

**DECISION-MAKING POLICY ON INDONESIA'S COAL EXPORT
MORATORIUM IN 2022**

UNDERGRADUATE THESIS



**UNIVERSITAS
ISLAM
INDONESIA**

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FACULTY OF PSYCHOLOGY AND SOCIO-CULTURAL SCIENCES**

UNIVERSITAS ISLAM INDONESIA

2024

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Proposed to the Department of International Relations
Faculty of Psychology and Socio-Cultural Sciences
Universitas Islam Indonesia
As a partial fulfillment of the requirement to earn
Bachelor's Degree in International Relations



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AUTHORIZATION PAGE

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Defended in front of the Board of Examiners
in the Department of International Relations
Faculty of Psychology and Socio-Cultural Sciences
Universitas Islam Indonesia

As a partial fulfillment of the requirement to earn
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Date

22 February 2024

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No other materials are used other than those contained. I have read and understood the university's rules and procedures regarding plagiarism.

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Feni Irmawati

TABLE OF CONTENT

UNDERGRADUATE THESIS	i
AUTHORIZATION PAGE	iii
STATEMENT OF ACADEMIC INTEGRITY	iv
TABLE OF CONTENT	v
LIST OF TABLES	vii
LIST OF DIAGRAM	viii
LIST OF FIGURE	ix
LIST OF ABBREVIATIONS	x
ABSTRACT	xi
CHAPTER 1 INTRODUCTION	1
1.1 Background	1
1.2 Research Question	5
1.3 Research Objectives	5
1.4 Research Scope	5
1.5 Literature Review	6
1.6 Research Framework	8
1.7 Provisional Argument	11
1.8 Research Method	14
<i>1.8.1 Type of the Research</i>	14
<i>1.8.2 Subject and Object of the Research</i>	14
<i>1.8.3 Method of Data Collection</i>	14
<i>1.8.4 Process of the Research</i>	14
1.9 Thesis Outline	15
CHAPTER 2	16
2.1 Actor	16
<i>2.1.1 President Joko Widodo</i>	16
<i>2.1.2 Ministry of Energy and Mineral Resources (ESDM)</i>	17
<i>2.1.3 Ministry of Trade</i>	17
<i>2.1.4 Commission VI DPR RI</i>	18
<i>2.1.5 PLN</i>	19
<i>2.1.6 Coal Mining Companies</i>	20
2.2 Bureaucratic Interests	21
<i>2.2.1 Domestic Energy Security</i>	22
<i>2.2.2 Environmental Considerations</i>	24

2.2.3 <i>Coal as Electricity Supply</i>	26
2.3 Debate on Moratorium Coal Exports	30
CHAPTER 3	33
3.1 Organizational Procedure	33
3.2 Moratorium as a Policy Tool	37
3.3 Moratorium Coal Export Decision-Making	38
CHAPTER 4	43
4.1 Conclusion	43
4.2 Recommendation	46
BIBLIOGRAPHY	47

LIST OF TABLES

Table 1. Actor and Their Roles in Moratorium Coal Export.....	21
Table 2. Comparing Gas Emissions Conditions Before and After Indonesia's Coal Export Moratorium (January 2022)	26
Table 3. Monthly Coal Production and Exports in Indonesia (2021-2023).....	28
Table 4. The Bureaucratic Politics Factors and Implications	29
Table 5 Moratoriums as a Policy Tool.....	37
Table 6 Bureaucratic Politics And The Implementation.....	44

LIST OF DIAGRAM

Diagram 1. Energy mix for power generation in Indonesia in 2022	22
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LIST OF FIGURE

Figure 1. Indonesian Coal Stockpiles (2011-2021)	27
Figure 2 Stages of Moratorium Decision-making Process	40

LIST OF ABBREVIATIONS

APBI	: Indonesian Coal Mining Association
BUP	: Coal Mining Business Entities
DMO	: Domestic Market Obligation
EMR	: Energy and Mineral Resources
FSA	: Financial Services Authority
GDP	: Gross Domestic Product
IEA	: International Energy Agency
IESR	: Institute for Essential Services Reform
IPP	: Independent Power Producer
IUPK	: Continuation of Contract/Agreement Operations
KLHK	: Ministry of Environment and Forestry
PKP2B	: Coal Mining Concession Work Agreement
PLN	: State Electricity Company
PLTU	: Electric steam power plant
WALHI	: Indonesian Forum for the Environment

ABSTRACT

This undergraduate thesis proposal delves into the multifaceted topic of "Decision-Making Policy on Indonesia's Coal Export Moratorium In 2022" in the context of the 2022 Indonesian coal export moratorium. The central issue explored is the relationship between Indonesia's coal export decision-making policy with particular emphasis on bureaucratic politics on the moratorium imposed in 2022. The theoretical framework in this research is bureaucratic politics models. There are three indicators namely: actor, bureaucratic interest, and organizational procedure. The provisional argument is that Indonesia's coal moratorium exports were enacted to secure domestic supply. The findings of this study will illuminate the extent of these reasons for Indonesia's moratorium on coal exports in that period. Additionally, it will analyze the potential influencing the strategies of both Indonesian and international coal stakeholders.

Keywords: Indonesia, coal exports, decision-making policy, moratorium, bureaucratic politics, global coal market

CHAPTER 1

INTRODUCTION

1.1 Background

Coal has played a crucial role in Indonesia's energy history. Coal is an important energy commodity for Indonesia. In 2022, Indonesia is the third largest coal producer in the world, with production reaching 615 million tons. Coal is used for a variety of purposes, including power generation, industry, and transportation. At the beginning of 2022, the Indonesian government announced a moratorium on coal exports for one month, from January 1 to January 31, 2022 (Utomo 2021).

Indonesia as the world's largest coal exporter, is responsible for nearly 40% of global seaborne coal trade (IEA 2023). Indonesian coal miners were caught off guard on the last day of 2021 when the government announced a ban on coal exports. The policy, outlined in Letter Number B-1605/MB.05/DJB.B/2021, was issued by the Directorate General of Mineral and Coal of the Ministry of Energy and Mineral Resources. It aimed to ensure sufficient domestic coal supplies for electricity generation (Adisuryo 2022).

Data on the circumstances leading up to the moratorium. Domestic coal reserves, despite Indonesia's vast resources, had dwindled to alarming levels, the fuel security of the state-owned electricity company PLN (PLN 2022). PLN, reliant on coal for over 60% of its electricity generation, faced coal shortages, with stockpiles falling below critical levels in December 2021. This situation was by the DMO (Domestic Market Obligation) policy mandating 25% of coal production for

domestic use fueled speculation that the government's hand was forced by immediate domestic energy needs (Karyza 2022).

However, the timing and suddenness of the ban suggest a more complex of factors at play. The international coal market, facing record-high prices due to supply chain disruptions and the Ukraine war presented a tempting opportunity for miners to prioritize export contracts over domestic obligations. This potential for miners, in contrast to the struggles of PLN and Indonesian consumers grappling with rising electricity costs, hinted at a potential conflict of interests within the Indonesian energy sector (Petromindo 2022).

Indonesia, which is grappling with the consequences of its dependence on coal, including air pollution and environmental degradation, faces increasing pressure to realize a cleaner energy future. This moratorium, although temporary, can be interpreted as an initial step towards diversifying Indonesia's energy mix and aligning it with established climate goals (IESR 2023).

The reason for the moratorium is to ensure the availability of coal for domestic electricity generation needs. This coal export moratorium policy has received mixed responses from various parties. On the one hand, this moratorium is seen as the right step to guarantee the availability of electricity in Indonesia. However, on the other hand, this moratorium is also considered to be detrimental to coal companies and other countries that are consumers of Indonesian (Utomo and Yusgiantoro 2021).

As the global coal market becomes more competitive, Indonesia's share of the market is expected to grow. Due to the high value of coal export, coal is a strategic

export commodity and key priority remains a key fuel for power generation in countries that possess abundant indigenous coal resources (Admi, Saleh, and Fitrianto 2022).

Indonesia's state income is supported by production, exports, and the mining materials industry, which contribute to GDP. GDP per capita is an average component to measure personal wealth within a country's territorial boundaries. The higher the GDP per capita of the destination country, the higher the demand for exports and the more competitive the domestic exports in the global market. That is why the coal sector has become important and a priority in the global market, so the policies implemented have shaken importing countries. The coal industry has subsequently developed mainly in Sumatra and Kalimantan, where the large Cenozoic sedimentary basins include coal deposits with thick seams amenable to low-cost mining (Friederich and van Leeuwen 2017).

