

## The Involvement and Conflict of Authority of Actors Managing the Indonesia-East Malaysia Border Area

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**Abstract:** *The management of Indonesian border areas encounters many complex problems in terms of the regional environment and border management actors. The objective of this study was to explore the involvement of actors and their authority in managing border areas. In this study, the researchers employed a qualitative approach to reveal the involvement of each actor and their authority. The results showed that the border area is a new arena for the Central Government as the main actor in terms of political affairs and public policies. This condition leads to a conflict of authority between the actors. The Regional Government plays a role as the second actor, acting as a passive object. In reality, management of border areas has not been taken by central and regional governments seriously, both in terms of distribution, autonomy, and reinforcement of authority. This makes the issue of the management of border areas complicated, especially to make border areas a connecting point of the state with neighboring countries by emphasizing a comprehensive welfare-oriented development program for each region without compromising the security approach. Based on the results of this study, it is recommended that constructing and building a complete synergy pattern between management actors are crucial starting points in developing border areas.*

**Keywords:** *Involvement; Central Government; Regional Government; Conflict of Authority.*

### Introduction

The border area is one of the important concerns for the Indonesian government in developing the country from the periphery. This commitment was realized by the establishment of the National Border Management Agency (Indonesian: *Badan Nasional Pengelola Perbatasan* (BNPP)) and the Special Unit for Border Management (Indonesian: *Unit Khusus Pengelola Perbatasan* (UKP2)) by considering the needs desired by the president (Indonesia's Law No. 48/2008 concerning State Territory, 2008). Government policies in support of this

commitment are also indirectly stated in other policies as a synergy for development purposes, both policies related to villages and those concerning national development planning (Indonesia's Law No. 6/2014 concerning Villages, 2014; Indonesia's Law No. 25/2004 concerning the National Development Planning System, 2004). At the provincial level, for example, the Provincial Government of West Kalimantan has established the Border Area Management and Cooperation Agency (Indonesian: *Badan Pengelola Kawasan Perbatasan dan Kerjasama*

(BPKPK)) (Regional Regulation of West Kalimantan No. 11/2019 concerning Amendments to Regional Regulation of West Kalimantan No. 8/2016 concerning the Establishment and Composition of Regional Apparatuses of West Kalimantan, 2019). At more specific levels (i.e., regency and city), there is a vacancy in the organization that specifically handles the border. However, the Regency government still has a responsibility to manage the issue, which is specifically attached to the Secretariat of Sambas Regency.

The development of facilities and infrastructure in the core zone of the border area has been quite adequate (Nainggolan, 2020). Road infrastructure, border markets, government office buildings, and other supporting facilities have been provided by the government. Theoretically, the development of regional facilities and infrastructure has a positive impact on the community, both social and economic impacts (Firdaus, 2019), making government institutions and the community able to work together in the development that is being carried out (Arifin & Rupita, 2021). However, the infrastructure provided by the government has not been maximized with a good management pattern (Deri *et al.*, 2021). At the top management level, it still has not shown a pattern of development with good synergy. The Central and Regional governments still consider the border area as a political arena, especially related to the distribution and autonomy of authority. This condition makes the area a mirage, especially for regional governments.

This article aims to analyze the role of government actors in border

management and to reveal the authority of each of these actors. Based on the elaboration above, this article discusses two main things: (1) the presence of government actors in border area management and (2) the conflict of authority that occurs in these actors in managing border areas.

Many researchers have conducted studies on the involvement of government actors in regional management policies from various perspectives. For example, a study conducted by Arifin & Rupita (2021) showed that the role of implementers in managing and developing border areas is influenced by the external environment. Another study conducted by Khairunisa (2022) argued that the failure of a policy is caused by the weak commitment and ability of actors in managing the policy locus. Apart from that, Sandy (2020) and Wibowo (2010) stated that the power of policy success involves many interrelated actors and is spearheaded by regional government actors. Furthermore, studies conducted by Rosyadi *et al.* (2021) and Wardono *et al.* (2019) show that the success of implementing policies and prospective policy alternatives requires good integration between actors. Based on the results of the previous related studies aforementioned, the integrated role of relevant actors is very important in determining the success of policy implementation. Several studies, on the other hand, have shown that a single actor's role in policy implementation leads to suboptimal success.

