevant because restrictions on land use may affect the economic interests of landholders while simultaneously serving broader public and social interests.

The individual interest of land rights holders is reflected in their legal entitlement to use and derive economic benefits from their land. However, Article 6 of Law Number 5 of 1960 establishes the social function of land rights, indicating that the exercise of land rights is subject to broader societal interests. Accordingly, restrictions on paddy field conversion should not be understood as an elimination of land rights, but as a regulation of their exercise to ensure that land utilization remains consistent with legally protected public interests. This approach is consistent with research emphasizing the need to harmonize agricultural land utilization with spatial planning and land-protection policies (Pitaloka, 2020). Similar concerns arise where economic and development pressures create competing interests between land utilization and the protection of sustainable agricultural land.

The public interest is reflected in the state's authority to regulate land use and protect land that is strategically important for food production. Under Presidential Regulation Number 4 of 2026, this interest is institutionalized through the Integrated Team under Articles 4–7 and through mechanisms for the verification, synchronization, designation, monitoring, and evaluation of Protected Paddy Fields (LSD). The institutional arrangement indicates that paddy field conversion control requires coordination among authorities responsible for food security, land affairs, spatial planning, infrastructure, and regional development. Thus, from Pound's perspective, the Integrated Team represents an institutional mechanism for reconciling development interests with the state's responsibility to protect food-producing land.

The social interest concerns the continuity of food production and the fulfillment of society's long-term food needs. In this respect, LSD functions as a spatial-based control instrument for identifying and protecting paddy fields that are important for food security. Its preventive function is strengthened through its integration with spatial-planning and land-administration mechanisms. However, the implementation of LSD protection may be affected by inconsistencies between LSD maps and spatial-planning maps, which can create legal uncertainty and complicate land-use control. Recent research by Radhwa and Waluyo identifies inconsistencies between LSD designations and regional spatial planning as a continuing legal and policy challenge, particularly because such discrepancies may create legal uncertainty for landholders and other affected parties (Radhwa & Waluyo, 2026).

The balancing of these interests must also be understood within the relationship between LSD and Sustainable Food Agricultural Land (LP2B). LSD and LP2B are complementary but legally distinct instruments. Law Number 41 of 2009, as amended by Law Number 6 of 2023, establishes the statutory framework for the protection of sustainable food agricultural land, whereas Presidential Regulation Number 4 of 2026 regulates the control of paddy field conversion through the LSD framework. Accordingly, LSD status cannot be interpreted as replacing the LP2B regime, nor can a Presidential Regulation override statutory provisions. The protection of paddy fields must therefore operate through a harmonized relationship between statutory protection and the administrative control mechanisms established under Presidential Regulation Number 4 of 2026.

The principle of legal balance is also directly relevant to the implementation of Presidential Regulation Number 4 of 2026. Ramdhani, Permadi, and Qurbani (2026) specifically examine the balance between restrictions on landowners' rights and the state's obligation to protect LSD, particularly through the provision of incentives as a balancing instrument. Their findings indicate that uncertainty concerning the implementation of incentives may affect legal certainty, proportionality, and the balance between the interests of landowners and the state's interest in protecting paddy fields (Ramdhani et al., 2026).

This study acknowledges the relevance of that balancing perspective but develops the analysis in a different direction. While Ramdhani et al. focus on the principle of legal balance and the protection of landowners' incentive rights under Presidential Regulation Number 4 of 2026, this study examines the effectiveness of the conversion-control system through its legal substance, institutional structure, and legal culture, and further constructs a preventive verification mechanism at the stage of land-right transfer through PPAT. Thus, the present study does not merely reconsider the balance of interests within LSD protection, but connects that balance with the operational effectiveness of the control system and its preventive implementation at the transaction level.

Accordingly, the central issue from Pound's perspective is not whether Presidential Regulation Number 4 of 2026 should give absolute priority to the state, land rights holders, or society, but whether the regulatory framework can establish

a legally coherent balance among these interests while maintaining national food security. The Integrated Team, LSD designation, and spatial-planning integration constitute instruments through which such balance may be pursued. However, the existence of these instruments does not by itself demonstrate the effectiveness of the control system. The next question is therefore whether these legal norms, institutional arrangements, and patterns of legal behavior are capable of functioning effectively, which is subsequently examined through Lawrence M. Friedman's legal system theory.

