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Editorial Office: Faculty of Law, Sriwijaya University
Jalan Srijaya Negara, Palembang, South Sumatra 30139, Indonesia.
Phone: +62711-580063 Fax: +62711-581179
E-mail: sriwijalayalawreview@unsri.ac.id | sriwijalayalawreview@gmail.com
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Mapping Public Participation in EIA in Indonesia: Recommendations for an Ideal Concept

Annisa Fianni Sisma^a, I Gusti Ayu Ketut Rachmi Handayani^a, Lego Karjoko^a,
and Ravi Danendra^b

^a Faculty of Law, Universitas Sebelas Maret, Surakarta, Indonesia. E-mail: fiannisisma22@student.uns.ac.id,
ayu_igk@staff.uns.ac.id, legokarjoko@staff.uns.ac.id

^b Oñati International Institute for the Sociology of Law, Spain. E-mail: rravi001@ikasle.ehu.eus

Article

Abstract

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A quality EIA document is directly proportional to the level of public participation that influences the preparation process. However, the EIA level of public participation in Indonesia is still very low, even reduced after being amended by Law No. 32/2009 in conjunction with Law No. 6/2023, which shows that public participation has not been prioritised. Several factors influence this, including the reduction of EIA participation through Law No. 6/2023, as well as the involvement of parties and forms that are not in line with the needs of the community. This research aims to identify the level of public participation in preparing EIA in Indonesia and present ideal concepts and recommendations regarding these three aspects. This legal research uses a statutory and conceptual approach with primary and secondary legal materials (Law No. 32/2009 in Lieu of Law No. 6/2023, Government Regulation No. 22/2021 and relevant scientific works). The level of public participation in the EIA preparation process in Law No. 6/2023 tends to be lower than before because the community cannot influence the final decision; affected parties are limited; forms of participation are limited to providing suggestions, opinions and responses; and the public participation in government institutions is eliminated. Therefore, the ideal concept uses a mapping that includes the parties involved, the form, and the purpose of participation with three rationales, namely normative, substantive, and instrumental, which are briefly related to the community role, the quality of environmental decisions, and the basis of legitimacy. The government needs to develop ideal regulations for public participation in preparation for EIA based on this mapping so that the preparation of EIA is participative, transparent, equitable, and informed.

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INTRODUCTION

Public participation is needed not only to protect the environment from pollution and/or damage for the final goal, but also to uphold transparency, equity, and to keep the public informed about

the process. Transparency in decision-making is important for informing stakeholders of the plan, identifying existing problems, minimising misunderstandings, and avoiding potential conflict in the long term.¹ Second, good public participation also contributes to realising the equitable access to justice by giving a chance for people to give suggestions, opinions, feedback, and even a major group's strong role² in the final decisions. Also, third, the importance of informed public stated in 10th Principle of Rio Declaration 1992, "... At the national level, each individual shall have appropriate access to information," which is later adopted in Law 39/2009³ Then, in the long term, it will realise a good and healthy environment, because the community and environment are the parties most affected by businesses and/or activities.⁴

Regulations in Indonesia that include public participation are Article 25 paragraph c and Article 26 of Law No. 32/2009 in Lieu of Law No. 6/2023. Those are about Environmental Impact Assessment (EIA)—an instrument that is used to prevent pollution and/or environmental damage. Before being amended by Law No. 6/2023, in Law No. 32/2009, the community involved in EIA was the affected community, environmentalists, and/or those affected by the decisions. The involvement is carried out in the announcement and public consultation process to collect suggestions and responses. However, in Article 26 of Law No. 32/2009, in Lieu of Law No. 6/2023, the community involved in the two agendas is limited to the community directly affected by the business plan and/or activities. This means that the parties involved in the two agendas are now more limited to those directly affected, not all parties affected by decisions in the EIA process.

Article 25, paragraph c, and Article 26 of Law No. 32/2009 in Lieu of Law No. 6/2023 are further regulated in Government Regulation No. 22/2021. Articles 28, 29, 31, 32, and 34 of Government Regulation No. 22/2021 further regulate EIA. In the explanatory notes to Article 29, it is specified that "directly affected communities" are limited to communities in the study area of the EIA preparation that are directly affected, whether positively (employment or business opportunities) and/or negatively (health or social impacts) by the planned business and/or activities. Environmental advocates, researchers, or non-governmental organisations may fall under the category of "directly affected communities" if they have been involved in and/or accompanied the process. If they have not been involved, they cannot be included at all.

The Environmental Feasibility Assessment Team consists of a chairperson, a secretary-general, and members. Members. Under Ministry of Environment and Forestry Regulation No. 18/2021, experts serving as members of the Environmental Feasibility Assessment Team are appointed by the Minister based on recommendations from the Director General, governor, or regent/mayor (through regional environmental agencies), environmental feasibility assessment

¹ Sarpong Hammond Antwi et Al, 'Public Participation in Environmental Decision-Making: A Water Sector Perspective', *Environmental and Sustainability Indicators*, 2025 <<https://doi.org/https://doi.org/10.1016/J.INDIC.2025.100656>>.

² Jan Sendzimir Stefan Schmutz, 'Riverine Ecosystem Management, Ed. Stefan Schmutz and Jan Sendzimir', *Springer International Publishing*, 2018 <<https://doi.org/https://doi.org/10.1007/978-3-319-73250-3>>.

³ UN, 'Report of the United Nations Conference on Environment and Development', 1992 <<http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm>>.

⁴ A L Sentot Sudarwanto, 'AMDAL Dan Proses Penyusunan Berdasarkan Peraturan Menteri Lingkungan Hidup Nomor 16 Tahun 2012 Tentang Pedoman Penyusunan Dokumen Lingkungan Hidup', *UNS Press*, 2018.

institutions by invitation, professional associations, or their initiative. Proposals for certified expert candidates must also meet the requirements of Article 42 of the Ministry of Environment and Forestry Regulation No. 18/2021.