A study conducted by Ulum *et al.* (2011) found that the role of actors in implementing policies needs to be supported by other actors who understand the partnership model being

implemented. The study has similarities to the topic being investigated in this study. The differences are the number of actors involved, the object, and the locus of research. Likewise, the results of a study conducted by Febriyanto (2016) showed that the role of top actors may determine the success of policy implementation but must be admittedly supported by the role of middle or lower actors. The similarity with this study is that the main actors and the middle actors play significant roles. However, in certain aspects (e.g., the political aspect), cooperation has not been fully implemented properly. In addition, a study conducted by Lestari & Firdausi (2017) also has similarities with this study, namely the role of the main actors, in which the Central Government actively implements development policies that focus on the interests of the community. The difference lies in the implementation of policies that researchers investigate and other conflicts of interest that occur outside the essence of the initial policy objectives that are oriented to the interests of the community.

The involvement and authority of actors in the management of border areas is an important issue because the optimization of an equitable distribution of development in all aspects is still a concern of all parties. According to Anderson (1979) and Lindblom (1980), actors involved in the public policy process are divided into two categories: official actors (inside of government) (e.g., government agents (bureaucracy), executive, legislature, and judicial institutions) and unofficial actors (outside of government) (e.g., groups of people who have interest, political parties, and individual citizens) (Salaputa *et al.*, 2013).

Some actors theoretically emphasize the existence of community culture in the policy formulation process. Moreover, some others emphasize economic rationalism in policy formulation (Prasetyo, 2012). In addition, the perspective of the political elite concept model in policy formulation views that there is always a policy bias from policy formulation to the implementation stages because the policies that are established are political references from the elites (Fauzi & Dewi Rostyaningsih, 2018). In this study, the researchers consider the concept of the actor's role as an official government actor in managing the border areas.

### Method

The type of this study was descriptive-qualitative, which sought to uncover and identify the inequality of the presence of actors at different government levels and the conflicts that accompany them (Tohardi, 2020). The investigated phenomena was the involvement of all actors and conflicts of authority, which were then described and analyzed as they were.

In this study, the researchers applied a qualitative approach in which the researchers started from the research locus, which was then described and explained in more detail (Yin, 2014). The focus of this study was the imbalance in the presence of actors and the conflicts that accompanied them.

Information in this study was gathered from informants, consisting of 2 people from the Provincial Government of West Kalimantan and 2 people from the Regional Government of Sambas Regency. Information from these informants was

the basis for describing actors and conflicts of authority in border management policies.

Apart from that, the employed methods of data collection consisted of observations, interviews, and documentation (Arifin et al., 2022). Observations were carried out to find out the pattern of the management of the border area at Aruk, Sambas Regency. After that, the researchers carried out interviews with officials from the Provincial Government of West Kalimantan, namely the Head and Secretary of the Preparatory Agency for the Development of Special Border Areas (Indonesian: *Badan Persiapan Pengembangan Kawasan Khusus Perbatasan* (BP2KKP)). Then, to obtain balanced information, the researchers also held interviews with the Head of the Secretariat and the Vice Regent of Sambas Regency. Furthermore, the researchers also carried out the documentation to collect data from the Central Government related to border area management. The presence of actors from various levels of government in the observation, interviews, and documentation is critical for obtaining natural and deep results (Creswell, 2014).

