

IMPLEMENTATION OF THE *PERATURAN PEMERINTAH NOMOR 9 TAHUN 2018* CONCERNING PROCEDURES FOR CONTROLLING THE IMPORT OF FISHERY COMMODITIES AND SALT COMMODITIES AS RAW MATERIALS AUXILIARY MATERIALS FOR INDUSTRY IN PAMEKASAN REGENCY

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ABSTRACT

The *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Auxiliary Materials stipulates permits to import industrial salt. This study aims to provide an overview of the implementation of the *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials for Pamekasan Regency. This study uses a qualitative descriptive research design. Data collection techniques were carried out by interviews, and documentation. Findings in the field show that the implementation of this policy has an unfavorable impact because it cannot be felt by the target group, this can be explained by two variables of content of policy and context of policy which consists of 9 indicators, there are 6 indicators that show negative things, namely: interests affected there are 2 parties whose interests are influenced, namely salt farmers and local agencies, the type of benefits is less beneficial in the welfare of salt farmers because they do not understand the wishes of farmers, extent of change envisioned shows a less positive impact due to the lack of understanding of salt farmers on the salt land integration model, site of decision making this policy eliminates the authority of the KKP to determine the amount of import quotas, committed human resources with an average education level of salt farmers from elementary to junior high school. Financial resources, income earned by salt farmers are decreasing, policy compliance and responsiveness is not profitable for salt farmers, because the Government does not provide clear price standards, import quota restrictions are not adjusted to the needs of the recipient's location, and there are no clear rules on when to load and unload imported salt.

Kata Kunci: *Impor Garam, Content of Policy, Context of Policy.*

A. PRELIMINARY

The salt import policy is carried out by the government in order to meet the need for salt on a national scale. To find out the amount of salt production in Indonesia, it can be seen in table 1.1 about the amount of people's salt production by province from 2012 to 2018 which the author got from (statistik.kkp, 2020). Not all provinces in Indonesia are salt producers, there are only 51 regencies out of 10 provinces. (See table 1.1) below:

Table 1.1
Number of People's Salt Production by Province

Provinsi	Tahun				
	2014	2015	2016	2017	2018
Aceh	8,093.90	9,135.84	14,595.47	17.274,78	11.689,50
NTT	11,764.71	11,189.87	9,459.16	8.818,06	
NTB	193,651,17	162,499.23	9,987.16	91.093,40	309.186,14
Bali	7,674.11	10,547.62	499.91	4.940,21	4.531,96
Sulawesi Selatan	80,203.94	82,869.26	3,577.71	35.973,62	111.835,03
Sulawesi Tengah	17,080.63	14,243.00	3,795.37	597,68	981,74
Gorontalo	0.00	709.83	176.54	395,92	1.263,46
Jawa Timur	921,195.42	1,011,697.13	51,891.82	372.728,72	782.783,03
Jawa Tengah	560,988.43	783,942.50	17,220.55	255.782,46	637.177,61
Jawa Barat	629,403.18	761,007.36	6,887.14	233.320,43	479.084,69
Total	2,236,404.32	2,847,841.64	118,090.14	1.020.925,27	2.349.629,81

Sources: *Ministry of Marine Affairs and Fisheries Statistics (researcher data processing)*

East Java's salt production is inseparable from the regencies/cities that produce salt. There are several salt-producing regencies/cities, out of a total of 38 regencies/cities in East Java there are 12 regencies/cities producing people's salt, including Bangkalan, Gresik, Pasuruan City, Surabaya, Lamongan, Pamekasan, Pasuruan, Probolinggo, Sampang, Sidoarjo, Sumenep and Tuban.

In 2018 the salt import policy was carried out by the government, the government issued an import permit for 3.7 million tons imported from Australia and India, this led to rejection, especially in Pamekasan Regency. The demonstration was carried out by salt farmers and activists of the Indonesian

Islamic Student Movement (PMII) on February 9, 2018 (Suarakarya, 2020). Protesters came to the Pamekasan Regency DPRD office to invite people's representatives to join the struggle to reject policies that harm the Madurese. Ubaidillah, Chair of the Salt Community Association (AMG), said that the price of people's salt began to fall. The price of salt at the farm level, which was originally Rp. 2.7 million per ton, has now fallen to Rp. 2 million per ton. The decline in local salt prices at the farmer level, especially in Pamekasan Regency, occurred in early February 2018, allegedly due to the entry of imported salt into Indonesia (ambassador, 2020).

