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# Effectiveness of Forest Moratorium Policy Using the EMMIE Framework **Approach**

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#### **ABSTRACT**

The increasing rate of deforestation in Indonesia has become a critical environmental issue that threatens ecological balance and undermines global climate change mitigation efforts. In response, the Indonesian government implemented a permanent forest moratorium policy through Presidential Instruction No. 5 of 2019, aiming to halt the issuance of new permits for primary forest and peatland exploitation. However, its effectiveness at the local level remains questionable, particularly in regions facing strong economic pressures such as Lembang Subdistrict, West Bandung Regency. This study aims to analyze the effectiveness of the forest moratorium policy in Lembang using the EMMIE Framework, which evaluates five dimensions: Effect, Mechanism, Moderators, Implementation, and Economy. Employing a qualitative descriptive approach, data were collected through in-depth interviews with local government officials, community leaders, tourism operators, and residents, complemented by field observations and document analysis. The results reveal that while the moratorium policy has succeeded in stopping the issuance of new forest conversion permits, illegal land use for tourism and commercial purposes continues to occur due to weak law enforcement, overlapping institutional authority, and low community participation. The analysis further shows that economic pressures and the high market value of forest land act as significant drivers of policy violations. From an implementation perspective, the lack of coordination between central and local agencies hinders policy consistency and sustainability. The study concludes that the effectiveness of the forest moratorium policy in Lembang remains limited strengthening institutional coordination, enhancing involvement, enforcing stricter supervision, and promoting sustainable livelihood alternatives to balance environmental protection and local economic development.

Keyword: Forest Moratorium, Deforestation, Policy Effectiveness, EMMIE Framework



### INTRODUCTION

Global climate change poses a serious threat to environmental sustainability worldwide. One of the main contributing factors is deforestation and land conversion in tropical forests, which play a crucial role as natural carbon sinks (Olsson et al., 2022). Indonesia, as one of the countries with the largest tropical forest cover in the world, faces significant challenges in controlling the rate of deforestation. Data shows that Indonesia ranks second in the world for tropical primary forest loss after Brazil. (BBC News Indonesia, 2021). This condition not only impacts the local environment, but also makes a significant contribution to the global climate crisis (Climate Impact Partners, 2024).

In an effort to address these issues, the Indonesian Government issued Presidential Instruction Number 5 of 2019 concerning the Cessation of New Permits and Improvement of Primary Natural Forest and Peatland Governance, which establishes a permanent moratorium on new permits in primary forest and peatland areas. This policy aims to reduce the rate of deforestation while encouraging more sustainable forest management. However, the effectiveness of this policy's implementation at the local level has not shown optimal results, especially in areas facing high development pressures and economic interests.

One area that has become a focus of attention is Lembang District, West Bandung Regency, West Java. This area has a very important ecological function as a buffer zone and water source for the Greater Bandung area (Larasanti, 2023). However, in recent years, there has been a conversion of forest land into commercial tourist destinations such as glamping, resorts, and nature-based recreational facilities, even though the area is legally a protected and conservation area (detikJabar, 2025). Weak supervision, overlapping authority between agencies, and low participation of local communities further worsen the situation on the ground.

Based on a literature review, no research has been found specifically examining the effectiveness of the forest moratorium policy in Lembang District, despite this area's high ecological significance as part of the North Bandung Region and a strategic water catchment area. Most studies of forest moratoriums in Indonesia have focused on Kalimantan and Sumatra, while studies in the West Java highlands are still very limited. Research conducted in West Kotawaringin Regency and Kapuas Regency, Central Kalimantan, found that the forest moratorium has not been effective in reducing forest conversion and carbon emissions, mainly due to company investments in secondary forests on mineral soils and the absence of alternative livelihood programs as required by the Paris Agreement (Suwarno et al., 2018).

Another study concluded that the national moratorium was quite strategic in reducing deforestation in the large-scale plantation sector but still faced implementation challenges at the local level (Austin et al., 2019). Meanwhile, research has shown that the moratorium has made only a minimal contribution in suppressing the expansion of oil palm plantations and has been less effective in maintaining ecosystem services in Kalimantan (Lim et al., 2019).