The applied method of analysis was descriptive analysis, by presenting the obtained data in the form of reports and descriptions. The collected data in the form of notes from interviews was then reduced by being selected and simplified according to the focus of this research. After that, the data was presented in the form of tables. The last stages were verification and conclusions. Descriptive analysis was thought to be capable of revealing the true problem and situation of

the actors involved in the border management process, in which data collected from the field was analyzed to determine the true meaning. Furthermore, the obtained data was also cross-checked with different sources, times, and techniques.

## Result And Discussion

### The Span of Control of Central Government Actors

Indonesian border areas are managed by the National Border Management Agency (Indonesian: *Badan Nasional Pengelolaan Perbatasan* (BNPP)). BNPP coordinates 13 Institutions/Ministries, in which the institution itself is under the Ministry of Home Affairs (Indonesian: *Kementrian Dalam Negeri* (KEMENDAGRI)) with *ex-offisio* status and directly responsible to the president (Benny & Rifky, 2021).

One of the border management policies is the advancement of the status of the area from the Cross Border Checkpoint (Indonesian: *Pos Pengawas Lintas Batas* (PPLB)) or a traditional border post to the Cross-National Border Post (Indonesian: *Pos Lintas Batas Negara* (PLBN)) or a modern border post. It is stipulated in the Presidential Instruction concerning the Acceleration of Development of 7 Integrated Cross-Border Posts (The Republic of Indonesia, 2015). Status changes that occur result in transformation in management aspects, especially in aspects of management, technology, security, service, and administration.

In terms of management, the change in status makes the built system quite integrated and unified. The management leads to single windows with

several separate units. In addition, the technology used is the latest technology, such as x-rays and others. Furthermore, the applied security system is layered but still not too tight. Additionally, the service is quite strict in that the documents that must be shown are the passport and other administrative documents (Wuryandari, 2018). Previously, during the status of PPLB, the management aspect was still separate from one unit to another, the technology used was simple, security and service characteristics were loose, and cross-border administration used travel documents only.

This represents the strong commitment of the Central Government to develop Indonesia from the periphery,

remote, and outermost areas, which means the border areas are also included in this category. This commitment, in addition to establishing the BNPP as the mandate of Law No. 43/2008 concerning National Territorial Boundaries, is also realized by forming the Special Unit for Border Management (Indonesian: *Unit Khusus Pengelola Perbatasan* (UKP2)) by considering the needs desired by the president. This institution is not attached to the office of the Presidential Secretariat and is not a pure bureaucratic institution. It is a parastatal (organizations that have semi-autonomous functions). The comparison between the Special Agency and the Presidential Special Unit can be seen in the following table.

**Table 1.**  
**The Comparison of the Positions, Strengths, and Weaknesses of the Presidential Special Unit and the Special Agency for Border Management**

<b>Forms of the Institution</b>	<b>Position Against the Presidential Institution</b>	<b>Strengths</b>	<b>Weaknesses</b>
Presidential Special Unit attached to the Presidential Office	Integral and attached to the presidential institution (Office of the Presidential Secretariat)	<ol style="list-style-type: none"> <li>1. Can be easily established by the president</li> <li>2. Attached to the presidential institution, in which its position is under the Office of the Presidential Secretariat</li> </ol>	<ol style="list-style-type: none"> <li>1. Can become a super-body institution</li> <li>2. Not permanent</li> <li>3. Not independent</li> </ol>
Special Agency for Border Management	<ol style="list-style-type: none"> <li>1. Can be outside the presidential institution</li> <li>2. Separate from the Office of the Presidential Secretariat</li> </ol>	More independent	<ol style="list-style-type: none"> <li>1. Not attached to the presidential institution</li> <li>2. Has obstacles in terms of coordination with the Office of the</li> </ol>

			Presidential Secretariat 3. Less Effective
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Source: Wuryandari, 2018.

