

The Effectiveness of the Implementation of the Ease of Doing Business Policy on Investment Growth in East Java

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Abstract

Increasing investment is a national strategic priority to boost economic growth, job creation, and regional competitiveness. A key challenge in realizing investment lies in the complexity of licensing, especially environmental permits that require compliance with technical standards and sectoral regulations. To address this, the government implemented a risk-based business licensing policy through digital systems OSS and JOSS. This qualitative study analyzes the effectiveness of this policy in East Java, using a framework of institutional capacity and effectiveness, viewed from the perspective of collaboration among policy actors. Findings show that OSS and JOSS systems have improved licensing efficiency, accelerated Business Identification Number (NIB) issuance, and strengthened DPMPSTP's role as the implementing institution. However, challenges remain in environmental licensing, including weak cross-sectoral coordination, limited human resources, inconsistent spatial and environmental data, and the absence of a structured collaborative mechanism involving local governments, businesses, and environmental oversight institutions. These barriers hinder optimal implementation. The study concludes that digital innovation alone is insufficient for successful policy outcomes. Effective implementation also requires regulatory consistency, institutional strengthening, and adaptive collaborative governance to respond to the complexity and dynamic nature of cross-sectoral policies, especially in environmentally sensitive areas.

Keywords: Public Policy Implementation; JOSS; OSS; Business Permission

How to cite

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INTRODUCTION

The omnibus law method in the formation of the Job Creation Law resulted in two government regulations forming the basis for risk-based business licensing. These regulations are Government Regulation No. 5 of 2021 concerning the Implementation of Risk-Based Business Licensing and Government Regulation No. 6 of 2021 concerning the Implementation of Business Licensing in Regions. The latter regulation serves as the basis for the implementation of business licensing in East Java. From these government regulations, there are two derivative regulations: East Java Governor Regulation No. 88 of 2022 concerning the Implementation of Business Licensing and East Java Governor Regulation No. 26 of 2022 concerning the Delegation of Authority for Business Licensing Implementation to the Head of the Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu (DPMPSTP).

East Java Governor Regulation No. 88 of 2022 ultimately became the basis for East Java Governor Decree No. 188/20/KPTS/012/2023 concerning Service Standards for Business Licensing at the Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu. This decree regulates how risk-based licensing is carried out in East Java through OSS (Online Single Submission) and JOSS (Jatim Online Single Submission) for licenses not covered by OSS. In its implementation, the OSS system is guided by business license types classified by risk or Online Single Submission Risk-Based Approach (OSS-RBA).

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OSS-RBA consists of business activities with low risk (R), medium-low risk (MR), medium-high risk (MT), and high risk (T).

The Indonesian government has adopted a business licensing reform policy through the implementation of the Business Registration Number (NIB) in the OSS-RBA system, aiming to simplify the licensing process and encourage investment growth. Specifically, for business activities with medium-high risk, in addition to NIB (Nomor Induk Berusaha), business actors are required to have a standard certificate. This policy is part of the implementation of the UUCK (Undang-Undang Cipta Kerja), which aims to create a more efficient and conducive business climate and promote national economic growth.

The impact of this business licensing policy, based on data from the Ministry of Investment/BKPM RI 2024, shows that national and regional investment realization, including in East Java Province, experienced a significant increase during the 2019–2023 period. East Java Province is one of the provinces with the largest contribution of Domestic Direct Investment (PMDN) and Foreign Direct Investment (PMA), supported by strong infrastructure and its position as a hub for the eastern Indonesian region. This investment growth also spurred an increase in the Regional Gross Domestic Product (GRDP) at Constant Prices (ADHK), indicating strengthening regional economy, although it was affected by the pandemic in 2020.

