

Towards a sustainable alcohol control framework: policy gaps and opportunities in Mojokerto Regency

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Abstract: Mojokerto Regency is known as one of the largest producers of alcoholic beverages in Indonesia, with production from PT Multi Bintang and home-made alcoholic beverages. This study analyzes the implementation of alcoholic beverage control and supervision policies in Mojokerto Regency using the Van Meter and Van Horn models. The research method uses a qualitative approach with data collection through in-depth interviews with key stakeholders from the Industry and Trade Service and the Civil Service Police Unit. The results of the study show three main findings: (1) There is a lack of clarity in the standards and objectives of the policy as reflected in the absence of official permit applications since the enactment of the 2016 Regional Regulation; (2) Although the structure of the Integrated Team across agencies has been designed, its implementation is hampered by the absence of an official Decree legitimizing the team's authority; (3) There is a significant gap between regulation and implementation as indicated by the failure of the monitoring and evaluation system. The main challenges lie in the weak coordination between agencies, limited data on the circulation of alcoholic beverages, and resistance from business actors. This study recommends the need to strengthen institutional aspects through the formalization of the Integrated Team, development of an integrated data collection system, and increased coordination between related agencies.

1. Introduction

Alcohol consumption is a significant global public health issue, contributing to various non-communicable diseases, injuries, and social problems (Rekve et al., 2019). The World Health Organization (WHO) has emphasized the need for policy interventions to mitigate alcohol-related harms (Matanje Mwangomba et al., 2018). Consistent evidence demonstrates a correlation between stringent alcohol control policies and reduced consumption and associated adverse effects (Ngwira, 2018; WHO, 2019). However, the effectiveness of such policies hinges on their local implementation, which often faces unique challenges and barriers (Akbar et al., 2020).

Mojokerto Regency faces complex challenges in regulating alcoholic beverages, underscored by its status as one of Indonesia’s largest alcohol-producing regions, home to PT Multi Bintang, a brewery with an annual production capacity of 1 million hectoliters of beer (Uddarojat, 2016). These challenges are exacerbated by the widespread circulation of illicit alcohol. In 2024 alone, the East Java I Regional Office of the Directorate General of Customs and Excise (DJBC) seized and destroyed 2,800 liters of illegal ethyl-alcohol-based beverages in Mojokerto Regency, with a total value of IDR 13 billion (<“USD 840,000) and estimated state revenue losses of IDR 7.8 billion (<“USD 500,000) (metrotvnews.com, 2024).

The circulation of illicit alcohol in Mojokerto Regency has demonstrated significant public health consequences, with three fatalities reported in January 2025 alone (detik.com, 2025), prompting urgent calls for action from both community members and local legislators. DPRD member Eka Septya Juniarti emphasized the need for preventive measures under Regional Regulation No. 2/2013, stating: “We must act before more lives are lost,” while residents like IM from Japanan Village reported additional concerns about illegal alcohol outlets doubling as covert prostitution hubs operating through WhatsApp-based systems (jawapos.com, 2025). These incidents reflect systemic challenges in regulating both traditional “warung remang-remang” (unlicensed liquor stalls) and emerging digital distribution networks, compounded by the region’s status as home to Indonesia’s largest legal brewery (PT Multi Bintang) - creating a paradoxical environment where formal and informal alcohol markets coexist with dangerous consequences.

The phenomenon in Mojokerto Regency demonstrates that uncontrolled alcohol consumption generates multifaceted health risks encompassing both physical and mental disorders, while simultaneously triggering criminal behavior (Boyle et al., 2021) reveal that alcohol consumption patterns are influenced not merely by individual factors but by broader socio-cultural contexts. This finding is particularly relevant in Mojokerto, where traditional alcohol production coexists with modern distribution networks. According too Fell, (2020) further substantiate that the effectiveness of alcohol-related harm reduction policies critically depends on regulating geographical availability a crucial consideration for Mojokerto given its status as both a major alcohol production hub and a region struggling with illicit distribution channels. These interconnected factors create a complex public health challenge requiring integrated policy solutions that address supply control while considering local cultural dimensions (Nashihah et al., 2024).

