



An analysis of legal protection for holders of duplicate land certificates with equal legal status in systematic land registration

Misbah Andalia¹, Suhaimi², Ika Susilawati³

¹ Faculty of Law, Universitas Syiah Kuala, Banda Aceh, Indonesia

² Faculty of Law, Universitas Syiah Kuala, Banda Aceh, Indonesia

³ Notary of Aceh Besar Regency, Indonesia

Abstract

Land registration is a legal instrument aimed at providing legal certainty and protection for land rights holders. However, in the practice of systematic land registration, serious problems persist, including the issuance of duplicate certificates with the same status for the same plot of land. This situation creates legal uncertainty and has the potential to harm well-intentioned rights holders. This study aims to analyze the provisions for preventive and repressive legal protection for rights holders with duplicate certificates with the same status under systematic land registration.

Keywords: Legal protection, duplicate certificates, legal certainty, systematic land registration

Introduction

Land serves not only as a foothold but also as a natural resource with high economic, social, and cultural value. As a non-renewable natural resource, land is very limited, so its use must be carried out wisely to ensure its continued benefits for current and future generations. Furthermore, land also plays a vital role in supporting national productivity, both in the agricultural, plantation, housing, and infrastructure development sectors, which directly and indirectly contribute to improving people's welfare, both materially and spiritually ^[1].

To achieve this goal, one concrete step the government has taken is land registration. Land registration plays a crucial role in providing legal legitimacy for land ownership, use, and utilization by the community ^[2]. The implementation of land registration in Indonesia is regulated through several implementing regulations, including Government Regulation (PP) No. 10 of 1961 concerning Land Registration and PP No. 24 of 1997 concerning Land Registration. PP No. 10 of 1961 is the initial regulation that regulates in detail the mechanisms and procedures for land registration, aiming to provide legal certainty and reduce land disputes. Along with the development of legal needs and social dynamics, the government then issued PP No. 24 of 1997 as an improvement to the previous regulation. PP No. 24 of 1997 brought important changes, including introducing the principle of simpler, faster, safer, and more transparent services in the land registration process, and emphasizing the function of certificates as strong evidence of rights. These two regulations are an important foundation in the national land system, particularly in efforts to realize orderly land administration and legal protection for land rights.

With land registration, it is hoped that every plot of land in Indonesia will have legal proof of title, thereby reducing disputes, encouraging investment, and accelerating national development. This land registration system is the foundation for achieving orderly land administration, which ultimately supports a sense of security and legal certainty for land rights holders (Mazwar, et al., 2024: 1673) ^[3]. In this regard, the existence of certificates as strong proof of title is crucial.

According to A.P. Parlindungan, the term "land registration" derives from the word "cadastre" (Dutch: "kadaster"), which is a technical term for a system for recording or recording land plots. In general, "cadastre" refers to documentation that includes information regarding the area, value, and ownership status or legal basis for rights to a plot of land. Etymologically, the term derives from the Latin "capistratum," meaning a register or list compiled to record land units in the ancient Roman agrarian system, known as "capitatio terrens." More specifically, "cadastre" is understood as a system for recording specific land, including land value assessments and the identities of land rights holders, originally used for tax purposes. Therefore, the cadastre serves as a crucial instrument for providing comprehensive identification of land parcels, both physically and legally. Furthermore, the cadastre is also a continuous recording system, ensuring that all changes in land rights status are accurately and continuously documented.

Thus, it can be concluded that land registration is not merely an administrative process, but rather a comprehensive, continuous, and structured recording system that addresses the physical and legal conditions of land parcels. The cadastre concept, which underpins modern land registration, reflects the importance of ensuring data certainty regarding land, both for legal protection of rights holders, asset management, and for taxation and spatial planning purposes. Therefore, land registration plays a strategic role in creating legal certainty, ensuring orderly land administration, and supporting economic and social stability.