The novelty (state of the art) of this research lies in two aspects. First, the study area focuses on Lembang District, an area with significant deforestation dynamics that has not been studied specifically. Second, it applies the EMMIE Framework as a policy evaluation framework, which is still rarely used in forestry studies in Indonesia, despite its advantages in comprehensively evaluating policy effectiveness through five dimensions: Effect, Mechanisms, Moderators (context), Implementation, and Economy (Tilley, 2016). In this study, effectiveness is understood as the level of achievement of predetermined goals in a measurable, structured manner, and according to success indicators. Effectiveness is measured not only by the policy's ability to reduce deforestation but also by how the policy is implemented, accepted, and impacts communities and ecosystems (Tilley, 2016).

The aim of this study is to analyze the effectiveness of existing regulations using the EMMIE Framework approach. The EMMIE approach enables policy evaluation that focuses not only on final outcomes but also on the processes and contexts that influence policy achievement (Croci, 2024). This framework is considered relevant for analyzing complex public policies, such as the forest moratorium, because it can explain both the technocratic and social aspects involved. Based on this description, this study aims to analyze the effectiveness of the forest moratorium policy in Lembang District using the EMMIE Framework approach.

The results are expected to provide a comprehensive, evidence-based evaluative overview of environmental policy implementation at the local level, while also providing a basis for recommendations for improving similar policies in the future. Based on the explanation

above, this study is interested in raising the problem formulation of how is the Effectiveness of the Forest Moratorium Policy Using the EMMIE Framework Approach?.

#### **RESEARCH METHODS**

This study employs a descriptive qualitative approach to examine the effectiveness of the forest moratorium policy in reducing deforestation in Lembang District, West Bandung Regency. This approach was selected because it enables an in-depth exploration of policy implementation dynamics at the local level. The research location was purposively chosen, as it represents a protected forest area facing significant land conversion pressures. The study was conducted from February to May 2025.

Primary data were obtained through in-depth interviews with government officials, community leaders, tourism operators, and residents living around the forest area, with a total of five informants representing these key actors. Secondary data were derived from policy documents, spatial maps, and official reports. Data collection techniques included semistructured interviews, participant observation, and documentation review.

The collected data were analyzed thematically using the EMMIE Framework, which encompasses five key evaluation: Effect, Mechanisms, Moderators, Implementation, and Economy. Data analysis followed the interactive model of data collection, condensation, conclusion drawing, and verification. Each data item was categorized according to these dimensions and analyzed narratively. The validity of findings was ensured through triangulation of data collection techniques and sources, as well as validation of interpretations through member checking with informants (Creswell, 2016; Miles et al., 2014; Tilley, 2016).

#### **RESULTS AND DISCUSSION**

Based on research conducted in Lembang District, West Bandung Regency, it was found that the effectiveness of Indonesia's forest moratorium policy in reducing deforestation rates still faces various challenges during implementation. Normatively, Presidential Instruction No. 5 of 2019 has halted the issuance of new permits in primary forest and peatland areas. However, field findings indicate that land conversion practices continue. Interviews and observations revealed that some areas that should be protected are being developed into tourist destinations without proper permits or through weak licensing procedures (Triana, 2025). This situation is further exacerbated by poor oversight, weak inter-agency coordination, and the economic pressures faced by communities surrounding forest areas. The research findings are categorized into five dimensions of the EMMIE Framework, as shown in Table 1.

Table 1. Findings based on each dimension

No.	Dimension	Findings
1	Effect	Land conversion continues to occur even though the moratorium policy is implemented.
2	Mechanisms	The PIPPIB map is not accompanied by alternative economic solutions.
3	Moderators	Overlapping authority and spatial planning conflicts are the main obstacles.
4	Implementation	Low supervision and weak cross-agency coordination.
5	Economy	Economic pressures are pushing people to sell or convert land.

Source: Processed by the Author (2025).

A concrete example of this problem is the existence of tourist attractions like Kampung Gajah and Kilogram Space, which operate in protected forest areas. Meanwhile, programs like social forestry have not yet reached all communities, leaving access to alternative economic opportunities limited.

#### 1. Effect

Policy effectiveness is the primary measure of how successfully an intervention or public policy achieves its empirically established objectives. In the context of the forest moratorium policy in Lembang District, effectiveness can be observed through its direct impact on the ground, encompassing ecological, administrative, and social aspects. The forest moratorium, enacted under Presidential Instruction Number 5 of 2019, has placed strict restrictions on activities that could potentially damage forest areas, particularly in protected and conservation areas.