When talking about directly affected communities, not everyone can be part of the team due to specific requirements. This means that experts can be directly affected in communities, but only those who have certification. However, directly affected communities should be involved as a form of meaningful community participation without such requirements, because they are the most affected. Therefore, individuals who do not meet the requirements in Article 42, paragraph (3) cannot become members of the team. In addition, restrictions are also seen in the abolition of the EIA Assessment Commission. The EIA Assessment Commission in Article 29 Law No. 32/2009 is a licensed commission established by the government. Members of the EIA Assessment Commission include representatives from potentially affected communities and environmental organisations. The EIA Assessment Commission is assisted by a technical team of independent experts and a secretariat to conduct technical studies. After the EIA Assessment Commission assesses the EIA document, the Minister, governor, regent/mayor, or mayor then determines the environmental feasibility or non-feasibility. This environmental feasibility is one of the prerequisites for the issuance of a Business Permit. However, now the environmental feasibility or infeasibility decision is issued by the Environmental Feasibility Test Team (EFTT), which does not have a community element. The team will issue an Environmental Feasibility Decree as the basis for issuing an Environmental Approval. The EFTT only involves environmentalists and/or other interested communities in the announcement of the plan, not the determination of environmental feasibility in PP No. 21/2022, which is the implementing regulation of Law No. 32/2009 in conjunction with Law No. 6/2011.

Another change is in Article 27 of Law No. 32/2009, which previously stated that in preparing an EIA related to involving the community, the initiator can ask for help from other parties. Now, the phrase 'can ask for help from other parties' has been changed to 'can appoint other parties'. The first phrase indicates an opportunity for additional involvement from other parties. However, the second phrase indicates an opportunity to replace a party, namely the directly affected community. In the explanation section, 'other parties' refers to the EIA drafting agency or consultant. This regulation further minimises public participation.

Based on this description, it can be seen that the community involved in EIA, including the plan's agenda, activity announcements, public consultation, and the Environmental Assessment Team, is increasingly reduced. All parties in the Environmental Assessment Team come from the government; there is no longer an element of representation from the affected community. In fact, the community's role in environmental protection is essential. In addition to the environment, the community is also the most affected party. It recognises the environment and environmentalists, researchers, or non-governmental organisations to jointly protect the environment from pollution and/or environmental damage for establishing businesses and/or activities.

Furthermore, previous related studies are, Delyarahmi (2023), which explains the urgency of public participation in EIA and emphasises that Law No.6/2023 reduces it⁵. Sri Subekti (2023) conveys this reduction and its impact.⁶ N. F. Gaffar (2022) explains the existence of untargeted participation.⁷ Simbiak (2022) notes that the participation guidelines are too general and difficult to use in certain situations, which makes the process less than optimal.⁸ R. Subekti (2022) convey problems like community insight, claiming not to be involved in the announcement or public consultations, local governments who claim the proponent has fulfilled the administrative requirements for permit issuance, and there is also no explanation of negative impacts, but only positive impacts.⁹ Azhara et al. (2022), the urgency of environmental organisations in preparing EIAs.¹⁰ Samad, et al. (2021) found that community participation was ineffective because the community lacked information about mining areas.¹¹

Participation mapping is a key tool for identifying and communicating needs and supporting social change.¹² It ensures that those involved are truly affected and can contribute positively to the quality of the decision, without being limited by inadequate administrative requirements. Therefore, participation mapping will make the EIA study more focused and in line with the needs of the local community and environment.

Therefore, this article not only identifies the level of public participation in EIA preparation in Indonesia but also provides recommendations for the ideal concept of participation in EIA preparation in terms of the parties, forms, and objectives of participation in terms of its rationality.

The objective of this article is to analyse the level of participation in EIA preparation regulations in Indonesia in the form of strengths and weaknesses, overcome the limitations of previous research, and present recommendations for EIA regulations to suit the needs of people around the study plan of business and/or activity to make the right decisions. This is because the regulations in environmental protection that have been in effect until now, including the

⁵ Rahmi Murniwati Sucy Delyarahmi, 'Peran Serta Masyarakat Dalam Penyusunan Analisis Mengenai Dampak Lingkungan Dalam Rangka Perlindungan Hak Atas Lingkungan Hidup', *UNES Journal of Swara Justisia*, 7.2 (2023).

⁶ Sri Subekti, 'Pentingnya Peran Masyarakat Dalam Amdal Demi Tujuan Pembangunan Berkelanjutan Berwawasan Lingkungan (Studi Kasus Putusan Mk No. 91/Puu-Xviii/2020 Tentang Judicial Riview Uu No.11 Tahun 2020 Tentang Cipta Kerja', *Jurnal Pro Hukum : Jurnal Penelitian Bidang Hukum Universitas Gresik*, 12.3 (2023).

⁷ Nurul Fadli Gaffar, 'Partisipasi Masyarakat Dalam Penyusunan Dokumen Amdal Penambangan Pasir Laut Di Perairan Spermonde (Berdasarkan PermenLH No.17 Tahun 2012)', 2022.

⁸ Irja Tobawan Simbiak, 'Keterlibatan Masyarakat Pada Proses Amdal: Potensi Permasalahan, Implikasi & Faktor Penyebab', *Jurnal Wilayah, Kota Dan Lingkungan Berkelanjutan 1, Orang. 1 (18 Orang 2022)*, 42–56 <<https://doi.org/https://doi.org/10.58169/jwikal.v1i1.37>>.

⁹ Amalina Ghaisani Putri Rahayu Subekti, 'Partisipasi Masyarakat Dalam Penyusunan AMDAL Di Kabupaten Sukoharjo', *Jurnal Pendidikan Kewarganegaraan Undiksha 10, No. 1, 2022*, 350.

¹⁰ Siti Ruhama Mardhatillah Melisa Ayu Azhara, 'Partisipasi Publik Dalam Penyusunan Dokumen Analisis Dampak Lingkungan Pasca Berlakunya Undang-Undang/Perppu Cipta Kerja', *Jurnal Hukum Ius Quia Iustum*, 30.2 (2023), 270–75 <<https://doi.org/https://doi.org/10.20885/iustum.vol30.iss2.art2>>.

¹¹ Hamzah Halim Rezki Purnama Samad, A. M. Yunus Wahid, 'Urgensi Partisipasi Masyarakat Terhadap Izin Usaha Pertambangan Pasir', *Al-Ishlah: Jurnal Ilmiah Hukum*, 24.1 (2021), 153–58 <<https://doi.org/https://doi.org/10.56087/aijih.v24i1.87>>.