In line with the strategic function of land registration as a sustainable physical and legal recording system, the existence of land certificates is a key element in ensuring the effectiveness and authority of that system. Land certificates are authentic evidence issued by the State through land institutions and have legal standing as strong evidence of ownership or rights to land. In the context of Indonesian positive law, these certificates serve as legal representation of the data recorded in the cadastre system, reflecting the landowner, the area of the plot, its boundaries, and the types of rights attached to it. Therefore, land

certificates are not merely administrative documents but also hold strategic value in legal protection, agrarian transactions, and the prevention of ownership conflicts. However, problems arise when the recording and verification system does not operate optimally, allowing for the issuance of duplicate certificates, creating legal uncertainty for rights holders. This is one of the fundamental challenges in realizing the principles of legal certainty and protection in the land sector.

A land certificate is authentic proof of ownership of land rights that is officially issued by the state through an authorized institution, namely the National Land Agency (BPN) ^[4]. The National Land Agency (BPN) has full authority to administer land registration, from collecting legal and physical data to issuing certificates as proof of rights. The issuance of these certificates aims to provide legal certainty and protection to land rights holders. Throughout the process, the BPN acts with due care and accuracy to ensure that registered land rights truly reflect the actual legal situation on the ground.

The emergence of duplicate certificates with the same legal standing in the Complete Systematic Land Registration (PTSL) program reflects the state's failure to implement comprehensive legal protection within the land system. According to Philipus M. Hadjon, legal protection is a form of recognition and respect for the dignity, honor, and fundamental rights of legal subjects, which must be guaranteed through valid legal regulations as a deterrent to all forms of arbitrariness. In this regard, the state, through the BPN, should act as a protector of citizens' rights by ensuring that every certificate issued truly reflects legitimate ownership rights and does not give rise to conflicts. However, the fact that two parties can legally hold certificates for the same plot of land indicates maladministration or verification weaknesses in the system, which have the potential to harm even well-intentioned parties. This situation represents a form of indirect administrative arbitrariness, arising not from malicious intent, but from a system that is unreliable in providing certainty and justice. In Hadjon's view, this failure indicates that legal protection is not only weak in preventive terms, but also repressive, because the State has not been able to provide legal certainty and adequate rights restoration mechanisms. Therefore, improvements to the legal protection system in the realm of land registration are urgently needed, so that the law can serve as a tool to defend people's rights, rather than a source of conflict due to erroneous procedures.

As the government agency responsible for land affairs, the National Land Agency (BPN) has the crucial task of issuing land title certificates. These certificates serve not only as proof of ownership but also as a guarantee of legal certainty for rights holders. Through a systematic registration process, the BPN strives to record all land parcels in Indonesia, thereby preventing overlapping ownership or land disputes. Therefore, certificates issued by the BPN serve as a key instrument in ensuring orderly land administration and strengthening legal protection for the public ^[5].

The land registration system implemented through the PTSL program in Indonesia aims to accelerate the realization of legal certainty over land. Land registration in Indonesia essentially adheres to a negative land registration system that contains positive elements. In a negative registration system, the data contained in land books and certificates do

not constitute an absolute guarantee of the material validity of the registered rights. This means that the state does not fully guarantee that the person named on the certificate is the legitimate holder of the material rights. Land registration functions primarily as a means of proving rights, not as absolute confirmation of ownership. However, this system is accompanied by positive elements because once registration is completed and the certificate is issued, the certificate has strong evidentiary force until other evidence revokes it ^[6].

In practice, Indonesia's negative land registration system allows other parties to file lawsuits against issued certificates if there is evidence that the registration was carried out illegally, erroneously, or in bad faith. Therefore, while land certificates provide strong legal protection to their holders, they are not immune to cancellation by court decision. This demonstrates that the state remains open to corrections for errors or irregularities in the land registration process, to uphold the principle of fairness in land ownership and use ^[7].

This situation implies that in Indonesia's land registration system, legal certainty is not absolute, but relative. Certificate holders must always be prepared for potential claims from third parties, particularly in the event of administrative errors or irregularities in the registration process ^[8]. Therefore, although land certificates provide confidence in transactions and strengthen the legal standing of land rights holders, caution is still required in acquiring and maintaining land rights, including conducting a thorough investigation of the land's history before making a transaction.

