

The Evaluation of the Coal Transportation Governance Policies in Jambi Province

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Abstract

This research is aimed at evaluating the policies issued by the Jambi Provincial Government in order to organize coal transportation. Since 2012, the Jambi Provincial Government has issued a series of policies aimed at regulating coal transportation so that its negative impacts, particularly related to congestion and road damage, can be overcome. Using William N. Dunn's policy evaluation concept which consists of six indicators, namely: effectiveness, efficiency, alignment, adequacy, responsiveness and accuracy. This research uses a combined qualitative and quantitative approach by interviewing the Department of Transportation and the Department of Energy and Mineral Resources of Jambi Province, the Directorate of Traffic and Traffic of the Jambi Regional Police, the community and public policy observers as data sources. Data were analyzed using qualitative data analysis consisting of data reduction, data presentation, data analysis and conclusions. The research results reveal that there are three indicators that are of particular note to the Jambi Provincial Government regarding the handling of coal transportation in Jambi. First, the Jambi Provincial Government's policies have not been effective in overcoming the negative problem of coal transportation because long traffic jams and road damage often occur. Second, with the limited authority it has, the Jambi Provincial Government is quite efficient in overcoming coal transportation problems through a series of policies from 2012-2022. Third, the Jambi Provincial Government's policies are not appropriate to overcome the problem, because what is needed is the construction of a special coal road or using the Batanghari River.

Keyword:

Policy; Evaluation of policy; Coal; Province government; Jambi.

INTRODUCTION

A study regarding the evaluation of coal transportation governance policies in Jambi Province would be interesting to carry out. First, Indonesia is one of the largest coal producers in the world with total production reaching 604 million tons in 2021 based on data from the Ministry of Energy and Mineral Resources. This data also places Indonesia as one of the largest coal exporters in the world (390

million tonnes) in 2021 and an important source of foreign exchange that contributes to national economic growth. Jambi Province is one of the regions that contributes to coal production in Indonesia (9%) with reserves of 1.9 billion tonnes and is estimated to be exhausted within the next 100 years (antaranews.com). Coal found in Jambi is generally of good quality with a high calorie content and contains little sulfur, so it is in great demand by local and international markets. Several coal producing areas in Jambi Province

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include Sorolangun, Bungo, Tebo, Batang Hari, Muaro Jambi and West Tanjung Jabung regencies. The large potential of coal in Jambi Province invites the interest of national class companies to invest in managing coal mines. Several mining companies operate in the area. Some of them are PT. Bukit Asam (Persero) Tbk, PT. Karya Bumi Baratama, PT. Jambi Prima Coal, and PT. Bara Jaya Utama. The government is truly exploiting the large coal potential in Jambi Province by continuing to increase its production. Based on data from the Central Statistics Agency (BPS), coal production in Jambi Province continues to increase from year to year. In 2016, production was 5.6 million tonnes, increasing in 2017 to 8.3 million tonnes and in 2018 again increasing to 11.2 million tonnes, continuing later in 2022 to 40 million tonnes. The size of this latest increase has tripled compared to the 2021 coal production quota of 14 million tonnes (kompas.id, 2022).

Second, the high rate of coal production in Jambi Province creates its own problems for the community. This is because coal production in Jambi Province still uses land roads (national roads and provincial roads) for transportation from production sites (mines) to the port. With high coal production, the need for coal truck transportation continues to increase in quantity (liputan6.com, 2022). Based on data released by the Jambi Provincial Transportation Service, 12,000-15,000 coal trucks operate in a day, meanwhile the number of loading and unloading vehicles at Talang Duku Port in one day can only accommodate 4,000 trucks (jambiexpresdisway.id, 2022).

The large number of coal trucks transported and the continued use of national roads and provincial roads as roads used to transport coal have given rise to various problems. Based on data from the Jambi Regional Police Traffic Directorate (2021), traffic accidents involving coal transportation in Jambi Province reached 900 cases. Ironically, out of hundreds of cases of traffic accidents involving the transportation of coal, 34 people died (regional.inews.id). The high traffic transporting coal also causes congestion which has an impact on various sectors of people's lives in Jambi Province, such as disruption to the community's economy caused by long travel times causing higher trade transportation costs (imcnews.id, 2022). The increase in coal transportation has also caused damage to national roads in Jambi Province, namely 603 km out of a total of 1,318 km of national roads (region.sindonews.com, 2022). The extent of the damaged national roads is on the Tembesi-Simpang Niam-Tebo-Muara Bungo roads (167.8 km), Sarolangun-Bangko-Muara Bungo – West Sumatra Province boundary (212.1 km) and Sarolangun-Simpang Tembesi-Muara Bulian-Jambi City - Talang Duku Harbor (223.3 km).