One of the most visible indicators of this moratorium's success is the total ban on logging and any activities that alter the landscape's structure. This information was obtained from informants from the Forestry Service, who stated that forest areas in Lembang are no longer permitted for mining or logging activities, as they are classified as protected and conservation forests. This provision also aligns with Government Regulation Number 23 of 2021 concerning Forestry Implementation, which expressly prohibits open-pit mining activities in protected forest areas and limits activities that could potentially degrade the area's function, damage soil structure, or disrupt the ecosystem's balance.

Furthermore, the use of the area for commercial purposes, such as tourism or education, must adhere to environmental conservation principles. This means that while there is scope for collaboration with the private sector in ecotourism development, permanent physical interventions are prohibited to avoid disrupting the integrity of the forest ecosystem.

The effectiveness of this policy is also reflected in a stricter permit control system. Based on interviews with informants, only national strategic projects (PSN) can obtain land use permits through the mechanism of amending the Indicative Map for Postponement of New Permits (PIPPIB). Beyond that, non-PSN private parties experience restricted access to forest areas. This finding is reinforced by a significant decrease in illegal development, such as villas and glamping sites, in conservation areas such as Tangkuban Parahu and Maribaya.

This indicates that administratively, the moratorium has succeeded in increasing state control over permits and land conversion. However, this effectiveness has not been fully distributed on the ground. Interviews with several informants revealed inequalities in permit granting, where certain actors continue to gain access to forest areas due to the influence of political power. For example, a well-known ecotourism company obtained a development permit in a conservation area, while similar applications from other actors were rejected (JawaPos, 2025). This phenomenon demonstrates that although the moratorium policy is normatively effective, its implementation on the ground still faces structural and political obstacles.

This situation also has social impacts, particularly among communities whose livelihoods depend on access to forest land. Several informants stated that since the moratorium was implemented, some land previously managed by residents is no longer accessible, leading to economic hardship and a sense of injustice due to the lack of community involvement in the policy formulation process. This inequality demonstrates that policy effectiveness is measured not only by technical and administrative aspects, but also by the extent to which the policy is able to accommodate social justice and inclusive community participation.

Thus, the moratorium policy in Lembang District can be said to be effective in curbing the rate of new permit issuance and strengthening protection of conservation forest areas. However, this effectiveness has not been fully consistent at the implementation level. Gaps in oversight and enforcement remain, allowing for hidden land conversion. Therefore, the success of the moratorium depends not only on the strength of its regulations but also on political commitment, strict oversight, and community involvement in the decision-making process. The impact of a policy will undoubtedly have direct implications for existing policy actors. Research conducted by Febriany & Rahardian (2020) found that the impact of existing policies will directly generate responses in the community. The effect of a policy is key to

whether the policy can be implemented well in the environment where the policy is implemented or not (Croci, 2024).

#### 2. Mechanisms

The mechanisms dimension in the EMMIE Framework focuses on how a policy works in practice, through specific channels or processes designed to produce the desired policy effects. In the context of the forest moratorium policy in Lembang District, the implementation mechanisms demonstrate a variety of approaches, including administrative, institutional partnerships, and participatory approaches. One of the most prominent mechanisms is the periodic updating of the Indicative Map of Postponement of New Permits (PIPPIB), which is conducted twice a year by the Ministry of Environment and Forestry (Forest Watch Indonesia, 2015).

This mechanism serves as a crucial administrative control tool, as each new permit application must align with the latest map showing forest protection zones. Through this update, the government strives to maintain consistency in protecting primary forest and peatland areas and prevent overlapping permits. Furthermore, the involvement of local governments and academics in this process demonstrates an effort to make the PIPPIB a data-driven oversight tool. Thus, the PIPPIB update is not merely procedural but also reflects the precautionary principle in forest area governance.

Another mechanism implemented in the field is a conservative partnership model between Perhutani, forest village communities (LMDH), and private partners. In this model, the use of forest areas for nature tourism is based on environmental conservation principles. Although the area is open to the public, no permanent buildings or activities that damage forest vegetation are permitted. This approach emphasizes a balance between conservation and economic benefits for local communities through a profit-sharing system. This practice, for example, occurs in Perhutani's collaboration with the Papedas community group in preserving the Orchid tourist area, which also serves as a means of reforestation and environmental education.