Systematic land registration is a government effort to provide legal certainty regarding land rights. However, in practice, duplicate certificates still exist with the same legal standing, creating serious problems in protecting the rights of certificate holders. The existence of these duplicate certificates creates legal uncertainty, ownership conflicts, and ultimately leads to lengthy court litigation ^[9]. The phenomenon of duplicate certificates, with equal status, is ironic in itself. This issue raises anxiety among land rights holders, as certificates that should serve as proof of rights instead become a source of conflict.

In the systematic land registration process, various administrative and technical obstacles are often unavoidable. One of the most complex obstacles is the emergence of duplicate certificates with equal legal force. This phenomenon highlights weaknesses in the land administration system and increases the risk of legal uncertainty for the public. Certificate holders face uncertainty over rights that should be guaranteed by the state. This problem raises questions about the reliability of the land registration system and the effectiveness of protection mechanisms for rights holders who are disadvantaged.

The issue of duplicate certificates in systematic land registration reflects the imperfections in Indonesia's land administration system. Registered land rights should provide a sense of security for their owners. However, in the practice of systematic land registration, the reality shows the opposite, with cases of duplicate certificates with equal status being discovered. This uncertainty not only harms those with good intentions but also creates significant social and economic burdens. This situation raises serious questions about the effectiveness of legal protection for rights holders. Therefore, it is necessary to analyze the

existing legal mechanisms in order to provide clarity and fair protection for the injured parties.

In this regard, analyzing the existence of duplicate certificates is crucial for understanding how the legal protection system can be strengthened and how land dispute resolution can be directed towards substantive justice. This situation is crucial to examine, given that the primary purpose of land registration is to ensure legal certainty and protection for the community. An in-depth analysis is needed regarding the legal protection that should be provided to rights holders in good faith.

Systematic land registration is a state instrument for protecting community land rights. However, in its implementation, problems arise from the existence of duplicate certificates with equal legal status. This creates conflicts of interest between parties who each believe they have rights to the land. This issue reflects a gap in the national land system, necessitating a critical review of legal protection efforts for rights holders. Therefore, a study is needed to determine how legal protection can be optimally provided to rights holders in this context.

Research Methods

In legal research, research methods play a crucial role in ensuring that the analysis of legal norms, legal events, and social dynamics related to law is conducted objectively and methodologically. With systematic methods, legal research can uncover relevant facts, examine applicable legal principles, and offer solutions to the legal issues under investigation. The method used in this research is normative legal research, which positions law as a norm or principle governing social life.

Regarding the research object, a normative approach is used because the issue of duplicate certificates in PTSL is a legal issue closely related to the regulation of state authority, the status of certificates as evidence of rights, and the guarantee of protection and legal certainty for land rights holders. This research is not directed at directly examining the behavior of the community or land officials, but rather at analyzing the applicable legal regulations, the underlying legal concepts, and how these norms are designed to provide legal protection for holders of dual certificates. Therefore, this research focuses on law as a norm (law on the books), in order to assess whether the existing land legal system is adequate in guaranteeing legal certainty and protection.

In this normative legal research, several research approaches are used to analyze the problem systematically and comprehensively. The research approach is the perspective or analytical angle used by researchers in examining legal norms so that legal problems can be understood comprehensively and in depth. The statutory approach is used by examining and analyzing all laws and regulations related to land registration and legal protection for land rights holders. (2) The conceptual approach is carried out by examining legal concepts and legal principles relevant to the research object, such as the concepts of legal protection, legal certainty, rights holders, land certificates, and dual certificates. and (3) a case-based approach is used by examining court decisions related to dual title disputes as material for normative analysis. Court decisions are viewed as concrete forms of the application of legal norms and a reflection of how judges interpret and apply land law provisions in resolving conflicts.

The data sources used are secondary data, as this research focuses on the study of law as norms and rules contained in various written legal materials. Data collection techniques in this research were conducted through literature review, which involved systematically collecting, reading, analyzing, and reviewing various legal materials relevant to the research problem.