The Presidential Special Unit is an integral part of the presidential institution and is expected to accelerate the president's priority policies in line with the vision and mission regarding the development of border areas with the slogan "Building the Nation from the Periphery" (Indonesian: *Membangun Negeri Dari Wilayah Pinggiran*). Meanwhile, the strength of the Special Agency for Border Management lies in its independence with very strategic main duties and functions (Widiartana, 2021). In addition, the central level of the agency has very broad main duties, functions, and authority compared to its branches at the provincial or regency/city (regional) levels. In this case, the regional levels of the agency are only executing policies from the central level.

### The Role of Regional Government Actors in Border Area Management

Regional governments consisting of Provincial and Regency/City governments that manage border areas are obliged to synchronize development programs in their respective border areas with the integrated/centralized/one-box policy concerning border area management in Indonesia. Regional Governments are allowed to establish Regional Border Management Bodies (Indonesian: *Badan Pengelola Perbatasan (BPP) Daerah*) as a follow-up to Law No. 43/2008

concerning State Territory through the Minister of Home Affairs Regulation No. 2/2011 concerning Guidelines for Establishing Border Management Bodies at the Regional Level.

The Provincial Government of West Kalimantan established a provincial border management agency long before the issuance of the Minister of Home Affairs Regulation based on the West Kalimantan Governor Regulation No. 161/2005 concerning the Preparatory Agency for the Development of Special Border Areas (Indonesian: *Badan Persiapan Pengembangan Kawasan Khusus Perbatasan (BP2KKP)*) of West Kalimantan Province. Furthermore, the agency based on the West Kalimantan Governor Regulation No. 65/2008 becomes the Border Area Management and Cooperation Agency (Indonesian: *Badan Pengelola Kawasan Perbatasan dan Kerjasama (BPKPK)*) of West Kalimantan Province, strengthened by the issuance of the Regional Regulation of West Kalimantan No. 10/2008 concerning the Organizational Structure of Regional Apparatus of West Kalimantan Province. As time went by, the Central Government established the National Border Management Agency (Indonesian: *Badan Nasional Pengelola Perbatasan (BNPP)*) through Presidential Decree No. 12/2010. For this reason, the Border Area Management and Cooperation Agency was revoked from the Organizational

Structure of Regional Apparatuses of West Kalimantan Province based on the West Kalimantan Governor Regulation No. 8/2016 concerning the Formation and Composition of Apparatuses of West Kalimantan Province issued on September 28, 2016.

The administrative area of the Provincial Government of West Kalimantan, categorized in the border areas, is spread over 5 regencies and 14 districts: Sanggau Regency (Entikong and Sekayam Districts), Bengkayang Regency (Jagoi Babang and Siding Districts), Sambas Regency (Paloh and Sajingan Besar Districts), Sintang Regency (Ketungau Hulu and Ketungau Hilir Districts), and Kapuas Hulu Regency (Batanglupar, Badau, Puring Kencana, Embaloh, North Putussibau, and Hulu Kapuas Districts).

The reality is that the Sambas Regency Regional Government has yet to establish a regional border management organization in the form of an agency or service office. This could be related to the abolition of border management institutions at the provincial level. This indicates that Regional Governments are withdrawing their main role in implementing regional autonomy in the management of border areas as a form of response related to the perception of regional officials regarding the overlap and limits of authority between the central and regional governments in managing border areas. Moreover, border affairs should be placed in one section under the Regional Secretariat of the Provincial Government. Likewise, border affairs in the Government of Sambas Regency must also be placed in a

section under the Secretariat of the Regency Government.

### Central Government Actors

The strong commitment of the central government to managing border areas can be seen in various institutional policies for border management that follow applicable laws and regulations. These institutions include the National Border Management Agency (Indonesian: *Badan Nasional Pengelola Perbatasan* (BNPP)) under the Ministry of Home Affairs and the Special Unit for Border Management (Indonesian: *Unit Khusus Pengelola Perbatasan* (UKP2)) as an organization that has a semi-autonomous function attached to the presidential institution and conducts direct reports to the Office of the Presidential Secretariat. This indicates that the authority and distribution of authority of the Central Government are very strong (Salaputa *et al.*, 2013).