In 2019, the price of salt among salt farmers in Pamekasan Regency was only IDR 200 to IDR 350 per kilogram. Head of the Section for Management and Development of Cultivation Areas at the Pamekasan District Fisheries Service, Muzanni, said that this rainy season, the price of salt is not in favor of farmers. He revealed that the drop in salt prices and the price imbalance had several causes, one of which was the large stock of companies, so that the company's absorption of people's salt was very low (surabaya.tribunnews, 2020). In 2020, the price of people's salt in Pamekasan Regency did not increase, the selling price was still at Rp. 300 rupiah per kilogram. This was conveyed by the Head of the Fish Cultivation Management Division (Kabid) of the Fisheries Service of the Pamekasan Regency Government, Istamam, the drop in the price of salt owned by farmers this season in the range of Rp. 300 rupiah due to salt imports from abroad. The following are the results of interviews conducted by Media Madura:

“Farmers continue to produce even though the price of salt is Rp 300 per kg. The price has dropped. Salt imports are one of the reasons. The authority to import salt is the central government. We hope that the price of salt will rise again so that farmers don't lose money,” (mediamadura, 2020).

The above opinion was also confirmed by Mr. Muzanni, Head of the Section for Management and Development of Aquaculture Areas at the Pamekasan Regency Fisheries Service, whom the researchers met, he conveyed :

“The price of salt in the farmers is indeed Rp. 300 to Rp. 350. So, with that price, it is not possible to raise the welfare of salt farmers yet and is not able to meet the basic costs of production, the HPP of salt farmers at the current condition should be around Rp. 800, only with that price the costs of production can be fulfilled. In 2019 people are still enthusiastic to produce salt, as well as in 2020 because they hope that the price of salt will be increased, when they know that the price of salt has not increased from the previous year, the people are not too enthusiastic about catching up in producing.” (Wawancara, 03 Desember 2020).

The implementation of the salt import policy carried out by the government, especially for Pamekasan Regency, caused a decrease in the income of salt farmers so that salt farmers felt threatened, as well as the availability of salt supplies for the Regency, both consumption and industrial salt. With this policy, it creates a polemic for many people, especially salt farmers.

B. PUBLIC POLICY IMPLEMENTATION MODEL BY M.S. GRINDLE

The model used in this study is the policy implementation model proposed by Merilee S. Grindle (1980: 11). Grindle's approach is known as *Implementation as A Political and Administrative Process*.

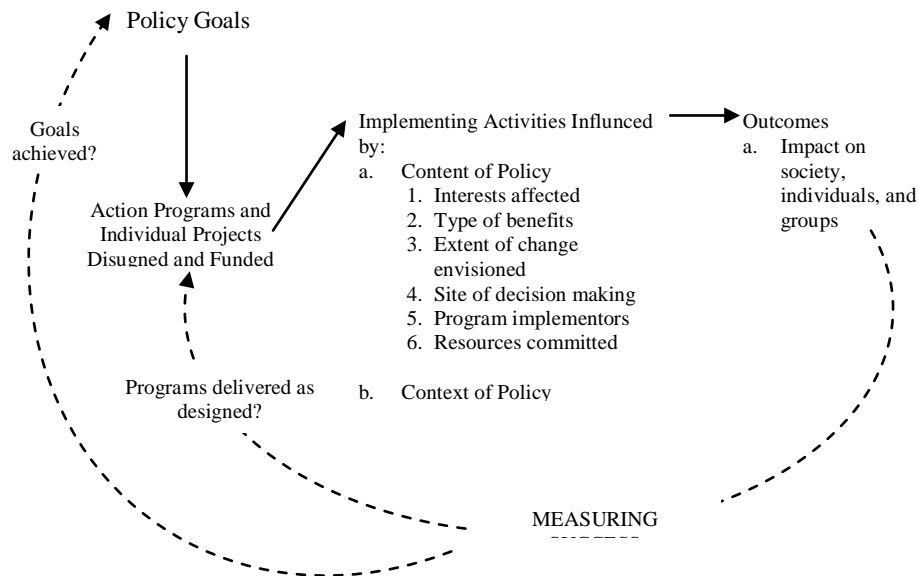


Image 1.1

Implementation as a Political and Administrative Process

Source: Grindle (1980: 11)

