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Legal Compliance and Government Supervision of Hazardous Waste Management in Cement Packaging

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Abstract

This study analyzes the legal compliance of PT Semen Baturaja Tbk. Unit Panjang regarding environmental approvals and reporting in hazardous and toxic (B3) waste management, while evaluating administrative supervision executed by the Environmental Agency (Dinas Lingkungan Hidup) of Lampung Province. Applying a normative-empirical research method with a primary focus on empirical implementation, the investigation utilizes a statute approach and a conceptual approach. Primary data were systematically collected through semi-structured interviews with corporate Health, Safety, and Environment (HSE) administrators and regional environmental officers, complemented by structured field observations at the Temporary Storage Facility (TPS Limbah B3). Secondary data comprised environmental approvals, technical details, e-manifests, and periodic reportings via the SIMPLE application. The findings indicate that PT Semen Baturaja Tbk. Unit Panjang has fulfilled both administrative and operational legal requirements pursuant to Government Regulation No. 22 of 2021 and Minister of Environment and Forestry Regulation No. 6 of 2021. Compliance is evidenced by valid Environmental Approvals, technical specifications for storage, systematic logbook maintenance, electronic manifest usage, and partnerships with licensed third-party waste managers. Concurrently, administrative supervision by the Environmental Agency of Lampung Province encompassing electronic report evaluations, manifest verifications, and field inspections has

operated effectively. Despite facing constraints such as budget and personnel limitations, active supervision has successfully fostered corporate compliance without requiring severe administrative sanctions, demonstrating that synergy between state oversight and internal corporate governance plays a pivotal role in preventing industrial environmental pollution.

A. Introduction

The cement industry constitutes a major industrial sector generating Hazardous and Toxic Waste (Limbah Bahan Berbahaya dan Beracun, hereinafter B3 Waste) in substantial volumes. These wastes originate primarily from auxiliary operational activities, including mechanical equipment maintenance, machinery lubrication, chemical usage, and environmental control systems. In non-kiln industrial facilities such as PT Semen Baturaja Tbk. Unit Panjang in Bandar Lampung which operates exclusively as a cement mixing, packaging, and distribution terminal with an annual packaging capacity of 350,000 tons clinker calcination is not performed on-site. Nevertheless, operational activities regularly produce B3 wastes, including used lubricating oil, contaminated rag filters, chemical packaging residues, laboratory test wastes, and spent dust collector bag filters. Because Unit Panjang is geographically situated in close proximity to dense coastal residential settlements in the Panjang sub-district, rigorous adherence to statutory environmental regulations is paramount to prevent chemical contamination and public health hazards.

Indonesia's statutory framework for environmental protection establishes stringent obligations for industrial waste generators. Article 28H Paragraph (1) of the 1945 Constitution guarantees the fundamental human right to a proper and healthy living environment, a principle echoed in Article 33 Paragraph (4) requiring sustainable and environmentally conscious national economic development. Under Law No. 32 of 2009 on Environmental Protection and Management (UU PPLH), Article 59 Paragraph (1) mandates that

every entity generating B3 waste must conduct comprehensive waste management. This primary statutory duty is operationalized through Government Regulation No. 22 of 2021 on the Implementation of Environmental Protection and Management (PP No. 22/2021) and Minister of Environment and Forestry Regulation No. 6 of 2021 (Permen LHK No. 6/2021). These regulatory instruments require formal Environmental Approvals (Persetujuan Lingkungan), technical specifications for storage facilities (Rincian Teknis TPS Limbah B3), systematic logbook recording, electronic manifest tracking, and mandatory periodic reporting.

Recent administrative shifts following the implementation of risk-based business licensing via the Online Single Submission (OSS) system have streamlined regulatory approvals across Indonesia. While intended to improve the ease of doing business, this administrative streamlining places heightened reliance on self-compliance by business entities and active post-licensing supervision by regional government authorities. Existing literature on environmental law compliance in Indonesia has heavily emphasized integrated cement manufacturing plants or high-profile judicial disputes, such as the Supreme Court Review Decision No. 99/PK/TUN/2016 regarding environmental permits in Rembang, or public nuisance controversies involving fugitive dust emissions in Semen Padang. However, academic inquiry examining the legal compliance of non-kiln cement packaging terminals coupled with administrative supervision executed by provincial environmental agencies (Dinas Lingkungan Hidup) remains distinctly sparse.

This research addresses this gap by analyzing the empirical legal compliance of PT Semen Baturaja Tbk. Unit Panjang and evaluating the administrative supervision conducted by the Environmental Agency of Lampung Province. Methodologically, this study employs a normative-empirical legal research design with a primary empirical emphasis. Normative analysis examines statutory norms in PP No. 22/2021 and Permen LHK No. 6/2021 using statute and conceptual approaches. Empirical investigation assesses actual

compliance and supervisory practices through semi-structured interviews with corporate HSE administrators and provincial environmental officers (Pengendali Dampak Lingkungan Ahli Muda), combined with field observation checklists at the TPS Limbah B3 facility. Collected data were analyzed using interactive qualitative analysis (data reduction, display, and conclusion drawing) verified through source and method triangulation. Consequently, this study investigates two central research problems: (1) How does PT Semen Baturaja Tbk. Unit Panjang fulfill its statutory legal compliance regarding environmental approvals, technical storage standards, and electronic reporting? and (2) How effectively is administrative supervision conducted by the Lampung Province Environmental Agency in overseeing B3 waste management operations?

