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OPTIMIZATION OF THE MULTIDOOR APPROACH IMPLEMENTATION IN HANDLING CRIMINAL CASES IN THE ENVIRONMENTAL FIELD

Indriyane Vera Natalia[1], Maret Priyanta[2]

[1]Padjadjaran University
JL. Raya Bandung-Sumedang KM. 21, Jatinangor, Sumedang, 45363, Indonesia
Telp./Fax: +62-22-84288888 E-mail: indriyanevn@gmail.com

[2]Padjadjaran University
JL. Raya Bandung-Sumedang KM. 21, Jatinangor, Sumedang, 45363, Indonesia
Telp./Fax: +62-22-84288888 E-mail: maret.priyanta@unpad.ac.id

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Abstract

Criminal acts in the environmental field are cross sectoral because they are almost followed by other criminal acts such as money laundering, bribery, corruption, gratification, etc. Thus, a multidoor approach was appear with the aim that the limitations of one rule can be filled with another. Furthermore, the magnitude of the chances of escape from criminal offenses, the ineffectiveness of environmental recovery, and the unavailability of deterrent effects can be avoided. The multidoor approach is a legal approach that relies on various laws to ensnare perpetrators of criminal acts in the environmental field. However, until now the application of the multidoor approach has not shown significant results. In this research, the concept of the multidoor approach will be examined from the background of its emerge, its type, and the legal instruments that govern it to its application as well as efforts to optimize the application of the multidoor approach. This research is a normative legal research through the method of legislation approach, conceptual approach and analytical approach. The research specification is analytical descriptive. The object of normative legal research is in the form of qualitative legal material, namely primary legal material, namely legislation and secondary legal material, namely library material. With regard to research data, both secondary and primary data, qualitative juridical analysis is carried out using legal interpretation methods. The conclusion of this study is to provide an understanding of the concept of the multidoor approach and provide suggestions for optimizing the application of this approach.

Keywords: *Criminal Law; Environmental Crimes; Environmental Law; Multidoor Approach*

INTRODUCTION

Spartan national development especially in urban areas, both in developing countries and in developed countries. has changed the way people think about the environment. The community considers the environment as something that must be controlled and utilized. This problem occurs in discrepancies in environmental functions,

namely the carrying capacity, tamping and resilience functions.[1] Most developers only consider the environment as free objects (res nullius) that are used fully to get the maximum profit in a short time, which results in disruption of environmental functions.[2]

The environmental quality degredation that is currently globalized has given a new awareness for mankind to maintain and preserve the environment optimally. This new awareness places environmental conservation efforts as a shared responsibility of all countries. The environment has global characteristics, so it cannot be handled partially. Fundamentally, the state has the responsibility of protecting the entire nation and all of Indonesia's blood. One of the concretisations of this responsibility is through the realization of the protection of environmental functions for the survival of present and future generations.[3]

Indonesia, which was established as a state of law, as reiterated by the Constitution of the Republic of Indonesia in 1945 (hereinafter "1945 Constitution")[4], creates a legal position in the sense that laws and regulations are important factors in the framework of ensuring the achievement of national development. Therefore, the regulation concerning environmental protection becomes one of the components incorporated within the target of fulfilling the national development. This is confirmed in Article 33 paragraph (2) and paragraph (3) 1945 Constituion, which stipulates:[5]

> *"..... Earth and water and natural resources contained therein are controlled by the state and the natural resources therein are controlled by the state and it's use must be utilized for the public interests,…… National economy is based on economic democracy with the principle of togetherness, efficiency fairness, sustainability, environmentally sound, independen, and by maintaining a balance of progress and national economic unity."*

Law becomes an important component in the realization of national development. This is written in the opening of the 1945 Constitution precisely in the fourth paragraph explaining the

[1] Ruslan Renggong. (2017). *Hukum Pidana Lingkungan.* Jakarta: Prenadamedia Group, p. 2.
[2] Daud Silalahi. (2001). *Hukum Lingkungan dalam Sistem Penegakan Hukum Lingkungan di Indonesia.* Bandung : Alumni, p. 4.
[3] Maret Priyanta. (2018). "Optimalisasi Fungsi dan Kedudukan Kajian Lingkungan Hidup Strategis dalam Penyusunan dan Evaluasi Rencana Tata Ruang dalam Sistem Hukum Lingkungan Indonesia Menuju Pembangunan Berkelanjutan". *Jurnal IUS Kajian Hukum dan Keadilan*, 1 (3): 389.
[4] See Article 1(3). 1945 Constitution of the Republic of Indonesia.
[5] See Articles 33 par (2) and par (3). 1945 Constitution of the Republic of Indonesia.

