



## Responsibilities of land deed officials (PPAT) for electronic registration of mortgage rights in Tasikmalaya city

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### Abstract

The government is actively promoting technological advancements in electronic mortgage rights within the land registration process. However, the rapid development of the system in Tasikmalaya City Land Office without a transition period and sufficient public awareness has led to procedural and technical challenges, particularly regarding the role and responsibilities of Land Deed Drafting Officers (PPAT) in the process. This study aims to assess the impact of PPAT delays in completing registration files on the cancellation of Electronic Mortgage Rights (HT-el) registration, as well as PPAT's obligations in the HT-el registration process at the Tasikmalaya City Land Office. Employing an empirical research approach with a sociological juridical research model, primary data was collected and supplemented with secondary data, including primary and secondary legal materials, utilizing descriptive qualitative analysis techniques. Findings indicate that a) Cancellation of Electronic Mortgage results in application cancellation, necessitating PPAT to reapply for Electronic Mortgage registration, with a new Letter of Instruction for Payment of Non-Tax State Revenue (PNBP) issued for re-registration. b) PPAT's responsibility in Tasikmalaya City's electronic Mortgage registration is confined to the electronic registration process, from initiation to Electronic Mortgage certificate issuance, via the PPAT Partner Work Application. In the event of errors, PPAT is accountable and must rectify them to ensure the validity and usability of the Electronic Mortgage certificate.

**Keywords:** Implementation, Electronic Mortgage, PPAT, Effectiveness

### Introduction

The development of science and technology is expected to make it easier for people to carry out their work or daily activities. An example of the useful use of technology in work and public services is the existence of an electronic system for registering mortgage rights, namely the *HT-el* system. Local Area Networks (LAN) and Wide Area Network (WAN) are two types of computer networks that have been identified as key to facilitating technological development (Anggara *et al.*, 2010) <sup>[1]</sup>. Various developments have occurred in e-commerce and e-government. In Indonesia, the law still does not provide full access to transactions carried out via the Internet. By paying attention to current developments, electronic systems are starting to take shape following the enactment of Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Electronic Information and Transactions.

In order to encourage the rapid development of the business world, the government has provided support by providing various facilities and facilities including efforts to support capital by providing credit facilities. Entrepreneurs often utilize credit facilities provided by the government to meet capital needs and improve the smooth running of their business. These credit facilities are channeled through financial institutions through credit agreements. All this is because banks have an important role in collecting funds from the public and managing them through lending until the funds are returned to the public in the form of deposits. Therefore, banks require collateral for the payment of their receivables from debtors to fulfill their obligations in every credit transaction.

Mortgage rights are security rights over land. Mortgage rights with a security encumbrance agreement that arises because of a credit agreement between the debtor and the

creditor, either made under the hand or by notarial deed. Prior to the enactment of electronic registration of Mortgage Rights, registration of Mortgage Rights was carried out at the National Land Agency, the mechanism was regulated in the Regulation stipulated in the Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency Number 5 of 1966 concerning Registration of Mortgage Rights. This ministerial regulation is an implementing regulation of Law Number 4 of 1996 concerning Mortgage Rights on Land and Objects Related to Land (UUHT).

The regulation is no longer valid due to the new implementation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency Regulation Number 9 of 2019 concerning Electronically Integrated Mortgage Services, but this Permen has not accommodated all HT services, so conventional HT services are still used. Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency Number 5 of 2020 concerning Electronic Mortgage Services replacing Permen ATR/BPN No. 9 of 2019, it turns out that there is still a lack of understanding on the part of individuals, banks or Land Deed Officials (PPAT) to use *HT-el* services even though previous socialization has been carried out.

Since the regulation on *HT-el* was enacted, the environment under the Ministry of ATR/BPN has implemented it, including the Land Office in Tasikmalaya City. In practice, it can be seen that most of the objects that become objects of collateral in credit agreements by banks are land, which based on the results of data collection, 52% of registered PPATs in West Java have made *HT-el* Deeds using the Partner Application to monitor PPAT performance by the Ministry of ATR / BPN West Java. Until now, the number of Electronic Mortgage Certificates has amounted to more than 3,000 made by West Java PPATs. But unfortunately, in

early 2021, 76% of PPAT Deeds in West Java were not registered on time.