B. Discussion

Administrative and Technical Legal Compliance in B3 Waste Management

Assessment of legal compliance requires evaluating whether a legal subject aligns its conduct with normative statutory mandates. Applying Soerjono Soekanto's legal consciousness framework—comprising legal knowledge, legal understanding, legal attitude, and legal behavior patterns PT Semen Baturaja Tbk. Unit Panjang demonstrates robust corporate legal compliance. Corporate management possesses clear knowledge and precise understanding of its obligations as a B3 waste generator under PP No. 22/2021. Rather than treating environmental management as mere formal bureaucracy, the company translates statutory requirements into operational workflows.

Empirical records from 2025 demonstrate systematic tracking of B3 waste generation across operational quarters. During Semester I (January–June 2025), total B3 waste generation recorded was 0.6149 tons, predominantly comprising used lubricating oil (0.3971 tons), laboratory wastes (0.2037 tons), and chemical packaging containers (0.0141 tons). In Semester II (July–December 2025), total generation increased by 34.80% to 0.8289 tons, primarily driven by laboratory

quality control testing (0.3943 tons) and the periodic replacement of dust control bag filter media (0.2234 tons) and mechanical filters (0.0075 tons). Although total daily generation remains well below the 50 kg/day regulatory threshold defined in Permen LHK No. 12/2020, statutory compliance requires strict adherence to technical storage, logging, and disposal standards.

Table 1. Recapitulation of B3 Waste Generation at PT Semen Baturaja Tbk. Unit Panjang (2025)

No	Waste Code	Waste Description	Sem I (Tons)	Sem II (Tons)
1	B105d	Used Lubricating Oil	0.3971	0.1977
2	A102d	Spent Lead Acid Batteries	0.0000	0.0000
3	B110d	Contaminated Cotton Rags	0.0000	0.0000
4	B104d	Chemical Packaging Residues	0.0141	0.0006
5	A106d	Laboratory Testing Wastes	0.2037	0.3943
6	B107d	Electronic Wastes	0.0000	0.0000
7	B307-3	Used Equipment Filters	0.0000	0.0075
8	B109d	Spent Dust Bag Filters	0.0000	0.2234

Source: HSE Department, PT Semen Baturaja Tbk. Unit Panjang (2026)

Regarding statutory administrative instruments, Unit Panjang maintains full documentation compliance. The facility holds valid Environmental Approvals (Decree No. 660/475/A0002257/V.16/24) and official Technical Details for TPS Limbah B3 (Document No. KM.01.12/0598/2023). Field observations verified using a 20-item checklist aligned with Permen LHK No. 6/2021 confirmed full operational compliance (100% 'Yes' ratings). The TPS Limbah B3 facility is physically isolated from general work zones, features restricted key-card access, impervious concrete floorings, rainwater protection, adequate natural ventilation, emergency spill kits, APAR fire extinguishers, clear hazard symbols, and waste-specific labeling. Furthermore, logbook entries are updated continuously, electronic

reports are transmitted quarterly via the national SIMPLE application, and off-site transportation is handled exclusively by licensed third-party contractors (PT Dame Alam Sejahtera and PT Pengolah Limbah Industri Bekasi) using official electronic manifests (e.g., Manifest No. ADI20251002-1769).

Government Administrative Supervision and Supervisory Synergy

Administrative supervision serves as a crucial preventive instrument in administrative law, enabling executive authorities to ensure business activities conform to environmental protection standards. Under Article 71 of UU No. 32/2009 and PP No. 22/2021, the Lampung Province Environmental Agency holds supervisory jurisdiction over industrial facilities in the region. Empirical findings reveal that supervision at Unit Panjang operates through two complementary channels: digital administrative evaluation and direct field inspection.

Digital oversight is conducted via periodic evaluation of electronic reports submitted through the SIMPLE application, combined with verification of e-manifest logs tracking waste movement from generator to licensed processor. Field supervision encompasses physical inspections of TPS construction, safety apparatus, waste segregation, logbook fidelity, and emergency response readiness. Interviews with DLH Lampung officials (Pengendali Dampak Lingkungan Ahli Muda) reveal that supervisory activities emphasize preventive guidance and administrative coaching rather than punitive repression. During the 2024–2026 evaluation period, no major administrative violations were identified, rendering coercive administrative sanctions (such as written warnings, government compulsion, or permit suspension) unnecessary.