purpose of the state, one of which is to implement world peace based on independence, eternal peace and social justice. So, it can be interpreted that the state must guarantee every citizen is able to get a good and healthy environment.[6]

To guarantee the fulfillment of these rights, each country has launched its own environmental legal instruments. Environmental law in the simplest sense is a law that regulates the environmental order, including all objects and conditions, including human beings and their actions in the space in which humans are and influences the survival and well-being of humans and other living bodies.[7] The purpose of environmental law is to realize sustainable development in the framework of the Indonesian people development as a whole and the development of a faithful and pious Indonesian community so as to create environmental preservation.[8]

These environmental problems can be solved by means of penal and non-penal. The penal means are policies that use criminal law (penal policy), while the non-penal means are policies that use legal means outside of criminal law (non-penal policy).[9] In order to applying these means as an effort to realize the objectives of environmental protection and management as stated in Article 3 letter a of Law No. 32 of 2009 concerning Protection and Management of the Environment, to be specific is protecting the territory of the unitary state of the Republic of Indonesia from environmental pollution and / or damage, then it can be realized by pursuing a criminal justice system.

Environmental law has characteristics as a multidisciplinary science among other sciences such as environmental engineering, environmental health, environmental biology, environmental chemistry and other correlated sciences. Then, a breakthrough emerged that stated that environmental law was interdisciplinary. In environmental law there is a system of compliance and enforcement of environmental law that can be maintained in civil, criminal, and administrative matters. Furthermore, environmental law increasingly plays a role in several other fields of law such as spatial law, taxation,

[6] See Article 28H par (1), 1945 Constitution of the Republic of Indonesia.
[7] Syahrul Machmud. (2012). *Penegakan Hukum Lingkungan Indonesia*. Yogyakarta: Graha Ilmu, p. 21.
[8] Maret Priyanta & Nadia Astriani. (2015). *Buku Ajar Hukum Lingkungan.* Bandung : Kalam Media, p. 67.
[9] Muladi. (1995). *Kapita Selekta Sistem Peradilan Pidana*. Semarang: Badan Penerbit Universitas Diponegoro, p. vii.

forestry, to international law.[10] In connection with these characteristics, the typology of environmental crime is also very extensive such as the encroachment of forest comrades, forest and land burning, illegal logging, biodiversity crimes, environmental destruction, B3 waste, and industrial pollution.[11] With this typology, of course, the system of compliance and environmental law enforcement in criminal matters is spread in various laws that contain environmental offenses.

In reality, challenges in law enforcement are increasing, especially for environmental crimes faced by KLHK with the increasing number and complexity of environmental cases. Moreover, with the merging of the Ministry of Forestry and the Ministry of Environment, internal issues such as the expansion of the LHK's authority and changes in work methods that need to be re-coordinated are also challenging. The authority to handle law enforcement related to crimes or violations of the environment and forestry is under the Ministry of Environment and Forestry as regulated in Article 63 paragraph (1) letter a of Law No. 32 of 2009 concerning Protection and Management of the Environment. To answer this challenge, the Directorate General of Environmental and Forestry Law Enforcement uses 4 (four) approaches to environmental law enforcement, namely: a policy on enhancing the capacity of law enforcement; a multi-legal policy; a multidoor policy; and a symbolic legal policy.[12]

An interesting new approach and a hope for law enforcers as a solution to the deterioration of environmental law enforcement is the multidoor approach. "Multidoor Approach" is a process and form of institutionalization of law enforcement by relying on various laws to ensnare perpetrators of environmental and forestry crime (TPLHK) as well as laws in the field of environment, forestry, spatial planning, plantation, mining, taxation, corruption and money laundering. This approach was launched because multi-sectoral characteristics of environmental crimes which is almost always followed by money laundering, bribery, corruption, gratuity, and tax avoidance.[13]

Thus, this approach is expected to

[10] Franky Butar-Butar. (2010). "Penegakan Hukum Lingkungan di Bidang Pertambangan". *Jurnal Yuridika*, 25 (2): 152.