A further problem faced by PPATs and creditors is the difficulty in electronic mortgage services because checking the certificate before making the deed is often hampered by the fact that the land title certificate has not been validated. This process takes three days or more, resulting in delays in Non-Tax State Revenue (PNBP) payments. The *HT-el* service has not been able to handle every application because the checking data does not cover all previously submitted applications. PPAT has a seven-day deadline to upload the Deed of Grant of Mortgage (APHT) on the *HT-el* web, and the bank must register the mortgage within that time. If it is late, the registration will be rejected, and any corrections must be made immediately. If it exceeds seven days, the system will reject the submission with a HT rejected statement, which requires re-submission with the code obtained during the first step in registering *HT-el* (Azizah *et al.*, 2022) <sup>[2]</sup>.

And some *HT-el* users sometimes experience some other difficulties such as entering the wrong data or lack of understanding of technology, which is a problem in itself. Although *HT-el* can speed up the process of registering Mortgage Rights, obstacles such as systems and networks during the *HT-el* management process are still one of the obstacles to the process.

### Research Method

This research is empirical research with a sociological juridical research model that has an object of study regarding community behavior (Dewata and Achmad, 2013) <sup>[3]</sup>. The community behavior studied is the behavior that arises from interacting with the existing norm system, with primary data collection techniques and supported by secondary data consisting of: primary legal materials and secondary legal materials. The research data sources are obtained from the Land Office and PPAT in Tasikmalaya City. The data analysis technique that will be used in this research is descriptive analysis with qualitative methods, namely researchers describe and explain the data found in the research from the data then analyzed by describing the facts systematically based on the scientific characteristics of individuals or groups to understand and reveal something behind the phenomena that occur regarding registration and the form of PPAT's responsibility for *HT-el* (Strauss, 2013) <sup>[12]</sup>.

### Research results and discussion

#### 1. Implementation Related to the Cancellation of Electronic Mortgage Registration (*HT-el*) Due to the Delay of PPAT in Completing Registration Requirements

Mortgage rights are security rights on land. Mortgage rights with a security encumbrance agreement that arises due to a credit agreement between the debtor and the creditor either made under the hand or by notarial deed. An underhand credit agreement means that the agreement is made by the parties, namely the creditor and the debtor without any authorized official, while a credit agreement with a notarial deed means that the agreement is made by the parties before a notary. According to Budi Harsono, there are four requirements that must be met so that land rights can be used as collateral, namely: can be valued financially, registered in the public register to meet publicity

requirements, can be transferred ownership, if the debtor defaults, the collateral object will be sold publicly, and must be stipulated by law.

Based on Article 4 paragraph (1) and paragraph (2) of the UUHT, what can be subject to a mortgage right includes ownership rights, business use rights, building use rights, and use rights. To impose a mortgage right, it is necessary to make a Deed of Granting Mortgage Rights (APHT) by a PPAT that includes the granting of mortgage rights to certain creditors. To obtain legal validity, the APHT that records the mortgage rights must be registered. The *HT-el* system is managed by the Land Office according to Article 4 paragraph (1) and as for the types of services in the *HT-el* system in Article 6, it determines "the types of mortgage rights services that can be submitted through the *HT-el* system, including: a. registration of mortgage rights; b. transfer of mortgage rights; c. change in the name of the creditor; d. elimination of mortgage rights" (Wiguna, 2020) <sup>[15]</sup>.

The birth of a mortgage right based on the provisions of Article 13 paragraph 5 of the UUHT occurs on the date on which the land book of the mortgage right described in paragraph 4 is issued. The date of publication of the land book of the mortgage is determined on the seventh day after the documents required for registration are received in full. The birth of a property right on a mortgage is dependent on the fulfillment of the principle of publicity, so that if the APHT is not registered with the BPN office, a property right will never be born. Consequently, the preferred creditor only acts as a concurrent creditor so that it does not have the superior characteristics of property rights (Usanti, 2012) <sup>[14]</sup>. The provisions of Article 6 (1) Second Part of Chapter II of the Regulation of the Head of the National Land Agency Number 9 of 2019 states that the types of *HT-el* services that can be submitted through the *HT-el* System include: registration of Mortgage Rights, transfer of Mortgage Rights, change of Creditor's name, elimination of Mortgage Rights, data correction. Considering that the implementation of *HT-el* services consists of individuals or legal entities (as Creditors), PPAT, and Ministry of Agrarian Affairs/BPN (as implementers). PPAT must use the application provided by the Ministry of ATR / BPN by becoming a partner in BPN, registering and creating an account online through the partner portal at mitra.atrbpn.go.id. If you do not update your data, you cannot access and register services on the electronic land service application. So that the PPAT cannot become a user in the Electronic Mortgage service (Nurwulan, 2021) <sup>[8]</sup>.