Third, the emergence of various problems related to the transportation of coal has been responded to by the Jambi Provincial Government through several policies. One of them is as stated in the Circular Letter of the Governor of Jambi Number: 1448/SE/DISHUB-3.1/XII/2021 dated 7 December 2021 concerning the regulation of coal transportation in the Jambi Province region. The next policy is the Instruction of the Governor of Jambi

Number 8/INGUB/DISHUB/2022 dated 11 October 2022 concerning traffic regulations for coal transportation in the Jambi Province area. These two policies are the Jambi Provincial Government's response to various problems that have emerged from coal transportation activities in Jambi Province.

As a policy that is understood as an effort made by the government to overcome existing problems in society (HM, 2023), what the Governor of Jambi is doing is expected to be able to answer the problem of transporting coal so far. Initially, the presence of this first policy provided a breath of fresh air by reducing traffic jams in Jambi Province. However, the effectiveness of the policies issued did not last long, since mid-2022 Jambi Province has again experienced problems with traffic jams caused by coal transportation. In fact, the traffic jams are getting worse (wahananews.co. 2022) and not only occur at night but also occur during regular hours which hampers the community's economy (jambilink.com, 2022). This is because there are still many coal trucks that exceed the tonnage regulations or are loaded with more than 8 tons and the number of trucks operating reaches 12,000-15,000 vehicles per day, where there are still many vehicles with number plates outside of Jambi (dishub.jambiprov.go.id, 2022), often Vehicles carrying coal trucks experience damage on the road due to the fact that many coal trucks are old and sometimes experience engine failure in the middle of the road (exposse.com, 2022). Including the presence of a second policy in the form of Jambi Governor's Instruction Number 8/INGUB/DISHUB/2022 concerning Transportation Traffic

Regulations which is considered unable to solve the problem of congestion in Jambi Province. According to the community, coal transportation in Jambi is becoming increasingly chaotic (kompas.id, 2023), and is becoming more and more complicated (jamberita.com, 2023), and they are even starting to dare to cross or enter the streets of Jambi City. Congestion that occurs due to coal transportation also raises serious attention from the government, especially from Commission IV of the Indonesian House of Representatives who visited Jambi directly to see the congestion that occurred and held a special commission working meeting to discuss congestion caused by coal in Jambi (kabarjambikito.id, 2023). The worst peak of traffic jam occurred on March 1 2023, namely for 22 hours or 15 KM which caused ambulances to not be able to pass, resulting in 3 deaths, fish died and the driver suffered a loss (regional.kompas.com, 2023). In fact, based on research conducted by Syarif (2019), it has not been seen that the existence of coal mines has had an impact on improving the welfare of the people around coal mining.

Seeing the massive negative impact of coal transportation in Jambi, this will of course lead to policies issued by the Jambi Provincial Government. The policy is intended to overcome congestion caused by coal transportation, but in practice it has not been able to solve the problem. This shows that the policies taken by the government have not been able to resolve existing problems.

Various studies show that regional governments have an important role in efforts to overcome various problems

faced by society, especially in the era of regional autonomy. Among these is a study conducted by Kisman and Tasar (2014) which shows the large role of local government (in Poland) in efforts to overcome social problems faced by society. This study also confirms that regional governments can improve community welfare more than when the government was still in a centralized system. In addition, studies conducted by Nak-ai et al. (2018), Sharma (2015) and Brillo (2017) also show that the role played by local governments by collaborating with several stakeholders is able to improve the standard of living of the community. A study conducted by HM & Darminto (2021) also shows that the policies implemented by the regional government (Jambi City) through the Bantar Village Program and the Bangkit Berdaya Program have a significant impact on the quality of life of the community. A study conducted by Subarudi et al (2016) also shows the significant role of the government through its policies in overcoming coal mining conflicts in East Kalimantan by implementing mining management in forest areas.