Effectiveness of Presidential Regulation Number 4 of 2026 from the Perspective of Friedman's Legal System Theory

Lawrence M. Friedman conceptualizes a legal system through three interrelated components: legal substance, legal structure, and legal culture. The effectiveness of law therefore depends not only on the content of legal rules, but also on the institutions responsible for their implementation and the attitudes and behavior of legal actors toward those rules (Friedman, 1969; (Friedman, 1969; Kautsar & Muhammad, 2022). In this study, Friedman's framework is used to assess whether the control mechanisms established by Presidential Regulation Number 4 of 2026 can operate as an integrated system.

Legal Substance: Strengths and Limitations of the Control Framework

From the perspective of legal substance, Presidential Regulation Number 4 of 2026 provides a relatively comprehensive framework for controlling paddy field conversion through the designation of Protected Paddy Fields (LSD), institutional coordination, verification and synchronization of data, monitoring, supervision, reporting, and funding. These provisions indicate that the regulation adopts preventive as well as administrative mechanisms rather than relying solely on sanctions after conversion has occurred.

Nevertheless, a normative gap remains in the connection between the governmental LSD-control framework and land-right transfer transactions. The regulation does not expressly establish a mechanism requiring LSD-status verification by PPAT before the preparation of a land deed. Consequently, the control system remains concentrated at the governmental and spatial-planning levels and is not yet directly connected to the transaction stage. This gap is significant because legal protection may become more effective when protected-land information is available before a legal act involving the land is completed.

The substance of the control system also needs to be harmonized with the existing statutory framework on Sustainable Food Agricultural Land (LP2B). LSD and LP2B have different legal bases and functions; therefore, the implementation of Presidential Regulation Number 4 of 2026 must remain consistent with Law Number 41 of 2009 as amended by Law Number 6 of 2023. The effectiveness of the *legal substance* consequently depends not merely on the existence of control instruments, but on the coherence and operational connectivity among the applicable legal regimes. Research on agricultural land protection similarly emphasizes the importance of harmonizing land protection with spatial-planning policies (Pitaloka, 2020)

Legal Structure: Strengthening Institutional Coordination and Data Integration

From the perspective of legal structure, Presidential Regulation Number 4 of 2026 establishes the Integrated Team for Paddy Field Conversion Control and assigns responsibilities relating to the verification, synchronization, designation, monitoring, and evaluation of protected paddy-field data. This institutional arrangement reflects the cross-sectoral nature of paddy field protection, which involves land affairs, agriculture, spatial planning, infrastructure, and regional government.

However, institutional effectiveness cannot be measured merely by the establishment of the Integrated Team. It also depends on clear authority, reliable data, inter-institutional coordination, and mechanisms for following up verification results. Research on sustainable agricultural land protection emphasizes the importance of clear governmental responsibility and coordination among relevant institutions in controlling land-use conversion (Akadir et al., 2019). Research on LSD further identifies inconsistencies between LSD maps and spatial-planning maps as a challenge in implementing protected paddy-field policies (Chandra & Suhadi, 2025; Radhwa & Waluyo, 2026).

Accordingly, strengthening the legal structure under Presidential Regulation Number 4 of 2026 should not be limited to the establishment of the Integrated Team. It should also include effective data-sharing and synchronization mechanisms linking LSD information with spatial-planning and land-administration systems. Such integration is necessary to ensure that verified LSD status can be accessed by authorized actors at relevant stages of land administration, including the proposed preventive verification of land objects before the preparation of a PPAT deed.