¹² Jon Corbett Logan Cochrane, 'Participatory Mapping', *In Handbook of Communication for Development and Social Change (Springer Singapore, 2018)*, 2018 <https://doi.org/https://doi.org/10.1007/978-981-10-7035-8_6-1>.

regulation of EIA, have not reduced the level of violations.¹³ This means that the EIA, which is intended to identify and prevent damage to and pollution of the environment, does not fulfil this function in practice. One of the reasons for this may be that the EIA is not prepared in accordance with the requirements for establishing a business and/or activity but is merely an administrative requirement.

RESEARCH METHODS

This legal research was conducted using a statutory and conceptual approach,¹⁴ also used primary and secondary legal materials (Law No. 32/2009 in Lieu of Law No. 6/2023, Government Regulation No. 22/2021, Ministry of Environmental and Forestry Regulation No. 18/2021, journals, reports, books, proceedings, and other relevant scientific articles). The legal material collection technique used was a literature study with a deductive analysis technique. This research aimed to analyse the level of participation in the EIA regulation in Indonesia with the theory of public participation by Sherry R. Arnstein and to provide recommendations for the ideal EIA regulation concept according to needs.

ANALYSIS AND DISCUSSION

The preparation of an EIA aims to reduce the environmental impact of industry by generating information on potential effects and supporting decision-making, ultimately protecting the environment and achieving sustainable development.¹⁵ The preparation of EIA has evolved from being a broader instrument addressing nature conservation, social and economic, and for decisions that support sustainable development.¹⁶ Public participation is required in most EIA programs in the world.¹⁷

There are different opinions regarding EIA quality, particularly concerning public participation. EIA is considered relevant because it has developed from its initial orientation of only preventing pollution, and now also addresses community interests. The effectiveness of EIA preparation can be seen from the dimensions of legitimacy, procedural, transactive, pluralist, substantive, and knowledge. Regarding procedural and substantive dimensions, the effectiveness of EIA preparation requires active public participation.¹⁸ For example, public participation in the procedural dimension is the existence of consultations that help conceptualise the consequences of development and how to overcome them. Meanwhile, in the substantive dimension,

¹³ Hilaire Tegnau et Al, 'Mining Corruption and Environmental Degradation in Indonesia: Critical Legal Issues', *Bestuur*, 9.2 (2021) <<https://doi.org/https://doi.org/https://dx.doi.org/10.20961/bestuur.v9i2.55219>>.

¹⁴ Peter Mahmud Marzuki, 'Penelitian Hukum', *Jakarta: Kencana*, 2022, 55.

¹⁵ Taako Edema George et Al, 'An Evaluation of the Environmental Impact Assessment Practice in Uganda: Challenges and Opportunities for Achieving Sustainable Development', *Heliyon*, 6.9 (2020) <<https://doi.org/https://doi.org/10.1016/J.HELIYON.2020.E04758>>.

¹⁶ Yuting Zhao et Al, 'How Does the Environmental Impact Assessment (EIA) Process Affect Environmental Performance? Unveiling EIA Effectiveness in China: A Practical Application within the Thermal Power Industry', *Environmental Impact Assessment Review*, 101 (2023), 1–11 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2023.107120>>.

¹⁷ Anne Shepherd Christi Bowler, 'Beyond the Requirements: Improving Public Participation in EIA', *Journal of Environmental Planning and Management*, 40.6 (1997), 725–38 <<https://doi.org/https://doi.org/10.1080/09640569711877>>.

¹⁸ Zhao et Al, 'How Does the Environmental Impact Assessment (EIA) Process Affect Environmental Performance? Unveiling EIA Effectiveness in China: A Practical Application within the Thermal Power Industry', 2–3.

stakeholder and public participation influence the EIA's decision-making in considering community input to the impact assessment process.¹⁹

The project proponent will have an impact on the environment. Therefore, EIA is the instrument or tool to plan preventive action to prevent damage, control negative impacts, and develop positive impacts. It can be seen how to improve the quality of EIA preparation documents so that they can function properly, one of which is public participation at an early stage and strengthening the community role to be more democratic.²⁰ In line with this, the problems in implementing the EIA preparation process in various countries that apply it are the lack of public participation.²¹ This has led to a lack of sustainable outcomes and objectivity in decision-making. In fact, an economy that is not balanced with concern for the environment is an attitude that violates the principle of sustainability for protecting the environment.²²

According to EIA researchers, such public participation in various countries shows poor participation, limited, ineffective, corruption, manipulation, and disrespect.²³ Some communities also choose not to engage due to a lack of guarantees and a feeling of powerlessness.²⁴ Yet, public participation is required in EIA preparation, review and the decision-making process.²⁵ It ensures dynamism and is responsive to environmental challenges.²⁶ Public participation is an effort to ensure access to information and the democratisation of environmental decision-making.²⁷ Public participation is also related to environmental justice as an opportunity for people to participate

¹⁹ Chaunjit Chanchitpricha Alan Bond, 'Conceptualising the Effectiveness of Impact Assessment Processes', *Environmental Impact Assessment Review*, 2013 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2013.05.006>>.

²⁰ Laurentiu Rozylowicz Andreea Nita, Stacey Fineran, 'Researchers' Perspective on the Main Strengths and Weaknesses of Environmental Impact Assessment (EIA) Procedures', *Environmental Impact Assessment Review*, 2022 <<https://doi.org/https://doi.org/https://doi.org/10.1016/J.EIAR.2021.106690>>.

²¹ Adel S Aldosary, Md Arif Hasan, Kh Md Nahiduzzaman, 'Public Participation in EIA: A Comparative Study of the Projects Run by Government and Non-Governmental Organisations', *Environmental Impact Assessment Review*, 2018, 12–24 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2018.05.001>>.

²² Birkah Latif et Al, 'The Impact of the Development of Trade Practices on Enforcement of International Environmental Law', *Sriwijaya Law Review*, 3.2 (2019), 139 <<https://doi.org/https://doi.org/10.28946/slrev.Vol3.Iss2.226.pp137-151>>.

²³ Rozylowicz Nita, Fineran, 'Researchers' Perspective on the Main Strengths and Weaknesses of Environmental Impact Assessment (EIA) Procedures', 2.