Indonesia is the largest economy in Southeast Asia. It is also the world's fourth-most populous country, seventh-largest economy, twelfth-largest energy consumer, and the largest coal exporter. Coal has been the energy source with the fastest-growing consumption and production in the world since 2000. Because Indonesia has been the largest exporter of steam coal in the world for many years (IEA 2022).

This route of supply should also be considered, coal is projected to be the fastest-growing energy source worldwide by 2025. However, it recognizes that Indonesian coal has been a relatively rare import to European countries overcoming the higher demand besides the United States from many Asian economies e.g.

China, Indonesia, and VietNam. In its Indonesian coal component, “More than 500 deltaic sediments from 14 basins in Western Indonesia were subjected to detailed geochemical, petrographic and palynological analysis.”(Davis, Noon, and Harrington 2007).

Throughout the year 2021, economic recovery prompted surges in energy demand and increases in coal consumption. The prices on the international market/global trade depend on the largest exporters as an important role and coal users. Several dynamic policies in Indonesia as an exporter country arise for coal with the ongoing global trade transition. Investments into new fossil fuel supply, and in particular coal, are increasingly considered to be at risk of becoming stranded assets (Auger, Trüby, Balcombe 2021).

An analysis of Indonesia's coal policy on moratorium coal in 2022 facing the immediate threat of widespread power outages due to falling coal stockpiles, prioritized domestic needs over export commitments. This aligns with bureaucratic self-preservation instincts, as ensuring energy security is a core responsibility and potential blackouts could lead to public backlash and political instability with the DMO policy's consequences.

Domestic Market Obligation (DMO) is a policy by the Indonesian government requiring coal mining companies to allocate a specific portion of their production to meet domestic demand. The policy aims to stabilize domestic coal prices, ensure adequate supply for power generation and other critical industries, and reduce dependence on imported energy. The specific DMO percentage is

stipulated in individual contracts between mining companies and the government by Government Regulation No. 34/2009 (Global Trade Alert 2009).

Even though this policy aims to secure domestic coal supplies, the policy design has proven capable of causing an unexpected surge in demand. This reveals internal bureaucratic struggles between factions supporting flexible export restrictions and DMO regulations.

1.2 Research Question

How was the decision-making process of the Indonesian government on moratorium coal export can handle domestic coal needs?

1.3 Research Objectives

The objectives of this research are:

1. This study aims to determine why the moratorium on coal export happened.
2. The decision-making process on moratorium coal export. And,
3. The dynamics of domestic political and economic situation towards the decision-making process.

1.4 Research Scope

This study begins by dissecting the factors driving the moratorium in Indonesia. The author examines challenges disrupting mining, surging domestic demand exceeding DMO reserves, and the widespread power outages that forced the government's hand. The author delves into bureaucratic politics, analyzing the conflicting priorities of the Ministry of Energy and Mineral Resources and PLN.

The decision-making process was held in 2021 before the moratorium announced by the government. Assessing the moratorium decision-making process on Indonesia's coal export also explores the potential economic and environmental benefits. The analysis of the government's response and plans for a moratorium landscape, focusing on policy reforms, diversification of energy sources, and ensuring transparency and accountability in dealing with this critical resource. The author explores the challenges and opportunities Indonesia faces as it navigates between ensuring energy security, minimizing environmental damage, and fulfilling its role in the coal electricity supply.

The moratorium policy implementation was held from 1-31 January 2022. Throughout this journey, the author engages with diverse sources scholarly analyses, news reports, government documents, and expert opinions to gain a comprehensive of the coal export moratorium and its implications.

By domestic pressures, it aims to offer insightful analysis of this decision-making process on moratorium coal export, with its lessons extending far beyond the nation's interest.

1.5 Literature Review

By contextualizing the moratorium within Indonesia's historical relationship with coal, the author gains insights from the Ministry of Energy and Mineral Resources journal entitled *Kebijakan Mineral dan Batu Bara Nasional in 2022* offers valuable insights into report and data related to minerals in Indonesia. Ministry of Energy and Mineral Resources concluded that there are factors that caused a moratorium on coal export. The journal explained that with the mineral and coal potential it has and its policies comprehensive, effective, and consistent in

the medium and long term then Indonesia has the opportunity to increase its superiority comparative and competitive in economic and geopolitical aspects regionally and globally (Kepmen ESDM 2022).

For the analysis of the security energy and environmental concerns to understand the immediate context leading to the moratorium, the author used the Institute for Essential Services Reform (IESR) journal. These studies shed light on Indonesia's rise as a coal exporter, the surge in domestic demand, and the environmental consequences of this reliance. The journal discusses the possibilities of energy transition in Indonesia, particularly the transition from coal-fired power plants while also considering the implications for the coal sector (IESR 2022).

Meanwhile, the author uses a journal entitled Ban on Coal Exports in Early 2022 by Dendi Adisuryo to analyze the decision-making policy on moratorium coal export in Indonesia. Regarding the Coal Supply Crisis of PT PLN Persero and Independent Power Producers (Letter from PLN). The Letter from PLN informs that there has been a coal supply crisis and very low coal availability at the Steam Power Plants (Pembangkit Listrik Tenaga Uap, "PLTU") of the PLN Group and Independent Power Producers (Adisuryo 2022).

The literature review is for a comprehensive analysis of the decision-making process on Indonesia's coal export moratorium in domestic coal needs. By engaging with diverse scholarly and journalistic sources, the author gains a deeper understanding of the historical context, factors, and potential future for Indonesia's complex relationship with this critical resource. This critical foundation ensures an

insightful exploration of the moratorium and its ongoing impact on Indonesia and the global landscape.

1.6 Research Framework

In analyzing why the policies of coal moratorium export happen, the authors chose to research using the Decision Making Policy written by Graham T. Allison. Decision-Making Policy is a perspective that explores the tension between rational decision-making and the complexities of political and bureaucratic factors that shape foreign policy choices. Allison argued that the fields of political science and international relations had been heavily influenced by rational expectation theories borrowed from economics. In this perspective, the analysis of state actions was based on the assumption that nations thoroughly evaluate all their choices and make rational decisions to maximize their self-interest. 3 models represent the Decision Making Policy, namely the rational **Actor Model, Organizational Process, and Bureaucratic Politics.**

The Rational Actor Model is a state's conduct mirroring that of a highly rational person who is typically presumed to possess an awareness of the situation and endeavors to optimize the values or objectives pursued in a particular circumstance. Rational Actor Models (RAMs) are theoretical framework models used in social sciences to explain and predict individual decision-making behavior. They assume that individuals act rationally, meaning they strive to maximize their benefits and achieve their desired outcomes (Allison, 1971).

An organizational process involves a decision maker facing limitations in time and information, and their goal isn't to find the best solution but to engage in

behavior. This means the organizational process aims for a solution that meets a minimum goal and minimizes the risk of failure. An organization is a complex system, made up of people, resources, and activities. To achieve its goals, it needs to coordinate these elements through organizational processes. These are a series of interconnected tasks and activities that transform inputs into outputs and deliver value to stakeholders (Allison, 1971).

The bureaucratic politics model is a theoretical framework used to analyze and understand the behavior and decision-making of bureaucrats and government agencies in political science and public administration to explain how policies are made. It emphasizes the internal decision and power dynamics between different actors within an organization. Furthermore, in a "Bureaucratic Politics" model, state actors pursue distinct objectives, which can sometimes clash. In this scenario, different individuals, each representing diverse organizational interests, work together to reach a negotiated group decision that reflects the state's policy (Allison, 1971).

In this analysis decision-making policy on coal moratorium export in the context of the bureaucratic politics model, Graham T. Allison. The author uses **bureaucratic politics models** because a moratorium is decided without a process of open public discussion, reflecting the typical characteristics of Indonesian bureaucracy. The model acknowledges that different bureaucracies within the government have varying levels of power and influence, which can shape the decision-making process. This is relevant as different ministries might have varying of influences depending on their expertise, political backing, and resource control.

Bureaucratic politics acknowledges the role of established procedures and routines within government agencies. This can be relevant as existing regulations, environmental impact assessments, or economic feasibility studies might have influenced the decision-making process.

There are 3 indicators in bureaucratic politics models in moratorium policy, namely: **Actor, Bureaucratic Interests, and Organizational Procedures**. In his book, *Essence of Decision*, Graham T. Allison defines an **actor** as an individual or group with goals and the ability to act independently (Allison, 1971).