In accordance with the provisions of Article 33 of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 5 of 2020 concerning Electronically Integrated Mortgage Rights Services, the Land Office is required to provide electronic mortgage rights services within a maximum of 3 (three) months after the regulation comes into force. This shows the commitment and seriousness of the Land Office in changing the paradigm of land services that were previously considered complex, complicated, and expensive to services that prioritize openness, timeliness, speed, convenience, and affordability as part of public services. It also aims to maintain consistency with legal developments and introduce new innovations in the land system in Indonesia.

This resulted in a change in the format of the certificate of Mortgage, where the certificate is now a single sheet of paper that includes record of encumbrance of Mortgage Rights that was previously attached to the land title certificate. The signature of the head of the local land office is no longer added to the certificate of Mortgage, but is replaced with a barcode mark that contains all information related to the certificate. Service access can be done through the Touch My Land application by scanning the barcode.

Specifically for APHTs made by PPATs, the delivery can only be done electronically, so the original copy of the second sheet of APHT is kept at the PPAT's office as warkah. Therefore, in terms of mortgage rights, such as registration, transfer and cancellation (*roya*) of mortgage rights, the land office only keeps electronic documents (*softcopy*) of the deeds and documents. The PPAT is responsible for maintaining all original copies of the APHT and related documents.

The Electronic Mortgage Registration mechanism is regulated in the Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency Number 5 of 2020 concerning Electronic Mortgage Services:

1. Registered banks and PPATs apply for *HT-el* services through the *HT-el* System provided by the Ministry of Agrarian and Spatial Planning/Head of the National Land Agency.
2. All *HT-el* service applications are submitted in the form of Electronic Documents and in accordance with the provisions of laws and regulations.
3. The PPAT submits the deed and documents completing the registration requirements through the partner's electronic system that is integrated with the *HT-el* system.
4. Submission of documents is equipped with a Statement Letter regarding the responsibility for the validity and correctness of the Electronic Document data submitted.
5. Application for *HT-el* services received by the *HT-el* system is given proof of registration and payment in accordance with the provisions of PNBP regulations.
6. The application is processed after the data and fees that have been paid are confirmed by the *HT-el* system. If the payment is not confirmed, the creditor can confirm directly to the Land Office.
7. Examination of the required documents and the draft *HT-el* certificate is carried out by the Head of the Land Office or a designated official through the *HT-el* system. If there are incomplete or inappropriate documents, the creditor or PPAT is asked to complete within 5 days.
8. If the examination is not done until the 7th day, the result of *HT-el* service is considered to be approved or endorsed.
9. The result of *HT-el* service is in the form of Electronic Document which includes *HT-el* certificate, record of Mortgage Rights in the land book, and record of Mortgage Rights in the Land Rights certificate.
10. The recording of the Mortgage on the land book is done by the Head of the Land Office in the Electronic Land Book.
11. Recording of Mortgage Rights on the certificate of Land Rights or Unit Ownership Rights is done by the creditor.

Announcement regarding the postponement or cancellation of *HT-el* registration will be submitted through the *HT-el* system or through other electronic media. If the *HT-el* registration is canceled after the applicant has paid the registration fee, the fee will be refunded in accordance with the applicable provisions. In the case of cancellation, only the registration process is canceled, without affecting the APHT that has been made by PPAT. Therefore, the *HT-el* registration process needs to be repeated from the beginning again in the event of cancellation, with all stages and requirements that must be met again. However, if there is no delay or cancellation, the Land Office will approve the issuance of HT in accordance with the applicable procedures.

According to Mr. Rais S as an employee of the Land Office in Tasikmalaya City, obstacles that often occur due to frequent system errors in the network. So that sometimes PPAT lacks time in inputting data. In ensuring optimal performance of the *HT-el* application, a stable internet connection is also very important. For example, if the number of devices used by employees ranges from 12 to 18, it is recommended to use internet services from providers such as speedy with bandwidth speeds of more than 100 Mbps. However, it should be noted that 100 Mbps bandwidth can only be used by 12 to 18 devices (Supryadi, 2022) <sup>[13]</sup>.