[11] Hani Afrinita Murti. (2017). "Penguatan Kebijakan Penegakan Hukum Multidoor sebagai Deterrent Effect untuk Menekan Laju Kasus Korupsi (Studi Kasus: Penerapan Pendekatan Multidoor di Kementerian Lingkungan Hidup dan Kehutanan)", *Proceeding International Seminar : Reconstructing Public Administration Reform To Build World Class Government*, p. 436.

[12] *Ibid.*

[13] *Ibid.*, p. 439

provide a deterrent effect optimally, avoid disparities in criminal prosecution in similar cases, avoid opportunities for escape from criminal offenses, demand corporate responsibility, restore the environment, open opportunities for international cooperation (assets recovery), restore state losses, and restore justice and rights to a good and healthy environment and the economic, social and cultural rights of local communities in the affected area.[14]

In consequence, in the process of handling environmental and natural resource cases, a law enforcement officer (PPNS, police, and prosecutor) must have an awareness that the case being handled has the potential to be related to crime and / or violations in other fields at the first time. Hence, from the beginning there will be a stage of coordinating the investigation process, the investigation to the prosecution by conducting legal analysis, building valid and comprehensive legal arguments and reasoning, including in determining good, correct and fair forms of indictments and claims.[15]

However, until now the application of the multidoor approach in terms of handling criminal cases in the environmental field has not yet shown significant results marked by 2017, only three cases were encouraged and carried out by applying the approach with suspects who have not even touched corporation. The application of the multidoor approach is not optimal due to several problems, namely coordination between agencies is still weak, there are no mechanisms or standards / guidelines regarding a technically clear multidoor approach, and the lack of awareness of Civil Servant Investigators (PPNS) to implement this approach. Weak coordination between agencies is the most important problem. With this weak coordination, overlapping authorities and policies have the potential to cause conflicts of interest.

Problems regarding the incorrect application of the multidoor approach occur in the termination of Reclamation without Permit in Belitung Regency, Bangka Belitung Province conducted by the joint PPNS Investigators namely the KLHK PPNS, the Ministry of Maritime Affairs and Fisheries (KKP), the Ministry of Agrarian Spatial Planning and the National Land Agency (Ministry of ATR) / BPN), and the PPNS Korwas Bareskrim

[14] A.A. Ngurah Oka Yudistira Darmadi. (2016). "Sistem Peradilan Pidana dalam Penegakan Hukum Pidana Lingkungan Hidup", *Jurnal Hukum UNDIKNAS*, 3 (2): 145.
[15] *Ibid.*, p 146-147

Polri and the Belitung Regency Environmental Agency. The reclamation case without permission has the potential to violate several criminal violations of several laws. The problem that occurs is because the PPNS KLHK takes the most important position in this termination by installing a barrier similar to the police line that reads PPNS KLHK. In fact, in addition to being suspected of criminal acts in the environmental field, beach reclamation activities without the permit are also suspected of violations / crimes in the field of spatial planning and management of coastal areas and small islands. Thus, it is necessary to strengthen or optimize the commitment of environmental law enforcement and various laws that contain environmental aspects with good coordination without being more important. The approach taken in this investigation can be said to be too "project oriented" and not a "science approach" so that it can get rid of the opportunity for other criminal acts to be dropped (in this case spatial crime and others).[16]

With regard to the various polemics, the author needs to represent the assessment of efforts to optimize the application of the multidoor approach especially in handling criminal cases in the environmental fields. These efforts will be the foundation for KLHK to eradicate every criminal cases in the environmental fielf in order to realize sustainable development in the context of preservation of environmental functions.

METHOD

The method used in this research is a normative research method, through the method of legislative approach, conceptual approach and analytical approach. This was carried out by studying the literature material or the secondary data.[17] The normative juridical approach which is often known as library research is a legal research approach that is conducted by prioritizing how to examine library materials or what is referred to as secondary data material in the form of positive law without neglecting the conduct of field research.[18] Secondary data sources consist of primary legal material. secondary legal material, or

[16] Dede Suhendar, "Tim Gabungan Penyidik KLHK, KKP, ATR/BPN dan Kepolisian Hentikan Reklamasi Tanpa Izin", Available from: https://belitung.tribunnews.com/2019/07/11/tim-gabungan-penyidik-klhk-kkp-atrbpn-dan-kepolisian-hentikan-reklamasi-tanpa-izin [accessed August 25, 2019]

[17] Peter Mahmud Marzuki. (2010). *Penelitian Hukum.* Jakarta: Prenada Media Group, p 22.