Therefore, so that the policies taken by the government can become a formulation in solving coal transportation problems in Jambi Province, a comprehensive policy evaluation is needed. In general, policy evaluation is intended to assess the effectiveness of a public policy so that it can be held accountable to the public (HM, 2023). Meanwhile, according to Riant Nugroho (2018, p. 784), public policy evaluation has four functions, namely: photographing the reality of program

implementation and making generalizations about the patterns of relationships between the various dimensions of reality observed; find out whether the actions carried out by the actors, both bureaucratic and other actors, are in accordance with the standards and procedures set by the policy; find out whether the output actually reaches the policy target group, or whether there are leaks or deviations.

One concept of policy evaluation that is commonly used is what was put forward by William N. Dunn. According to Dunn (1999), the success of a policy, or its failure, is determined by six indicators consisting of: Effectiveness. Concerns whether an alternative achieves the expected results (consequences), or achieves the goal of the action. Effectiveness, which is closely related to technical rationality, is always measured in terms of units of a product or service or its monetary value. Efficiency (efficiency). With regard to the amount of effort required to produce a certain level of effectiveness. Efficiency, which is a synonym for economic rationality, is a relationship between effectiveness and effort, the latter of which is generally measured in terms of monetary costs. Adequacy. Concerns the extent to which a level of effectiveness satisfies needs, values, or opportunities to create problems. Adequacy criteria emphasize the strength of the relationship between policy alternatives and the expected results. Alignment (equity). Closely related to legal and social rationality and refers to the distribution of consequences and efforts between different groups in society. Equity-oriented policies are policies in which consequences (e.g. units

of service or monetary benefits) or efforts (e.g. monetary costs) are fairly distributed. Policies designed to distribute income, educational opportunities, or educational services are sometimes distributed on the basis of equality criteria. The criterion of equality is closely related to competing conceptions of justice or fairness and to ethical conflicts around adequate grounds for distributing society's resources. Responsiveness concerns the extent to which a policy can satisfy the needs, preferences or values of certain groups of society. The responsiveness criterion is important because an analysis that satisfies all the other criteria – effectiveness, efficiency, adequacy, equality – still fails if it does not respond to the actual needs of the group that should benefit from a policy. Accuracy (appropriateness). Appropriateness criteria are closely related to rationality, substantiveness, because the question of policy appropriateness is not concerned with individual units of criteria but two or more criteria together. Appropriateness refers to the value or value of the program objectives and to the strength of the assumptions underlying those objectives.

Through the use of Dunn's policy evaluation concept, an assessment of the Jambi Provincial Government's policies was carried out in an effort to overcome problems related to coal transportation. The hope, as mentioned by Dunn (As cited in Agustino, 2023), is that this policy evaluation will provide valid and reliable information regarding policy performance; contribute to the clarification and critique of the values underlying the selection of target

objectives; contributed to the application of other policy analysis methods, including the formulation of problems and recommendations related to coal transportation in Jambi Province.

Related to the above, this article is intended for two main purposes. First, this article is intended to describe the Jambi Provincial government's policies regarding coal transportation. Second, this paper is intended to evaluate the Jambi Provincial government's policies regarding coal transportation using the Dunn concept.

RESEARCH METHOD

This study is a combination of quantitative research paradigms and descriptive qualitative research or what is called mixed methods research. Combination research is not carried out simultaneously between quantitative and qualitative, but their use is different with the intention of complementing one another (Sugiyono, 2012). The objects of this research consist of five, namely the Jambi Provincial Government, coal entrepreneurs, coal truck drivers, the community, and public policy experts.

The first stage carried out in this research was a quantitative method with a survey approach using random sampling techniques. The research locus was carried out in Jambi Province with the research focus lying on the Coal Transportation Governance Policy. This is because there are various problems arising from transporting coal across land routes in Jambi Province, ranging from environmental problems to life safety. The survey was conducted by distributing questionnaires to respondents ranging from coal truck

drivers to the public. After collecting quantitative data, the researcher then conducted research using descriptive qualitative methods. This qualitative method uses the snowball technique for research informants. Researchers conducted in-depth interviews with informants related to coal transportation governance policies, such as regional governments, both the Jambi Provincial Government (in this case the ESDM Service and the Transportation Service), the Jambi Regional Police Traffic Directorate, coal truck drivers, public policy experts, and also local community. The results of this in-depth interview were then analyzed theoretically and described.