²⁴ Yuanni Wang et Al, 'A Public Participation Approach in the Environmental Governance of Industrial Parks', *Environmental Impact Assessment Review*, 101.107131, 3 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2023.107131>>.

²⁵ Luan Shengji Thiri Shwesin Aung, Thomas B. Fischer, 'Evaluating Environmental Impact Assessment (EIA) in the Countries along the Belt and Road Initiatives: System Effectiveness and the Compatibility with the Chinese EIA', *Environmental Impact Assessment Review*, 2020 <<https://doi.org/https://doi.org/https://doi.org/10.1016/J.EIAR.2019.106361>>.

²⁶ Lego Karjoko Muhammad Bagus Adi Wicaksono, I Gusti Ayu Ketut Rachmi Handayani, 'Degradation of Authority Local Governments in Coal Mining Licenses and Environmental Management in Indonesia', *Journal of Legal, Ethical and Regulatory Issues*, 24.6 (2021), 3.

²⁷ Pedro Bigolin Neto, Alexandra Mallett, 'Public Participation in Environmental Impact Assessment Processes through Various Channels – Can You Listen to Us Now? Lessons from a Brazilian Mining Case', *The Extractive Industries and Society*, 2023 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.exis.2022.101186>>.

in environmental decisions.²⁸ Participation is also useful to make conscious choices regarding environmental impacts and open up the process.²⁹

In general, public participation is important in social change.³⁰ Public participation has various objectives. These goals are to create a democratic and aspirational government; to serve the interests and community needs, as a manifestation of the good governance principles³¹ in making decisions related to community interests, implementing and evaluating government and development programmes in the region; and building government and community partnerships to be responsible of the development.³² Public participation is needed to influence the outcome of a process. Public participation can be useful to integrate legal and social advocacy later.³³ In addition, communities also have rights to land and resources, including natural resources,³⁴ so that they have the right to be involved in businesses and/or activities related to them.

The Ladder of Citizen Participation

There is a difference between pseudo-participation and real participation in influencing the outcome of a process. Therefore, do not let the EIA process become just a formality to obtain a permit.³⁵ There is a typology of participation levels with eight rungs of participation to analyse the EIA's public participation in Indonesia. Those eight rungs are differentiated based on the level of public participation, from minimal to high, and whether it is fake or real.

The first and second rungs, Manipulation and Therapy, are pseudo-participation. The third and fourth rungs, Informing and Consultation, lead to tokenism (deceptively positive behaviour).

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- ²⁸ I Gusti Ayu Ketut Rachmi Handayani et Al, 'Water Availability In The Framework Of Environmental Justice: Reconstruction Of Municipal Waterworks (PDAM) Regulations', *International Journal of Business, Economics and Law*, 20.4 (2019), 53 <https://doi.org/https://ijbel.com/wp-content/uploads/2021/01/IJBEL-20_307.pdf>.
- ²⁹ Ayla Bilgin, 'Analysis of the Environmental Impact Assessment (EIA) Directive and the EIA Decision in Turkey', *Environmental Impact Assessment Review*, 2015 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2015.04.001>>.
- ³⁰ Lego Karjoko Rosidi Roslan, I Gusti Ayu Ketut Rachmi Handayani, 'Legal Relationship and Social Changes and Their Impact on Legal Development', *In Proceedings of the International Conference on Environmental and Energy Policy (ICEEP 2021) Atlantis Press*, 2021, 583, 279 <<https://doi.org/https://doi.org/https://doi.org/10.2991/assehr.k.211014.060>>.
- ³¹ Thabang Maphanga et Al, 'The State of Public Participation in the EIA Process and Its Role in South Africa: A Case of Xolobeni', *South African Geographical Journal*, 106.3 (2023), 278 <<https://doi.org/https://doi.org/10.1080/03736245.2022.2087726>>.
- ³² Lego Karjoko Joko Suhendro, I Gusti Ayu Ketut Rachmi Handayani, 'The Implementation of Land Consolidation in Planning of Urban Slum Area as Environmental Based Optimisation of Urban Land Use and Utilization', *In Proceedings of the International Conference on Environmental and Energy Policy (ICEEP 2021) Atlantis Press*, 139 <<https://doi.org/https://doi.org/https://doi.org/10.2991/assehr.k.211014.030>>.
- ³³ "The Politics Settlement of Land Tenure Conflicts During Jokowi's Presidency I Gusti Ayu Ketut Rachmi Handayani et al., 'No Title', *JILS (Journal of Indonesian Legal Studies)*, 7.2 (2022), 507 <<https://doi.org/https://doi.org/https://doi.org/10.15294/jils.v7i2.57539>>.
- ³⁴ Lego Karjoko et Al, 'The Consequence of the Decision of the Constitutional Court in Forestry on the Recognition of Traditional Forests in Indonesia', *Journal of Legal, Ethical and Regulatory Issues*, 24.2 (2022), 507 <<https://doi.org/https://doi.org/10.15294/jils.v7i2.57539>>.
- ³⁵ Mallett Neto, 'Public Participation in Environmental Impact Assessment Processes through Various Channels – Can You Listen to Us Now? Lessons from a Brazilian Mining Case', 3.

The community only receives one-way information. In the fourth rung, people are given the space to express their opinions, but no guarantee of changing the status *quo*.³⁶

On the fifth rung, Placation, communities can propose things, but not decide. At the sixth rung, Partnership, communities are negotiating. At the 7th is Delegated Power, and the eighth is Citizen Control; the community has dominant decision-making authority. On the eighth rung, the community has a guaranteed level of power.³⁷

Absolute control of the community is not a viable solution because it allows for separatism, balkanisation, a lack of merit system,³⁸ grassroots participation—local interests overshadow and dominate common interests—so that common interests are neglected; more active communities drown out other weaker, less visible, or more passive communities.³⁹ This happens because each party has different perspectives, competing interests, racism based on certain categories, paternalism (limiting others to their own freedom), resistance to redistribution of power, mistrust, etc.⁴⁰

Regulation of Public Participation in the Preparation of EIA in Indonesia

Regarding Arnstein's typology of participation, the regulation related to EIA preparation documents in Indonesia is not on the first and second steps because participation is not mathematically calculated or limited to educated individuals and does not focus on diversion or treatment. Meanwhile, in the public consultation agenda, the proponent submits information containing at least a plan description, potential impacts from the proponent's initial identification, and components that will be affected.