Legal Culture: Compliance in Paddy Field Conversion Control

The legal culture component concerns the values, attitudes, and patterns of behavior that influence how legal rules are understood and implemented. In the context of paddy field conversion, this component is important because the effectiveness of legal protection depends not only on formal rules and institutional arrangements, but also on the behavior and compliance of the actors subject to and implementing those rules (Friedman, 1969)

Economic pressures and increasing land values may encourage landholders to convert paddy fields for greater economic benefit. These conditions demonstrate that conversion control is influenced by social and economic factors as well as by legal norms. Research on agricultural land conversion in Indonesia shows that farmers' values, attitudes, and behavior toward agricultural land and LP2B policies influence the implementation of land-protection policies. The study also emphasizes the importance of harmonizing formal legal rules with social practices, strengthening monitoring and law enforcement, and increasing community participation and legal awareness (Suhadi et al., 2024)

Accordingly, the implementation of Presidential Regulation Number 4 of 2026 requires more than formal regulation and institutional coordination. Legal culture needs to be strengthened through transparency regarding protected-land status, public guidance, supervision, and legal awareness among landholders and relevant legal actors. In this respect, the effectiveness of the regulation depends on whether the actors involved recognize and comply with the protected status of paddy fields and understand the legal consequences of land conversion.

PPAT as a Preventive Control Point in Paddy Field Protection

While Pound's theory is used to examine the interests that need to be balanced and Friedman's legal system theory to assess the effectiveness of the control system, Hadjon's concept of preventive legal protection is employed to identify the point at which legal protection can be exercised before paddy field conversion occurs. In this context, the transfer of land rights through a Land Deed Official (*Pejabat Pembuat Akta Tanah/PPAT*) may constitute a potential point of preventive verification. Research on LP2B demonstrates the relevance of protected-land status verification to land-right transfers, while recent studies have also highlighted the role of Notaries/PPATs in transactions involving protected paddy fields (Rangkuti et al., 2023; Utomo et al., 2026).

Under the concept of preventive legal protection, legal protection is provided through measures designed to prevent potential violations before they occur (Hadjon, 1987). In land transactions, PPATs are public officials authorized to prepare authentic deeds concerning specified legal acts involving land rights. Their duties involve the examination of relevant land data and supporting documents in the preparation of deeds, which is relevant to legal certainty and the protection of parties to land transactions (Wahyuningrum & Badriyah, 2024).

However, the transfer of land rights and the change of land use constitute legally distinct acts. Therefore, PPAT examination should not be construed as authority to determine whether a paddy field may be converted. Rather, this study proposes positioning the PPAT as a preventive verification point through which the status of a land object may be examined against official LSD data before a land deed is prepared. This proposed function remains subject to a specific legal basis, reliable official data, and the existing limits of PPAT authority.

PPAT's Verification of LSD Status

Presidential Regulation Number 4 of 2026 does not explicitly impose a specific obligation on PPATs to verify the LSD status of a land parcel before preparing a deed of land-right transfer. The regulation places LSD verification and synchronization within the governmental control framework and the Integrated Team. Therefore, LSD-status verification cannot currently be regarded as a specific statutory obligation inherent in the PPAT's duties under Presidential Regulation Number 4 of 2026.

If LSD verification is to be incorporated into the preventive function of PPATs, a clear legal basis is required to regulate the scope of verification, official data sources, verification procedures, and the follow-up to verification results. Such a mechanism should position PPAT as a verification point based on official data, without transferring to PPAT the authority to determine or approve paddy-field conversion.

Sources and Mechanism for Verifying LSD Status

Verification of LSD status should rely on official land and spatial-planning data provided by the competent authorities. Verification of LSD status should rely on official land and spatial-planning data provided by the competent authorities. Article 30 of Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 2 of

2024 provides for an information system for controlling LSD conversion containing LSD maps, recommendations for land-use changes, and monitoring and evaluation results, integrated with the land-administration information system managed by the Ministry. This provision provides a normative basis for connecting official LSD information with land-administration processes, although it does not impose a specific obligation on PPATs to conduct LSD verification.

Under the proposed reconstruction, PPATs would not determine or establish LSD status. Rather, they would examine the land object against official LSD information available through the authorized land and geospatial information system before preparing a deed. The proposed mechanism therefore connects existing official geospatial information with the land-right transfer process without transferring the authority to determine LSD status to PPATs.

This construction is supported by previous research demonstrating the relevance of protected-land verification to land-right transfers, although the existing analysis concerns LP2B rather than LSD. The LP2B checking mechanism enabled the protected status of land to be identified during the registration of land-right transfers, demonstrating the relevance of protected-land status verification to land transactions. (Rangkuti et al., 2023).