As an effort to analyze the data that has been obtained and collected, qualitative data analysis techniques are used which are carried out in three ways, namely: reducing data, displaying data, and drawing conclusions (Miles and Huberman, 1992, p. 88-90). Data reduction is the process of selecting, focusing on simplifying, abstracting, and transforming "rough" data that emerges from written notes in the field. Next, data presentation is a collection of structured information that provides the possibility of drawing conclusions and taking action. The final method used is drawing conclusions or verification, namely the interpretation or interpretation of all the collected data so that adequate conclusions can be obtained.

RESULTS AND DISCUSSION

Jambi Provincial Government Policy Regarding Coal Transportation

As mentioned, Jambi Province is one of the regions contributing to coal production in Indonesia (9%) with reserves of 1.9 billion tons and it is estimated that they will only be used up in the next 100 years (antaranews.com). In addition, of the total existing coal resources, only 90 million metric tons have been produced, so coal resources or reserves in Jambi are still large and still have potential (www.gatra.com). The existence of coal in Jambi cannot be separated from the history of its management in the world and Indonesia itself. Based on BPS data (2022), massive coal management in the world started in 1973, while in Indonesia it mainly started in 1980 through the approval of several black gold mining companies. Meanwhile, in Jambi Province itself, it only started massively in 2006, and experienced significant development in 2020 (metrojambi.com). This significant development can be seen from the production level which has increased from year to year, in 2021 it was 13.5 million tons, increasing again in 2022 to 17.3 million tons (166%) with a production value of IDR 70 trillion.

As an important world commodity, coal management has significant implications for state revenues. Based on trends, Reference Coal Prices (HBA) tend to increase and could be higher than the average price in 2020 which fell due to the Covid-19 pandemic (www.gatra.com). In April 2021, HBA strengthened again to US\$ 86.68 per ton, after falling in the previous month. The HBA value since

2021 has been quite volatile, opening at US\$ 75.84 per ton in January, increasing in February to US\$ 87.79 per ton, then dropping in March to US\$ 84.47 per ton. The large production and high selling prices of coal certainly have implications for the government's economic revenues. If calculated using the standard price of coal on the market, only US\$ 112/ton, coal sales from Jambi exceed Rp. 24 trillion. A very large amount of funds to help develop Jambi Province and improve the quality of life of the community.

Apart from the positive impacts above, managing coal, especially regarding its transportation from mining areas to the port in Jambi City, also creates its own problems for the community. Following the massive mining and transportation of coal, the number of traffic accidents in Jambi Province has increased. Based on data from the Jambi Regional Police Traffic Directorate (2021), traffic accidents involving coal transportation in Jambi Province reached 900 cases. Ironically, out of hundreds of cases of traffic accidents involving the transportation of coal, 34 people died (regional.inews.id). Not to mention the accompanying problem in the form of damage to national roads in Jambi Province, namely 603 km out of a total of 1,318 km of national roads (region.sindonews.com, 2022). The extent of the damaged national roads is on the Tembesi-Simpang Niam-Tebo-Muara Bungo roads (167.8 km), Sarolangun-Bangko-Muara Bungo – West Sumatra Province boundary (212.1 km) and Sarolangun-Simpang Tembesi-Muara Bulian-Jambi City - Talang Duku Harbor (223.3 km).

As a party that is constitutionally given the authority to manage its territory, the Jambi Provincial Government has issued a series of policies. Historically, mining regulations in the country are based on the 1899 "Indische Mijnwet" (Syarif, 2019) which states that Regional Governments are given the right to control mining objects (*delfstoffen*) that are not mentioned in Article 1 paragraph (1) "Indische Mijnwet", *Staatsblad* 1899 No. 214 jo *Staatsblad* 1919 No. 4 which are found in the lands of the Free State (*Vrij Landsdomein*). In practice, the implementation of the authority referred to in paragraph (1) above applies *mutatis mutandis* to the provisions contained in the regulations concerning general conditions regarding the granting of permits to take the mining objects in question, which are contained in *Staatsblad* 1926 No. 219 (since several times amended and supplemented). The provisions mentioned above ended after the issuance of Law Number 11 of 1967 concerning Basic Mining Provisions.