Result and Discussion

1. Preventive Legal Protection for Holders of Duplicate Certificates with Equal Status

The phenomenon of dual certificates with equal status represents one of the most serious failures in Indonesia's land registration system. This problem not only gives rise to complex land disputes but also directly undermines the normative purpose of land registration as an instrument of legal certainty and protection. In this regard, the discussion of preventive legal protection for holders of dual certificates is crucial, as it addresses a fundamental question: to what extent the law is capable of preventing conflicts before they arise.

Preventive legal protection is normatively defined as legal measures designed to prevent violations or rights disputes from the outset. In land registration, preventive protection should operate before the certificate is issued, not after two or more certificates have been formally issued for the same land. Therefore, when dual certificates with equal status arise, the failure is not merely an administrative failure, but a normative failure in carrying out the function of preventive legal protection.

Duplicate certificates of equal standing mean that each certificate was issued by an authorized official, following formal procedures that appear administratively valid, and are both recorded in the land registration system. Under these circumstances, no certificate can be immediately deemed defective from the outset. This is precisely where the normative problem lies: the land registration system has produced two mutually exclusive legal products, each intended to serve as strong evidence of title.

Normatively, preventive legal protection for holders of duplicate certificates should be rooted in strict, accurate, and transparent procedural regulations for land registration. Legal norms require thorough verification of physical and legal data before certificate issuance. Land surveying, rights history research, data disclosure, and examination of objections from other parties are preventive instruments theoretically designed to eliminate the possibility of duplicate certificates. However, when duplicate certificates persist, it can be concluded that these preventive instruments are ineffective. This failure is often caused by weak land data integration, inaccurate rights history checks, and poor internal oversight. From a normative perspective, this condition indicates a gap between the norms governing preventive legal protection and the practice of implementing them in the field.

In the case of duplicate certificates of equal standing, preventive legal protection can no longer be interpreted narrowly as prevention before the issuance of the first certificate, but must be expanded as a continuing prevention mechanism to prevent conflicts from further harming rights holders. The state, through its legal system, has an obligation to minimize the impact of legal uncertainty created by such administrative errors.

One relevant form of preventive legal protection is the establishment of an accurate and integrated land information system. Normatively, land registration requires integration between registration maps, land books, and other legal data. If this system operates consistently, the likelihood of duplicate certificates being issued can be significantly reduced. The lack of data integration is not merely a technical issue, but also a normative failure to realize the principles of prudence and legal certainty.

Furthermore, preventive legal protection is also closely related to the principles of openness and public participation. The announcement of land registration data aims to provide an opportunity for interested parties to file objections. Normatively, this mechanism serves as a first line of defense against the issuance of overlapping certificates. However, if the announcement is conducted in a formalistic manner without ensuring adequate access to information, its preventive function becomes illusory.

For holders of multiple certificates with similar status, the lack of preventive protection places them in a vulnerable legal position. Each certificate holder has acted based on trust in the state-managed land registration system. Therefore, it is normatively unfair to place the entire risk of administrative errors on the rights holder. Preventive legal protection should include internal state mechanisms to detect, stop, and correct potential conflicts before they escalate into open disputes.

Within the framework of administrative law, preventive protection can also be realized through inherent supervision and quality control of certificate issuance. Legal norms position land officials as subjects with both authority and legal responsibility. If supervision is carried out consistently, errors that could potentially lead to duplicate certificates can be prevented from the outset. The absence of effective supervision actually opens up room for repeated errors and weakens the legitimacy of the land registration system.

Normatively, preventive legal protection for holders of duplicate certificates also requires a higher standard of care in systematic land registration. In administrative law doctrine, Philipus M. Hadjon emphasizes that preventive legal protection aims to prevent rights violations before administrative decisions are made, thus requiring careful and cautious action from state officials at every stage of decision-making^[10]. This view is relevant in the context of systematic land registration, where the state, through land officials, exercises administrative authority that directly impacts citizens' civil rights. Furthermore, Bagir Manan emphasized that the precautionary principle is a logical consequence of the rule of law, as every government action must be legally accountable and must not harm citizens. If systematic land registration is implemented with a low standard of care, the state has normatively neglected its preventive legal protection function and created the opportunity for duplicate certificates with the same status. Therefore, implementing a high standard of care is not merely a technical administrative requirement, but rather a normative state obligation to ensure legal certainty and protection for land rights holders.