Despite effective supervisory outcomes, structural constraints persist within regional government oversight. The Environmental Agency faces acute shortages in certified environmental inspectors (Pejabat Pengawas Lingkungan Hidup), limited operational budgets, and an

expansive ratio of industrial entities to supervisory personnel across Lampung Province. Conversely, the company encounters regional infrastructure gaps: because licensed B3 waste treatment facilities do not currently exist within Lampung Province, all collected waste must be transported long-distance across state highways to certified processors in Java. These logistical hurdles increase transport risks and financial compliance costs. Nevertheless, corporate transparency, open access to internal documentation, and collaborative communication between company HSE staff and provincial inspectors have successfully bridged regional resource constraints, establishing a highly resilient model of environmental administrative governance.

C. Conclusion

PT Semen Baturaja Tbk. Unit Panjang exhibits exemplary legal compliance in managing hazardous and toxic (B3) waste, fulfilling both administrative and technical obligations mandated by PP No. 22 of 2021 and Permen LHK No. 6 of 2021. The facility maintains valid Environmental Approvals and Technical Details for its Temporary Storage Facility (TPS Limbah B3), enforces rigorous logbook logging, utilizes electronic reporting via the SIMPLE platform, executes waste transfer exclusively through e-manifests and licensed third-party handlers, and maintains fully compliant physical storage infrastructure. This high level of compliance reflects strong corporate legal consciousness, wherein statutory mandates are effectively integrated into daily industrial operations.

Concurrently, administrative supervision executed by the Environmental Agency of Lampung Province functions effectively as a preventive control mechanism through digital report audits and periodic field inspections. The synergy between proactive internal corporate governance and constructive government supervision has successfully safeguarded the local environment without resorting to punitive sanctions. To ensure long-term sustainability, it is recommended that PT Semen Baturaja Tbk. Unit Panjang maintain

continuous workforce training on evolving environmental regulations. Furthermore, provincial and regional governments should prioritize developing local licensed B3 waste treatment infrastructure within Lampung Province to reduce long-distance transport risks and optimize regional waste management.

REFERENCES

Abdussalam, and Desasfuryanto. Hukum Ketenagakerjaan. Jakarta: PTIK, 2016.

Akib, Muhammad. Penegakan Hukum Lingkungan Dalam Perspektif Holistik Ekologis. Bandar Lampung: Penerbit Universitas Lampung, 2011.

Akib, Muhammad. Hukum Lingkungan: Perspektif Global Dan Nasional. Edisi revisi. Jakarta: Rajawali Pers, 2014.

Arpangi. "Pelindungan Hukum Terhadap Tenaga Kerja Indonesia Di Luar Negeri." Jurnal Pembaharuan Hukum 3, no. 1 (2016): 120–135. https://doi.org/10.26532/jph.v3i1.1354.

Aufa, A. A. "Prinsip Sustainable Development Dalam Penegakan Hukum Lingkungan." Staatsrecht: Jurnal Hukum Kenegaraan Dan Politik Islam 1, no. 2 (2021): 88–104.

Fathoni, Sri Sulastuti, Rifka Yudhi, and Hieronymus Soerjatisnanta. "Striking a Balance: Streamlining Environmental Licensing for Business Growth and Environmental Protection in Indonesia." Scholars International Journal of Law, Crime and Justice 7, no. 6 (2024): 215–224.

Hafidh, A. A., and D. A. H. Taroepratjeka. "Identifikasi Limbah B3 Di Kawasan PT Dirgantara Indonesia." Prosiding FTSP Series 5 (2024): 45–52.

Jannah, A. S., N. F. Salma, A. Salma, and M. V. Maulana. "Tanggung Jawab Administratif Pemerintah Daerah Dalam Pengawasan Izin Lingkungan." Constituo: Jurnal Riset Hukum Kenegaraan Dan Politik 4, no. 1 (2025): 30–44.

Purwendah, E. K., and E. M. Erowati. "Prinsip Pencemar Membayar (Polluter Pays Principle) Dalam Sistem Hukum Indonesia." Jurnal Pendidikan Kewarganegaraan Undiksha 9, no. 2 (2021): 340–355.

Rachma, D. A., and A. M. Triwibowo. "Penerapan Prinsip Strict Liability Dalam Penegakan Hukum Lingkungan Di Indonesia." Jurnal Yudisial 16, no. 1 (2023): 65–82.

Rahma, A. K., S. A. N. Aida, D. I. Safira, A. H. Setiyagi, and A. Kurniawan. "Tanggung Jawab Hukum Korporasi Atas Pencemaran Lingkungan: Analisis Yuridis Terhadap Konsep Pertanggungjawaban Dalam Undang-Undang No. 32 Tahun 2009 Dan Peraturan Pelaksanaannya." Jurnal Tana Mana 6, no. 2 (2025): 112–128.

Rambe, M. I. I., and N. Sukmawati. "Penerapan Prinsip Kehati-Hatian Dalam Perizinan Lingkungan Di Era Industri 4.0." Innovative: Journal of Social Science Research 4, no. 4 (2024): 201–215.

Soekanto, Soerjono. "Kesadaran Hukum Dan Kepatuhan Hukum." Jurnal Hukum & Pembangunan 7, no. 6 (1977): 462–470.