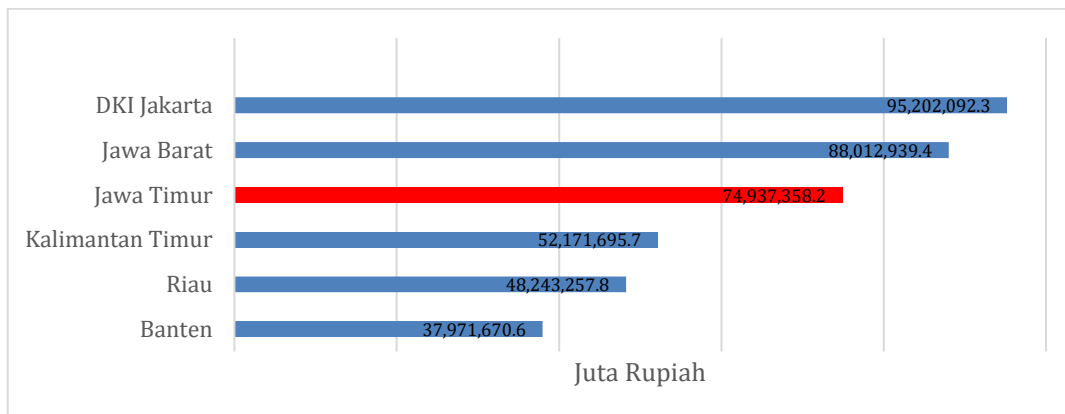


Figure 1. Provinces with the Highest National Domestic Investment Value in 2023
Source: (Ministry of Investment/BKPM RI, 2024)

East Java Governor Regulation No. 69 of 2020 concerning the Implementation of One-Stop Integrated Services and East Java Governor Regulation No. 88 of 2022 concerning the Implementation of Business Licensing serve as the basis and guide for the implementation of business licensing, including environmental sector licensing. With this policy, environmental sector licensing, which was previously considered difficult and convoluted due to requiring many separate service counters, is now integrated into a one-stop service.

Although the implementation of this policy has been ongoing for several years, in practice, environmental sector licensing still experiences several changes in authority between the central and regional governments. Furthermore, the implementation of environmental licensing, which requires the involvement of many parties, makes this research topic interesting. Therefore, the business ease policy is expected to have an effective impact on the implementation of environmental sector licensing.

According to [Sururi and Zainuri \(2023\)](#), there are three aspects to understanding policy effectiveness: first, a conducive space or policy formulation environment; second, the novelty of the policy that can provide solutions to existing problems; and third, the application of the policy instrument itself. Effective policy implementation relates to how the process changes from the policy are carried out and the changes that occur in the target groups, by looking at quality and final results ([Sandford and Moulton, 2015](#)).

This research will discuss the effectiveness of the business ease policy implementation in East Java Province from the perspective of capacity and effectiveness. The purpose of this research is to analyze the implementation of the business ease policy in East Java Province through the Online Single Submission (OSS) and Jatim Online Single Submission (JOSS) applications. As regulated in East Java Governor Regulation No. 69 of 2020 concerning the Implementation of One-Stop Integrated Services and East Java Governor Regulation No. 88 of 2022 concerning the Implementation of Business Licensing. This research approach uses the perspective of effectiveness and capacity by adapting the theory proposed by [Sandfort and Moulton \(2015\)](#), which consists of effectiveness and institutional capacity, policy/regulation, changes in implementation systems, and the degree of change in target groups.

This article differs from previous studies on the Ease of Doing Business (EoDB) and OSS implementation in several fundamental ways. First, it provides a contextual extension by focusing on the environmental licensing sector in East Java, a policy domain characterized by high regulatory complexity, multi-level authority, and cross-sectoral coordination challenges that are often underexplored in EoDB research, which typically emphasizes licensing speed, investment growth, or general administrative efficiency. Second, this study offers a theoretical refinement by linking EoDB implementation to the perspective of collaborative governance, demonstrating that policy effectiveness is not solely determined by digital systems such as OSS and JOSS, but also by the quality of interaction, coordination, and collaboration among implementing actors across institutions and sectors. Third, the article contributes to policy learning by analyzing the dynamics of shifting authority between central and regional governments in environmental licensing, highlighting how frequent regulatory and institutional changes shape implementation capacity and policy outcomes. Rather than treating EoDB as a purely technical or administrative reform, this study conceptualizes it as a governance process embedded in institutional capacity, collaboration, and authority dynamics, thereby extending the analytical scope of EoDB research in developing country contexts