Bureaucratic Interests in the context of Allison's model, refer to the goals, priorities, and motivations that drive the behavior of individual actors and entire bureaucracies within a government. These interests can be diverse, ranging from preserving or expanding their power and influence within the government structure, protecting their organizational resources and budgets, advancing specific policy agendas aligned with their expertise or ideology, and responding to external pressures from constituents or interest groups (Allison, 1971).

Organizational Procedures refer to a structured series of steps or stages undertaken by actors or parties involved in discussions to reach an agreement. It's a strategic interaction aiming to reconcile differences and achieve mutually acceptable outcomes through effective communication, understanding, and compromise (Allison, 1971).

The three indicators are used to analyze decision-making processes on moratorium coal export in governments, particularly how various actors and organizations within a government can have conflicting interests and influence

policy outcomes. To explain why a particular formal governmental decision was made, or why one pattern of governmental behavior emerged, it is necessary to identify the games and players, to display the coalitions, bargains, and compromises, and to convey some feeling for the confusion (Allison, 1971).

The concept of decision-making bureaucratic politics models above will be used to answer the problem formulation raised by the author, namely looking at how the decision-making process of the Indonesian government on moratorium coal export can handle domestic coal needs.

1.7 Provisional Argument

Based on bureaucratic political models on analysis of the decision-making process on Indonesia's coal export moratorium in 2022, the author's argument on the first indicator namely the **actor**, Indonesia's coal export moratorium decision wasn't a solitary decree, but diverse actors wielding varying of influence.

President Joko Widodo navigated the complex of interests and executive authority to ultimately greenlight the policy with the Ministry of Energy and Mineral Resources as Indonesia's energy sector. The Ministry of Trade plays a role in formulating and implementing Indonesia's trade policies, including regulations related to resource exports like coal.

PLN, the state-owned electric company. Its dire fuel shortages threatened power outages, creating a compelling argument for prioritizing domestic coal (Karyza 2022).

Their concerns with coal mining companies while potentially facing revenue dips, ultimately saw the policy as a chance to stabilize domestic prices and secure long-term market share (Fitriani and Syafrida, 2022).

Environmental groups like Wahana Lingkungan Hidup Indonesia (WALHI) raised concerns about the moratorium's impact on climate goals and air quality, urging stricter environmental safeguards. International trade partners and coal-powered nations expressed anxieties about supply disruptions and market volatility (KLHK 2022).

By understanding the roles and interplay of these diverse actors, the author gains power dynamics and steps that shaped this policy decision-making process. This threatened power outages and potential social unrest, raising concerns about national stability (Andresen 2023). By prioritizing domestic coal supply, the moratorium aimed to mitigate these risks, ensuring energy and minimizing dependency on international markets. Beyond immediate risks, the moratorium presented the Ministry of Energy and Mineral Resources with an opportunity to its bureaucratic power.

Second, **bureaucratic interests** in moratorium can be seen as a strategy by the government to protect national interests and meet domestic energy needs. This policy gave rise to a debate that is still ongoing today. Coal companies criticized this policy as hurting them economically. Coal-importing countries criticized this policy because it caused coal prices abroad to increase. "The coal export moratorium caused global coal prices to increase by up to 50%. This is detrimental to coal importing countries, especially developing countries" (IESR 2022).

Environmental groups criticized this policy because they did not consider the environmental impact of coal mining. However, there is some possibility environmental groups and activists may have lobbied the government to implement a moratorium to reduce the environmental impact of coal use (World Energy Transitions 2022).

Therefore, acknowledging the influence of bureaucratic interests, both overall and within individual institutions, provides a better understanding of the coal export moratorium. While these interests may not always align with public welfare or environmental goals, they remain a crucial factor in policy decisions. Examining how bureaucratic interests played a role in maintaining security.

Third, **Organizational Procedures** in the decision-making process on Indonesia's coal export handle domestic coal needs. The prospect of domestic energy shortages, as witnessed by PLN's dependence on imports, with concerns about national security and social stability. Furthermore, the DMO policy necessitated increased regulatory oversight and enforcement, expanding the Ministry of Trade's bureaucratic apparatus and potentially granting it access to additional resources (Fitriani and Syafrida, 2022).

The process of making the coal export moratorium policy in Indonesia in 2022 is fast and precise. This policy succeeded in ensuring the availability of coal for domestic electricity generation needs and preventing national power outages.

1.8 Research Method

1.8.1 Type of the Research

The author will conduct an in-depth qualitative research methodology to find research data to gather rich and detailed insights into literature-based research that prioritizes analysis and perspectives on the topic.

1.8.2 Subject and Object of the Research

In this study, the research subject is the Indonesian government and the research object is the coal export moratorium in 2022 highlighting the dynamic of the decision-making process linked to politics and economy that arise.

1.8.3 Method of Data Collection

In this study, secondary data collection methods will be gather relevant information on the topic of interest. In this case, the databases, reports, and publications will be utilized to obtain data on the variables of interest that can help complete this research. These sources may include government databases, academic journals, industry reports, and other relevant publications. By using secondary data, this study aims to give information and resources while still obtaining valuable insights into the research topic.

1.8.4 Process of the Research

The research decision-making process on Indonesia's coal export moratorium in 2022 thorough literature review will be conducted to understand the existing knowledge and research gaps in this topic. This would involve studying previous

studies, reports, and articles related to Indonesia's moratorium on coal exports. Once the research design is finalized, data collection will begin. Additionally, relevant documents such as policy papers, trade agreements, and market reports will be analyzed to provide a comprehensive understanding of the topic.

After data collection, the gathered information would be analyzed using qualitative data analysis techniques. This would categorize the data to identify patterns, themes, and relationships. The research report presents the findings, analysis, and conclusions of the study.

This report would contribute to the existing body of knowledge on Indonesia's moratorium on coal exports and provide insights into bureaucratic politics in Indonesia.

1.9 Thesis Outline

In Chapter I Introduction background, objectives, significance, scope of the research, literature review, theoretical basis, provisional arguments, and methods used by the author can support this research and become the opening information about the research dynamics of government policies regarding moratorium coal exports in Indonesia.

In Chapter II will discuss Indonesia's coal export in the role of the actor and bureaucratic interest of Indonesia's policy on coal export.

In Chapter III, the author will analyze the process of the Indonesian government in making policies on coal exports.

Chapter IV will conclude and close this research.

CHAPTER 2

Navigating Indonesia's Moratorium Coal Export

Coal, though a debated fuel on the domestic and global stage, remains of Indonesia's energy security and a significant contributor to its economic sectors. Understanding its importance requires a closer look at the numbers and the implications related to Indonesia's coal export moratorium.

Applying Graham T. Allison's framework of bureaucratic politics by examining the competing objectives of actors within the government, their strategies, and the influence of external aspects (Allison, 1971).

2.1 Actor

The decision-making process on Indonesia's coal export moratorium in 2022 of actors and interests shaping energy policy. This subchapter delves into the roles in the decision-making process in this policy. The actor is an individual or group with goals and the ability to act independently (Allison, 1971).

2.1.1 President Joko Widodo

Ultimately, the decision-making process to enact the moratorium rested with President Joko Widodo. As the head of state, Joko Widodo navigated the complex interplay of energy security, economic concerns, and international relations. While acknowledging the potential economic of the ban, Presiden Joko Widodo prioritized ensuring stable electricity for citizens, a pillar of his administration's development agenda (Kementerian Luar Negeri Republik Indonesia 2023). This decision highlighted his role as the final decision-maker, balancing diverse interests and prioritizing public welfare amidst the coal crisis.

Facing the threat of widespread blackouts due to low coal stockpiles, Joko Widodo prioritized ensuring stable electricity for Indonesian citizens. This decision aligned with his administration's focus on public welfare and development, recognizing that reliable energy access is crucial for economic growth and social well-being.

Examining his role requires understanding the balance between immediate energy security, economic considerations, and public expectations.

2.1.2 Ministry of Energy and Mineral Resources (ESDM)

Ministry of Energy and Mineral Resources under the leadership of Minister Arifin Tasrif, occupied the central stage in the export ban. Their responsibilities encompass managing Indonesia's vast mineral resources, including coal while ensuring national energy security (Ministry of Energy and Mineral Resources). Faced with blackouts due to low coal stockpiles, the ESDM prioritized domestic needs over export commitments, reflecting their obligation to secure fuel supplies for PLN, the state-owned electricity provider, and to maintain energy stability for the nation (Djakarta Mining Club 2023).

The Ministry of Energy and Mineral Resources (ESDM) Directorate General of Minerals played a pivotal role in navigating the coal during Indonesia's 2022 export moratorium. While its decision to prioritize domestic needs over export commitments.