Legal Consequences When the Object Is Designated as LSD

LSD status does not, by itself, determine the validity of every transfer of land rights, because the transfer of rights and the change of land use constitute legally distinct acts. Under Presidential Regulation Number 4 of 2026, LSD primarily functions as an instrument for controlling changes in paddy-field use. Therefore, its status should be considered in determining the legal requirements applicable to the land object before any subsequent land-use change is undertaken (Presidential Regulation No. 4 of 2026 Concerning Control of Paddy Field Conversion, n.d.)

Recent research indicates that the transfer of rights over LSD may be subject to requirements relating to changes in land use and that Notaries/PPATs have an important role in preventing transactions that do not comply with applicable protection requirements (Pratiwi et al., 2026). Accordingly, LSD status should function as a preventive legal checkpoint that triggers further examination, rather than as an automatic basis for concluding that a transfer of land rights is prohibited (Pratiwi et al., 2026).

Limits of PPAT Authority to Refuse a Deed

LSD status should not, by itself, be treated as a sufficient legal basis for a PPAT to refuse to prepare a deed. The transfer of land rights and the change of land use are legally distinct acts, and the authority of a PPAT to refuse a deed must be based on specific grounds provided by applicable laws and regulations. Research on LSD likewise indicates that transactions involving protected paddy fields are connected with compliance with requirements governing land-use changes, while the role of Notaries/PPATs is relevant to preventing transactions that do not comply with applicable requirements (Pratiwi et al., 2026).

The LP2B verification mechanism provides a relevant comparison because protected-land status may become known during the registration of a land-right transfer. However, the findings concerning LP2B cannot automatically be extended to establish an obligation for PPATs to verify LSD status or to refuse a deed (Rangkuti et al., 2023). Accordingly, LSD status should function as legal information that triggers further examination, rather than as an automatic ground for deed refusal. A PPAT may refuse to prepare a deed only where a specific legal ground and corresponding authority are provided by the applicable laws and regulations.

Construction of PPAT as a Preventive Instrument

Previous studies have established a relationship between protected-land verification, land-right transfers, and paddy-field protection. Research on LP2B demonstrates the relevance of protected-land verification to land-right transfers, while recent research on LSD highlights the role of Notaries/PPATs in transactions involving protected paddy fields (Pratiwi et al., 2026; Rangkuti et al., 2023; Utomo et al., 2026). However, these studies have not specifically constructed PPAT verification of LSD status as a preventive control point within the paddy-field conversion control system under Presidential Regulation Number 4 of 2026.

Based on this research gap, this study constructs PPAT as a preventive verification point for LSD status before the preparation of a land deed. The proposed construction consists of three elements: (1) a normative basis for LSD-status verification; (2) integration of LSD data with official land and geospatial information systems; and (3) a follow-up mechanism for verification results within the existing limits of PPAT authority.

Accordingly, PPAT is not positioned as an authority that determines LSD status or grants permission for paddy-field conversion, but as a preventive verification point connecting official land-protection information with the process of transferring land rights. This construction provides the basis for the proposed reconstruction of the paddy-field.

Reconstruction of the Paddy Field Conversion Control System

Based on the preceding analysis, the main problem with Presidential Regulation Number 4 of 2026 does not lie in the absence of control instruments, but rather in the lack of integration among control norms, institutional arrangements, LSD data, spatial planning, and land transactions within a single preventive mechanism. Accordingly, the reconstruction proposed in this study is directed toward strengthening the relationship between the governmental control system and the process of land-right transfer.

First, institutional coordination needs to be accompanied by clear mechanisms for data exchange and allocation of responsibilities. The Integrated Team established under Presidential Regulation Number 4 of 2026 needs to be supported by regular mechanisms for exchanging land, spatial-planning, and LSD data, together with evaluation of the implementation of each institution's authority. This strengthening is important because paddy-field protection depends not only on the existence of legal norms but also on the ability of institutions to exercise their respective authorities in a coordinated manner. Research on LSD has likewise emphasized the importance of regulatory coordination and the resolution of discrepancies among institutions involved in LSD management (Robbi et al., 2024).