HYPOTHESES DEVELOPMENT

Concept of Coordination, Cooperation, and Collaboration

Along with the increasing complexity of public problems, governments can no longer solve problems independently and have begun to involve various other actors through mechanisms of coordination, cooperation, and collaboration. Although the three often overlap in practice, experts explain their differences. Coordination, according to Terry (in [Hasibuan, 2014](#)), is an effort to harmonize the implementation of activities to achieve organizational goals. Meanwhile, according to Koontz and O'Donell (in [Akmal, 2006](#)), coordination is the integration of processes within work units to achieve common goals.

Furthermore, cooperation, according to [Soekanto \(2002\)](#), is a social interaction characterized by contact and communication to achieve common goals, whose success is determined by trust and the contribution of each party ([Surminah, 2013](#)). However, cooperation tends to be short-term and does not deeply integrate resources ([Dwiyanto, 2012](#)).

Among these two concepts, collaboration emerges as the most mature stage in cross-sectoral work networks, emphasizing resource integration, active participation, and long-term relationships ([Lasker et al., 2001](#)). In the context of public administration, collaboration is needed to handle complex problems through a transformative process involving various stakeholders ([Zaenuri 2017](#)). Collaboration can create collaborative networks such as alliances, ecosystems, open innovation, and supply chains that enable the synergy of individual or organizational capacities in facing challenges that cannot be overcome independently ([Camarinha-Matos et al., 2022](#)). Although collaboration has great potential, it still faces obstacles such as differences in formal rules, informal norms, and resource imbalances, which can only be overcome through effective communication and strong networks ([Sullivan and Skelcher, 2003](#)). Thus, collaboration becomes the most ideal form in overcoming increasingly complex public problems.

Effective Public Policy Implementation

Public policy implementation is a crucial process in public administration aimed at realizing political decisions into concrete actions in society. Gerald Caiden explains that public administration helps solve complex social problems. Therefore, emphasizes that problem-solving cannot be done individually but collectively, thus public policy is needed as a problem-solving instrument. In its execution, the success of public policy is more determined by the quality of its implementation, which is 60%, compared to only 20% from policy formulation or oversight (Nugroho, 2012).

Three generations of policy implementation studies, according to Peter and Linda deLeon (in Nugroho, 2012), explain the development of approaches in policy implementation. According to them, from merely follow-up actions to decisions, it became a top-down process, and finally considered the behavior of implementers and policy adaptability (Peter and deLeon in Nugroho, 2012). Furthermore, Lester and Stewart (in Winarno, 2012) state that implementation involves various actors, organizations, and procedures to achieve policy goals. Implementation should also be measured not only by its output but also its outcome on target groups (Winarno, 2012). Thus, implementation requires a series of programs and projects designed and systematically run from policy to beneficiaries, as stated by Nugroho (2012).

Indicators of policy implementation effectiveness according to Sanford and Moulton (2015) include two main aspects: changes in operating systems (service structures and processes) and changes in target groups (behavior, satisfaction, and public involvement). The approaches used in implementation are differentiated into top-down and bottom-up. The top-down approach, being hierarchical, receives criticism for simplifying the complexity of policy execution (Kasmad, 2016). Conversely, the bottom-up approach pays attention to lower-level bureaucrats and target group participation, which is considered more responsive to on-the-ground realities (Kasmad, 2016).