Table 1. Media reports on alcohol-related impacts in Mojokerto Regency

News Title	Year	Source
Drunk and Challenging Officers, Six Mojokerto Youths Arrested	2023	Beritajatim
Suspected of being drunk, motorcyclist dies after crashing into truck in Mojokerto	2024	Kabarterdepan
Alcohol Party at Mojokerto Cafe, Four Teenagers Arrested, Two of Them Students	2025	Suarajatimpost
Police Investigate Video of Mojokerto Schoolgirl Drunk at Angkringan	2019	Disway

The Mojokerto Regency Government has enacted Regional Regulation No. 3 of 2016 concerning Alcohol Beverage Control and Supervision, establishing a legal framework to protect public interests and maintain social order, security, and community health. However, the policy implementation has yet to achieve its intended outcomes, as evidenced by persistent alcohol-related criminal incidents (see Table 1). This implementation gap suggests systemic challenges in enforcement, particularly given the region’s

dual challenges of large-scale legal alcohol production and widespread illicit distribution networks. The regulation's limited impact underscores the need for stronger compliance mechanisms and interagency coordination to address both supply-side availability and demand-side consumption patterns in this culturally complex environment.

This research provides critical insights into the policy-practice gap in local-level alcohol control implementation. Employing Van Horn & Van Meter, (1977) policy implementation analysis framework, the study systematically examines the determinants influencing the effectiveness of alcohol beverage regulation enforcement in Mojokerto Regency. The findings are expected to yield actionable recommendations for strengthening institutional capacities and implementation mechanisms, ultimately enhancing policy outcomes in safeguarding public health, social order, and community safety.

2. Literature Review

Policy implementation framework

The policy implementation model developed by Van Meter and Van Horn (1975) highlights the inherent complexities in public policy execution (Sager & Gofen, 2022) reinforce this perspective by asserting that *"policy implementation is a process that takes place within a given institutional setting and requires a specific organizational structure."* Their work emphasizes that implementation success critically depends on how institutions and organizations determine discretion levels through the distribution of decision-making authority among policy delivery actors (Rani et al., 2024).

Lotta & Marques, (2020) introduce a critical dimension by conceptualizing policy implementation as *an interactive process grounded in daily relationships* between street-level bureaucrats, their clients, colleagues, and supervisors. According from (Berdzuli et al., 2020), caution that policy adoption without parallel administrative capacity expansion may precipitate immediate implementation challenges. This perspective underscores that effective policy execution requires not only robust regulatory frameworks but also sufficient institutional capacity to support frontline implementers.

The Van Meter and Van Horn model identifies six key variables in policy implementation: (1) policy standards and objectives, (2) policy resources, (3) implementing agency characteristics, (4) inter-organizational communication, (5) implementer dispositions, and (6) social, economic, and political conditions (Bianchi et al., 2021) reinforce the relevance of these variables in alcohol control contexts, emphasizing the need for effective *"control and supervision through population-wide interventions with immediate anticipated impacts."*

Following Uddarojat, (2015), complements this perspective by identifying three critical success factors for alcohol control policy implementation: (1) regulatory clarity, (2) institutional capacity, and (3) community participation. Then, according to Fernández-I-Marín et al., (2024), further emphasize the necessity of preserving allocative power and maintaining robust implementation capacity. Together, these theoretical perspectives provide a comprehensive framework for analyzing subnational alcohol policy implementation, incorporating both regulatory design and institutional execution dimensions (Afrizal et al., 2024; Putra et al., 2025).

3. Research Methods

This study employs a qualitative case study approach to examine the implementation of alcohol control policies in Mojokerto Regency. Following Yin, (2018) framework, the research investigates this

contemporary phenomenon within its real-world context through in-depth interviews with key stakeholders from the Industry and Trade Office, Health Office, Civil Service Police Unit (Satpol PP), and local business operators. Policy documents, including Local Regulation No. 3/2016 and Regent Regulation No. 72/2017, were analyzed as secondary data sources. Semi-structured interviews were conducted using a protocol developed from policy implementation dimensions, enabling researchers to capture both the complexity of implementation processes and contextual factors influencing outcomes.

Thematic analysis was applied to identify patterns emerging from interview transcripts and policy documents, adhering to (Yin, 2018) standards of rigor, validity, and reliability. To ensure research quality, data triangulation was performed by cross-verifying information across different sources and methods. This approach aligns with Yin’s emphasis on researcher expertise in conducting systematic triangulation to develop a comprehensive understanding of case study phenomena while maintaining methodological credibility and confirmability. The study particularly focused on capturing temporal changes and contextual conditions affecting policy implementation in this specific regional setting.