2.1.3 Ministry of Trade

The Ministry of Trade plays a role in formulating and implementing Indonesia's trade policies, including regulations related to resource exports like coal. While the DMO policy itself was initiated by the Ministry of Trade likely had

some involvement in its finalization and subsequent implementation. This could involve consultations on potential impacts on international trade agreements, export licensing procedures, and coordination with foreign trade partners (Pwc 2019).

The Ministry of Trade controls the issuance of export licenses for various commodities, including coal. During the moratorium, the Ministry played a crucial role in enforcing the ban and monitoring domestic and international compliance. This might involve verifying compliance documents, coordinating with customs authorities, and taking action against any potential violations (Permendag 2019).

2.1.4 Commission VI DPR RI

Commission VI DPR RI has responsibility for trade, investment, cooperatives and micro, small and medium enterprises, BUMN, national standardization, and business competition agencies (Resmini, 2022). In this case, Committee VI considers that the ban on coal exports is a real effort by the Government to maintain the stability of the community's electricity supply. This policy reflects the Government's prioritization of public interests over other interests, and the Government's protection of national interests by Article 33 of the 1945 Constitution. On the one hand, coal exports have the potential to bring significant profits, but the government's attitude is positive. This means putting aside profits for the sake of the common good (Bachtiar, 2022).

Furthermore, Members of Commission VI DPR RI urged consideration of the use of coal handling environmental impacts from mining and making contributions to community economic empowerment and regional and economic development. Members of Commission VI DPR RI also urged that a study be

carried out regarding the emissions program 0% which was previously in 2050 will become 2060 because many countries such as England, Japan, and China are returning to using coal as national energy as well the interests of the transition period for the use of renewable energy and national energy security (Linggih, 2022).

2.1.5 PLN

PLN, the state-owned electricity provider in Indonesia, played a pivotal role in advocating for and shaping the 2022 coal export moratorium (Ministry of Energy and Mineral Resources 2022). The potential for economic and social chaos fueled by blackouts pushed PLN to advocate for a temporary halt to coal exports, a measure they saw for national energy stability.

PLN, helmed by President Director Darmawan Prasodjo, played a crucial role in pushing for the moratorium. Facing depleting coal reserves at its power plants, PLN risked widespread outages, potentially impacting millions of Indonesians. This pressure aligns with the government's commitment to affordable electricity, placing PLN in a precarious position, and advocating for a temporary halt to exports to safeguard domestic supplies (IBP 2023).

This crisis, fueled by various factors like rising domestic demand and the DMO policy's shortcomings, pushed PLN to prioritize securing coal supplies for electricity generation. Navigating this crisis forced PLN to balance its immediate need for fuel security with the potential financial losses of coal producers due to exports.

However, PLN understood the need for long-term solutions beyond the ban. They actively participated in discussions on policy changes like improving DMO

regulations and promoting renewable energy sources, recognizing the importance of diversifying Indonesia's energy mix to avoid future crises.

2.1.6 Coal Mining Companies

Facing the immediate financial impact of the ban, these companies lobbied while also seeking long-term policy reforms to stabilize the sector. The export ban dealt a substantial blow to coal mining companies, leading to revenue losses, contract breaches, and potential layoffs (OJK 2023).

Mining giants like Adaro Energy and Bumi Resources saw their stocks plummet as the ban choked off vital export pipelines. Facing these challenges, industry associations like the Indonesian Coal Mining Association (ICMA) launched intensive lobbying efforts, urging the government to swiftly lift the ban or introduce compensation schemes to mitigate the financial pain (CNBC 2021).

Beyond the immediate financial losses, the moratorium presented an opportunity for coal mining companies to push for long-term policy reforms. Recognizing the unsustainable nature of relying solely on exports, they called for improvements in the Domestic Market Obligation (DMO) regulations to ensure predictable domestic coal supplies and minimize future disruptions (Togi and Mayasari 2023).

Additionally, companies like PT Kaltim Prima Coal voiced their support for investments in cleaner coal technologies and diversification towards renewable energy sources to ensure the sector's long-term viability (KPC 2022).

Table 1. Actor and Their Roles in Moratorium Coal Export

No	Actor	Roles
1.	President Joko Widodo (Joko Widodo)	His administration's focus is on public welfare and development, recognizing that reliable energy access is crucial for economic growth and social well-being.
2.	Ministry of Energy and Mineral Resources (ESDM)	Their responsibilities encompass managing Indonesia's vast mineral resources, including coal while ensuring national energy security to avoid future crises.
3.	Ministry of Trade	Enforcing the ban and monitoring domestic and international compliance.
4.	Commission VI DPR RI	Commission VI DPR RI has responsibility for trade, investment, cooperatives and micro, small and medium enterprises, BUMN, national standardization, and business competition agencies (Resmini, 2022).
5.	PLN	PLN prioritized securing supplies for electricity generation over export commitments and improving DMO regulations.
6.	Coal Mining Companies	Push for long-term policy reforms and minimize future disruptions.

2.2 Bureaucratic Interests

Bureaucratic Interests in the context of Allison's model, refer to the goals, priorities, and motivations that drive the behavior of individual actors and entire bureaucracies within a government. These interests can be diverse, ranging from preserving or expanding their power and influence within the government structure, protecting their organizational resources and budgets, advancing specific policy agendas aligned with their expertise or ideology, and responding to external pressures from constituents or interest groups (Allison, 1971).

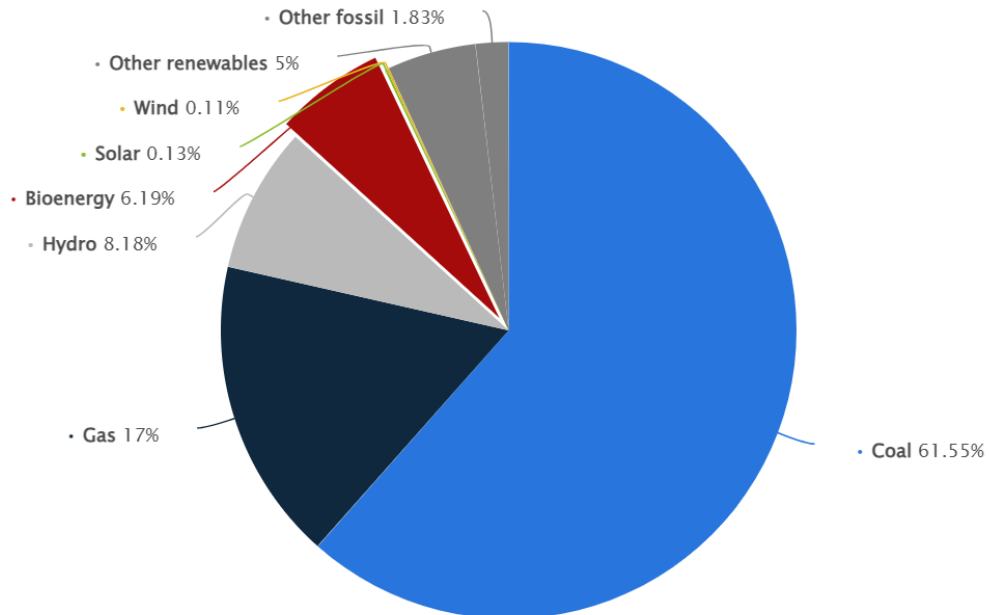
The Indonesian government's decision-making process in the coal export moratorium in 2022 is not solely driven by urgent energy needs and industry lobbying. Beneath the surface, complex bureaucratic interests and power dynamics play an important role in determining the direction of these policies.

2.2.1 Domestic energy security

Indonesia boasts the world's fifth-largest coal reserves, estimated at 114 billion tons (Indonesia Investments 2023). This translates to immense economic potential, as coal mining contributes directly to 7% of Indonesia's GDP and employs over 700,000 people (Afkarina, Wardana, and Damayanti 2019). The industry fosters regional development, particularly in resource-rich islands like Sumatra and Kalimantan, where mining activities drive local economies and infrastructure advancement (Rustiadi 2023).

More importantly, coal accounts for roughly 60% of Indonesia's electricity generation (Kementerian ESDM 2023).

Diagram 1. Energy mix for power generation in Indonesia in 2022



Source: (Statista 2022).

Based on data from 2022, the total electricity produced from coal in Indonesia accounted for around 61.55 percent of the nation's electricity mix.

Coal plays a vital role in Indonesia's electricity sector and the Indonesian government perceives it as the cheapest energy source for electricity compared to other fossil fuels and most renewables (Statista 2022).