There are several policy implementation models, such as the classic model by Van Meter and Van Horn (in Winarno, 2012) which identifies six variables influencing implementation, including policy objectives, resources, communication, characteristics of the implementing body, socio-political conditions, and implementer tendencies. Other models, such as that presented by Elmore (in Kasmad, 2016), emphasize the importance of public participation in policy implementation based on public needs. While Edward III's model (in Nugroho, 2012) highlights four important factors: communication, resources, implementer disposition, and bureaucratic structure, all of which interact in determining implementation success.

Thus, the success of public policy implementation is determined by many factors, both structural, technical, and relational among policy implementers. Therefore, policy implementation is not merely carrying out orders, but also requires a comprehensive understanding of the policy, clear communication, availability of resources, and implementer commitment so that policy objectives are truly felt by the target community.

METHOD, DATA, AND ANALYSIS

This study employs a qualitative method with naturalistic approach, aiming to understand social phenomena from the participants' perspective, especially in the context of the effectiveness of business ease policy and environmental permit implementation in East Java. This research focuses on processes, meanings, and understandings, not numbers or generalizations. Within this approach, the researcher serves as the primary instrument for data collection and interpretation.

Data were collected using purposive sampling, where informants were selected based on the relevance of their knowledge and experience to the research focus. The study applied an interactive data analysis model by (Chuah et al., 2025), comprising three stages: Data Condensation, which involves filtering and simplifying significant information; Data Display, which systematically presents findings through matrices, graphs, and charts; and Conclusion Drawing/Verification, which involves formulating and validating conclusions throughout the data collection and analysis process.

To ensure analytical integration between numerical indicators and field-based findings, this study does not treat quantitative data – such as the number of license applications, issued permits, and

investment realization figures—as standalone measures of policy success. Instead, these numerical trends are interpreted in conjunction with qualitative evidence derived from interviews and document analysis. In particular, increases in licensing volume and permit issuance are examined alongside policy actors' perceptions regarding system usability, institutional coordination, and regulatory clarity.

Actor perceptions are used to contextualize numerical improvements, revealing that while digital platforms (OSS and JOSS) have accelerated administrative processing, perceived effectiveness varies depending on sectoral involvement and technical capacity. Technical constraints—such as limited human resources, inconsistent spatial and environmental data, and system interoperability issues—are analyzed as explanatory factors behind discrepancies between application volume and approval rates. Furthermore, fluctuations in licensing performance are interpreted in light of authority conflicts between central and regional governments, especially in the environmental sector, where frequent shifts in regulatory control affect both implementation consistency and actors' confidence.

By relating numerical trends to these qualitative dimensions, the study positions quantitative data as indicators of surface-level performance, while field findings explain the underlying governance dynamics shaping policy effectiveness. This integrated approach enables a more comprehensive assessment of EoDB implementation, capturing not only measurable outputs but also the institutional and relational conditions that influence policy outcomes.

RESULTS

The Effectiveness of the Implementation of the Ease of Doing Business Policy

Responsive public services serve as a key measure of governance performance, particularly in evaluating how effectively public policies are implemented. In East Java Province, the implementation of business licensing—commonly referred to as business ease—is guided by East Java Governor Regulation No. 69 of 2020 on the Implementation of One-Stop Integrated Services. This regulation designates the DPMPTSP as the main agency responsible for execution, supported by a verification team comprising representatives from relevant regional units tasked with processing, providing notifications, and assisting in both licensing and non-licensing matters.

In the implementation of business licensing carried out through OSS managed by the central government, if there are requirements, approvals, and/or further permits that are not regulated by OSS, they are managed through the provincial licensing application, JOSS. One type of licensing service delegated by this governor's regulation to the head of the Government is in the environmental sector, whose authority lies with the province.