The success of an implementation of Grindle (in Agustino, 2016: 142) can be measured from the process of achieving the outcome whether or not the goals to be achieved can be seen through 2 things, namely:

1. The process, questioning whether the implementation of the policy is in accordance with what is determined (design) with reference to policy actions.
2. Have the policy objectives been achieved, measured by looking at two factors, namely:
 - a. The impact or effect on society individually and in groups.
 - b. The degree of change that occurs and the acceptance of the target group and the changes that occur.

The success of an implementation is influenced by two major variables, namely the content of the policy and the implementation environment (context of policy). Indicators of policy content variables (content of policy) consist of:

1. Parties whose interests are affected (*interests affected*)
2. Types of benefits that can be obtained (*type of benefits*)
3. Expected range of change (*extent of change envisioned*)
4. Decision-making position (*site of decision making*)
5. Program implementers (*program implementors*)

6. Resources that can be provided (*resources committed*)

Meanwhile, according to Grindle, the environmental variables (*context of policy*) that affect the success of a policy consist of 3 elements, namely:

1. Powers, interests and strategies of the actors involved (*power, interest and strategies of actors involved*)
2. Characteristics of regimes and institutions (*institution and regime characteristics*)
3. Awareness and responsiveness (*compliance and responsiveness*)

C. RESEARCH METHOD

In this study, the author uses a qualitative approach because the author intends to obtain an in-depth picture of the *Peraturan Pemerintah Nomor 9 Tahun 2018* implementation concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials in Pamekasan Regency.

This research was conducted in Pamekasan Regency, this is because Pamekasan Regency is one of the regencies as a salt producer on a national scale, where Pamekasan Regency occupies the second position in 2016 as a salt producing area in the national realm and this research was also conducted on government institutions in order to obtain research supporting data, including the Pamekasan Regency Fisheries Office.

The focus of this research is to provide an overview of the implementation of the *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials for Pamekasan Regency based on implementation theory.

The data sources in this study are primary data and secondary data. The primary data in this study are the results of interviews from several informants, the results of direct observations in the field in the form of notes on conditions and situations in the field. The research subjects in this study were salt farmers in Pamekasan Regency. Supporting informants in this study are government agencies that play a role in this policy. The informants selected in this study were employees of the Pamekasan Regency Fisheries Service, LSM and Salt Farmers. Secondary data in this study are in the form of regulatory documents, news and information from the internet, study results, and journals related to the procedures for controlling salt imports in Pamekasan Regency.

The technique of collecting data obtained from the field is the Interview Method (interview). The interview used in this study is an in-depth interview (depth interview). To obtain data to match the subject matter posed, before conducting interviews, the researcher first made an interview guide that contained a number of questions related to the research. Determination of data sources on interviewees is done purposively.

D. DISCUSSION

In this section, the researcher will discuss all the data obtained from interviews with predetermined informants and documentation in the field. The

data obtained in the research process are then analyzed according to the focus of the research study. The policy content variable (content of policy) has 6 (six) indicators which become an indicator of the extent to which policy implementation is running. The results of these indicators are as follows:

Parties whose interests are affected

Based on the findings in the field, there are 2 parties whose interests are affected. Those parties are:

- 1). Salt farmers, because the policy is deliberately designed to prosper salt farmers by providing protection and empowerment.
- 2). Regional agencies, namely the Fisheries Service as implementers of empowerment and protection of salt farmers.

