

ABSTRAK

PERIZINAN IMPOR KENDARAAN BERMOTOR PENUMPANG NON-AGEN TUNGGAL PEMEGANG MEREK

Oleh

STEVAN SANTIAGO RAWIS

Perizinan impor kendaraan bermotor penumpang *Non-Agen Tunggal Pemegang Merek* merupakan hal yang penting bagi importir dalam menjalankan kegiatan usahanya. Melalui reformasi regulasi izin usaha termasuk impor yang telah dilakukan pemerintah Indonesia berdasarkan Peraturan Pemerintah Republik Indonesia Nomor 28 Tahun 2025 tentang Penyelenggaraan Perizinan Usaha Berbasis Risiko yang bertujuan meningkatkan efisiensi, transparansi, terintegrasi sistem, serta mekanisme fiktif-positif. Berdasarkan tujuan reformasi regulasi izin usaha termasuk impor yang telah ditetapkan, dampak nyata terhadap impor kendaraan bermotor sangat ditentukan sejauh mana regulasi teknis turunannya berperan sesuai dengan reformasi regulasi izin ini.

Permasalahan dalam skripsi ini adalah: (1) Bagaimanakah prosedur perizinan dalam usaha impor kendaraan bermotor penumpang Non-Agen Tunggal Pemegang Merek? dan (2) Bagaimana koordinasi antar instansi dalam perizinan impor kendaraan bermotor penumpang Non-Agen Tunggal Pemegang Merek? Penelitian ini menggunakan metode yurdis empiris dengan mendalami peraturan hukum yang berlaku dan mendalami implementasi di lapangan. Data yang digunakan yaitu sumber data primer melalui wawancara kepada pelaku usaha, Kepala Biro Hukum Sekjen Kementerian Perdagangan, Direktur Industri Maritim Alat Transportasi dan Alat Pertahanan, Kepala Seksi Impor IV Direktorat Teknis Kepabeanan, Kepala Balai Pengujian Laik Jalan dan Sertifikasi Kendaraan Bermotor, dan Kasi Registrasi dan Identifikasi serta sumber data sekunder berdasarkan peraturan perundang-undangan dan kebijakan serta kepustakaan

Hasil penelitian menunjukkan bahwa (1) Prosedur perizinan usaha ini melibatkan beberapa instansi pemerintah yang berwenang berdasarkan syarat serta prosedur teknis turunan, namun masih terdapat ketidaksederhanaan dalam sistem reformasi perizinan ini dan (2) Koordinasi antar instansi pada implementasinya masih terdapatnya tumpang tindih kebijakan hukum dan ketidakharmonisan prinsip koordinasi antar instansi.

Kata Kunci: Perizinan, impor, kendaraan Non-Agen Tunggal Pemegang Merek, prosedur, koordinasi.

ABSTRACT

NON-SOLE AGENT PASSENGER MOTOR VEHICLE IMPORT LICENSING

By

STEVAN SANTIAGO RAWIS

Non-sole agent passenger motor vehicle import licensing is an essential aspect for importers in conducting their business activities. Through the regulatory reform of business licensing, including import permits, the Government of Indonesia has introduced Government Regulation of the Republic of Indonesia Number 28 of 2025 concerning the Implementation of Risk-Based Business Licensing, which aims to enhance efficiency, transparency, system integration, and the implementation of a positive-fictitious mechanism. In accordance with the objectives of the regulatory reform on business licensing, including importation, the actual impact on motor vehicle imports largely depends on the extent to which the derivative technical regulations function in alignment with the spirit of this reform.

The problems examined in this thesis are: (1) What is the licensing procedure for importing passenger motor vehicles by non-sole brand holder agents (Non-ATPM)? And (2) How do government agencies coordinate in the licensing process for such imports? This study uses an empirical juridical method, focusing on the analysis of relevant legal regulations and their practical implementation. The data were collected from primary sources, including interviews with business actors, the Head of the Legal Bureau at the Ministry of Trade, the Director of IMATAP, the Head of Import Section IV at the Directorate of Customs Technical Affairs, the Head of the Roadworthiness Testing and Vehicle Certification Center, and the Director of Vehicle Registration and Identification. Secondary data were also used to support the analysis.

The research findings indicate that: (1) The licensing procedure for vehicle import businesses involves several authorized government agencies based on derivative technical requirements and procedures; however, the licensing reform system still lacks simplicity; and (2) In practice, inter-agency coordination among competent authorities remains hindered by overlapping legal policies and the absence of harmonized coordination principles among institutions.

Keywords: *Licensing, import, Non-Sole Agent motor vehicles, procedures, coordination.*