The implementation of the business policy, especially the implementation of environmental sector licensing, particularly in East Java Province, already involves several stakeholders, including the DPMPTSP of East Java Province as the delegated service provider. Meanwhile, the relevant department, in this case, the Environmental Department of East Java Province, is one of the verification teams, and business actors are the service users as regulated in East Java Governor Regulation No. 69 of 2020 concerning the Implementation of One-Stop Integrated Services. The policy seeks to facilitate business operations and foster a favorable investment climate by delivering fast, effective, efficient, and transparent licensing and non-licensing services that ensure legal certainty and uphold the rights of both the public and investors in accessing these services.

Besides integrating licensing and non-licensing services through an online platform, the implementation of this business ease policy is also conducted via a one-stop integrated service mechanism. All forms of business licensing services are conducted in one place. Overall, this mechanism means that investors or business actors no longer need to visit separate department counters to process business permits.

The business ease policy in East Java Province was then reinforced through East Java Governor Regulation No. 88 of 2022 concerning the Implementation of Business Licensing. This regulation serves as a guide for the implementation of integrated business licenses, especially licenses not yet included in OSS, which can be done through JOSS. Since the enactment of this regulation, the entire licensing service process, from filing to issuing business licenses, is done online. This electronic-based service mechanism

facilitates checking administrative completeness and requirements, monitoring progress stages, and documenting issued licenses. Business actors admit that it has become easier to apply for their business permits.

In the environmental sector, the implementation of the business ease policy also has a positive impact. This is because environmental sector licensing has so far been considered difficult and convoluted due to complex requirements and significant operational costs in the application process. However, with the current business ease policy through the JOSS application, the environmental licensing mechanism is no longer an obstacle to increasing investment in East Java Province. Business actors or investors can easily obtain information on requirements, system mechanisms and procedures, completion time, and required fees/costs. This information is clearly published on the joss.jatimprov.go.id website.

The effectiveness and capacity of the business ease policy in environmental licensing can be reflected, for instance, in the growing number of license applications and approvals. In 2023, the number of environmental permits issued was 128 out of 386 permit applications received through the JOSS application. Then in 2024, 344 environmental sector licenses were issued from 608 permit applications made through the JOSS application. This increase reflects the effectiveness and success of implementing the business ease policy in East Java Province in fostering a conducive investment climate that promotes equitable economic growth.

Effectiveness and Institutional Capacity in Business Ease Implementation Policy

To accelerate and simplify the business licensing process by centralizing authority in a single institution, the East Java Provincial Government issued Governor Regulation No. 26 of 2022 concerning the Delegation of Authority for Business Licensing Implementation to the Head of the Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu (DPMPTSP). The delegated authority covers the issuance of licenses as well as the supervision, evaluation, and guidance of business licensing activities under provincial jurisdiction.

The licenses under provincial authority, whose implementation is delegated to the Head of DPMPTSP of East Java Province, consist of 18 sectors and 158 types of licenses. In terms of institutional capacity, the large number of license types would not be effectively managed. However, in its implementation, this governor's regulation applies the concept of one-stop integrated services (PTSP), which integrates all processes—from the application stage to the final stage of license issuance—into a single, streamlined system.

This concept aims to simplify bureaucracy, accelerate processes, increase transparency, and efficiency in managing various types of licenses required by the public or business actors. The principle of integration in the PTSP concept is that services are carried out in one place and/or through one system, eliminating long bureaucratic processes carried out separately in each department.

In general, PTSP within in the implementation of the business ease policy in East Java Province is a service concept that integrates various types of business licenses in one point or one service location. The JOSS application functions as the online platform used by the East Java Provincial Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu to deliver these electronic one-stop integrated services.

In terms of institutional capacity, DPMPTSP of East Java Province as the leading sector for the implementation of business ease has several important aspects, including:

1. Competence and professionalism of human resources;
2. Adequate information technology systems and infrastructure; and
3. Regulatory and policy support.