Second, LSD data needs to be integrated with land and spatial-planning information systems. Such integration is necessary to ensure that the protected status of a particular parcel can be consistently identified during land administration services. Harmonization between LSD and RTRW/RDTR is also necessary to prevent discrepancies in spatial information that may create legal uncertainty. Studies on LSD indicate that discrepancies between LSD maps and spatial-planning maps may constitute a problem in the implementation of paddy field protection (Chandra & Suhadi, 2025; Sari & Budhianti, 2023).

Third, verification of LSD status needs to be integrated into the land-right transfer process through PPAT. Presidential Regulation Number 4 of 2026 has established mechanisms for the verification and synchronization of paddy-field data through relevant ministries/agencies and the Integrated Team. However, these mechanisms have not yet connected the results of LSD verification with the examination of land objects at the stage of preparing a PPAT deed. Recent studies demonstrate that transfers involving LSD are closely related to land-use requirements and that Notaries/PPATs have an important role in preventing transactions that are inconsistent with the applicable protection requirements (Pratiwi et al., 2026; Utomo et al., 2026). Accordingly, this study constructs LSD-status verification as a preventive verification point before the preparation of a land deed, using official data verified by the competent authorities.

Fourth, a clear legal basis and limits for follow-up action are required. Verification of LSD status by PPAT cannot currently be regarded as an obligation under Presidential Regulation Number 4 of 2026 or the applicable provisions governing PPAT. Research on LP2B demonstrates that the verification mechanism at the Land Office may affect the process of land-right transfers and provide relevant information concerning the legal status of the land (Rangkuti et al., 2023). However, this mechanism cannot automatically be equated with an obligation for PPATs to verify LSD status. Therefore, a specific legal basis is required to regulate the obligation or procedure for verification, the source of data, the verification procedure, and the follow-up to the verification results.

Fifth, a mechanism for following up on verification results is required. Verification of LSD status does not automatically determine whether a transfer of land rights may or may not take place. If the object is identified as LSD, the verification result should serve as a basis for the PPAT to ensure that the parties fulfill the requirements and procedures relating to land protection and spatial planning before the deed is prepared. This is consistent with the findings of Pratiwi et al. (2026), which demonstrate that transfers of rights over LSD are related to requirements concerning land-use changes and require attention to the protected status of the land object. (Pratiwi et al., 2026)

Under this construction, LSD status functions as legal information that triggers further examination, rather than as an automatic prohibition on the transfer of land rights. If certain requirements have not been fulfilled, follow-up action should be taken in accordance with the authority of the competent institution, while the PPAT continues to exercise its authority in preparing deeds in accordance with the applicable laws and regulations. Thus, the verification mechanism can function as a preventive control point without transforming the PPAT into an authority that grants permission for paddy field conversion.

CONCLUSION

Presidential Regulation Number 4 of 2026 strengthens the control of paddy field conversion through LSD designation, the Integrated Team, spatial-planning integration, and monitoring mechanisms, replacing Presidential Regulation Number 59 of 2019. However, from Friedman's perspective, its effectiveness remains limited by gaps in legal substance, institutional coordination and data integration, and legal culture. The main normative gap is the absence of a mechanism connecting official LSD information with land-right transfer transactions, while LSD and LP2B remain distinct but complementary legal instruments.

This study reconstructs PPAT as a preventive verification point rather than an authority to determine LSD status or authorize land-use conversion. LSD status should be examined against official and validated land and geospatial information before the preparation of a land deed. Such verification would connect governmental paddy-field protection with land-right transfers while maintaining the distinction between transfer of rights and land-use conversion. However, because Presidential Regulation Number 4 of 2026 does not establish a specific PPAT obligation to verify LSD status, a clear legal basis is required concerning the verification procedure, data sources, access, and follow-up.

Accordingly, strengthening the control system requires integration of LSD data with land-administration and spatial-planning systems and a legally defined verification mechanism at the land-right transfer stage. The proposed construction contributes a preventive mechanism that connects official LSD information with PPAT transactions without expanding PPAT authority. LSD status should therefore serve as information requiring further legal examination, rather than as an automatic basis for refusing a deed unless expressly provided by law.

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