4. Results and Discussion

Analysis of revenue gaps and policy implementation

An analysis of Mojokerto Regency’s 2023 Local Budget Realization Report (Laporan Realisasi APBD) reveals that entertainment tax contributions to Local Own-Source Revenue (PAD) were minimal, amounting to only Rp 1.69 billion (0.26%) of the total PAD (Rp 656.12 billion). This figure appears highly contradictory given that Mojokerto hosts PT Multi Bintang Indonesia, the largest beer factory in Indonesia. Within the entertainment sector, taxes from discotheques, karaoke venues, and nightclubs contributed a mere Rp 70.78 million—far below the expected potential considering Mojokerto’s strategic position in the alcoholic beverage industry.

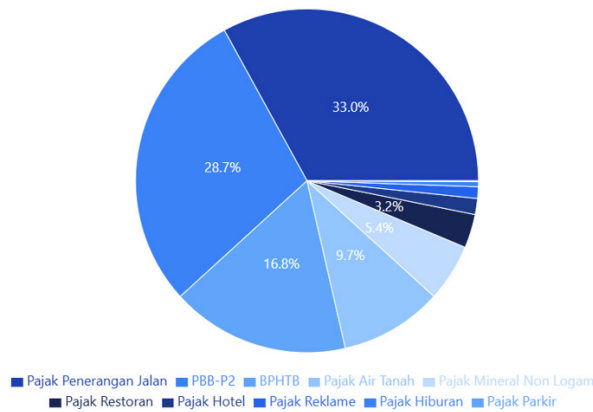


Figure 1. Percentage diagram of MojokertoRegency tax revenues 2023

When compared to other local tax sources—such as street lighting tax (Rp 121.98 billion, 33%) and rural/urban land and building taxes (PBB-P2, Rp 106.22 billion, 28.7%)—entertainment tax revenues remain disproportionately low. This discrepancy suggests significant revenue leakage, highlighting inefficiencies in tax collection and policy enforcement. The stark contrast between Mojokerto’s status as a major alcohol production hub and its underperforming entertainment tax revenues underscores potential gaps in regulatory oversight and fiscal management.

A significant gap exists between potential and realized revenue from the alcohol-related entertainment sector in Mojokerto Regency. According to the 2023 Regional Budget (APBD) realization report, tax revenue from discotheques, karaoke bars, and nightclubs reached Rp70,783,752—marginally exceeding the modest target of Rp70,000,000. This minimal surplus reveals an overly conservative revenue target, particularly incongruous given Mojokerto’s status as the production base of PT Multi Bintang Indonesia, Indonesia’s largest brewery.

The persistently low tax receipts suggest substantial revenue leakage in the nightlife and alcohol distribution sectors. This is corroborated by the recurring discovery of illicit alcohol circulation within the regency, indicating systemic challenges in tax enforcement and regulatory oversight. The data underscores a critical misalignment between Mojokerto’s position as a national alcohol production hub and its capacity to capture commensurate fiscal benefits from the entertainment sector.