Meanwhile, after the reform and implementation of regional autonomy, mining regulations (including coal) at the local level, such as in Jambi Province, are based on Law Number 22 of 1999 concerning Regional Government which delegates authority in managing coal mining natural resources to local government. In fact, through the Minerba Law Number 4 of 2009, there is a division of authority between the center and the regions in regulating and managing coal natural resources within the framework of the principle of decentralization. However, through the enactment of Law Number 32 of 2014 concerning Regional

Government, the authority to regulate the management of natural resources such as coal was again taken over by the central government through the relevant ministries.

In the context of the Provincial Government as the representative of the Central Government in the region, the Jambi Provincial Government has issued a series of policies related to coal management in this region (Darminto, Hapsa, Baidowi, 2021). Moreover, paying attention to the series of negative impacts it causes, especially on people's lives. A series of policies aimed at overcoming various problems resulting from coal management and transportation activities have been issued.

If traced, the policies issued by the Jambi Provincial Government in an effort to overcome the problems associated with coal management began in 2012. At this time, the Jambi Provincial Government released Regional Regulation (Perda) Number 13 of 2012 concerning Regulation of Coal Transport in Jambi Province on December 28 2012 (Subhan, 2015). Through this regulation, the Jambi Provincial Government requires that all coal transportation be carried out via special roads or river routes. In fact, this regulation also regulates the deadline for the procurement of the special route, namely no later than January 2014. This provision gives business actors a one year deadline to build their own special road for transporting coal. Through this provision, it shows that the Jambi Provincial Government accommodates the needs of business actors by providing tolerance to prepare special roads so that they no longer pass through public roads.

It's not quite there, through additional regulations, the Jambi Provincial Government in March 2013 again released Governor's Regulation (Pergub) Number 18 of 2013 concerning Procedures for Implementing Coal Transport (Subhan, 2015). As a technical regulation, this Gubernatorial Regulation states the formation of an Integrated Team (Timdu) in order to provide guidance, supervision and enforcement of the implementation of the above regulations. This team consists of elements from the Transportation Service, ESDM Service, TNI, POLRI, Satpol PP, and other related elements. Every business actor who violates the provisions on special roads and river routes is subject to administrative sanctions in the form of revocation of mining business permits.

After 2013, there seemed to be a vacuum regarding coal regulations in Jambi Province. Only in 2021, the Jambi Provincial Government released a policy regarding coal through the Circular Letter of the Governor of Jambi Number: 1448/SE/DISHUB-3.1/XII/2021 on December 7 2021. Through this policy, the Governor of Jambi regulates the transportation of coal with the following provisions: The type of vehicle permitted is a 2-axle vehicle with a total load of 8 tons and a vehicle weight of 4 tons, so a total of 12 tons; The coal transportation route originating from mines located in Merangin, Sorolangun, Batanghari and Muaro Jambi Regencies is taken to Talang Duku Port via the Muara Bulian (Simpang BBC)-Bajubang-Tempina-South Ring Road with timings from 18.00-06.00 WIB, if there is road damage or an accident that causes population density

on the Bajubang-Tempino route then traffic will be diverted to the Muara Bulian-Pijoan route-Southern ring road of Talang Duku Harbor with operational hours at 21-03.00 WIB, the coal transport route is originating from mines located in Bungo and Tebo via Simpang Niam (Tebo)-Lubuk Kambing –Merlung (Tanjabbar)-Trade Harbor with operational hours 18.00-06.00; Land Transportation Management Center (BPTD) Region V Jambi Province reactivated the weigh bridge; IUP holders regulate fuel filling and are required to use the Jambi Province (BH) Regional Police Number.