In addition to conservative partnerships, social forestry is also an important mechanism in implementing the moratorium. Through this program, communities are given legal access to manage forest areas productively, while still considering sustainability aspects. The Work Agreement Document (DKK) and Decree (SK) issued by the government serve as the legal basis for communities to develop eco-tourism villages or forest farms. However, since 2023, significant changes have occurred with the transfer of management to PT Palawi Risorsis, a subsidiary of Perhutani. This shift indicates a transition from a participatory approach to a more corporate model, which has the potential to reduce the space for community participation. Although these mechanisms have been designed with formal structures and good intentions, their implementation still faces challenges.

One of the main obstacles is weak oversight on the ground and overlapping authority between the central and regional governments. Since the enactment of the Job Creation Law, regional authority in managing forest areas has been limited (Shalmont & Dominica, 2022), This creates a gap between national regulations and local realities. Furthermore, community involvement remains suboptimal, particularly in areas with limited access. Many residents and village officials are unaware of the contents of the moratorium policy, including Presidential Instruction No. 5 of 2019, creating a significant information gap between policymakers and field implementers.

This situation is exacerbated by unclear coordination mechanisms and inter-agency responsibilities. Forest Village Community Institutions (LMDH), which should be strategic partners, are often excluded from decision-making processes. When violations occur in the field, community reports are not always promptly addressed due to lengthy bureaucratic processes. This indicates that vertical mechanisms from the central government to the regions have not been effective, both in terms of policy dissemination and technical implementation.

Thus, although theoretically the moratorium policy has been equipped with formal, collaborative, and participatory mechanisms, its effectiveness at the local level is still heavily influenced by institutional factors such as clarity of authority, involvement of local actors, and effective oversight. Without improvements in these aspects, the designed policy mechanisms will struggle to function optimally to achieve their primary goal, namely sustainable forest conservation. Research conducted by Alma'Arif, Satyapraja & Sum (2024) found that their study emphasized the role of mutual trust between the government and local communities as a crucial factor in encouraging inclusive participation, from policy planning to implementation and evaluation in environmental issues. The implementation of a policy has an impact on whether a policy is effective and has a broad impact on a policy (Tilley, 2016).

### 3. Moderators

The moderator dimension in the EMMIE Framework refers to contextual factors that can strengthen or weaken the effectiveness of a policy. These moderators can be social, economic, institutional, or environmental, and their presence significantly determines the extent to which a policy can be implemented as expected. In the implementation of the forest moratorium policy in Lembang District, various moderators identified in the field revealed a complex and dynamic situation. One of the main inhibiting factors identified was the community's lack of understanding of forest area boundaries and ignorance of applicable regulations. Many residents still view forest areas as community property, not as part of a state-managed area (Ikhlas & Jauhari, 2024).

This lack of understanding allows for violations, such as unauthorized land use, encroachment, or uncoordinated non-permanent development. This lack of legal literacy demonstrates the government's lack of adequate information dissemination to residents living directly adjacent to the forest. In addition to this lack of legal understanding, public environmental awareness remains a problem. This was evident in the flood disaster that occurred in May 2025, which some informants attributed to residents' poor hygiene and littering in the forest tourism area. However, other stakeholders expressed differing views, stating that damage to upstream areas due to land use change and weak conservation oversight were the primary causes of the increased disaster risk (detikJabar, 2025).

These differences in perception indicate the lack of a common narrative and cross-sectoral coordination in addressing environmental issues comprehensively, which ultimately impacts the effectiveness of overall policies. Economic factors also play a significant role in moderating the success of the moratorium policy. Forest areas in Lembang have high economic value, particularly in the tourism and agricultural sectors. This economic incentive often conflicts with the conservation spirit promoted by the moratorium policy. Communities and businesses tend to be encouraged to expand cultivated land or build new tourism facilities, even though this could potentially violate protected forest area regulations.

Furthermore, capacity disparities between villages also hinder the equitable implementation of sustainability principles. Some villages, such as Jayagiri, are considered better prepared in terms of institutions, training, and network access, compared to others, such as Cikole, which still face resource constraints. Nevertheless, there are also supporting factors that strengthen the implementation of the moratorium, particularly in the form of community support in certain areas. In Cikole Village, for example, the community has shown strong support for forest-based tourism management because this activity provides direct economic benefits, such as employment, business opportunities, and increased local income.