However, the facts on the ground show that the presence of these two central government institutions has not been able to synergize the management of the border areas, especially those related to programs to improve community welfare. In referring to Law No. 43/2008 concerning State Territories and Presidential Regulation No. 12/2010 concerning the National Border Management Agency, the establishment of this agency aims to accelerate the resolution of problems in the national border areas. Therefore, the main task of this agency is to carry out the objective of its establishment by constructing the Cross-National Border Post (Indonesian: *Pos Lintas Batas Negara* (PLBN)) as the coordinator and

facilitator in ensuring CQIS (Custom, Quarantine, Immigration, and Security) and other elements at the border areas. However, its authority is not similar to the authority given to UKP2 in coordinating and synchronizing with ministries/agencies/local governments in accelerating the program to improve the welfare of the people in the border areas. Apart from that, the regional governments also have the inherent authority and responsibility to proactively pursue poverty alleviation policies in the border areas, either directly or indirectly. The responsibility is a consequence of implementing regional autonomy, which has objectives, one of which is to create a better, more effective, and efficient public service system, which eventually may lead to the improvement of the welfare and independence of the local community.

Therefore, efforts to develop border areas should not solely become the responsibility and/or be carried out by the Central Government. Centralized development policies with the principle of “*McDonaldnization*” have proven to be less than optimal in managing local resources and regional independence. The border area has the potential to be developed and possesses resources that can eventually provide for the welfare of its people. However, UKP2 and BNPP, supported by UPT PLBN Aruk, do not get local partners due to the absence of a regional-level border management agency. This makes institutional actors and individual actors from these institutions unable to synergize optimally with the Provincial Government of West Kalimantan and the Regional Government of Sambas

Regency because of the lack of coordination in border management.

### **Regional Government Actors**

Regional Governments consisting of Provincial or Regency/City Governments that manage border areas are obliged to synchronize development programs in their respective border areas to the integrated/centralized/one-box policy concerning border area management in Indonesia, which has been manifested by the establishment of UKP2. The role of this agency is to coordinate and synergize with relevant ministries, institutions, and regional governments when implementing the program in their respective areas. The synergy of authority between the Central and Regional Governments is highly needed in managing border areas, especially related to improving development programs that directly touch on the welfare of border area communities. A study conducted by Firdaus (2019) shows that the welfare level of the people in the border areas is quite good because the coverage area of observation is only one village, not the whole. Meanwhile, for wider area coverage, studies from Bastian (2021) and the Central Bureau of Statistics of Sambas Regency (2020) indicate that welfare has not yet touched remote areas.

This fact shows that there is no division of authority or synergy between the Central and Regional Governments in the development of border areas. Based on Indonesia’s Law No. 32/2004 concerning Regional Governments, a regency or city is an autonomous region that has the authority to regulate its



respective affairs. On the other hand, the regency or city that has territories bordering other countries must interact with the Central Government regarding immigration, customs, quarantine, and security issues. In this case, there is a dichotomy in terms of the authority and the budget provided.

Many phenomena have shown the indication of a conflict of authority, overlapping authority, and unclear authority between institutions (both central and regional actors) in managing the border area, making problems in this area complicated. This cannot be separated from the actors involved in making the policy. We can classify these actors into two categories: elites and politicians-bureaucrats. These actors are involved in public policy, which we usually call the policy elite. In line with the topic of this study, we further discuss who the elite are in the public policy process. Public policy can be viewed as the values and choices of the governing elite (Mills, 1956). The main argument of the theory of the elite is that people do not determine public policy through their demands and actions; it is the ruling elite who formulates policy. Based on this theory and correlated with border area management, it can be concluded that policies formulated dominantly by the central elite are not necessarily in line with the demands of people living in the border area. It can be seen from the establishment of many institutions by the Central Government, such as UK2P as a non-parastatal institution under the presidential institution and BNPP under the Ministry of Home Affairs with its integrated UPT PLBN. Similarly, regional elites also do the same thing by