One year later, precisely on October 11 2022, the Jambi Provincial Government again issued a policy contained in the Instruction of the Governor of Jambi Number 8/INGUB/DISHUB/2022 concerning Traffic Regulations for Coal Transport in the Jambi Province Region. The contents of regulations related to coal in Jambi Province are as follows: Prohibition of the use of subsidized fuel; The status of the coal truck vehicle must belong to a Mining Business Entity or Transporter which is a legal entity; Every coal truck transport is required to have a hull number; Conditions of coal transportation tax that are still valid; Obligation to use the Jambi Province (BH) Regional Police Number; Limitations on the number of vehicles in operation regulate the number of coal transporters in operation: The number of coal trucks in operation. In one day it reaches 12,000-15,000 vehicles, meanwhile the number of loading and unloading at the Talang Duku port in one day is only 4000 trucks. As an effort to prevent overload, the government has set the number of trucks

operating in a day to only 3,500 trucks; Vehicle age limit must be at least 2013 to avoid damage on the road; Arrangements for coal truck operations: Truck operations leave the mine mouth to the port from 18.00-06.00; Coal transportation routes originating from mines located in Merangin, Sorolangun, Batanghari and Muaro Jambi districts which are lifted to the Talang Duku port via the Muaro Bulian road (Simpang BBC)-Bajubang-Tempina-South Ring Road with timings from 18.00 -06.00 WIB, if there is road damage or an accident that causes population density on the Bajubang-Tempino route then traffic will be diverted to the Muara Bulian-Pijoan route-Southern ring road of Talang Duku Harbor with operational hours at 21-03.00 WIB. The coal transportation route originating from mines located in Bungo and Tebo is via Simpang Niam (Tebo)-Lubuk Kambing-Merlung (Tanjabbar)-Trade Port with operational hours from 18.00-06.00; The truck is empty and returns to the mine site via the Simpang Paal 10-Simpang Tempino-Panerokan-Bajubang-Simpang BBC route.

This is a series of policies issued by the Jambi Provincial Government regarding coal transportation activities in the Jambi Province area. These policies are aimed at overcoming negative problems as a side impact of coal transportation activities in Jambi Province.

Meanwhile, another policy related to the same thing, but released by the central government (Ministry of Energy and Mineral Resources of the Republic of Indonesia) is Press Release Number: 099.Pers/04/Sji/2023 Dated March 4 2023 concerning Responses Regarding Road

Congestion Conditions in the Province Jambi. Based on this policy, the Central Government through the Indonesian Ministry of Energy and Mineral Resources stipulates the following things:

Firstly, regarding operating hours for coal transportation vehicles on public roads or leaving the mine site (after 18.00), restrictions on coal transportation loads, the obligation to have permits for coal transportation vehicles, and the obligation to comply with routes in accordance with the provisions of the Jambi Provincial Government through: Circular Letter of the Director General of Minerals and Coal Number 4.E/MB.05/DJB.B/2022 dated April 9 2022 concerning the Use of Motorized Vehicles for Transporting Minerals and Coal; Circular Letter of the Director General of Minerals and Coal Number 6.E/MB.05/DJB.B/2022 dated 30 April 2022 concerning Arrangement and Regulation of Coal Transport Traffic (repealed); and The Directorate General of Mineral and Coal, Ministry of Energy and Mineral Resources has issued sanctions through temporary suspension letters to 36 IUPs that have committed coal transportation violations in Jambi Province, and has revoked these sanctions to 27 IUPs as of June 2022; Circular Letter of the Director General of Mineral and Coal Number 10.E/MB.05/DJB.B/2022 dated 7 December 2022 concerning Arrangement and Regulation of Coal Transport Traffic.

Second, encourage acceleration and participate in supervising the construction of special coal roads carried out by 3 special road developers, namely: PT Putra Bulian Properti, PT Sinar

Anugerah Sukses, and PT Intitirta Primasakti.

Third, another thing to overcome the damaged condition of public roads in Jambi, KESDM has also coordinated with the Governor regarding the Jambi Regional Government's proposal to repair alternative roads in the Simpang Luncuk - Sridadi area with coal mining business entities and the Jambi CSR Forum to participate and commit to repairing them that road.

Evaluation of Jambi Provincial Government Policy Regarding Coal Transportation

As is known, after a policy is implemented, an evaluation needs to be carried out which is intended to assess its effectiveness so that it can be held accountable to the public (HM, 2023). One concept that can be used to evaluate policy implementation is what was put forward by William N. Dun. According to Dunn (As cited in HM, 2023), the success of a policy, or its failure, is determined by six indicators consisting of effectiveness, efficiency, adequacy, alignment, responsiveness and accuracy. In the context of this research, the evaluation of coal transportation policies in Jambi Province utilizes William N. Dunn's concept above.