This is not surprising, considering that Indonesia is the third-largest coal producer in the world. Gas is in second place with a share of 17%, followed by hydro with a share of 8.18%. Bioenergy, solar, and wind each have a share of 6.19%, 0.13%, and 0.11%, respectively.

This dependence fuels affordable power for millions of Indonesians, powering homes, industries, and public infrastructure. In 2021, coal-fired power plants generated nearly 210 terawatt-hours of electricity.

Representing a critical factor in the nation's economic growth and social stability (World Energy Transitions Outlook 2022). This dependence creates a vulnerability to any disruptions in coal supply, potentially leading to power outages and hindering economic activity.

Coal as an electricity raw material has caused a moratorium because of concerns about domestic energy security, here are the reasons:

1. When domestic coal stockpiles fall critically low, the government may prioritize a secure fuel supply for Indonesian power plants and impose temporary export bans to avoid potential blackouts. And,
2. Global coal price fluctuations can incentivize exporters to prioritize foreign markets over domestic needs, prompting the government to restrict exports to ensure sufficient fuel at affordable prices for Indonesian consumers.

2.2.2 *Environmental Considerations*

Indonesia has faced increasing domestic and international pressure to address its greenhouse gas emissions, heavily driven by coal consumption. The moratorium could be seen as a temporary measure to curb these emissions and align with the country's stated climate goals (KLHK 2021).

Data supporting environmental concerns:

1. Indonesia is the world's fifth-largest coal producer and exporter, with coal accounting for over 50% of its electricity generation. This reliance translates into significant greenhouse gas emissions, making Indonesia the world's fifth-largest emitter (IEA 2022).
2. Coal-fired power plants are major contributors to air pollution in Indonesia, leading to respiratory illnesses and environmental degradation. The moratorium could be seen as a temporary measure to improve air quality and public health (Susanto 2020).
3. Indonesia is a signatory to the Paris Agreement and has committed to reducing its greenhouse gas emissions by 29% by 2030. The moratorium could be seen as an initial step towards fulfilling these commitments (KLHK 2021).

Coal combustion contributes significantly to Indonesia's carbon footprint, raising concerns about environmental sustainability and aligning with the growing global pressure to transition towards cleaner energy sources (Sujai 2023). Balancing environmental responsibility remains a central challenge for Indonesia's energy future.

Air pollution from coal mining and burning also poses severe health risks for communities living near mining sites and urban centers. Recognizing these environmental costs is crucial for a responsible future.

The challenge in navigating a sustainable energy future that balances with the environmental imperative to transition to cleaner sources. Indonesia has to achieve carbon neutrality by 2060, requiring a significant shift towards renewables like solar, wind, and geothermal. This transition presents both challenges and opportunities. Investments in renewable infrastructure, technological advancements, and workforce training are crucial to ensure a smooth and equitable transition.

There are the Environmental benefits of a moratorium on coal export :

1. Reduced air pollution, Coal-fired power plants are a major source of air pollution, including harmful emissions like sulfur dioxide, nitrogen oxides, and particulate matter. Indonesia's coal export ban could lead to a reduction in these emissions, improving air quality and public health (Sinaga 2023). And,
2. Protected ecosystems, coal mining, and transportation can have a significant impact on ecosystems including deforestation, water pollution, and soil degradation. The moratorium could help to protect sensitive ecosystems and biodiversity in Indonesia (Gunawan 2022).

Table 2. Comparing Gas Emissions Conditions Before and After Indonesia's Coal Export Moratorium (January 2022)

Context	Pre-Moratorium	Post-Moratorium
Emissions	Indonesia was one of the world's largest coal exporters, contributing significantly to global greenhouse gas emissions. Coal-fired power plants were a major source of air pollution, releasing sulfur dioxide, nitrogen oxides, and particulate matter (Sanchez and Luan 2018).	While coal exports halted, domestic coal usage for power generation might have increased to compensate for the export shortfall. This could potentially offset some of the initial emission reductions (IEA/OECD 2022).
Energy	Indonesia's reliance on coal for electricity generation meant lower utilization of cleaner alternatives like solar and wind. This dependence on fossil fuels further amplified air pollution levels (IESR 2019).	The moratorium led to a decrease in coal production and consumption, potentially resulting in a decline in air pollutant emissions. Studies have shown a temporary reduction in PM concentrations in some areas (Firdaus 2023).

2.2.3 Coal as Electricity Supply

Coal is a finite resource, and its continued use raises concerns about long-term sustainability and potential future energy shortages. Triggered by a confluence of factors, Indonesia's 2022 coal export moratorium emerged as a response to a domestic crisis. Disrupted mining and transportation, causing rapid depletion of coal stockpiles (Figure 1).

Figure 1. Indonesian Coal Stockpiles (2011-2021)

Type of Energy	2011	2012	2013	2014	2015	2016 ¹⁾	2017 ¹⁾	2018 ¹⁾	2019 ¹⁾	2020 ¹⁾	2021
Oil	46.77	47.43	48.13	46.77	42.00	44.84	41.43	38.72	34.97	32.75	33.40
Coal	27.74	27.77	24.79	25.90	30.05	27.80	30.52	32.99	37.31	38.52	37.62
Gas	21.73	20.88	22.12	21.97	23.05	21.09	21.39	19.68	18.52	17.46	16.82
New Renewable Energy	3.77	3.92	4.96	5.35	4.90	6.27	6.66	8.60	9.19	11.27	12.16
Hydropower	2.32	2.35	3.15	3.07	2.85	3.47	3.56	2.74	2.52	3.14	3.09
Geothermal	1.26	1.22	1.25	1.31	1.35	1.28	1.52	1.78	1.68	2.01	1.99
Solar	n.a	n.a	n.a	n.a	n.a	n.a	n.a	0.02	0.03	0.05	0.05
Wind	n.a	n.a	n.a	n.a	n.a	n.a	n.a	0.03	0.08	0.08	0.07
Other Renewables	n.a	n.a	n.a	n.a	n.a	n.a	n.a	2.08	1.92	2.11	2.52
Public Street Lighting	n.a	n.a	n.a	n.a	n.a	n.a	n.a	0.00	0.00	0.00	0.00
Biofuel	0.19	0.35	0.56	0.97	0.69	1.51	1.57	1.93	2.95	3.86	4.41
Biogas	n.a	n.a	n.a	n.a	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Note : Oil including crude oil, petroleum product and LPG
 Coal including coal and briquette
 Gas including natural gas and LNG
 Solar PP including solar photovoltaic (PV), Solar-powered street lighting and solar-powered energy saving lamp
 Other renewable including biomass PP, biogas PP, waste PP, and hybrid PP
 Biofuel : liquid biofuel (biodiesel)
 1) Revised data

Source: (Handbook of Energy and Economic Statistics of Indonesia 2021).

While geopolitical factors and global energy markets played a role, the decision in Indonesia's critical coal stockpiles dwindled rapidly in 2021, which is why at the beginning of 2022 there was a policy for a coal moratorium.

It was averted immediate blackouts and protected public sentiment, the move exposed the complex interplay between policy, resource management, and geopolitical considerations. The DMO policy's unintended consequences, the pressure to balance economic dependence on coal with environmental concerns, and the potential influence of global tensions.

This coal demands greater policy coherence, diversifying energy sources to against future disruptions, and implementing transparent practices to ensure accountability for both the benefits and burdens of Indonesia's relationship with coal.

Table 3. Monthly Coal Production and Exports in Indonesia (2021-2023)

Month	Production (Million Tonnes)	Exports (Million Tonnes)
January 2021	46.84	29.36
February 2021	45.28	26.76
December 2021	46.53	24.01
January 2022	44.53	10.63
February 2022	48.83	27.96
December 22	51.22	30.79
January 2023	62.32	19.87
February 2023	57.37	34.26
December 2023	46.84	49.49

Source: (Minerba One Data Indonesia 2024).

Interpretation:

1. The data reveals a significant disruption in coal exports during the moratorium, with a drop of over 50% in January 2022.
2. The subsequent recovery in exports suggests the policy's effectiveness in prioritizing domestic coal supply.
3. However, production levels remained relatively stable throughout the period, indicating that the moratorium primarily impacted export volumes rather than overall production.
4. This data could be used to analyze the moratorium's impact on domestic energy security, mining company revenues, and international coal markets.

While Indonesia's coal production remained consistently high throughout 2021-2023, the 2022 export moratorium drastically cut exports in half during its implementation, revealing its effectiveness in prioritizing domestic fuel supply. This shift has implications for energy security, mining industry revenues, and international coal market dynamics.