Human resources within an organization or department are required to have technical capabilities and understanding of the system to be run within that organization. The competence and professionalism of human resources are demanded to have a deep understanding of new licensing policies, regional potential, and the interrelation between license types, as well as the suitability and alignment of investment plans with regional development policy directions.

Furthermore, the information technology systems and infrastructure that support the implementation of business licensing services in East Java consist of the JOSS application as a digital PTSP platform and supporting facilities such as computers and internet networks available at the PTSP office. In addition, regulatory and policy support is provided through delegated business licensing authorities stipulated in the governor's regulation.

To accommodate the large number of licenses consisting of 18 sectors and 158 types of licenses, and each license requiring technical recommendations from related Regional Apparatus Organizations (OPD), including in the implementation of environmental sector licenses. Therefore, based on East Java Governor Regulation No. 69 of 2020 concerning the Implementation of One-Stop Integrated Services, DPMPTSP of East Java Province involves a verification team. This team consists of several elements of OPD assigned to DPMPTSP of East Java Province. Therefore, this verification team is not only comprised of internal DPMPTSP staff but also representatives or staff from technical OPDs who have authority related to each required license type.

Effectiveness and Capacity of Changes in Business Ease Implementation System

Based on the research results, the quality of the business ease policy implementation process in East Java Province has been running well and effectively. This can be seen from several indicators showing an improvement in the quality of the implementation process, including the running of service stages and processes, socialization and education to relevant stakeholders, preparation of performance reports, and an increase in applications and issued permits.

This demonstrates that the East Java Provincial Government, through the DPMPTSP, is committed to addressing licensing challenges that impede investment realization and economic growth in the province. The actions taken by the provincial government represent deliberate decisions and proactive measures to deliver community-oriented solutions, supported by a focused implementation strategy.

Furthermore, this quality process indicator can be seen from the integrated licensing services. Before this policy, licensing services were carried out in each department, then various types of business licenses were integrated into a one-stop service or one service location. The medium used to facilitate the implementation of this policy is the JOSS application as a digital medium or platform used by the Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu of East Java Province to provide electronic services (PTSP through digital media).

The effectiveness of the policy and the role of each actor includes the following aspects (Scott and Thomas, 2016):

1. Leadership that directs collaborative governance initiatives;
2. Drive or motivation in providing human, financial, or technical resources; and
3. Followers, who join and are organized by other parties.

Ideally, policy implementation should anticipate several causes of its failure. The causes of failure in policy implementation, according to [Hudson et al. \(2019\)](#): 1) Improper governance; 2) Overly optimistic expectations; 3) Inadequate collaborative policies; and 4) Political dynamics. If the above causes are linked to the research results, then there are potential causes that could make the business ease policy in East Java less effective. These causes lie in inadequate collaborative policies. In terms of business ease policies, collaboration has not fully occurred. The relationships formed between OPDs in policy implementation are still at the level of coordination and cooperation but have not reached the level of collaboration.

Additionally, the business ease policy framework limits involvement to two helices—government and business actors. In practice, however, implementing business ease, particularly environmental sector licensing, demands collaboration among multiple stakeholders (helices). Collaboration among helices in the implementation of environmental sector permits is highly necessary, and optimal collaboration can even help in controlling the impact of environmental damage in the future ([Wirashana 2024](#)).

This collaboration highlights that interactions among the three helix components serve as the primary driver for fostering conditions conducive to innovation, skills, creativity, and ideas in economic development. The helix collaboration approach illustrates how innovation arises through balanced, reciprocal, and ongoing relationships among the helixes.

Degree of Change in Target Groups

One factor that can encourage a sustainable degree of change in target groups is through regulations and policies that can compel and change the behavior of target groups ([August, 2010](#)). In the context of business ease in East Java, all licensing services are conducted through the JOSS application, so every license can be integrated into one single point or platform.