The impact of the invalidation of Electronic Mortgage is the cancellation of the application and the system will automatically delete the registration application. Therefore, the PPAT must re-submit the *HT-el* application. According to Mr. Risman Yunandar, S.H., M.Kn. that in the system that causes interference with the *HT-el* system, so that the results of the Mortgage Rights service cannot be issued and the *HT-el* service application is canceled so that it must submit a re-registration application. This is an obstacle in the system that causes interference with the *HT-el* System, causing losses to PPAT and creditors. Because they have to repeat the *HT-el* process from the beginning, which results in a waste of time and service costs, as well as PNBP funds that have been paid previously being forfeited.

The birth of Technical Guidelines Number: 2/Juknis-400.HR.02/IV/2020 which is a reference or guideline for the Land Office in implementing *HT-el* services. In the Technical Guidelines, system constraints on *HT-el* are included in the category of force majeure. This disruption results in the results of the Mortgage Rights service cannot be issued, and the *HT-el* Service application is canceled. The applicant can apply for re-registration, and request a refund of the service fee. However, the implementation is difficult to do in the field, such as funds that have been paid in the registration process are forfeited and must be paid again, even though technical instructions regarding fee refunds already exist.

Another impact is the issuance of a new PNBP deposit warrant that results in double payment for *HT-el* registration. The delay in the implementation of *HT-el* due to the cancellation of the application due to the late completion of registration documents may result in liability for PPAT. Even though the *HT-el* system no longer imposes administrative sanctions on the PPAT, the PPAT can still be held civilly liable if there is a loss to the parties because the Mortgage Rights have not been born.

## 2. PPAT Responsibilities in Implementing Electronic Mortgage Rights Registration at the Tasikmalaya City Land Office

The Land Deed Official (PPAT) is one of the officials authorized to make a deed of agreement which is usually used to transfer land rights, mortgage land or borrow money with land rights as collateral, and grant a new right to land (Peranginangin, 2007). In addition, there is a clear definition of PPAT according to Government Regulation No. 24/2016 on the Amendment to Government Regulation No. 37/1998 on the Regulation of the Position of Land Deed Officials, which is “*A public official who is authorized to make authentic deeds regarding certain legal acts concerning land rights or Property Rights over a Flat Unit*”.

PPAT has the authority as stipulated in Article 2 of Government Regulation Number 24 of 2016, especially in terms of granting mortgage rights. Here, the PPAT has an important role in the process of registering mortgage rights, where currently the process is carried out through the Electronic Mortgage Rights (*HT-el*) system. “*The mortgage rights is a security right over land for the repayment of certain debts, which gives priority to certain creditors over other creditors, with the object of security in the form of land rights regulated in the UUPA*” (Suradi, 2005). The Electronic Mortgage Registration process is regulated in the Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 5 of 2020 concerning Electronically Integrated Mortgage Rights Services charges if it is legally proven to have committed or entered into a crime. Criminal element in the authentic deed he made and participating in committing a criminal act.

Since the regulation on *HT-el* was enacted, the environment under the Ministry of ATR/BPN has implemented it, including the Land Office in Tasikmalaya City. In practice, it can be seen that most of the objects that become objects of collateral in credit agreements by banks are land, which based on the results of data collection in 2022, 72% of registered PPATs in West Java have made *HT-el* Deeds using the Partner Application can monitor PPAT performance by the Ministry of ATR / BPN West Java. Until then, the number of Electronic Mortgage Certificates has amounted to more than 3,000 made by the Tasikmalaya City PPAT.

Based on the results of interviews with PPATs in the Tasikmalaya City area, after the spread of the COVID-19 virus and the simultaneous implementation of electronic Mortgage Rights referring to the Technical Guidelines 2 of 2020, it shows that the comparison between the implementation of Conventional HT Services and *HT-el* Services is more efficient than Conventional HT services. The registration process until the delivery of the product is carried out online, which makes it more practical because the applicant does not need to queue at the Land Office. In addition, the implementation time of *HT-el* Services is more standardized because it is regulated by the system. Recording and signing are done electronically through the system, then affixed to the Land Book and Certificate. *HT-el* application documents are stored by the system, so they do not require storage space and make it easier to find documents.