Based on the findings in the field, there are two parties whose interests are influenced in the salt import control policy. These parties are salt farmers who want a standardization of salt prices made by the Government so that when imported salt enters, the price of their salt does not fall as is happening at this time and there must be clear rules when loading and unloading imported salt is carried out. Then the second interest, namely the interests of the Fisheries Service as the executor of the empowerment and protection of salt farmers, is confused with existing policies because of the intersection of regulations between Pergub and PP.

Types of Benefits Obtained

The *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials. The policy benefit indicator tries to show and explain what benefits are obtained from the policy for Pamekasan Regency, based on the findings in the field, the benefits of this policy cannot be felt, especially for the welfare of salt farmers because they do not understand the wishes of farmers who want price standardization, so they take action to reject the policy. However, regarding the facilities provided by the Government through the relevant Offices in increasing salt productivity by distributing assistance in the form of providing geomembranes to salt farmers, it is acceptable for salt farmers, so that the results obtained are quite high compared to processing salt without using geomembrane tools or manually.

Expected Range of Change

Efforts made by the Pamekasan District Fisheries Service to protect salt farmers with this policy by providing empowerment in the form of improving the quality of local salt and accelerating production with the launch of the *PUGAR* program since 2011. *PUGAR* in 2011 in the form of Community Direct Assistance (BLM) until 2014. In 2015 it changed to the development of the people's salt business, but in 2016 this program was not implemented due to the weather anomaly that occurred at that time, the implementation of the development of the people's salt business could only be implemented in 2017 with the salt land integration model. Salt land integration or corporate farming is a combination of salt land in the form of a cooperative, a minimum land area of about 15 Ha which is divided for land for brine water tank, hatchery land, salt scrolls to land for salt crystallization.

The salt land integration program or corporate farming in Pamekasan Regency has not been fully accepted by salt farmers as a target group due to their lack of understanding of the results that will be obtained become a corporate farm sales of salt production can be directly absorbed in cooperatives that have collaborated with local governments so that the welfare of salt farmers is more secure.

Decision Making Position

The making of *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling Imports of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials, eliminating the authority of the Ministry of Maritime Affairs and Fisheries (KKP) to determine the number of import quotas, determining the number of import quotas only referring to the Ministry of Industry, so this has caused a lot of criticism from many parties, because they consider the imported data issued to be quite high and not in accordance with the needs of industrial salt in 2018.

The policy of controlling the import of salt which aims to guarantee the protection of salt farmers cannot be felt for their income because this policy causes the selling price of local salt to fall, this is directly proportional to the income they earn. Based on the findings in the field, the implementation of this policy is considered less beneficial for salt farmers in Pamekasan Regency, because it actually makes the price of people's salt go down, because the price of people's salt is determined entirely by the market with no bargaining position on the part of salt farmers, especially small salt farmers and cultivators.

Program Executors

The implementation of the policy on controlling the import of salt cannot be separated from the understanding of the relevant agencies, the understanding of implementing the policy of *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling the Import of Fishery Commodities and Salt Commodities as Raw Materials and Industrial Auxiliary Materials, namely the Fisheries Service, is quite good.

Based on the findings in the field, the Fisheries Service is trying to give the best to salt farmers, this is done so that people's salt can be well absorbed even though there is imported salt, so that the Department hopes that the price of people's salt will return to stability. The policy issued by the Government through *Peraturan Pemerintah Nomor 9 Tahun 2018* in order to protect salt farmers is considered to have less positive impact, this is because with this policy the price of people's salt has decreased and has made salt farmers miserable.

Resources Provided

The financial resources of salt farmers with the salt import policy show that the income earned by salt farmers is actually decreasing and resulting in less than adequate income. The decline in local salt prices among salt farmers in Pamekasan Regency is not direct but gradual. Based on the findings in the field, the decline in local salt prices among salt farmers in Pamekasan Regency was not directly but gradually, in February 2018 the price of salt was at Rp. 3,000 per kg then decreased in June to Rp. 2,500 per kg, in August there was a decline again, namely Rp. 1,500 per kg and then in September the price of salt reached Rp. 1,100

per kg and in October it fell again to Rp. 800 per kg. This is because when there is an abundance of salt in the market, many large companies also lower their buying prices for local salt because the price of imported salt is much cheaper than the price of local salt.