The regulation of EIA preparation documents is also not on the 3rd step because, according to the announcement, information is not only one-way from the power holder, but there is room to provide suggestions, opinions, and responses to business plans and/or activities for 10 working days since the announcement. In the public consultation, the public can submit all three, which are then recorded in the minutes of the event. Arrangements regarding the preparation of the EIA in Indonesia are contained in the 4th step. This is because the public can submit suggestions, opinions, and responses. Still, the public cannot be sure, and there is no guarantee that those responses will affect the final decision.

Regarding the fifth rung, the regulation of EIA preparation does not reach this rung. The community is not placed into the institution and allowed to propose something. Before the Law No. 32/2009 amendment, community elements were involved in the EIA Assessment Commission. This commission is tasked with assessing the FKA, ANDAL document, and RKL-RPL document, whose final output is an Environmental Permit. However, with the amendment of Law No. 32/2009 with Law No. 6/2023, the community is not involved in assessing these documents because the EIA Assessment Commission is abolished and then replaced by the

³⁶ Sherry R Arnstein, 'A Ladder Of Citizen Participation', *Journal of the American Planning Association*, 4, 217 <<https://doi.org/https://doi.org/http://dx.doi.org/10.1080/01944366908977225>>.

³⁷ Sherry R Arnstein.

³⁸ Sherry R Arnstein.

³⁹ Philip Selznick Philippe Nonet, 'Law and Society in Transition: Toward Responsive Law', *New York: Routledge Taylor and Francis Group*, 2017, 2017, 101–3.

⁴⁰ Arnstein, 'A Ladder Of Citizen Participation', 217.

EFTT, whose parties are determined and come from the government. The EFTT only involves environmentalists and/or other interested communities in the announcement of plans, not the determination of environmental feasibility. This shows a decrease in the level of participation.

Next, the regulation of EIA preparation also does not reach the sixth rung because the community does not play a role beyond just submitting suggestions, opinions, and/or responses. The community is also powerless because it cannot ensure its influence on the final decision. It also does not reach the seventh rung because citizens do not have dominant decision-making power. Also, the eighth rung, communities do not have the level of control or power that ensures they are highly influential in the final decision or directly involved.

Apart from Indonesia, one of the countries that regulates and supports the public's role in this matter is Denmark. One of the things discussed in the Aarhus Convention is that public participation can improve decision quality.⁴¹ Not only that, such participation also helps to increase public awareness of the environment, allows the public to express their concerns about the environment, and allows public authorities to consider these concerns. Article 8 also emphasises that the results of participation must be maximised.⁴² Denmark must also include these provisions in its national regulation as a state party to the UN.

Public participation in preparing an EIA in Denmark is regulated in VEJ nr 9339 af 12/03/2009 *Vejledning om VVM i planloven* (Guidelines for EIA in the Planning Act), namely in screening decisions, EIA assessments, and EIA permits to complete the planning of a project or activity. Screening is the government's assessment of whether a construction project has a significant impact on the environment. Denmark also requires that all questions posed to the public and their answers be publicised.. At the planning stage, the public can submit objections. In Indonesia, the submission of objections to EIA documents previously governed by Article 26 of Law No. 32/2009 was abolished.

The public participation mechanism also affects the effectiveness of EIA preparation because Danish citizens play a role in the planning process and meet community expectations. People can raise objections that can stop or delay projects and plans from being developed. Public participation is also centred on issues important to the community, making decisions more democratic than just an export-oriented quality control system.⁴³ Denmark's success is demonstrated by its position at number 1 out of 180 countries as the best environmentally performing country according to the Environmental Performance Index (EPI) 2022, with a score of 77.90.⁴⁴

⁴¹ Przemysław Kledzik Magdalena Michalak, 'The Aarhus Convention and Polish Regulations Concerning Parties to Proceedings for Issuing the Eia Decisions', *Journal for European Environmental & Planning Law*, 1–2, 2021, 56–76 <<https://doi.org/https://doi.org/10.1163/18760104-18010005>>.

⁴² UNECE, 'Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention)', *Aarhus, Denmark: UNECE*, 1998.

⁴³ Ivar Lyhne et Al, 'Theorising EIA Effectiveness: A Contribution Based on the Danish System', *Environmental Impact Assessment Review*, 2017, 246–47 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2015.12.002>>.

⁴⁴ Yale Center for Environmental Law & Policy, 'No Title', *Environmental Performance Index Results*, 2022.

Ideal Concept of Public Participation in the Preparation of EIA in Indonesia

Based on this description, the urgency and necessity of mapping have been recognised, addressing the need to engage the parties involved, define the form, and establish the purpose of participation. This means that it is not only the level of participation and obstacles that need to be analysed and considered, but also the mapping, so that it is carried out as needed. The urgency of this mapping is to harmonise suggestions, opinions, responses, needs, and expectations to ensure that there are no conflicting expectations that can deceive people.⁴⁵

Within the four project attitudes, key influences include ambivalence, support, rejection, and acceptance. Ambivalence is a positive attitude towards the endeavour or activity, but rejects the decision-making process, which may result in the denial of future participation. Acceptance is an attitude in which people have a negative judgment but accept the legitimate means of decision-making, thus continuing to participate in the future. Rejection is an attitude that dislikes the decision-making process or business plan. It may even lead the community to block or withdraw from the plan and cease participation. Support is an attitude that approves of the process and the business plan or activity, may even offer resources to implement it, and will participate in the future.⁴⁶

Mapping the Most Affected Parties

IAIA defines about public participation in EIA is involving individuals and/or groups who are affected by a programme, or other interested parties.⁴⁷ The element considered is the affected parties subject to the process, but it does not highlight the extent of community influence in decision-making.

Hughes (1998) says that participation in EIA is a mechanism through which affected individuals or groups can effectively shape decision-making processes.⁴⁸ Hughes highlights the importance of affected parties to influence decision-making. According to Arnstein (1969), participation is a redistribution of power so that people participate in future political and economic processes, a strategy so that people, the more powerless, can participate in determining government policies, as a significant social reform so that mutual benefits are obtained, and a form of citizen power.⁴⁹ Arnstein's view is that people must have influence, participate in the process, be involved in the political and economic future, and make changes for mutual benefit.