It can be observed that the role of PPAT is as follows: First, the PPAT must verify the land use right/flat house ownership certificate before determining the APHT. This

verification can be done manually or electronically depending on the availability of electronic land data at the Ministry of ATR/BPN facilities. After the verification is completed, the PPAT must immediately finalize the APHT after the Land Office announces the result of the verification; Second, APHT reporting is done through the PPAT Working Partner Application. Third, the PPAT is responsible for inputting the deed data. Fourth, the PPAT must upload the APHT and its supporting data. Fifth, the PPAT downloads the deed cover letter. Sixth, the PPAT scans and uploads the deed cover letter that has been signed and stamped as proof of electronic submission of the original APHT and its supporting data to the Head of the Land Office through the PPAT Working Partner Application.

As a public official, a PPAT has the responsibility to ensure the formal truth and correctness of legal actions in every deed it makes, including in the transfer of land rights, especially in administrative aspects. This includes checking all the conditions that must be met before transferring land rights (Maharani, 2022) <sup>[5]</sup>. The principle of prudence is an important factor in supporting PPAT performance.

According to Kranenburg and Vegtig, there are two concepts of responsibility within the framework of public officials. The first is the *fautes personnelles theory*, which means that an official will bear the consequences of his or her own actions against third parties. This means that if an official's actions cause harm to others, then the official will be individually liable. The second theory is the *fautes de service theory*, which states that the agency or position associated with the official will be responsible for the harm caused by his or her actions to third parties. In other words, if the actions of an official in his or her official capacity result in harm to others, then the relevant agency or position will be liable for the harm (Rismayanthi, 2016) <sup>[10]</sup>. These two theories highlight that responsibility for the actions of public officials can fall on the individual himself or on the body or position associated with the official.

In accordance with the regulation of the Regulation of the Minister of ATR/BPN Number 5 of 2020, PPAT's duties only include submitting APHT according to a certain schedule through the electronic system of mortgage rights. As in PMATR/BPN No. 5 of 2020, those who are able to register Mortgage Rights at the Land Office are creditors. Based on this, in accordance with the provisions of PMATR/BPN No. 5 of 2020, PPAT cannot work on the listing of Mortgage Rights at the Land Office (Rachmayanti, 2022) <sup>[9]</sup>. Before submitting the APHT as stated in PP No. 24 of 1997, the PPAT checks the Land Title Certificate with the Land Book located at the Land Office.

The certificate verification process will be a major concern for PPATs who have the authority to verify or check land certificates as referred to in Article 54 paragraph (1) of Perkaban No. 1 Year 2006 which states that: “Prior to the making of deeds such as sale and purchase, exchange, grant, entry into a company, division of joint rights, granting of Building Rights Title, Use Rights on Freehold land, granting of Mortgage Rights, and granting of power of attorney to charge Mortgage Rights, the PPAT is obliged to check the suitability of the certificate and other records at the local Land Office by explaining the purpose and objectives. If there is an error in checking the certificate, then the next to the final stage will cause data errors and the output of the *HT-el* certificate is invalid or cannot be used because there

are data errors and mismatches with existing data. If there is an error, the PPAT is responsible for making repairs.”

In making APHT, the role of Notary and PPAT is very important in the context of legal responsibility. The legal relationship between the two is indispensable. When a credit agreement is to be executed, the Notary has the obligation to make a credit agreement deed that binds the debtor and creditor. After the deed of credit agreement is completed, the PPAT's duty will continue with the making of APHT and SKMHT.

The process of making a deed of encumbrance is carried out by a PPAT as the initial stage in the legal process related to credit agreements (Azizah, *et al.*, 2022) <sup>[2]</sup>. The task of the Notary is to draw up the credit agreement deed, while the PPAT is responsible for the preparation of APHT and SKMHT as part of the formation of the mortgage rights. The collaboration between the Notary and the PPAT ensures that all legal aspects related to the credit transaction are properly fulfilled.

After the encumbrance of the mortgage, which is marked by the creation of the APHT, the next step is to register the APHT at the Land Office. The file can be submitted directly to the Land Office or sent by registered post within a maximum of seven working days after the signing of the APHT. Another alternative is to submit the documents through the mortgagee at no additional cost to the mortgagee.