establishing regional institutions, such as BPKPK under the Provincial Government of West Kalimantan (previously known as UPT PPLB). However, the institution was later removed from the West Kalimantan Province's regional apparatus organizational structure. This shows that the establishment and abolition of various institutions have been carried out by the policy elite and government agencies at both central and regional levels. These phenomena show that the policy elite and government agencies have difficulty implementing their authority in managing the border area. In other words, the Provincial and Regency Governments are inconsistent in carrying out the mandate of Law No. 43/2008 even though this law allows the establishment of regional border management bodies. Furthermore, the guidelines for doing so are regulated through Minister of Home Affairs Regulation No. 2/2011 concerning Guidelines for Establishing Border Management Bodies at the Regional Level. Intrinsically, these two provisions can be used as the basis for the establishment of a provincial or regency/city border management agency in regions that have border administrative areas.

The vacancy of regional border management organizations may have an impact on the Provincial and Regency Governments' commitment to budget politics in border area management. Moreover, this will also result in a lack of coordination and synergy with BNPP and UKP2 in managing border areas, especially things related to the acceleration of development programs,

which directly touch on the welfare of people living in border areas. In addition, the absence of a border management agency at the regional level will influence the program for channeling funds (if any) in the form of special allocation funds for border areas. This means that any assistance given may not reach the border areas directly because it has to go through the government at the provincial level.

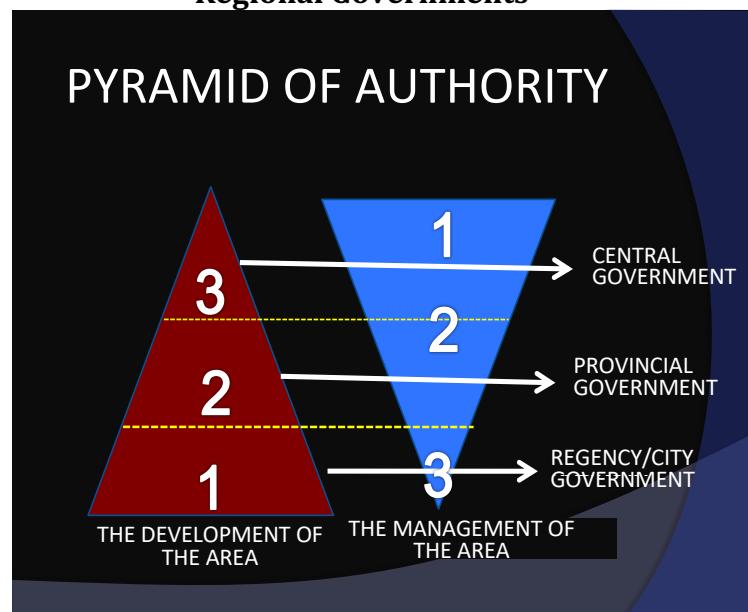
**Conflict of Authority**

The obtained data illustrates how dominant the authority of the main actors (Central Government) is in planning, regulating, and building border areas. Meanwhile, Regional Governments are also given the authority to build border areas physically but with little funds. Undoubtedly, this is not possible

considering that this matter requires a lot of money. This indicates that the politics of decentralization with the concept of autonomy – which is the choice of the Indonesian people in carrying out the governance system – is not implemented thoroughly. The concept of autonomy should make Regional Governments the main actors in planning and developing their regions, not only objects of power from the Central Government. The granting of autonomy to the regional level that is not fully implemented becomes a paradox and reverses the backflow of power from the regions to the center or back to a centralized model.

The following is the pyramid of the division of authority among various actors in the management of border areas.