Mapping Who is Suitable to Participate

⁴⁵ Anne N Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?', *Environmental Impact Assessment Review*, 43 (2013), 106
<<https://doi.org/https://doi.org/10.1016/j.eiar.2013.06.003>>.

⁴⁶ Bert Enserink Miriam Cuppen, Bertien Broekhans, 'Public Participation in EIA and Attitude Formation', *Impact Assessment and Project Appraisal*, 30.2 (2012), 64
<<https://doi.org/https://doi.org/10.1080/14615517.2012.660348>>.

⁴⁷ Ross Hughes, 'Environmental Impact Assessment and Stakeholder Involvement', *London: International Institute For Environment and Development*, 1998, 8.

⁴⁸ Ross Hughes.

⁴⁹ Arnstein, 'A Ladder Of Citizen Participation', 216.

According to who should participate, the terms 'public', 'proponent', 'stakeholder', and 'citizen' are often used. The terms used should be appropriate to map the parties that need to be involved.⁵⁰ Petts (2003) states that understanding who the participants are and their interests is important. Not only to recognise the benefits of participation, but also to determine appropriate activities. These participants can be people, groups or organisations affected by environmental decisions, and the general public and stakeholders should be distinguished.⁵¹

According to Dietz and Stern (2008), involving all public actors in environmental controversies is inefficient, time-consuming and costly. Environmental decisions are indeed far-reaching, which means they affect the quality of life of almost everyone because ecosystems are interconnected. However, mapping is needed to eliminate those who cannot contribute constructively. If a democratic approach is taken, an inclusive approach does not make sense because the greater the risk, the more people are involved. This is because it will be more difficult to fulfil expectations, and many expectations will not be met, thus reducing the community's willingness to participate or even creating informal participation because suggestions, opinions, and/or responses are not accommodated.⁵²

Determine the Appropriate Form of Participation

According to its form, Hughes says the term 'participation' is only appropriate when those involved have significant control over the decision-making process because it is successful based on the process.⁵³ Therefore, various forms are distinguished, such as information provision, consultation, and joint decision-making. Regarding EIA, participation, such as information provision, loses effectiveness when it is not coupled with concrete forms of public engagement, like collaborative decision-making.⁵⁴ Consultation can be a form in the early stages⁵⁵, but the community needs to be involved in the final decision.

Arnstein distinguishes the forms of participation with those eight rungs. Meanwhile, Adnan (1992) distinguishes five typologies: Passive Participation, Informing, Consultation, Functioning Participation, Interactive Participation, and Self-Mobilisation.⁵⁶ ⁵⁷This formal form of participation has been criticised, and the opinion has emerged that informal participation, such as rallies, protests, campaigns, and petitions, is more effective in conveying or influencing the final decision.⁵⁸ However, public participation will fall apart if this is the case. In addition, the action is a reaction to the non-accommodation of influential public participation at the normative

⁵⁰ Thomas Bernward Fischer, Juwo Juwish Lwesya Sibale, 'Who Is Involved in Environmental and Social Impact Assessment Public Participation? Observations on Urban and Rural Practices in Malawi', *Impact Assessment and Project Appraisal*, 41.4, 302–3 <<https://doi.org/https://doi.org/10.1080/14615517.2023.2220152>>.

⁵¹ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?', 113.

⁵² Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁵³ Aldosary Hasan, Nahiduzzaman, 'Public Participation in EIA: A Comparative Study of the Projects Run by Government and Non-Governmental Organizations', 13.

⁵⁴ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁵⁵ Zishu Wang et Al, 'A Process-Based Evaluation Framework for Environmental Impacts of Policy Making', *Environmental Impact Assessment Review*, 104.107351 (2024), 2 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2023.107351>>.

⁵⁶ Hughes, 'Environmental Impact Assessment and Stakeholder Involvement', 4.

⁵⁷ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁵⁸ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

level. Therefore, participatory EIA preparation regulations are needed to establish businesses and/or activities relevant to common needs, not damage the environment, and prevent such informal actions.

Determining Participation Goals Based on Three Rationalities: Normative, Substantive, and Instrumental

According to the objectives that will have implications for the quality of EIA documents, society and the environment, there are various extensive objectives related to public participation. These objectives are specified into three rationales: normative, substantive, and instrumental. In terms of normative rationale, public participation is linked to different democratic ideals and the belief that the powerless should be empowered. People's right to information and expression of opinion should influence decisions, as it is undemocratic to exclude them. In fact, Barton (2002) argues that the community must give consent to the establishment.⁵⁹ However, this is risky because if the business and/or activity is, for example, a landfill, then no one will agree to it, resulting in a policy deadlock.⁶⁰ One of them is residents who are worried about prolonged health problems.⁶¹ Therefore, mapping the parties is important.

Concerning democratic capacity building, participation ought to serve as a mechanism for cultivating citizenship capabilities, such as the articulation of interests, deliberation, communication, and collaboration, a space to learn social and civic responsibilities, develop full potential as citizens, and see their interests as related and dependent on the interests of others. In this case, the preparation of EIA functions educationally as a space for community expression, and it provides information as transparently⁶² as possible regarding the positive and negative impacts on society and the environment, environmental conditions, environmental mitigation, etc.⁶³

To empower the freedom of marginalised individuals and groups, the equitable redistribution of power is the goal of public participation, according to Arnstein. This stems from the notion that power is unevenly distributed in society due to the exclusion of certain parties in decision-making. This is because some people do not participate due to a lack of resources, unfamiliar and intimidating processes, or because the government dominates. It is also important that the process

⁵⁹ Barry Barton, 'Underlying Concepts and Theoretical Issues in Public Participation in Resources Development', *In Donald M. Zillman, Alastair Lucas, and George (Rock) Pring (Eds), Human Rights in Natural Resource Development: Public Participation in the Sustainable Development of Mining and Energi Resources (Oxford: Oxford Academic, 2002), 2002, 79–80* <<https://doi.org/https://doi.org/10.1093/acprof:oso/9780199253784.003.0003>>.

⁶⁰ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁶¹ Lee Jae-hyuck et Al, 'Communication Problems and Alternatives in the Process of Collecting Resident Opinions for Environmental Impact Assessment through Text Mining: A Case Study of the Dangjin Landfill in Korea', 95.106781 (2022), 10 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2022.106781>>.