Effectiveness is an indicator relating to whether an alternative achieves the expected results (consequences), or achieves the objectives of the action. In this context, the regulation of coal transportation carried out by the Jambi Provincial Government is aimed at regulating the transportation fleet so that it does not cause negative problems for

the community. However, in practice in the field, the objectives of regulating coal transportation in Jambi Province have not been achieved optimally.

Based on interviews with officials from the Jambi Provincial Transportation Service and the Jambi Regional Police Traffic Directorate (September 2023), the traffic jams are getting worse, not only occurring at night, but also during regular hours during the day. The increase in coal transportation has also caused damage to national roads in Jambi Province, namely 603 km of the total 1,318 km of national roads. Another problem, as mentioned by Jambi Police Traffic Directorate officials (September 2023), with the existence of coal in Jambi Province is related to its transportation from mining areas in the west to ports in the east, causing a series of traffic accidents. According to the Jambi Regional Police Traffic Directorate (September 2023), traffic accidents involving coal transportation in Jambi Province reached 900 cases and 34 of them died.

Efficiency is an indicator relating to the amount of effort required to produce a certain level of effectiveness. In this context, there are various efforts that have been and are being carried out by the Jambi Provincial Government in collaboration with the Jambi Regional Police in order to organize the transportation of coal in this region. These efforts mainly started in 2012 through a series of policies aimed at regulating the management of coal mining in Jambi Province.

Based on interviews with officials from the Jambi Province ESDM Service (September 2023), the efforts made by the government to regulate coal management

in Jambi Province can be divided into 2 policies, namely Central Government Policy and Jambi Provincial Government Policy. The policy issued by the central government, in this case, was carried out by the Indonesian Ministry of Energy and Mineral Resources in the form of Press Release Number: 099.Pers/04/Sji/2023 dated March 4 2023 concerning Responses Regarding Road Congestion Conditions in Jambi Province. Through this policy, the Central Government determines several things, namely operational hours for coal transportation, encouraging the acceleration of construction of special coal roads, and coordinating repairs to damaged national roads.

The efforts made by the Jambi Provincial Government to organize coal management in Jambi began in 2012 through Regional Regulation Number 13 of 2012 concerning Coal Transport Regulations in Jambi Province on December 28 2012. Through this regulation, the Jambi Provincial Government regulates that every coal transport required to go through a special road or river route. In fact, this regulation also regulates the deadline for the procurement of the special route, namely no later than January 2014. This provision gives business actors a one year deadline to build their own special road for transporting coal.

Another follow-up effort, as mentioned by Jambi Province Transportation Service officials (September 2023), is the issuance of Governor Regulation Number 18 of 2013 concerning Procedures for Implementing Coal Transport. As a technical regulation, this Gubernatorial Regulation states the

formation of an Integrated Team (Timdu) in order to provide guidance, supervision and enforcement of the implementation of the above regulations. This team consists of elements from the Transportation Service, ESDM Service, TNI, POLRI, Satpol PP, and other related elements. Every business actor who violates the provisions on special roads and river routes is subject to administrative sanctions in the form of revocation of mining business permits.

In 2021, the Jambi Provincial Government again issued a policy regarding coal through the Circular Letter of the Governor of Jambi Number: 1448/SE/DISHUB-3.1/XII/2021 on 7 December 2021. This policy regulates the specifications of transport vehicles, road routes that can be passed, permitted operating hours, optimization of weigh bridges, and the requirement to use Jambi (BH) police number plates. Jambi Provincial Transportation Service officials further stated (September 2023), that in October 2022 the Jambi Provincial Government again issued a policy contained in the Jambi Governor's Instruction Number 8/INGUB/DISHUB/2022 concerning Traffic Regulations for Coal Transport in the Jambi Province Region. This policy contains a prohibition on the use of subsidized fuel, the status of transport vehicles owned by legal entities and no later than 2013, the inclusion of hull numbers, using the Jambi Province (BH) Regional Police Number, restrictions on operational hours, and permitted road routes. Jambi Provincial Transportation Service officials further stated (September 2023) that as an effort to overcome traffic jams, the Jambi Provincial Government is

collaborating with related agencies and the community to build parking lots on various roads used by coal transport vehicles.