Community involvement in conservation partnership models and social forestry is a positive element that can strengthen the policy's effectiveness on the ground. However, institutional issues pose a challenge. The legal standing of Forest Village Community Institutions (LMDH) is not as strong as that of formal government institutions or corporate entities like PT Palawi Risorsis. This imbalance in institutional structure results in LMDHs often receiving insufficient budgetary support and minimal involvement in decision-making. Yet,

LMDHs are the local actors closest to forest areas and possess field knowledge that can serve as a valuable source of information for monitoring and preserving them.

Taking these findings into account, it can be concluded that the success of the forest moratorium policy is greatly influenced by the strength or weakness of contextual moderators. On the one hand, growing public awareness through a partnership approach is a strategic supporting factor. However, on the other hand, economic pressures, fragmentation of authority between governments, and weak local institutions are major obstacles that need to be addressed immediately. Without managing these moderating factors holistically, the effectiveness of the moratorium policy will only be partial and unsustainable at the local level. Tiley et al. (2016) explain that policy effectiveness reflects the number of successes and failures a policy can determine.

#### 4. **Implementation**

Policy implementation is a crucial bridge between policy formulation and the achievement of results on the ground. Within the EMMIE Framework, implementation refers to how policies are actually implemented, including consistency of implementation, actor involvement, and obstacles encountered during the process. In the context of the forest moratorium policy in Lembang District, policy implementation demonstrates complex dynamics and does not always proceed uniformly across regions. Normatively, the moratorium policy is implemented with a repressive and administrative approach, one of which is through the imposition of sanctions for violations of protected forest area use.

The West Java Provincial Government, through the Forestry Service, states that any form of unauthorized development in protected areas is subject to dismantling and legal sanctions. This statement demonstrates a strong legal commitment to protecting conservation areas from illegal activities, as emphasized in the following interview:

"A lot of development has already been done, especially in the nature tourism sector. As long as it doesn't cause damage and can be controlled, not all of these activities will be immediately regulated." (Interview, May 26, 2025, at the West Java Provincial Forestry Office).

However, behind these normative commitments, practice on the ground demonstrates a more complex dynamic. One of the main challenges in implementation is the shift in the cooperation model from one based on community participation to a more corporate one. This is evident in the transfer of management of tourist areas to PT Palawi Risorsis, a subsidiary of Perhutani, which has reduced the space for community involvement in strategic decisionmaking. The role of local residents in this scheme is often limited to labor, with no substantive authority to determine the direction of area management.

This dominance of corporate actors creates a power gap and undermines the principle of ecological justice that should be the foundation of conservation policy. As a result, community participation tends to be symbolic and does not fully reflect local aspirations. This inequality is exacerbated by the government's inconsistent approach to enforcement. Unlicensed tourism activities are not immediately stopped, especially if they are deemed not to cause direct damage. This inconsistency has the potential to create injustice and weaken the policy's legitimacy in the eyes of the community.

On the other hand, there are also areas that demonstrate relatively positive implementation practices. Jayagiri Village serves as an example of how collaboration between communities and forest managers can create sustainable utilization patterns. Residents in this village utilize specific zones within the forest to grow coffee and grass under tree stands, without damaging the area's ecological structure. This practice demonstrates that when there is certainty about zoning and effective communication, policies can be implemented in an orderly manner and in alignment with conservation principles. However, the experience of Jayagiri Village has not yet fully become a universal pattern. Illegal land conversion practices are still found in other areas, such as the construction of Kilogram Space in a protected forest zone, which demonstrates weak oversight and the potential for political interference in the permitting process (Triana, 2025). In this case, not only the rules were violated, but also the principles of transparency and accountability in public policy making.

From these findings, it appears that the successful implementation of the forest moratorium policy is largely determined by several factors: first, institutional firmness in enforcing the law; second, the form of cooperation implemented between the state, communities, and the private sector; third, consistency in imposing sanctions for violations; and fourth, the capacity of communities to actively participate in area management. Implementation requires not only strong regulations but also strategies that adapt to local conditions, while maintaining the community as the primary subject in forest conservation. Policy implementation will also be successful if policy actors can translate various existing policy techniques (Rahardian, 2024). In policy implementation influences the public's response to the acceptance of a policy (Tilley, 2016).