Table 4. The Bureaucratic Politics Factors and Implications

Aspect	Implication
Domestic Energy Security	<ol style="list-style-type: none"> 1. When domestic coal stockpiles fall critically low, the government may prioritize a secure fuel supply for Indonesian power plants and impose temporary export bans to avoid potential blackouts. And, 2. Global coal price fluctuations exporters to prioritize foreign markets over domestic needs, and the government to restrict exports to ensure sufficient fuel at affordable prices for Indonesian consumers.
Environmental Consideration	<ol style="list-style-type: none"> 1. Indonesia’s total energy sector CO2 emissions were 600 Mt in 2021, almost as much as from Korea’s energy sector. Indonesia’s total energy sector CO2 emissions more than doubled between 2000 and 2021, of which coal is responsible for over 70% of the increase (IEA 2022). 2. Indonesia submitted its updated Nationally Determined Contribution and first Long-Term Low Emissions Strategy to the UNFCCC in 2021. The strategy states that Indonesia has the opportunity to “progress towards net zero emissions in 2060 or sooner”. Achieving this ambitious target would require strong action across the whole energy sector (Indonesia LTS-LCCR 2021). 3. Indonesia is the world's fifth-largest coal producer and exporter, with coal accounting for over 50% of its electricity generation. This reliance translates into significant greenhouse gas emissions, making Indonesia the world's fifth-largest emitter (IEA 2022). 4. Coal-fired power plants are major contributors to air pollution in Indonesia, leading to respiratory illnesses and environmental degradation. The moratorium could be seen as a temporary measure to improve air quality and public health (Susanto 2020). 5. Indonesia is a signatory to the Paris Agreement and has committed to reducing its greenhouse gas emissions by 29% by 2030. The moratorium could be seen as an initial step towards fulfilling these commitments (KLHK 2021).

Coal as Electricity Supply	<ol style="list-style-type: none"> 1. From 2010 to 2050, electricity generation will increase by an average of 5.5% per year, which is about the same as the average economic growth. This may be the result of the electrification of end users where people prefer electricity to combustion energy systems, and also because of the development of the commercial sector where its energy consumption is mostly in the form of electricity (Indonesia LTS-LCCR 2021). 2. Coal is responsible for over 60% of the increase, with the share coming from coal-fired electricity generation. 3. The government of Indonesia's policy direction is to provide electricity at the lowest cost possible. The government's policy effort focuses on reducing the cost of PLN's electricity generation and increasing electricity access to the entire country. The government and PLN prioritize coal to meet these two needs (Arinaldo 2019).
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2.3 Debate on Moratorium Coal Exports

In a meeting held at Commission VI located in the DPR RI Commission VI hearing room, Nusantara Building 1, 1st floor, Jl. General Gatot Soebroto, Jakarta 10270 was attended by members of Commission VI and the Indonesian Coal Mining Association (APBI-ICMA) Coal moratorium policymaking begins with existing information that the coal supply crisis for both state-owned power plants and other private power plants is contrary to the fact that Indonesia is one of the largest coal producers (DPR RI Report Meeting, 2022).

This indicates whether there is a fault in the management of the national coal industry so that existing production is unable to meet domestic needs or, to be precise, there is a concern about supply for domestic needs, one of the causes of the critical national coal supply, of course, cannot be but because it is driven by an increase in stone prices. national coal, which is offset by an increase in coal demand

in the global market caused by various reasons. Including information about the rapid economic recovery of countries that are improving the conditions of the COVID-19 pandemic or some other information, because the need for coal is related to winter in several countries so supplies are needed to require primary energy for heating needs. This triggered national coal entrepreneurs to finally try as much as possible to divert supplies to the international market considering that the profits or price of the coal produced were getting bigger (Resmini, 2022).

Thus, matters related to the problem of unsustainable coal contracts between PLN and/or IPPs, as well as several obstacles imposed by suppliers also contribute to the critical condition of domestic coal supplies. This is why finally, Commission VI invited the relevant parties to resolve, one of which is the provision for coal producers to reserve a certain amount of production for domestic national consumption.

A statement from the coal business association conveyed the situation that regarding domestic coal supplies, one must of course look at the macro level of how Indonesia's national coal resources and reserves are a blessing from the powerful, this is data from the Ministry of Energy and Mineral Resources.

With the debate regarding the decision-making process on Indonesia's coal export moratorium in 2022, the Ministry of Energy and Mineral Resources, and APBI members as government partners with the DPR, will always provide input on behalf of the coal industry as a whole, even though their duties and responsibilities are only limited to members who join.

Responding to this policy, Commission VI (House of Representatives) as PLN's partner fully supports the government's policy to ban coal exports to provide

domestic energy. Member of Commission VI DPR RI, Andre Rosiade, stated that Commission VI knows exactly what PLN's reserves for domestic PLTUs are, not only because electricity goes out but also disrupts other industries that need coal energy (DPR RI, 2022).

In contrast, the Director of Samindo Resources, Gilbert Markus Nisahpih, saw that this regulation was too sudden and too hasty. This condition should not have occurred if the government had been able to project this condition. Beforehand Director of Samindo Resources, Gilbert Markus Nisahpih, said that the 25% DMO rule should be able to meet domestic coal needs, including PLN. It's just that assessment and supervision of its main realization is needed for mines that do not comply with this rule. Apart from that, the low domestic DMO prices which are far from international prices require a review (CNBC Indonesia, 2022).

Head of the East Kalimantan Energy and Mineral Resources Service, Christianus Benny. On Tuesday 4 January 2022, the results of the meeting or socialization by the Indonesian Minister of Trade were that there were 418 companies that as of October 2021 had not implemented any DMO for PLN at all, so their export permits would be temporarily frozen. "This was conveyed by the Minister of Trade to the Director General of Trade" (Guitarra, 2022).

The 25 percent DMO obligation is stipulated in the Minister of Energy and Mineral Resources Decree No. 139.K/2021 concerning domestic coal fulfillment. Apart from setting a DMO of 25 percent, a price benchmark of US\$70 per metric ton is also set. The ban on coal exports is caused by poor governance in fulfilling coal DMO regulations by mining companies. Only 85 companies fulfill the DMO of 100 percent, while 489 companies fulfill domestic supply below 15 percent. Only

85 companies complied, the remaining 418 were defaulters, and the 25% DMO would have been met if everything was correct, this is the majority who defaulted (Guitarra, 2022).

CHAPTER 3

Decision-Making Policy on Indonesia's Moratorium Coal Exports

Understanding Indonesia's 2022 coal export ban necessitates delving into the intricate realm of bureaucratic politics. This chapter illuminates the complex interplay pressures that shaped the decision-making process. Beyond a singular, top-down directive, the moratorium emerged from a dynamic power struggle within the Indonesian bureaucracy, influenced by shifting alliances and a delicate balancing act on domestic concerns drawing upon the framework of bureaucratic politics (Allison, 1971), the authors examine the motivations and power of key stakeholders within the government.

3.1 Organizational Procedure

Organizational Procedures refer to a structured series of steps or stages undertaken by actors or parties involved in discussions to reach an agreement. It's a strategic interaction aiming to reconcile differences and achieve mutually acceptable outcomes through effective communication, understanding, and compromise (Allison, 1971).

By examining the internal documents issued by key ministries. Circular Letter No. 77. K/MB.01/ME3.B/2022 from the Ministry of Energy and Mineral Resources (ESDM) stands as a pivotal document, outlining the justification for the ban based on critical coal stockpiles and potential power outages (ESDM 2022).

Joint press releases from ESDM and the Ministry of Trade offer insights into the collaborative yet competing perspectives within the government, highlighting economic concerns alongside energy security priorities (Kemendag, 2022).

At the end of 2021, the coal mining trade was shocked by an arrangement issued a ban on coal by the Indonesian government. This arrangement is related to the moratorium on coal trades issued by the Directorate General of Mineral of the Ministry of Energy and Mineral Resources of the Republic of Indonesia. Through Letter Number B-1605/MB.05/DJB.B/2021 December 31, 2021, regarding fulfilling needs for general electricity, because PLN is experiencing a coal supply crisis for PLN, PLTU, and Independent Power Producers (IPP) (Djamaluddin 2021).

The decision by the Directorate General of Minerals of the Ministry of Energy and Mineral Resources of the Republic of Indonesia was formulated by a letter from the President Director of PT PLN (Persero) Number 77875/EPI.01.01/C01000000/2021-R dated 31 December 2021 concerning Supply Crisis (Dirjen Mineral and Batubara 2021).