Adequacy is an indicator relating to how far a level of effectiveness satisfies needs, values, or opportunities to create problems. In this context, the various efforts that have been and are being made by the Jambi Provincial Government to manage coal transportation are not enough to overcome the problems it causes. As stated by officials from the Jambi Province Transportation Service (September 2023), the average number of vehicles carrying coal on the roads of Jambi Province is 11,000, while the road capacity is only 4,000 vehicles. Thus, coal transportation arrangements will not be fully able to overcome congestion, including road damage, because the quantity of vehicles in circulation is already very large. The regulatory efforts undertaken do no more than minimize and localize places of congestion so that they do not directly and massively have a negative impact on community activities.

Equity is an indicator that is closely related to legal and social rationality and refers to the distribution of consequences and efforts between different groups in society. In this context, the efforts made by the Jambi Provincial Government to organize coal transportation have not had a broad impact on the existing components of society.

As stated by officials from the Jambi Provincial Transportation Service (September 2023), the arrangement for coal transportation was carried out amidst the limited authority of the Jambi Provincial Government. Due to limited authority, the efforts made by the Jambi

Provincial Government can only be carried out in the corridor of transport regulation, it has no authority to execute company violations and so on. As a result, the negative impacts that arise in society cannot be reached directly by the Jambi Provincial Government.

Responsiveness is an indicator relating to the extent to which a policy can satisfy the needs, preferences or values of certain groups of society. In this context, the efforts made by the Jambi Provincial Government within its limited authority capacity have been quite responsive in trying to overcome the problems faced by the community.

As stated by officials from the Jambi Province Transportation Service and ESDM Service (September 2023), various policies issued since 2012 show that the Jambi Provincial Government is responding to the problems caused by coal mining activities. With its limitations as a representative of the central government in the regions, the Jambi Provincial Government continues to strive to help the community overcome the problems that arise due to the transportation of coal. Efforts that can be made by the Jambi Provincial Government are regulating transportation routes, operational times, requiring the use of operational vehicles that are in roadworthy condition and have Jambi plates, optimizing weigh bridges, providing parking pockets and so on.

Appropriateness is an indicator that is closely related to rationality, substantiveness, because the question of policy appropriateness is not concerned with individual units of criteria but two or more criteria together. In this context,

the efforts made by the Jambi Provincial Government to organize coal transportation are not appropriate.

As stated by officials from the Jambi Province Transportation Service and ESDM Service (September 2023), due to the limited authority it has, the Jambi Provincial Government cannot do much more to overcome the negative problems of coal mining activities. As mentioned by public policy observer, Dr. Pahrudin HM (September 2023), the right policy to overcome the problem of coal mining in Jambi is to build and provide special coal roads, not to allow the use of public roads. At the very least, coal transportation in Jambi can use the Batanghari River as a transportation route from the mining site to the sea port. This policy will not only eliminate traffic jams that often occur, but also keep people away from frequent traffic accidents and of course, road damage can be minimized.

Interviews conducted with several community members (September 2023) also revealed the importance of providing a special coal road in Jambi Province as an appropriate and needed policy. A similar opinion was also conveyed by an official from the Jambi Regional Police's Traffic Directorate (September 2023) who emphasized the need for a special road for transporting coal so that the negative impacts that are often found in the field can be overcome and the community can truly experience the positive impacts.

CONCLUSION

The management policy for coal transportation in Jambi Province is of particular concern to the Jambi Provincial Government. From 2012 to 2022, the Jambi Provincial Government has

attempted to organize the management of coal transportation through a series of policies aimed at overcoming the negative problems it causes.

Based on William N. Dunn's concept of 6 policy evaluation indicators, there are three indicators that need to be noted by the Jambi Provincial Government. First, the effectiveness of coal transportation management policies has not yet achieved its objectives because long traffic jams, road damage and traffic accidents still frequently occur. Second, the responsiveness shown by the Jambi Provincial Government in its efforts to overcome coal transportation problems is carried out within the limited authority it has within the framework of regional autonomy. As a result, the policies issued have not been able to overcome problems surrounding coal transportation in Jambi Province. Third, the various policies issued by Jambi Province with all their limited authority are not appropriate for overcoming problems surrounding coal transportation. The right policy is the construction and provision of a special road for transporting coal or at least using the Batanghari River.

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