## 5. Economy

The Economy dimension in the EMMIE Framework highlights how a policy impacts the economy, both in terms of direct benefits, costs, and new economic opportunities created by the intervention. In the forest moratorium policy in Lembang District, the economic dynamics that emerged were not linear. Rather than simply suppressing community economic access, this policy actually encouraged adaptation, innovation, and transformation toward more sustainable economic practices, particularly in areas with social and institutional readiness. One of the most prominent economic transformations was the development of conservation-based ecotourism.

Communities that previously depended on land clearing or extractive practices for their livelihoods are now shifting resources and labor to the environmental services sector. Activities such as forest trekking, educational tours of medicinal plants, and the utilization of honey and coffee from forest areas demonstrate that the potential of a green economy has become a promising alternative, especially for communities in areas like Cikole and Jayagiri.

In this case, the moratorium policy serves not merely as a barrier but also as a catalyst for a more environmentally friendly economic transformation. This situation demonstrates the process of "economization of conservation," where forest preservation is no longer viewed as an economic obstacle but rather as an opportunity for new growth. This aligns with the sustainable livelihoods approach, where local communities play a key role in creating livelihoods based on natural resources without destroying them. New job opportunities emerge through community collaboration with Perhutani and private partners, as seen in the tourism sector in the Orchid Forest area, where residents are involved as parking managers, food providers, and local guides.

However, these positive economic impacts are not fully distributed. Field findings indicate that only a portion of the community involved in formal institutions such as the LMDH (Land Management Unit) has direct access to these new economic resources. Other community groups not involved in official schemes, such as smallholder farmers, small business owners, or informal service providers, still face structural barriers in accessing these opportunities. They often operate in a gray area, neither fully legal nor formally involved. This inequality indicates that the conservation-based economy is not yet fully inclusive. In this context, the moratorium policy presents a paradox.

On the one hand, it paves the way for a sustainable economy. On the other, it also creates new exclusions, especially for those without institutional connections or access to information and capital (Luhukay, 2021). Restrictions on permits in areas included in the Indicative Map for Postponement of New Permits (PIPPIB), for example, have impacted the economic activities of communities that previously relied on agriculture or other productive land uses. Thus, the economic dimension of the forest moratorium policy in Lembang District demonstrates ambivalence: this policy simultaneously presents both an opportunity and a

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challenge. It can strengthen community economic independence if supported by training, incentives, and equitable benefit distribution. However, without attention to equity and social inclusion, this policy can also widen socioeconomic gaps within communities. Therefore, future conservation policy design needs to consider not only ecological sustainability but also the accompanying economic justice. The economic impact will also be a crucial factor in policy acceptance within the community (Dunn, 2018).

### CONCLUSION

The forest moratorium policy implemented in Lembang District, West Bandung Regency, has had a positive impact, particularly in curbing the issuance of new permits in primary forest and peatland areas. This indicates that the policy is effective in preventing legal expansion that could potentially accelerate deforestation. However, this study also shows that the policy's overall effectiveness remains limited. Illegal land conversion, particularly for the development of commercial tourism destinations, remains rampant despite the moratorium's implementation.

Based on analysis using the EMMIE Framework, it was found that the policy's impact was indeed visible in terms of preventing the issuance of new permits, but the implementation mechanism in the field was suboptimal due to a lack of information dissemination, community involvement, and cross-sector coordination. Contextual factors such as economic pressure, high land prices, and fragmentation of authority between institutions also influenced low compliance with the policy. From an implementation perspective, weak oversight and inconsistent law enforcement often resulted in the policy not being implemented in accordance with existing provisions.

Furthermore, the economic dimension showed an uneven impact. While the moratorium policy encouraged the emergence of green economy practices through the development of ecotourism and social forestry, some communities experienced a decrease in income due to the loss of access to previously usable land. Thus, it can be concluded that the forest moratorium policy in Lembang District has not been fully effective. To optimally achieve the policy's objectives, strengthening implementation mechanisms, increasing community participation in forest management, strict law enforcement against violations, and providing sustainable livelihood alternatives for local communities are needed to ensure environmental conservation and economic development can coexist.

#### **ACKNOWLEDGEMENT**

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