[18] Soerjono Soekanto dan Sri Mamuji. (2003). *Penelitian Hukum Normatif Suatu Tinjauan Singkat.* Jakarta: PT Raja Grafindo Persada, p. 13.

tertiary data and field research. [19] In addition, this research approach prioritizes library research and how it is implemented in practice.[20] The research specification is analytical descriptive, which is a research method that functions to describe, describe, examine and analyze the provisions and applicable laws and regulations and legal theories in implementation.[21] The object of the normative legal research is in the form of qualitative legal material, namely primary legal material, legislation and secondary legal materials and library materials, such as books, journals and reports that have relevance with the discussion within this writing. With regards to the research data, both secondary and primary data, a qualitative juridical analysis is carried out using the method of legal interpretation, specifically grammatical interpretation, historical interpretation and systematic interpretation and analogy and constructivism, the results of which will be written descriptively.

[19] Amirudin. (2003). *Pengantar Metode Penelitian Hukum.* Jakarta: PT Raja Grafindo Persada, p. 118.
[20] Ronny Hanitjo Soemitro. (1990). *Metodologi Penelitian Hukum dan Jurimetri.* Jakarta: Ghalia Indonesia, p. 97.
[21] Sugiyono. (2009). *Metode Penelitian Bisnis*, (Pendekatan Kuantitatif, Kualitatif dan R&D). Bandung: Alfabeta, p. 29.

ANALYSIS AND DISCUSSION

The Concept of a Multidoor Approach in Handling Criminal Cases in the Environmental Field

Environmental offense is an order and prohibition of laws to legal subjects which if violated will be threatened with the imposition of criminal sanctions, including imprisonment and fines, with the aim of protecting the environment as a whole as well as elements in the environment such as forest animals, land , air, and water and humans.[22] Inherently. environmental offense is an act of polluting and causing environmental damage that directly or indirectly endangers the life and soul of humans. However, at the time of the drafting of the Criminal Code, environmental problems were not yet problems that caught the attention of many people.[23]

Criminal sanctions in environmental law are divided into two types of activities, namely acts of polluting the environment and acts of damaging the environment. This includes logging in protected debt, hunting, capturing and killing protected animals, taking, destroying and trading

[22] Takdir Rahmadi. (2011). *Hukum Lingkungan di Indonesia*. Jakarta: PT Raja Grafindo Persada, p. 221.
[23] Koesnadi Hardjasoemantri. (1999). *Hukum Tata Lingkungan.* Yogyakarta: Gadjah Mada University Press, p. 31.

protected plant species, to new offenses such as criminal acts in the fields of fisheries, plantations, spatial planning, buildings, buildings, oil and gas, mineral and coal mining, and others. In the Indonesian legal system, the offenses are spread in various regulations.[24]

Environmental offenses are divided into two, namely material offenses and formal offenses. The mechanism of environmental criminal law enforcement includes several processes. Enforcement of environmental criminal law is divided into three main stages, namely pre-emective actions, preventive actions and repressive measures. Pre-emtive actions are anticipatory actions that detect early various criminogen correlation factors, such as factors that allow damage and environmental pollution.[25] Then, preventive action is a series of concrete actions aimed at preventing environmental damage or pollution, such as ongoing supervision of factories, environmental law supervisors who act responsive to community complaints, forestry policemen who supervise, and others. Lastly, repressive actions are a series of actions carried out by legal officers through a criminal process, because the actions committed by the perpetrators damage and pollute the environment.

The authority to carry out actions within the framework of environmental criminal law enforcement is under the Ministry of Environment and Forestry (KLHK) as stipulated in Article 63 paragraph (1) letter a of Law No. 32 of 2009 concerning Protection and Management of the Environment. The nomenclature "Government" in the article is represented by KLHK. Operationally, law enforcement is forwarded to the Environmental and Forestry Civil Servants (PPNS) under the institution of the Directorate General of Environmental and Forestry Law Enforcement (DG PHLHK).[26]

In reality, the implementation of law enforcement by KLHK is still not effective. Some of the main problems are the breaking of the chain in finding the perpetrator's brain and not yet optimally applying the “follow the money” approach (tracing the perpetrators and the flow of money). PPNS is often found to be still implementing a single legal regime in snaring suspects. The target to be achieved by each PPNS included in the PPNS performance indicator is P-21, while the settlement of cases using the multidoor approach is not in the performance indicators. With a

[24] Ruslan Renggong, *Op.Cit.*, p. 11-12.
[25] A.A. Ngurah Oka Yudistira Darmadi, *Op. Cit.*, p. 140.
[26] Hani Afrinita Murti, *Op. Cit.*, p. 436.

strong impetus in the work pattern of PPNS to immediately reach the P-21 target, PPNS tends to apply more the principle of "follow the suspect" and not at the stage of "follow the money".