After the documents arrive at the Land Office, they will be signed by a designated officer, stamped, and dated as a receipt. The receipt is then delivered to the PPAT concerned. After it has been examined and deemed complete, the Head of the Land Office will register the mortgage right by making a land book and land certificate or land title or property rights over the flat unit that is the object of the mortgage right. This registration is done on the seventh day after the date of receipt. If the seventh day falls on a holiday, the registration will be carried out on the next working day (Sjahdeini, 1999).

The role of the Land Registry Office as a publication institution authorized to carry out management regarding land allows them to register mortgage rights using credit guarantee procedures. As a legal service provider authorized to make authentic deeds, PPAT must apply the principles of accuracy and prudence in order to carry out its duties effectively in carrying out its duties (Salim, 2015) <sup>[11]</sup>.

Every legal action taken by a Notary or PPAT will have legal consequences. Therefore, they are obliged to carry out their duties thoroughly, meticulously, and carefully. Negligence in carrying out their duties may result in them being held liable for the act. The responsibilities of Notaries and PPATs as public officials include the professional responsibilities of the PPAT itself related to the deeds they make.

Based on the theory of legal responsibility, where a person is legally responsible for an act he has committed or it is certain that he is responsible, then the subject means that the person is responsible for sanctions in the event of a contrary act. If the process of registering a mortgage is carried out electronically and involves a PPAT in its implementation, then the PPAT is responsible for the entire process. If there are irregularities in the process, the PPAT will be responsible for any actions that occur during the electronic registration of mortgage rights. For example, such as when checking the land use certificate, making a record of the cost

of the mortgage rights (APHT), implementing the APHT declaration, and filling in the data for the *HT-el* certificate.

PPAT accountability can be divided into 2 (two), namely ethical accountability and legal accountability. Ethical responsibility in this case is in relation to the PPAT profession, while legal responsibility in this case is in relation to the deed made by the PPAT, which can be further explained based on administrative law, civil law and criminal law (Agustina, 2016).

To ensure that Mortgage Rights are secured electronically, PPATs are no longer required to represent applicants (creditors) in the listing of Mortgage Rights at the Land Office. This is so that the role of the PPAT as a deed maker on legal activities related to land objects remains focused, without having to be involved in administrative tasks outside of its core responsibilities (Dewi, *et al.*, 2020).

Previously, *HT-el* registration was carried out by creditors. If an error occurs in the *HT-el* certificate, it is not the responsibility of the PPAT. Since *HT-el* registration is not the responsibility of the PPAT, the PPAT is not responsible for any errors that may occur in the *HT-el* certificate. Based on Article 19 of PMATR/BPN No. 5 of 2020, if there is an error in the *HT-el* service submission that is only realized after the *HT-el* certificate is issued, the owner of the *HT-el* certificate, i.e. the creditor, can apply for rectification through the *HT-el* device within 30 days from the date of issuance of the *HT-el* certificate. Therefore, if there is an error on the *HT-el* certificate, the *HT-el* owner cannot claim liability from the PPAT.

As stipulated in PMATR/BPN No. 5 of 2020, the duty of PPAT is only limited to submitting APHT through the *HT-el* system. The obligation to register the Mortgage falls on the applicant (creditor). Therefore, it is the applicant (creditor), who is also the owner of the *HT-el* certificate, who is responsible and has the right to apply for rectification of errors in the *HT-el* certificate. The PPAT does not have the authority to apply for rectification of errors in the *HT-el* certificate because it is outside the scope of its duties.

## Conclusion

The implementation of the cancellation of Electronic Mortgage resulted in the cancellation of the application, with the system automatically deleting the registration application, requiring the PPAT to submit a new *HT-el* registration application. The issuance of a new PNBPN deposit warrant results in double payment for *HT-el* registration. Delays in the implementation of *HT-el* due to the cancellation of the application due to the late completion of the registration document may result in liability for the PPAT. Although the *HT-el* system no longer imposes administrative sanctions on the PPAT, the PPAT can still be held civilly liable if losses arise for related parties due to the non-issuance of the Mortgage Rights.

The responsibility of the PPAT in the process of electronic registration of Mortgage Rights in Tasikmalaya City is limited to actions in the electronic HT registration process. The PPAT is also responsible for scanning and uploading the deed cover letter that has been signed and stamped, as evidence of the original electronic submission of the APHT and its supporting data to the Head of the Land Office through the PPAT Working Partner Application. If an error occurs in the process, the PPAT must be responsible for the error and make repairs so that the *HT-el* certificate is valid and can be used.

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