The contents of the decision letter number B-1605/MB.05/DJB.B/2021 companies faced the following restrictions:

1. A complete ban on exporting coal during the specified period.
2. Mandatory prioritization of domestic electricity needs: Coal supply had to fulfill (1) domestic obligations, (2) government-assigned deliveries to specific companies, and/or (3) existing contracts with PLN and IPPs.

3. Immediate delivery of any already loaded coal: If coal was already at the loading port or onboard vessels, it had to be redirected to PLN and IPP power plants.

By looking at the data and facts above, it will be a question for all of us why the number 4 coal-producing country in the world can experience a shortage of coal supply for PLN PLTUs and IPPs. To answer this, we must first know about the obligation to fulfill domestic coal needs (DMO) for coal by coal mining business entities (BUP), Coal Mining Concession Work Agreement (PKP2B), and (IUPK) as a Continuation of Contract/Agreement Operations.

Article 33 Paragraph 3 of the 1945 Constitution of the Republic of Indonesia regulates that the earth water and the natural resources contained therein are controlled by the state and used for the greatest prosperity of the people.

To fulfill these constitutional obligations, Article 5 of Law Number 3 of 2020 regulates amendments to Law Number 4 of 2009 concerning Mineral and Coal Mining as well as the implementation of business activities in the Mineral and Coal Mining sector. In its implementation, Article 158 Paragraph 3 of Government Regulation Number 96 of 2021 concerning the Implementation of Mining and Coal Business Activities also states that BUP Batubara is coal produced abroad after domestic coal needs have been met (Kemenkeu 2022).

The above regulations aim to ensure the availability of sufficient quantities of industrial coking coal in the country. The implementation of domestic coal production to ensure the sustainability of domestic industry, especially to meet the interests of society such as PLN, cement, fertilizer, and other industries that require coal as a raw material, is very necessary.

The discussions and concerns regarding potential restrictions dominated the news throughout the month. The following details the important events and actors involved:

January 4, 2022. Energy and Mineral Resources Minister, Arifin Tasrif announces concerns over declining domestic coal stockpiles and expresses the possibility of a temporary export ban to prioritize domestic needs (ESDM 2022).

January 14, 2022. Director General of Mineral and Coal at the EMR Ministry, Ridwan Djamaluddin Confirms ongoing discussions within the government regarding potential export restrictions but clarifies that no official decision has been made (JAC 2022).

January 18, 2022. Coal Mining Association (APBI) issued a statement opposing any export restrictions, arguing they would harm the industry and disrupt global markets (ICMA 2022).

January 21, 2022. EMR Ministry released a statement clarifying that there is no immediate plan for an export ban but emphasizes the need to prioritize domestic coal supply (ESDM 2022).

January 27, 2022. Coordinating Minister for Maritime Affairs and Investment Luhut Pandjaitan announces the government's decision to increase domestic coal production and prioritize fulfilling domestic needs before considering exports (Maudisha 2022).

January 31, 2022. EMR Ministry reiterates its commitment to balancing domestic needs with export obligations and outlines plans to improve coal production monitoring and distribution (Kementerian ESDM 2023).

3.2 Moratorium as a Policy Tool

Table 5 Moratoriums as a Policy Tool

Temporary restrictions	Moratoriums on coal exports or new coal-fired power plants can be temporary measures to address immediate concerns like domestic energy shortages or air pollution crises (Yanguas 2023).
Transition strategy	Moratoriums can also buy time and create space for developing and deploying clean energy alternatives, making the transition away from coal smoother and more manageable (Mirzania 2023).
Political and environmental considerations	Moratoriums can be politically appealing by demonstrating commitment to environmental action, but they can also face opposition from stakeholders in the coal industry and communities reliant on it (Brauers 2020).

Moratoriums can be a valuable tool to address immediate concerns and facilitate a transition towards cleaner energy sources. However, the effectiveness and impact depend on careful planning, implementation, and consideration of all stakeholders involved.

The Ministry of Energy and Mineral Resources (ESDM) played a pivotal role, wielding data on critical coal stockpiles and potential power outages as potent arguments for the ban (ESDM, 2023). Meanwhile, the Ministry of Trade (Kemendag) voiced concerns about potential trade disruptions and economic repercussions (Ministry of Energy and Mineral Resources 2022).

3.3 Moratorium Coal Export Decision-Making

Formulating national mineral and coal policies requires the participation of all stakeholders. This policy states that minerals and coal are limited and available in inexhaustible quantities and must be used sustainably for the benefit of the people and maximum prosperity, as well as to support the interests and development of national defense and resilience.

The Mineral and Coal Policy also serves as a guideline for the preparation of legal codification and governance for minerals and coal. In this way, the National Mineral and Coal Policy can be a step forward for central and regional governments in formulating laws and regulations in the mineral and coal sector, as well as supporting local communities and economic actors in implementing mineral and coal resource policies (Kepmen ESDM 2022).

Basics for Formulating Mineral and Coal Policy Formulating Mineral and Coal Policy has 4 (four) main foundations, namely philosophical, political, legal, and strategic foundations.

- a. Philosophical Foundation, Pancasila Every Indonesian policy must refer to Pancasila, as a national philosophy, so that both the content of the narrative and the articles are loyal to the values:
 1. Belief in One Almighty God,
 2. Just and civilized humanity,
 3. Indonesian Unity,
 4. Democracy led by wisdom in deliberation/representation, and
 5. Social justice for all Indonesian people.

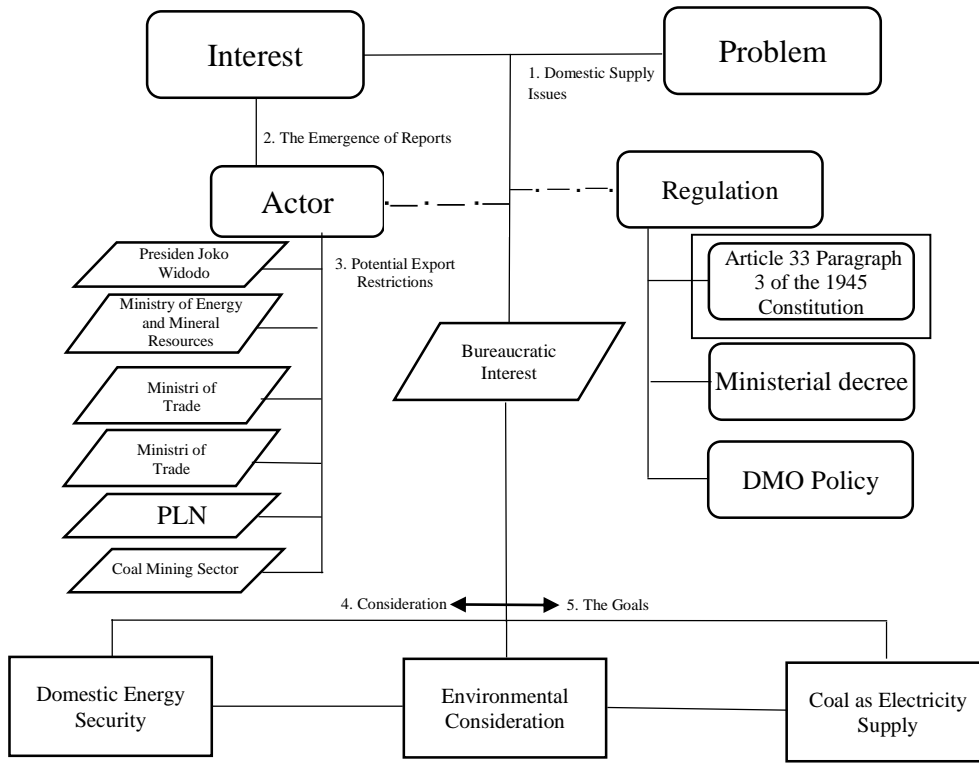
- b. Political Foundation, national interests are the orientation in developing Indonesia's mineral and coal resources, which are a type of non-renewable national asset (non-renewable resources), are placed as a national interest.
- c. Legal Foundation, the legal basis for the management of mineral and coal resources in Indonesia is contained in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia which reads "Earth and water and the natural resources contained therein are controlled by the state and used for the greatest prosperity of the people."
- d. Strategic Foundation, basic rules for management of mineral and coal resources.
Basic rules for managing mineral and coal resources include:
 - 1. Inventory,
 - 2. Management and utilization, and
 - 3. Conservation.

The rules for managing mineral and coal resources must be carried out as an integrated unit (Kepmen ESDM 2022).