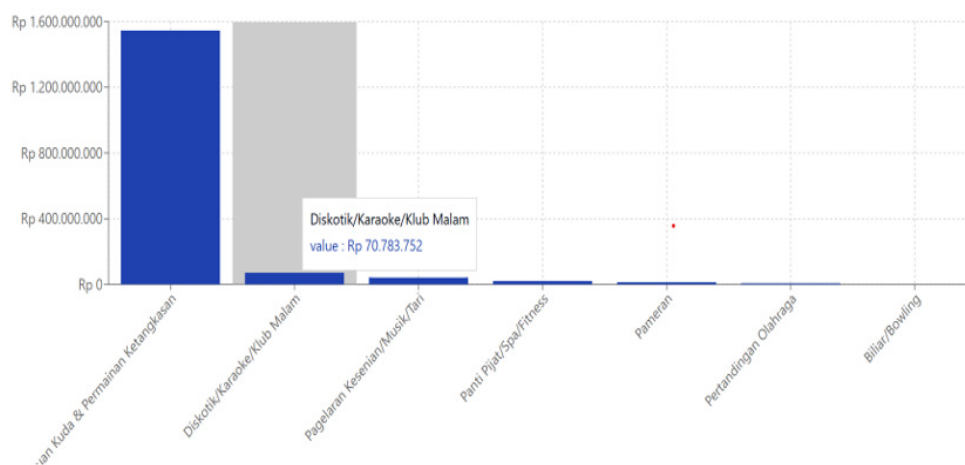


Figure 2. Comparison of entertainment tax revenue in Mojokerto Regency 2023

A thorough analysis reveals that the gap between potential and actual tax revenue stems from several interrelated factors. First, weak monitoring systems and lax enforcement of regulations on nightlife establishments—many of which serve as distribution channels for illicit alcohol—have significantly undermined revenue collection. As emphasized by Sager & Gofen, (2022), the success of public policy implementation critically depends on robust institutional frameworks and effective oversight mechanisms.

Second, suboptimal tax recording and reporting systems have created opportunities for income underreporting. This situation reflects what Fernández-I-Marín et al., (2024) term “*bureaucratic overload*,” wherein administrative capacity fails to keep pace with policy implementation demands. Together, these factors highlight systemic governance challenges in aligning Mojokerto’s status as Indonesia’s alcohol production hub with equitable fiscal returns.

A third significant factor contributing to low revenue optimization is the widespread circulation of illegally produced alcoholic beverages sold at substantially lower prices. This creates unfair competition for licensed entertainment venues that comply with tax obligations. The phenomenon not only reduces Local Own-Source Revenue (PAD) but also generates broader public health and social problems.

According to D. J. Rehm, (2020), emphasize that effective alcohol control requires a comprehensive approach addressing economic, social, and public health dimensions. In Mojokerto Regency, weak monitoring systems and inadequate law enforcement have created favorable conditions for illicit alcohol distribution. This situation produces dual negative effects: (1) economic losses through continual erosion

of potential local revenue from the entertainment sector, and (2) public health risks from increased consumption of dangerous adulterated alcohol products. Field evidence reveals systematic tax avoidance practices in nightlife establishments, while health data shows hundreds of illegal alcohol poisoning cases occurring annually in the region.

The implications of policy uncertainty on social issues

The impact of the unclear standards and objectives of the alcoholic beverage control policy in Mojokerto Regency can be seen from the rampant circulation of illegal and mixed alcoholic beverages during the 2022-2024 period in Table 2.

Table 2. Result of operation to control illegal alcoholic beverages

Total Confiscated Goods	Year	Source
"225 bottles of arak and 12 bottles of wine"	2024	Radarmojokerto
"674 bottles of arak, 24 beers, 5 red wines, 5 white wines, and 2 bottles of whisky."	2022	Radarmojokerto

Table 2 reveals that the volume of confiscated alcoholic beverages continues to number in the hundreds, demonstrating the persistent ineffectiveness of control measures despite long-standing policy implementation. This finding aligns with Rehm et al., (2021)) conclusion that "due to the high levels of alcohol use, alcohol-attributable mortality and burden of disease, and detrimental drinking patterns," rigorous and measurable control policies are essential. Media-compiled data illustrates the negative consequences of weak policy enforcement, including intergroup brawls, public indecency, and disruptive public intoxication - all of which indicate implementation failure. Van Horn & Van Meter, (1977) identify clear policy standards and objectives as critical variables for successful implementation, a requirement evidently unmet in Mojokerto's case.

The consequences of inadequate control are reflected in numerous alcohol-related incidents throughout Mojokerto Regency from 2022-2024. As McCambridge et al., (2018) noted, "alcohol-attributable mortality was among the highest globally" when control policies are poorly implemented. Various documented cases - including alcohol-fueled brawls, substance-impaired indecent acts, public order disturbances from intoxication, and poisoning incidents - collectively demonstrate policy failure. Van Horn & Van Meter, (1977) emphasize that effective implementation requires clear, measurable standards and implementer commitment. These recurring incidents confirm that ambiguous policy standards negatively impact not only administrative and revenue aspects but also pose serious threats to public safety, social order, and community welfare throughout Mojokerto Regency.