Law enforcement efforts that become the answer to the problem of legal action in the field of environment are expected to have the main characteristics. First, making optimal use of various laws and regulations that postulate criminal sanctions for a series of crimes committed on forest areas, such as plantations, mining, the environment, corruption, money laundering and taxation.[27] Secondly, it can be ascertained the occurrence of environmental restoration and the return of assets and profits that cause state financial losses from criminal acts committed. Third, it has the ability to create a deterrent effect, among others through criminal, civil and administrative instruments, which not only lead to physical perpetrators but are stronger to capture the corporation and intellectual dadder in it. Fourth, being able to optimize the role of law enforcers related to handling crime in forest areas in a coordinated, integrated, transparent and accountable work unit.

Therefore, KLHK through the Directorate General of PHLHK decided to strengthen its law enforcement policies. These policies have been initiated with the 2012 Memorandum of Understanding on increasing cooperation in law enforcement to support sustainable natural resource management in the implementation of Reduction of Emissions from Deforestation and Forest Degradation (REDD +) by the Ministry of Environment, Ministry of Forestry, Ministry of Forestry Finance, the Attorney General's Office of the Republic of Indonesia, the Indonesian National Police, and the Center for Reporting and Analysis of Financial Transactions (PPATK). Law enforcement efforts can be seen in Figure 1 which contains the form of law enforcement activities in REDD + cooperation.

Figure 1.1

Law Enforcement Activities in REDD + Cooperation: Handling Forest and Land Fires

[27] A.A. Ngurah Oka Yudistira Darmadi, *Op. Cit.*, p. 144.

Source: REDD + Progress Report Indonesia-Norway Cooperation Transition Phase: Law Enforcement Component submitted by Muhammad Yunus, Director of Criminal Law Enforcement, Director General of Environmental and Forestry Law Enforcement in Jakarta, 29 April 2016

One step that can be taken is to encourage a multidoor approach to be applied in handling criminal cases in the environmental field. The multidoor approach is a legal approach that relies on various laws to ensnare perpetrators of criminal acts in the environmental field.[28] The law can be spread in the various fields such as environment, forestry, spatial planning, plantations, mining, taxation, corruption and money laundering. Environmental crime is a cross-sector crime that is almost followed by other criminal acts such as money laundering, bribery, corruption, gratification, and tax avoidance. Thus, a multidoor approach was launched with the aim that the limitations of one legislation can be filled with another. Hence, disparity in criminal prosecution in similar cases, the magnitude of the chances of escaping criminal offenders, ineffective environmental recovery, etc. can be avoided and the deterrent effect is realized, opening opportunities for international cooperation (asset recovery) and returning state losses in criminal acts of corruption.[29]

The multidoor approach can be seen as two thoughts. As a "process", this multidoor approach idealizes a pattern of cross-interaction and instrumentation between existing legal disciplines. As a process, this approach cannot be separated from constraints such as differences in legal politics and the formal objectives adopted in various laws and regulations as well as the scope of the regulation of each statute one of the biggest challenges that will occur if this approach implemented. Then, from an institutional standpoint, this multidoor approach idealizes the existence of a one roof enforcement system model that ensures strong coordination between law enforcers related to handling cross-sectoral environmental cases that do not only lead to wrong just one legal sector.

[28] Hani Afrinita Murti, *Op. Cit.*, p. 438.

[29] *Ibid.*, p. 439

The multidoor approach was first regulated in Decree of the Director General of PHLHK Number SK.5 / PHLHK-Setdit / 2015 concerning the Formation of a Team for Forming a Presidential Regulation on Guidelines for Integrated Law Enforcement in Environmental Protection and Management, and Decision of the Director General of PHLHK Number SK.6 / PHLHK-PHP / 2015 concerning the Task Force for Investigation of Environmental and Forestry Crimes as a form of follow-up to the 2012 Memorandum of Understanding that the author has described above. Then, strengthening the multidoor approach itself can be seen by the formation of a team to compile an integrated law enforcement guideline and the establishment of a criminal investigation unit in the environmental field. In addition, there is also the Regulation of the Attorney General of the Republic of Indonesia Number PER-029 / A / JA / 10/2014 concerning the Organization and Work Procedure of the Cross-Country Natural Resource Task Force. Furthermore, effective implementation of the multidoor approach is also institutionally one of them by increasing the capacity and competence of PPNS through training for central and regional PPNS on the science of multidoor approach itself.