Land registration acceleration programs must not sacrifice accuracy. When speed is prioritized without adequate normative safeguards, the risk of duplicate certificates increases. In this context, preventive protection should be realized by balancing speed and accuracy. Therefore,

preventive legal protection for duplicate certificate holders with the same status cannot be reduced to a mere technical procedural issue. It is part of the state's normative responsibility to guarantee legal certainty and justice. Duplicate land titles are an indicator that the land registration system is not yet fully capable of fulfilling its preventive function. Therefore, improving norms, strengthening oversight, and increasing data accuracy must be understood as absolute prerequisites for preventive legal protection. Ultimately, preventive legal protection aims not only to prevent disputes but also to maintain public trust in land law. When two equally valid land titles are issued for the same land, what is at stake is not only individual rights but also the credibility of the rule of law itself. From a normative perspective, failure to prevent duplicate land titles is a failure of the state to fully fulfill its legal protection function.

2. Repressive Legal Protection for Holders of Dual Certificates with the Same Status

Repressive legal protection for holders of dual certificates with equal legal standing is a logical consequence of the failure of preventive legal protection mechanisms in the land registration system. When two or more land title certificates are issued for the same object, each with equal legal standing, the legal certainty that is the primary purpose of land registration is significantly undermined. In this situation, the law no longer functions as a preventative measure but is instead forced to act as a tool of correction and restoration through repressive mechanisms. Repressive legal protection is normatively understood as an effort to resolve and restore rights after a violation or dispute occurs. Unlike preventive protection, which operates before a conflict arises, repressive protection only kicks in once the loss has already occurred. In the context of dual certificates, repressive protection not only deals with resolving disputes between certificate holders but also with efforts to restore the authority of the law that has been tarnished by the issuance of two conflicting legal instruments.

Dual certificates with equal legal standing create a paradoxical situation. On the one hand, each certificate is normatively a strong means of proof of rights. On the other hand, the existence of another certificate for the same object negates this exclusive power. As a result, repressive legal protection cannot simply side with one certificate based solely on the chronology of issuance or the physical existence of the document, but must go through a more in-depth legal testing mechanism. Normatively, repressive legal protection for holders of dual certificates is available through several legal channels: administrative remedies, state administrative courts, and civil courts. Each channel has different characteristics, functions, and limitations, and often overlap in practice. Administrative remedies are an initial form of repressive protection that theoretically aims to resolve administrative errors without having to take the case to court. In the context of dual certificates, this mechanism can include the cancellation or correction of the certificate by authorized officials if administrative defects are proven in the issuance process. However, the effectiveness of repressive protection through administrative channels is often limited, especially when both certificates were issued through formal procedures that appear legitimate.

When administrative remedies fail to provide certainty, holders of dual certificates can resort to state administrative courts to challenge the validity of the administrative decision to issue the certificate. From a normative perspective, this lawsuit is aimed at assessing whether the certificate issuance complied with the procedures and authorities stipulated by law. The state administrative court serves as a tester of the legality of state administrative actions, not as a determinant of the "true" landowner in the civil sense.

However, repressive legal protection through state administrative courts has inherent limitations. The focus of formal-procedural review often overlooks the factual substance of land control and ownership. As a result, decisions to revoke or maintain a certificate do not always fully resolve conflicts, particularly when disputes involve claims stemming from civil relations.

Therefore, repressive legal protection for holders of dual certificates has also shifted to the civil courts. In civil cases, certificates are treated as strong, but not absolute, evidence. Judges will assess the strength of the certificate by considering the entire evidence, including the history of rights acquisition, physical possession, the good faith of the parties, and the consistency of the certificate data with the facts on the ground. In this context, repressive protection no longer relies solely on the formality of the certificate, but rather on an assessment of substantive justice.