⁶² Antonio Marcomini Daniele Brombal, Angela Moriggi, 'Evaluating Public Participation in Chinese EIA. An Integrated Public Participation Index and Its Application to the Case of the New Beijing Airport', *Environmental Impact Assessment Review*, 2017, 49–60 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2016.07.001>>.

⁶³ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

is open to various perspectives and that the government creates an atmosphere that is not dominating.⁶⁴

From a substantive rationale, public participation aims to improve the quality of environmental decisions. Public participation should be designed to ensure the availability of relevant and comprehensive information from affected communities and proponents, so that it can form the basis for informed and prudent decision-making. Incomplete or lack of information will make it difficult to estimate impacts.⁶⁵ Providing information to the community is an important prerequisite. The related information must be delivered in a timely, complete and understandable manner.⁶⁶ Timely information means as early and accurate as possible before deciding. Complete information means that it includes alternatives. Information that the public can understand means that it must convey scientific-technical issues that must be understood. This is mandatory because otherwise, the information will not be useful. Even in some circumstances, information must be cross-border if the business and/or activity crosses national borders and impacts communities in bordering countries.⁶⁷

The way to do this is by capturing local environmental and/or social information such as demographics, flora, fauna, etc, combining experimental knowledge and value-based or local knowledge⁶⁸ (morality of social interests and based on the perception of social values that indicate the goodness of a business and/or activity); and public officials test the truth of information from other sources, namely the community because the proponent is only oriented to obtain approval so that it tends to ignore negative impacts, exaggerate potential and benefits as justification for its business and/or activities.⁶⁹

Seen from an instrumental rationale, the purpose of public participation is to generate legitimacy⁷⁰ and resolve conflicts, so it has an instrumental basis. In relation to generating legitimacy, public participation is carried out to establish the project's legitimacy, as the proponent requires community approval. This can be applied in Indonesia as the realisation of community rights to land and resources must be respected, including natural resources.⁷¹ Public participation can improve the quality of environmental decisions by taking into account

⁶⁴ Monika Suškevičs et Al, 'Public Participation in Environmental Assessments in the EU: A Systematic Search and Qualitative Synthesis of Empirical Scientific Literature', *Environmental Impact Assessment Review*, 98.106944 (2023) <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2022.106944>>.

⁶⁵ Sudarwanto, 'AMDAL Dan Proses Penyusunan Berdasarkan Peraturan Menteri Lingkungan Hidup Nomor 16 Tahun 2012 Tentang Pedoman Penyusunan Dokumen Lingkungan Hidup', 125.

⁶⁶ Koesnadi Hardjasoemantri, 'No Title', *Hukum Tata Lingkungan (Yogyakarta: Gadjah Mada University Press, 2021)*, 105.

⁶⁷ Hardjasoemantri, 110–11.

⁶⁸ Jie Wang et Al, 'Environmental Justice, Infrastructure Provisioning, and Environmental Impact Assessment: Evidence from the California Environmental Quality Act', *Environmental Science & Policy*, 146, 2023, 66–75 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.envsci.2023.05.003>>.

⁶⁹ Zhao et Al, 'How Does the Environmental Impact Assessment (EIA) Process Affect Environmental Performance? Unveiling EIA Effectiveness in China: A Practical Application within the Thermal Power Industry', 7.

⁷⁰ Thomas Johnson, 'Public Participation in China's EIA Process and the Regulation of Environmental Disputes', *Environmental Impact Assessment Review*, 2020, 2 <<https://doi.org/https://doi.org/https://doi.org/10.1016/j.eiar.2019.106359>>.

⁷¹ Karjoko et Al, 'The Consequence of the Decision of the Constitutional Court in Forestry on the Recognition of Traditional Forests in Indonesia', 7.

community concerns and local values.⁷² However, it is not enough to only allow communities to express their ideas, but they also need to be considered to influence decisions. Procedural transparency is important and even key to enhancing legitimacy. Therefore, it is important to demonstrate the degree to which community suggestions, opinions and/or responses influenced the decision and what considerations and criteria were used to determine it. Lack of substantive community engagement, not realising values, views or ideas in decision-making, can lead to protests and other informal engagement actions.⁷³

About resolving conflicts, public participation should be able to identify and resolve conflicts before final decisions are made. The existence of diverse interests, communities and proponents, the complexity of environmental issues, conflicting interests, and differences of opinion will inevitably lead to conflict. Conflict resolution should be productive, not destructive, so that cooperation and common interests can be found. To do so, Connelly and Richardson (2005) consider that deliberation is the solution. Public participation aims not to avoid conflict but to provide an opportunity with appropriate mechanisms to debate different interests and objectives in public. If this is successful, then the establishment of businesses and/or activities will be prevented from conflicts, demands, and in conflict resolution, there will also be many active roles, not reactive ones.⁷⁴

Based on this description of the public participation mapping, the author argues that the parties involved in public participation are people, groups, or organisations, namely the community, environmentalists, researchers, non-governmental organisations, proponents, and the government. Each party is a party with an interest in the proposed plan, has a constructive contribution, is positively or negatively affected, and helps guide and/or assist the community.

The formal public participation form that needs to be implemented is the provision of transparent information by ensuring community understanding of positive and negative impacts and community rights; ensuring the availability of all relevant information; testing the truth of the information received to the community; paying attention to the local values, especially indigenous peoples; holding well-considered discussions, not just education; a process that is not unfamiliar or intimidating; the government does not dominate; discussions that focus on the establishment of businesses and/or activities, their impacts on the environment, and mitigation; the community is able to ensure the proponent's accountability of the business and/or activities from various aspects to the community; the community can influence the final decision, not just convey ideas, views, and/or values; there are mechanisms, considerations and criteria used to show the level of community influence on the final decision; and productive, not destructive, conflict resolution by deliberation so that cooperation and common interests can be found.

In addition, it needs to be specified regarding the purpose of public participation from a normative rationale. It is to empower the community, realise the right to environmental information, as a space for community expression to convey their interests, develop the skills of citizens, and redistribute power. While the substantive rationale, namely improving the decision quality with the existence of relevant and complete information, can be understood, it is provided

⁷² Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁷³ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

⁷⁴ Glucker et Al, 'Public Participation in Environmental Impact Assessment: Why, Who and How?'

as early and as thoroughly as possible, with careful consideration to achieve the most appropriate decision. Then, from the instrumental rationale, namely legitimising the implementation of business and/or activities and resolving conflicts before the final decision is made. Sustainability aims to prevent conflicts and demands, trigger active roles, and prevent environmental pollution and/or damage.