In essence, this multidoor approach is launched based on an awareness that criminal acts in the environmental field in fact always have a connection with criminal acts and / or violations in other legal fields, for example in the financial sector, both as a "concursus" and "the deed continuous".

Application and Optimizatin of the Multidoor Approach in Handling Criminal Cases in the Environmental Field

The multidoor approach in its application is divided into two types. The first type multidoor approach application is in the case of article dropping. The application of the first multidoor approach is in the case of article overtap or ensuing. Criminal acts in the environmental field are cross sectoral. The formulation of criminal acts in the environmental field was not found only in Law No. 32 of 2009 concerning Management and Protection of the Environment, but is spread in various other laws. Other laws that also regulate environmental crimes are said containing environmental offenses if they contain aspects or material for the crime and the environment together.

In Law Number 32 of 2009 concerning Management and Protection of the Environment, environmental

criminalization are regulated in Article 69. Violations of the aforementioned prohibitions are threatened with criminal sanctions regulated in Article 98 paragraph (1) to Article 119 of the UUPPLH. Next, here are other laws that also regulate environmental criminalization along with the articles:

a. Law Number 5 of 1990 concerning Conservation of Biological Natural Resources and their Ecosystems (Article 40 paragraphs 1 to 5);

b. Law Number 41 of 1999 concerning Forestry (Article 78 paragraph 1 to paragraph 14 and Article 79 paragraph 1 to paragraph 3);

c. Law Number 18 of 2013 concerning Prevention and Eradication of Forest Destruction (Articles 82 to Article 109);

d. Law Number 36 of 2016 concerning Plantations (Articles 103 to 113);

e. Law Number 31 Year 2014 concerning Fisheries and Law Number 45 Year 2009 concerning Amendment to Law Number 31 Year 2014 (Articles 84 to 104);

f. Law Number 27 of 2007 concerning Management of Coastal Areas and Small Islands (Articles 73 to 75);

g. Law Number 26 of 2007 concerning Spatial Planning (Articles 69 through 75);

h. Law Number 22 of 2001 concerning Oil and Gas (Articles 51 to 58);

i. Law Number 4 of 2009 concerning Mineral and Coal Mining (Articles 158 to Article 165);

j. Law Number 36 of 2009 concerning Health (Articles 190 to Article 201);

k. Law Number 18 of 2012 concerning Food (Articles 133 to Article 148).

Furthermore, the second type of multidoor approach application is in terms of investigation. As with other criminal offenses, criminal offenses in the environmental field are processed according to the provisions in the Criminal Procedure Code, except if specified otherwise in the UUPPLH and other laws that contain environmental aspects. Broadly speaking, environmental criminal law enforcement goes through four stages: the investigation stage (which can be preceded and / or accompanied by investigation activities) carried out by the investigator, the prosecution stage carried out by the public prosecutor, the stage of

examination in court by a judge, and the stage of execution or implementation of court decisions.

According to Article 94 of the UUPPLH, it is determined that those who become investigators in criminal offenses in the environmental field are:[30]

a. Official of the Republic of Indonesia State Police; and

b. Certain Civil Servants in the environment of government agencies whose scope of duties and responsibilities are in the field of environmental protection and management.

As explained earlier, in addition to the National Police investigators there were also PPNS investigators. In Article 7 paragraph (2) of the Criminal Procedure Code it is determined that the investigator as referred to in Article 6 paragraph (1) letter b (that is, the PPNS investigator) has the authority in accordance with the law on which each legal basis is based and the implementation of his duties is under coordination and the supervision of the investigator is in Article 6 paragraph (1) letter a (i.e. the National Police investigator). These provisions emphasize that PPNS investigators have the authority to investigate criminal offenses based on certain laws governing the scope of their authority.

In conducting investigations, PPNS investigators must coordinate with police investigators for the smooth investigation. Such coordination can be in the form of notification of the commencement of investigations to the public prosecutor with a copy of the National Police, notification to the police investigator, and coordination in the case of detention of suspects in a criminal offense in the environmental field with the aim of obtaining assistance from personnel, facilities and infrastructure. This coordination is coordinated by the Minister of Environment.