The equally strong status of dual certificates places their holders in a vulnerable legal position. Each party can argue that they obtained their rights through legal procedures and in good faith. This situation emphasizes that repressive legal protection does not always produce quick certainty, but often requires a lengthy and complex evidentiary process. Normatively, this condition represents the price paid for weak preventive protection.

From a legal protection perspective, it is important to note that holders of duplicate certificates are essentially victims of systemic failure. They have trusted the state as the land registration administrator and act based on the legitimacy of the certificates issued. Therefore, repressive legal protection should not be understood solely as an arena for individual disputes, but also as a mechanism for holding the state accountable for administrative errors.

However, in normative practice, state responsibility is often not explicitly defined in the dispute resolution mechanism for dual title titles. The burden of proof and legal risk are primarily borne by title holders, while the state's role tends to be limited to issuing administrative decisions. This situation highlights the weaknesses of repressive legal protection structures, which do not fully support the restoration of the rights of victims of systemic errors. Repressive legal protection also faces challenges in terms of effectiveness. Lengthy judicial processes, high costs, and uncertainty of outcome often exacerbate the losses suffered by dual title holders. Normatively, this contradicts the very purpose of legal protection, which should provide a sense of justice and certainty, not prolong legal hardship.

Therefore, repressive legal protection for dual title holders in similar positions should be understood as an emergency corrective mechanism, not an ideal solution. It operates after the system fails, and its effectiveness depends heavily on the law's ability to balance formal certainty with substantive justice. From a normative perspective, repressive protection that rests too heavily on individuals without state

accountability actually exposes fundamental weaknesses in the land registration system. Ultimately, the existence of repressive legal protection should not be used to justify the failure of preventive protection. Duplicate certificates are not merely disputes between citizens, but rather an indicator that the state is not yet fully capable of fulfilling its legal protection function. Repressive legal protection is indeed important as a solution, but normatively, it is a sign that the law has arrived too late.

Conclusion

Preventive and repressive legal protection arrangements for rights holders of duplicate certificates with the same status in the Systematic Land Registration system are normatively available in Indonesian land law, primarily through the UUPA, PP No. 24 of 1997 and its implementing regulations including the Regulation of the Minister of ATR/BPN. Preventive legal protection is realized through the regulation of land registration procedures that include the collection and verification of physical and legal data, the announcement of data to open up space for objections, and administrative supervision before the issuance of certificates. Meanwhile, repressive legal protection is provided through administrative remedies, lawsuits to the State Administrative Court, and dispute resolution through civil courts. However, the existence of duplicate certificates with the same status indicates that the preventive legal protection mechanism has not been running effectively, so that repressive legal protection becomes the main instrument that is corrective and comes after legal losses have occurred. The UUPA and its implementing regulations conceptually provide a basis for legal certainty for land rights holders through land registration and the issuance of certificates as strong evidence of rights. However, this legal certainty is relative because Indonesia adheres to a negative publication system containing positive elements, in which the state does not guarantee the absolute accuracy of the data contained in the certificates. In the case of duplicate certificates with the same status, legal certainty becomes problematic because two certificates that are both formally valid actually negate each other's evidentiary power. As a result, legal certainty for rights holders is not created from the outset (*ex ante*), but can only be obtained after a legally binding court decision (*ex post*). This condition confirms that the guarantee of legal certainty provided by the land registration system does not fully protect certificate holders in good faith from the risk of state administrative errors.

Suggestions and Recommendations

Strengthening preventative legal protection within the Systematic Land Registration system is necessary by establishing the principle of prudence as the primary standard in every stage of land registration. Accelerating land registration should not compromise the accuracy of physical and legal data. Therefore, tightening substantial verification standards, improving the quality of data announcements to ensure transparency and public participation, and integrating an accurate and up-to-date land information system are necessary to prevent duplicate certificates from the outset.

Legal regulations regarding early correction mechanisms for indications of overlapping rights in the systematic land registration process need to be clarified and refined. Existing regulations should provide land officials with clear

authority to delay, stop, or review the registration process if there is a potential dispute or unclear data, so that certificates are not issued under conditions that, by definition, risk conflict.