Prior to the business ease policy, business licensing processes—particularly in the environmental sector—were handled at separate locations without integration through the PTSP system. After the issuance and implementation of the business ease policy, the public or business actors can submit applications from anywhere through the JOSS application. In addition, business actors can also visit the PTSP office, which provides facilities such as computers and internet networks if business actors wish to submit applications with assistance from officers. License applications, whether at the PTSP office or outside the PTSP office, must still be submitted through the JOSS application.

Subsequently, business actors upload the complete required documents, which are then verified by the verification team. If the required documents are in order, the application will be forwarded to the relevant technical OPD for follow-up with field verification. However, if the required application documents are not in order, the application is returned to the applicant for revision.

After the field verification results comply with applicable laws and regulations, the technical OPD will forward the application to the DPMPTSP of East Java Province for approval and license issuance. Then the licensing documents can be easily downloaded by the applicant or business actor. The entire series of processes described above are carried out on a single digital platform, JOSS.

Thus, the empirical findings of the research indicate that the implementation of the business ease policy in East Java, based on the aspect of the degree of change in target groups, has been achieved both in terms of policy targets and program objectives themselves. This is because the implementation of business ease through the PTSP concept and JOSS has been carried out with a holistic approach. However, in the implementation of environmental sector licensing, a different phenomenon occurs. If viewed from the implementation process, the target group has shown a significant degree of change. However, in the context of authority to implement the policy, it continues to change. Previously under regional government authority, environmental approvals shifted to central government control, with certain types now being delegated back to regional authorities. These shifting authorities become an independent inhibiting factor for the implementation of business ease, especially in the context of the environmental sector.

According to (Siemiatycki, 2008), issues related to legitimacy or authority faced by a public policy consist of:

1. The impact of performance in terms of effectiveness and efficiency;
2. Limits in the policy formulation process;
3. The position of democracy and future government performance.

In this case, the business ease policy does not only focus on increasing investment and economic growth. But it also needs to prepare and establish clear, firm, and sustainable regulations that can influence the results of policy implementation ([Linder and Peters 1987](#)).

CONCLUSION

The implementation of the business ease policy through the One-Stop Integrated Services (PTSP) concept and the Jatim Online Submission (JOSS) application has achieved significant changes in target groups (business actors), seen from the ease of submitting applications, document verification, progress monitoring, and online license download. Effectiveness and efficiency of procedures also occur in environmental sector licensing, which can be seen, for example, through the increase in applications

and licenses issued in the environmental sector. Business ease in East Java uses a digital platform named JOSS, which can be accessed through joss.jatimprov.go.id. This platform provides convenience for business actors in submitting required permits and information about permits such as requirements, procedural mechanisms, costs, and completion time of applications.

Despite yielding positive outcomes, the implementation of environmental licensing policies encounters significant hurdles. The primary challenge remains inadequate collaboration among key helix stakeholders (actors). At present, environmental sector licensing involves only the East Java Provincial DPMPTSP, the Provincial Environmental Department, and business actors. The research results show that collaboration has not been fully realized and is still limited to coordination, which is only the integration of processes within work units to achieve specific goals without social interaction, emphasis on resource integration, active participation, and long-term working relationships. The implementation of environmental sector licensing requires collaboration from various parties or "helixes" (government, business actors, academics, media, and consultants) in formulating policies and solving complex problems through a transformative process involving the helixes mentioned above.

In addition to the lack of a systematic collaborative mechanism in the implementation of the business ease policy, there are also obstacles in the delegation of licensing authority related to the environmental sector, which constantly changes. For example, the authority for environmental approvals, which was generally the authority of regional governments, was then taken over by the central government since 2021 through Government Regulation No. 5 of 2021 on Risk-Based Business Licensing Implementation standardized environmental feasibility evaluations, including AMDAL, driving a major shift to centralized authority. Subsequently, Government Regulation No. 28 of 2025 on the same framework redelegated most environmental approvals to provincial and district/city governments based on central NSPK standards. These frequent authority changes over a brief period have posed major challenges for business operators.

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