As has been explained above, that environmental offenses are not only contained in one law but are spread in various laws. So, besides the inverstigators which regulated in UUPPLH, in several laws that contain environmental aspects also regulates the investigator and his authority. This regulation is intended as a legal basis for PPNS investigators in carrying out their authority, and at the same time is an effort

[30] See Article 94, Law No. 32 of 2009 concerning Protection and Management of the Environment

to make PPNS investigators as professional investigators in the field of duties and scope of authority of their institutions. These PPNS investigators are categorized as investigators in the field of forestry, investigators in cases of prevention and eradication of forest damage, investigators in spatial planning crime, investigators in oil and gas crime cases, investigators in mineral and coal mining crimes, and others.

However, the multidoor approach to handling criminal cases in the environmental field has not yet shown significant results. That is because there are still many problems in applying this approach. The first problem is about coordination between agencies which is still weak. Weak coordination between law enforcement agencies can lead to overlapping authorities and policies that have the potential to create conflicts of interest.[31] The related institution in a chain of cases of violations and environmental and forestry crimes is crucial to the process of law enforcement. Lack of coordination with various related agencies will make it difficult to implement this policy. This is compounded by the second problem, namely the absence of mechanisms or standards or guidelines for a multidoor approach technically. The mechanism can be in the form of Standard Operating Procedures and other guidelines that can contain an institutional multidoor approach (for example: the existence of a permanent multidoor secretariat), a funding system, and others. The third problem is the lack of awareness of PPNS investigators to apply the multidoor approach or the multidoor approach that was applied incorrectly.

Ergo, the steps that must be taken are in the form of optimizing the multidoor approach as a solution to the deteriorations mentioned above. The steps that can be done, inter alia:

a. Establishment of integrated multidoor law enforcement between agencies and joint multidoor law enforcement in operational investigations between agencies with priority cases. This can be supported by the establishment of a multidoor secretariat located in each law enforcement agency by establishing a system of interrogation access registers of inter-agency (technological systems), coordination

[31] Christophe Baheut, *"Multi-door Approach' to address forest-related crimes in Indonesia"*, Available from: http://www.id.undp.org/content/indonesia/en/home/presscenter/articles/2016/03/21/-blog-multi-door-approach-to-address-forest-related-crimes-in-indonesia.html [accessed August 26, 2019]

that can be carried out in the form of activities such as case surgery or operations together with the budget mechanism agreed upon, and making law enforcement guidelines with multidoor and other approaches. This is intended to improve coordination between agencies;

b. Ensuring law enforcement agencies integrate the multidoor approach in operational investigations to encourage compliance, by including the achievement of multidoor cases handled by PPNS performance indicators which can be supported by mechanism rewards;

c. Strengthening institutions internally to meet challenges in a multidoor approach. This multidoor approach requires PPNS to have comprehensive identification capabilities, because more efforts are needed to collect, identify evidence and conduct investigations, with the administration which is certainly more complex. Internal institutions reinforcement can be done with the form of training that is accompanied by assessments, establishing a system of investigation administration (device technology) and manuals, increasing the capacity of administrative personnel to arrange an orderly investigation administration as well.

CONCLUSION

The concept of a multidoor approach is a legal approach that relies on various laws to ensnare perpetrators of criminal acts in the environmental field. The law can be spread in the various fields such as environment, forestry, spatial planning, plantations, mining, taxation, corruption and money laundering. This pproach is launched based on an awareness that criminal acts in the environmental field that always have a connection with criminal acts and/or violations in other legal fields. Application of multidoor approach is divided into two types, namely in article dropping and in terms of investigation. The application of multidoor approach has not yet shown significant results. That is because there are still many problems in applying this approach, namely coordination between agencies which is still weak, the absence of mechanisms or standards or guidelines for a multidoor approach technically, and the lack of awareness of PPNS investigators to apply the multidoor approach or the multidoor approach that was applied incorrectly. For

these problems, the efforts that need to be made to optimize the application of the multidoor approach are as follows: establishment of integrated multidoor law enforcement between agencies and joint multidoor law enforcement in operational investigations between agencies, ensuring law enforcement agencies integrate a multidoor approach in the operational investigation that can be supported by a mechanism of reward, and strengthening institutions internally to meet challenges in a multidoor approach.

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