Based on the ideal concept and analysis using the participation ladder above, the regulation of EIA preparation in Indonesia only reaches the 4th step. The parties that can be involved as directly affected communities are appropriate if the phrase 'the EIA preparation study area that will be affected' is set with the widest possible impact criteria to capture the truly affected communities, because environmental decisions affect everyone. The regulated parties have also fulfilled the criteria of interested parties, namely the directly affected community, the proponent, and the government.

However, environmentalists, researchers, or non-governmental organisations should not be limited to those who have mentored and/or assisted directly affected communities. This is because environmentalists, researchers, or NGOs are the ones who can make constructive contributions, ensure that participation rights are respected, make recommendations, and thus ensure the effectiveness of participation.⁷⁵ This also threatens communities not previously coached and/or assisted by environmentalists, researchers, or non-governmental organisations, who are often considered experts on the environment. In effect, the community will have very little information about the environment, potential threats that will arise and interfere with their health, potential impacts of environmental pollution and/or damage, and tend to only see from the side they know.

Regarding its form, the regulation of EIA preparation in Indonesia is only up to providing suggestions, opinions, and/or responses in the public announcement and consultation agenda. Information submitted to the public has been specifically regulated in Articles 30 and 34 of Government Regulation No. 22/2021, has been ensured to be understood because it requires the use of Indonesian and local languages that are understood, it has also been regulated that local values that have the potential to be affected are accommodated; the discussion has focused on the establishment of businesses and/or activities which include name, address, type, scale/size, location, potential impacts, date of announcement posted, deadline for submission of suggestions, opinions, and responses, plan description, potential impacts from initial identification which include degradation of water quality, air, environmental damage, public unrest, traffic disturbances, public health problems, employment opportunities, business opportunities, affected environmental components, and mitigation in general; and there is a regulation that requires the EIA preparation institution to carry out internal quality control of EIA implementation, including maintaining the principle of impartiality and/or avoiding conflicts of interest.

The regulation of EIA in Indonesia is still not ideal to accommodate the community's interests or environmental protection. Still, it cannot ensure that the preparation of the EIA has been qualified, nor can it ensure that the final decision made is correct. This is because the details of the information that has been regulated to be submitted have not discussed what rights are

⁷⁵ Mark Aspinwall, 'Bringing Rights to Life: How Civil Society Organizations Help Guarantee Participation Rights in Developing Countries', *The Extractive Industries and Society*, 2021, 1–8.

obtained by the community and the level of understanding of the impact and their rights; there are no indicators of the availability of all relevant information as material for consideration; there is no mechanism for testing the correctness of the information received; there are no criteria for holding well-considered discussions with scientific considerations because it is only held to decide on business plans and/or activities that must be EIA and when with the EFTT, not directly affected communities.

Therefore, it is better to involve the community as well rather than an expert-oriented quality control system only; there is no guarantee or legal protection of the community from intimidating or false processes, either in the form of orders or sanctions; there is no indicator or guarantee that the answers submitted by the proponent are relevant to the community's questions; there is no mechanism for involving community representatives to the authorised public institutions in making final decisions; there is no mechanism for the community to be able to ensure the accountability of the proponent for the implementation of business and/or activities from various aspects; there is no mechanism that allows the community to influence the final decision, not only provide ideas, views and/or values in suggestions, opinions, and/or responses from community; still no mechanisms, considerations, and criteria used to show the level of community influence on the final decision; and there is no mechanism for the community to file objections to EIA documents because the form of participation only accommodates suggestions, opinions, and/or responses.

Furthermore, more specifically related to the institution of the EIA Assessment Commission, which is abolished and replaced with the EFTT, whose parties are entirely from the government, it is necessary to establish a similar institution with duties and authorities that affect the final decision and involve representatives from the directly affected community.

Philippe Nonet and Philip Selznick convey several important things as indicators of participatory institutions: authority must be open and participatory; support consultation; the reasons for decisions must be explained; criticism must be accepted; and rational consent is taken.⁷⁶ Participation in decision-making must be organised because it is an agenda as a source of knowledge, a means of communication, and even a basis for approval. Later, there will be a series of duties and powers to the organisation or institution, so that it is able to play an active role in requesting public participation.⁷⁷

The purpose of public participation in the preparation of EIA in Indonesia is only the delivery of suggestions, opinions, and/or responses, which are then documented and processed by the initiator and used as input for filling the documents. However, the community cannot know how much influence they have because there are no mechanisms, considerations, or criteria used to show the level of community influence on the final decision.

CONCLUSION

Public participation in the preparation of quality EIA is important. The strength of participation in Indonesia the fourth stage (Consultation) is that the government opens space for the public to ask questions and provide suggestions, opinions, and/or responses, but the public cannot

⁷⁶ Nonet and Selznick, 'Law and Society in Transition: Toward Responsive Law', 99.

⁷⁷ Selznick.

influence the final decision because their ability is limited. This study overcomes the limitations of previous research, which only criticised the reduction of participation in the Job Creation Law, criticised guidelines that are too general and unclear, untargeted participation, incorrect forms of participation, and the determination of parties who will be involved and contribute substantively to their participation, thus requiring participation mapping. The level of participation in Indonesia is still very low and inappropriate in terms of the parties involved, the form of participation, and its purpose. The current EIA regulation in Indonesia tends to favour the proponent, the government, limiting the opportunities for affected communities to influence decisions regarding business plans or activities with potential environmental impacts. Therefore, there is an urgent need for reforms to improve public engagement. The government needs to revise Law No. 32/2009 in conjunction with Law No. 6/2023 on EIA public participation in accordance with the recommendations of that ideal concept in the form of mapping that includes the parties involved, the form, and the purpose based on the presented rationales: normative, substantive, and instrumental, which are briefly related to community role, the quality of environmental decisions, and the basis of legitimacy. This mapping is important so that community participation is in line with the needs of EIA preparation and to protect the environment in the long term.

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