The state needs to be firmly held accountable for administrative errors in certificate issuance, particularly in mass systematic land registration programs. Regulations regarding institutional accountability, rights restoration mechanisms, and effective sanctions for misconduct by land officials must be clarified to prevent moral hazard and provide fair protection for certificate holders acting in good faith.

Repressive legal protection for holders of dual certificates in similar positions needs to be directed not only at resolving disputes between individuals but also at restoring substantive justice through state accountability. Dispute resolution through administrative and judicial channels should be designed to be more effective, expeditious, and coordinated, so as not to burden rights holders with lengthy, expensive, and uncertain processes.

For the future development of land law, a fundamental evaluation of the land registration publication system is necessary, particularly in the context of legal protection and legal certainty for rights holders. Without serious systemic and normative reforms, land registration has the potential to continue producing duplicate certificates, which will undermine public trust in land law and the rule of law itself.

References

1. Nasution SP, *et al.* Pemberdayaan Ekonomi Masyarakat Dengan Sumber Daya Alam Kelapa Sawit Untuk Meningkatkan Perekonomian Masyarakat Di Desa. *Jurnal Pengabdian Mitra Masyarakat*,2023;2(2):102–12. <https://doi.org/10.30743/jurpammas.v2i2.6747>.
2. Apriliani SD. Perlindungan Hukum Bagi Pemegang Hak Atas Tanah Yang Bersertifikat Ganda (Overlapping). *Jurnal Ilmiah Dinamika Hukum*,2021;22(2):21–30. <https://doi.org/10.35315/dh.v22i2.8715>.
3. Mazwar, Suhaimi, Munirah I, Mahfud. Position of Physical Land Tenure Certificate (Sporadic) Above Cultivation Rights. *International Journal of Advanced Multidisciplinary Research and Studies*,2024;4(3):1670-1674. <https://www.multiresearchjournal.com/archives-list/id-2024.4.3>
4. Taqiyah MA, Winanti A. Perlindungan Hukum Pemegang Sertifikat Atas Tanah Ganda Berdasarkan Peraturan Pemerintah No.24 Tahun 1997. *Jurnal Justisia: Jurnal Ilmu Hukum, Perundang-Undangan Dan Pranata Sosial*,2020;5(1):77. <https://doi.org/10.22373/justisia.v5i1.7272>.
5. Karim MP, Dunga WA, Mantali ARY. Akibat Hukum Dari Diterbitkannya Sertifikat Tanah Dengan Kepemilikan Ganda. *Journal of Comprehensive Science (JCS)*,2023;2(6):1532–43. <https://doi.org/10.59188/jcs.v2i6.372>.
6. Apriani D, Bur A. Kepastian Hukum Dan Perlindungan Hukum Dalam Sistem Publikasi Pendaftaran Tanah Di Indonesia. *Jurnal Bina Mulia Hukum*,2020;5(2):220–39. <https://doi.org/10.23920/jbmh.v5i2.11>.
7. Apriani D, Bur A. Kepastian Hukum Dan Perlindungan Hukum Dalam Sistem Publikasi Pendaftaran Tanah Di Indonesia. *Jurnal Bina Mulia Hukum*,2020;5(2):220–39. <https://doi.org/10.23920/jbmh.v5i2.11>.
8. Santoso U. *Pendaftaran Tanah di Indonesia*. Jakarta: Kencana, 2010.
9. Rizki K. Perlindungan Hukum Pemegang Sertifikat Hak Milik Atas Terbitnya Sertifikat Ganda Berdasarkan Asas Kepastian Hukum. *Aktualita (Jurnal Hukum)*,2020:688–704. <https://doi.org/10.29313/aktualita.v0i0.6763>.
10. Christanto FH. *Perlindungan Hukum Terhadap Pemilik Hak Atas Tanah Akibat Kejahatan Mafia Tanah Berbasis Keadilan*. Doctoral Dissertation, Universitas Islam Sultan Agung Semarang, 2024.