**Figure 1.**  
**The Pyramid of Authority in Managing Border Areas between Central and Regional Governments**



Source: Researchers, 2020

Notes:

1. The Authority of Central Government
2. The Authority of Provincial Government
3. The Authority of Regency Government

Figure 1 above illustrates the conflict of authority in the management of border areas. The red pyramid (the development of the area) should be the responsibility of the Regency Government. Meanwhile, the first actor (i.e., the Central Government) in this pyramid is given a small portion of land to build upon physically. This is very difficult to implement because the funds in the Regional Government are limited. Some experts have found that the conflict between the Central and Regional Governments occurs because of demands from the people that the Central Government must share its power in the form of taxes and structural reforms in the government body in both economic and political contexts. Through decentralization, Grindle assumes that regional governance may become a new arena in political affairs, decision-making, and those concerning good governance (Widiastuti & Suryawati, 2021).

The decentralization that has been implemented has not provided flexibility for Regional Governments both in terms of politics and policies. This assumption is reinforced by other findings which explain that the autonomy of Regional Governments in the form of a policy has not provided a broad picture of autonomy (Said, 2015). Additionally, policy communication carried out on basic and important programs still does not run in harmony (Putra & Handoko, 2021). In addition, the relationship between the Central and

the Regional Governments is still characterized by a span of interests, so that a conflict of authority usually occurs in the management of certain regions (Abdullah, 2016). Other studies also confirm that the discrepancy between policies and authorities between the Central and Regional Governments is caused by the substance of the legislation itself. Therefore, several laws and regulations that are not in synchrony or not in line with regional autonomy should be amended to minimize the chance of a conflict of authority.

The results of this study justify the presence of a conflict of authority between the Central and Regional Governments. However, the conflict of authority that occurs is different from other studies that investigate the conflict of authority between implementing actors in one government unit or institution. In addition, other previous studies show significant differences from the results of this study, especially in the relationship between actors. For example, a study conducted by Arifin & Rupita (2021) examined a single actor as an executor who is influenced by the policy environment. Likewise, a study conducted by Firdaus (2019) concludes that welfare may only impact the community within the scope of one village and is not distributed in the entire border area. Studies by Deri *et al.* (2021) and Khairunisa (2022) assert that the top management in the government requires a strong commitment to developing a region. However, this study

just explores the commitment of one actor, namely the top management level, as the central actor in the successful implementation of policies in the case of managing a region.

Based on this analysis, it is clear that the regional government should be given a larger role in managing border areas, given that the areas are geographically located within the regional government's administrative jurisdiction. In addition, greater authority must be given to the Regional Governments in managing the border areas so that they may be all-out in its implementation. Even though the regional government is the second actor in policy implementation, their insight, competence, and commitment make them the primary determinants of policy implementation effectiveness.

### **Conclusion**

The Central Government as the main actor with strong institutional support and authority in the management of border areas, has not been able to improve the border areas thoroughly. An important problem in the ineffectiveness of achieving the overall development goals is the lack of synergy with other interested parties, especially the second actor (i.e., the Regional Government).

Apart from that, the Regional Governments as the second actors in the management of the border area, seem less active in solving development problems because they withdraw from an important position as the implementers of regional autonomy. Regional Governments have a respective perception of their overlapping and

limited authorities. In addition, they only have limited funds to execute various delegated policies.

The conflict of authority between the Central and Regional Governments makes the Regional Government only the executor of the residual affairs of the Central Government. In addition, Regional Governments have the authority to build the physical sector with limited funds. On the contrary, the Central Government with abundant funds, is only given dominant authority at the policy level in the economic and political sectors.

The border area for the main actor (i.e., the Central Government) is considered a new arena in political and policy affairs. Meanwhile, for Regional Governments, border areas are a mirage because of limited authority, funds, and other aspects that supposedly support the acceleration of development as a whole. This makes them the second actor that plays a less effective role in managing border areas.

Finally, this study has a limitation in the arena of conflict of authority that has not been fully described. In line with this limitation, it is necessary to conduct further studies with more complex methods, involving actors outside the government and examining wider contexts with a variety of cases.

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