Multi-stakeholder engagement in policy implementation

Research findings indicate that the implementation of alcoholic beverage control and supervision policies in Mojokerto Regency has involved various actors from several institutions. As explained by Imperial, (2021), "Policy implementation is an interactive process based on daily relationships between bureaucrats and their clients, peers, and superiors." The involvement of multiple stakeholders such as the Department of Industry and Trade, Health Department, Municipal Police, Food and Drug Administration, Indonesian Ulema Council, as well as the Armed Forces and National Police demonstrates efforts to build an interactive implementation process. This aligns with the findings of Lesch & McCambridge, (2022)

that successful alcohol control policies require “highly effective general population interventions with an anticipated immediate impact” through coordination among various stakeholders.

Nevertheless, the research identifies serious constraints in the legitimacy aspect of the Integrated Team. The absence of an official decree for the Integrated Team indicates weak formalization of inter-agency relationships. Babor et al., (2015) emphasize that “control and supervision of alcoholic beverages” requires a clear institutional framework to achieve “expected changes in consumption and alcohol-attributable harm.” The absence of an Integrated Team decree reflects a fundamental weakness in the institutional aspect that may hinder control effectiveness.

The implications of the absence of an official decree for the Integrated Team significantly impact the effectiveness of policy implementation. As emphasized in Berdzuli et al., (2020) research, alcohol control policies require “institutional arrangements” that are robust to address “high levels of alcohol use, alcohol-attributable mortality and burden of disease, and detrimental drinking patterns.” However, in the case of Mojokerto, the weakness in the institutional aspect adversely affects the effectiveness of policy coordination and implementation. Lotta & Marques, (2020) also assert that “organizational factors influence less the uses of styles than individual decisions and relations,” but the absence of formal legitimacy causes the Integrated Team to lose the necessary authority to perform its supervisory functions effectively. This ultimately may hinder the achievement of policy objectives for controlling and supervising alcoholic beverages in Mojokerto Regency.

Gap between regulation and implementation

Research findings indicate a significant gap between comprehensive regulations and their field implementation. As explained by Fernández-I-Marín et al., (2024), “If policies are adopted without a parallel expansion of administrative capacities, this can directly translate into growing implementation problems.” Although Regent Regulation No. 72/2017 has detailed the licensing procedures for SITU-MB and SIUP-MB from application to license issuance, the fact remains that not a single business entity has applied for official licensing.

The implementation gap becomes more apparent from the non-functioning quarterly reporting system as stipulated in the Regent Regulation. Sornpaisarn et al., (2020) emphasize the importance of “control and supervision of alcoholic beverages” through structured monitoring mechanisms. However, the absence of official licensing renders the reporting system non-functional. The Regent Regulation has mandated quarterly reporting obligations on March 31, June 30, and September 30. This condition reflects “bureaucratic overload” as explained by Fernández-I-Marín et al., (2024), where a gap exists between the implementation burden and the available administrative capacity.

Implementation failure is also evident from the ineffectiveness of the administrative sanctions mechanism regulated in the Regent Regulation. Although the stages for imposing sanctions have been established, ranging from warnings to license revocation, without official licensing, this sanctions mechanism cannot be executed. As explained by Fernández-I-Marín et al., (2024), this condition reflects a “disruption in the allocative powers” where the government loses formal instruments to conduct supervision and control. Consequently, the policy objective of protecting society from the negative impacts of alcoholic beverage circulation becomes difficult to achieve.

5. Conclusion

The implementation of alcoholic beverage control and supervision policies in Mojokerto Regency is rife with significant deficiencies. These include the absence of an official decree establishing the In-

tegrated Supervisory Team, which undermines institutional authority, and the ineffective application of the licensing system under Regional Regulation No. 3 of 2016, as no license applications have been submitted since its enactment. Additionally, there is a conspicuous absence of coordination among the pertinent agencies. While the Municipal Police concentrate on enforcement and the Department of Industry and Trade prioritizes licensing, their efforts remain fragmented and uncoordinated. The situation is further complicated by the absence of reliable data on the circulation of alcoholic beverages, hindering effective monitoring and evaluation.

To enhance the efficacy of policy implementation, strategic actions must be undertaken. These include the issuance of a formal decree for the Integrated Team to legitimize its role, the development of a centralized data system for effective oversight, and the strengthening of inter-agency coordination through routine meetings and transparent reporting. Furthermore, it is imperative to enhance public awareness and educate business actors on the significance of licensing. Additionally, fostering community participation in supervision is crucial. The efficacy of this policy is contingent upon the robust commitment of the local government, enforcement bodies, businesses, and the public. The overarching objective is to mitigate the adverse impacts of alcohol misuse.

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