Policy Environment

In the policy environment variable (context of policy), there are 3 (three) dimensions that become an indicator of the extent to which policy implementation is running. The indicators are as follows:

1. Powers, Interests and Strategies of the Actors Involved

Based on the findings in the field, the absorption and marketing of local salt carried out by the Fisheries Service for salt farmers in Pamekasan Regency is quite optimal, marketing can be done in several ways, namely selling production to cooperatives that have partnered with PT. Garam, then selling directly to collectors and can done by selling to companies other than PT. Garam.

2. Characteristics of Regimes and Institutions

In Pamekasan Regency, PT. Budiono is the only salt company that can accept all types of salt at the farm level, this is different from PT. Salt that only accepts premium salt, namely salt with Production Quality 1 (KP1). PT. Budiono accepts all types of salt and each type of quality salt has a different price, the better the quality, the higher the price offered. Based on the findings in the field, the Government, especially the Fisheries Service, provides regulations that require salt factories in Pamekasan Regency to absorb or buy salt from farmers, this is supervised by the Government so that people's salt can be absorbed optimally.

3. Awareness and Responsiveness

Based on the findings in the field, the outcome or impact of the *Peraturan Pemerintah Nomor 9 Tahun 2018* concerning Procedures for Controlling the Import of Fishery Commodities and Salt as Raw Materials and Industrial Auxiliary Materials carried out in Pamekasan Regency was less affected by salt farmers as the target group because it had an impact on the the price of local salt which actually causes the price of salt to fall so that salt farmers feel disadvantaged by this policy, as well as many things that must be improved by the Government as the implementer of the policy because the Government should provide clear price standardization to salt farmers so that there is clarity on the prices given by middlemen, restrictions on import quotas that are adjusted to the needs of the location of the recipient of imported salt, as well as clear rules when the loading and unloading of imported salt is carried out, this is done so that when the people's salt harvest is carried out it does not conflict with the the problem of imported salt which has resulted in the destruction of the salt price structure carried out by middlemen.

E. CONCLUSION

Based on the description of the findings in the field and the previous discussion, the results show that it is less effective. Of the 9 indicators studied, there are 6 indicators that think that this policy is considered to have less positive impact, including; 1. Indicators of parties whose interests are affected, there are 2 parties whose interests are influenced in the salt import control policy, namely salt

farmers and regional agencies; 2. The indicator of the type of benefits, this indicator states that the benefits are not felt, especially in the welfare of salt farmers because they do not understand the wishes of the farmers, resulting in rejection; 3. The indicator of the extent of change envisioned shows a less positive impact, due to the lack of understanding of salt farmers on the salt land integration model or corporate farming carried out by the Government. ;4. Indicator of the position of decision makers (site of decision making), This policy eliminates the authority of the Ministry of Maritime Affairs and Fisheries (KKP) to determine the number of import quotas, the determination of the number of import quotas only refers to the Ministry of Industry. The implementation of this policy is considered to be of no benefit, because it makes the price of people's salt fall; 5. Indicators of the resources provided (resources committed), human resources education level of the average salt farmer from elementary to junior high school. The financial resources of salt farmers with the salt import policy indicate that the income earned by salt farmers is decreasing. 6. Indicators of awareness and responsiveness (compliance and responsiveness), the response to the adverse effects of policies carried out by the government are less profitable for salt farmers.

The other indicators consist of 3 indicators showing that the policy has positive things, namely; 1. Indicators of program implementers, the performance of the Fisheries Service is quite good, the Service is trying to give the best to salt farmers, this is attempted so that people's salt can be absorbed even though imported salt comes, so the hope the Service wants the price of people's salt to be stable .; 2. The indicators of power, interest and strategies of the actors involved (power, interest and strategies of actors involved), absorption and marketing of local salt carried out for salt farmers in Pamekasan Regency are quite maximal; 3. Institutional and regime characteristics indicators, the regulation provided by the Fisheries Service by requiring salt factories in Pamekasan Regency to absorb or buy salt from farmers, this is monitored by the Government so that people's salt can be absorbed optimally.

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