A moratorium is a temporary suspension of an activity or law until future consideration warrants lifting the suspension, such as if and when the issues that led to the moratorium have been resolved. A moratorium may be imposed by a government, by regulators, or by a business. Moratoriums are often imposed in response to temporary financial hardships. In legal proceedings, a moratorium can be imposed on an activity such as a debt collection process during bankruptcy proceedings (Hayes 2022).

The decision in Indonesia's critical coal stockpiles dwindled rapidly in 2021, which is why at the beginning of 2022 there was a policy for a coal moratorium.

Figure 2 Stages of Moratorium Decision-making Process



In the early 2020s the emergence of reports, like the one by the Center for Indonesian Policy Studies, raised concerns about a crucial issue, declining domestic coal production in Indonesia. Aging mines, stricter environmental regulations, and limited investment in new mines were identified as key factors contributing to this downward trend. Meanwhile, demand for coal from power plants was simultaneously on the rise, fueled by a growing population, increasing electrification efforts, and reliance on coal-fired power generation. This widening gap between supply and demand casts, raising concerns about potential power outages and prices (Suharsono and Lontoh 2022).

By mid-2021, within the industry, particularly among groups like the Indonesian Coal Mining Association (APBI), began to surface. News articles, like

the one in Antara in July 2021, highlighted their concerns regarding potential export restrictions being implemented to address domestic supply issues. These industry representatives feared the impact on various aspects, including job losses, revenue decline, and negative consequences for the broader economy. Their arguments likely emphasized the importance of the coal industry and its contribution to the nation's economic well-being (CIF 2022).

The latter half of 2021 witnessed a shift in the narrative. Reported on intensified government discussions surrounding potential limitations on coal exports. These discussions likely involved key figures and ministries grappling with the complex issues. Arguments for and against restrictions were presented, considering economic, social, and environmental factors. Concrete proposals, like temporary bans or quotas based on domestic needs, might have been explored at this stage, indicating a move toward potential policy action (Adisuryo 2022).

Within the ESDM, the Directorate General of Mineral and Coal (Ditjen Minerba) spearheaded the technical aspects of the ban, while the Directorate General of Electricity (Ditjen Listrik) coordinated with PLN to assess power plant needs (Kementerian ESDM 2023). However, as reported by The Jakarta Post, internal disagreements arose regarding the timing and severity of the ban, with some officials advocating for a more gradual approach before the end of 2021.

Coal mining companies, through industry associations like the Indonesian Coal Mining Association (ICMA), lobbied against the ban's duration, citing economic losses. Meanwhile, environmental NGOs, such as Greenpeace Indonesia, urged stricter regulations to prevent future coal crises and accelerate the transition to renewable energy this was reported at the end of December 2021. While primarily aimed at stabilizing domestic energy and ensuring PLN's (the state-owned electricity company) fuel security.

The bureaucratic dynamics surrounding the coal export moratorium offer valuable lessons for future policymaking. Understanding the different interests at play, the potential for inter-ministerial conflicts, and the importance of transparency can help improve the efficiency and legitimacy of future policy decisions. Additionally, actively engaging diverse stakeholders, including civil society organizations and environmental experts, can provide a more comprehensive perspective and contribute to more sustainable and equitable policy outcomes.

CHAPTER 4

CONCLUSION

4.1 Conclusion

In following the moratorium policy, The President of Indonesia Joko Widodo issued an official policy at the beginning of 2022 to deal with domestic electricity generation needs and adapt to ensure national energy security. This policy was publicly announced as a commitment to the Ministry of Energy and Mineral Resources, Ministry of Trade, Commission VI DPR RI, PLN, and Coal Mining Companies. This Moratorium policy making is a fast and precise process. This policy succeeded in ensuring the availability of coal for domestic electricity generation needs, thereby preventing national power outages.

The author raises a research question: How was the decision-making process of the Indonesian government on the moratorium coal export can handle domestic coal needs?

The author applies 1 of 3 models of decision-making policy theory using 3 indicators to analyze the process of moratorium policymaking in Indonesia. Graham T. Allison explained about three models of decision-making policy there are Rational Actor Models, Organizational Process, and Bureaucratic Politics. From these three models of decision-making policy, the author considers **bureaucratic politics** as the tool of analysis and examines it more deeply using 3 indicators, namely Actor, Bureaucratic Interest, and Organizational Procedures.

Table 6 Bureaucratic Politics And The Implementation

No	Indicators	Implementation
1.	Actors	<p>In the Actor indicator, President Joko Widodo as the head of state has executive authority and navigated the interests to finally approve the measure. However, with the Ministry of Energy and Mineral Resources (ESDM), the energy sector in Indonesia occupied the central stage in crafting the export ban. While, The Ministry of Trade plays a key role in formulating and implementing Indonesia's trade policies, including regulations related to resource exports like coal and PLN, the state-owned electric company, it is dire fuel shortages threatened power outages, creating a compelling argument for prioritizing domestic coal.</p> <p>Coal mining businesses shared their concerns, as they perceived the strategy as an opportunity to stabilize prices and ensure long-term market share, even though it would result in lower revenue.</p>
2.	Bureaucratic Interest	<p>In the bureaucratic interest indicator, moratorium coal export has interests involving maintaining security among other strategic priorities. In terms of bureaucratic interest, there are some factors behind the moratorium policy. The first one, domestic energy security aims to prioritize secure fuel supply for Indonesian power plants and impose temporary export bans to avoid potential blackouts.</p> <p>Second, environmental considerations address greenhouse gas emissions and align with the country's stated climate goals. Third, coal as an electricity supply emerged as a response to the domestic crisis of coal stockpiles of electricity.</p>
3.	Organizational Process	<p>The organizational procedure of the moratorium decision-making process is the stages undertaken by actors or parties involved to reach an agreement. In terms of organizational procedure, It's a strategic aiming to reconcile interests and achieve mutual outcomes. The decision itself navigated a delicate balancing act. Within The government prioritized immediate domestic energy needs, averting blackouts and protecting public sentiment.</p> <p>However, this came at the cost of disrupting global markets and generating economic anxieties for coal exporters. Ultimately, the ban stands as a stark reminder of the intricate relationship between resource governance, energy dependencies, and environmental considerations.</p>

No	Indicators	Implementation
3.	Organizational Process	<p>By examining the internal documents issued by key ministries outlining the justification for the ban based on critical coal stockpiles and potential power outages. Joint press releases from ESDM and the Ministry of Trade offer insights into the collaborative yet competing perspectives within the government.</p> <p>The steps of the decision-making process begin in the early 2020s with the emergence of reports, like the one by the Center for Indonesian Policy Studies, raising concerns about a crucial issue, declining domestic coal production in Indonesia. After that By mid-2021, within the industry, the Indonesian Coal Mining Association (APBI) highlighted their concerns regarding potential export restrictions being implemented to address domestic supply issues.</p> <p>The latter half of 2021 witnessed a shift in the narrative. Reported on intensified government discussions surrounding potential limitations on coal exports. These discussions likely involved key figures and ministries grappling with the complex issues. Within the ESDM, the Directorate General of Mineral and Coal (Ditjen Minerba) spearheaded the technical aspects of the ban, while the Directorate General of Electricity (Ditjen Listrik) coordinated with PLN to assess power plant needs.</p> <p>Coal mining companies, through industry associations like the Indonesian Coal Mining Association (ICMA), lobbied against the ban's duration, citing economic losses. Meanwhile, environmental NGOs, such as Greenpeace Indonesia, urged stricter regulations to prevent future coal crises and accelerate the transition to renewable energy this was reported at the end of December 2021.</p>

The moratorium serves as a potent catalyst for future policy discourse. It ignited discussions on revising the Domestic Market Obligation (DMO) policy to prevent future shortages and exploring sustainable energy diversification alternatives. By illuminating the challenges and opportunities presented by this policymaking.

4.2 Recommendation

While navigating the complexities of the decision-making policy on the coal export moratorium, the author provides several recommendations for further research. As for some recommendations from the author, namely:

1. The author of this research used one model of decision-making policy by Graham T. Allison. The decision-making to reach the policy is still possible to analyze using the other models.
2. Not all decision-making process by the decision makers is publicly reported, the analysis still needs more detail to complete. Therefore, the process timeline focuses on publicly reported data and statements.
3. Given this policy, it would be very interesting for further studies could analyze the precise factors of the moratorium on coal using other models. This study primarily relied on qualitative data and expert opinions, providing valuable insights into policy motivations. However, quantitative analysis could offer more precise measurements of the policy.
4. Future research could explore the potential for replicating the moratorium model in other resource-rich countries facing similar challenges. While this study focused on the specific context of Indonesia, examining the applicability of the model in other settings could contribute to broader policy discussions on resource management and energy security.

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