

# Review of Regulatory Framework Governing Digital Tourism Information Center Program Based on Regulatory Impact Assessment

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## Abstract

*This study evaluates the Tourism Information Center (TIC) Digital Nusantara's regulatory framework regarding industrial efficiency. The primary issue is the fragmented, non-binding nature of current circular letters, leading to inconsistent implementation and budgetary waste. Using normative legal research and the Regulation Impact Assessment (RIA) framework, findings show that existing executive rule-making provides flexibility but fails to ensure national data integration. Aligned with Presidential Instruction No. 1/2025 on budget efficiency, this study concludes that a non-regulatory approach—revising technical guidelines and strengthening private-sector partnerships is more effective than creating rigid new regulations. Therefore, the government must prioritize data interoperability standards and formalize digital platform cooperation to ensure a cost-effective, integrated tourism ecosystem.*

## KEYWORDS

*Tourism Information Center, Regulation Impact Assessment, Budget Efficiency.*



## Introduction

Along with the strengthening of budget efficiency policies in government administration, each ministry is required to be more selective in designing its work programs. Policy focus is no longer merely on the number of activities, but on the extent to which programs are able to deliver tangible impacts with more controlled budget utilization. This condition encourages the government to seek alternative policies that are more efficient and adaptive to technological developments (Azis et al., 2023). In an official press release, the Minister of Tourism and Creative Economy, Sandiaga Uno, stated in 2024 that the launch of the Digital Nusantara Tourism Information Center (TIC) was an effort to provide an integrated and easily accessible tourism information hub for tourists. The Digital Nusantara TIC is designed as a one-stop information gateway containing various types of tourism data, ranging from destinations, accommodation, and transportation to supporting services, which can be accessed digitally through links or by scanning QR codes (Alvian et al., 2017). This approach is expected to enhance the effectiveness of national tourism promotion while simultaneously making it easier for tourists to plan their travels (Kemenparekraf, 2024). All of these provisions are set out in the Circular Letter of the Deputy for Marketing Number SE/1/DS.x01.01/D.5/2024 on the Development of the Digital Nusantara TIC in the Regions and Guideline Number PDM/4/P.01.00/MK/2024 on the Development of the Digital Nusantara TIC.

The launch of the Digital Nusantara Tourism Information Center (TIC) can also be understood as a response to the need to reorganize tourism promotion spending patterns to achieve greater efficiency. By centralizing information within a single national digital platform, the government seeks to reduce dependence on high-cost physical promotional media and to minimize overlapping programs among regions. National media have assessed that the Digital Nusantara TIC is positioned as a more cost-efficient promotional instrument, as information can be updated

periodically without incurring repeated printing and redistribution costs (Redaksi Bisnis, 2024).

However, as a public policy, the implementation of Digital TIC cannot be separated from questions regarding the extent to which this policy truly delivers benefits proportional to the costs and resources expended. Therefore, an analytical approach is required that is capable of assessing policy impacts in a more comprehensive manner. Regulation Impact Assessment (RIA), which in international literature is more commonly referred to as Regulatory Impact Assessment, is used as the analytical framework to examine the benefits, costs, as well as the social, economic, and environmental impacts of the Digital Nusantara TIC policy. Through this approach, policy is assessed not only in terms of innovation or its normative objectives, but also in terms of its effectiveness and efficiency in practice.

The importance of using RIA in policy formulation is further reinforced by the recognition of this method in Law Number 13 of 2022, indicating that policy-making in Indonesia is increasingly being directed toward an approach that is more grounded in impact analysis and rational consideration (Retnosari, Radian, et al., 2024). Policy focus is no longer merely on the number of activities, but rather on the extent to which programs are able to generate tangible impacts while utilizing a more controlled budget. Accordingly, the Digital Nusantara Tourism Information Center (TIC) is not merely a government platform, but a collaborative ecosystem that leverages the mature digital infrastructure of the private sector in order to achieve state expenditure efficiency, in line with the mandate of Presidential Instruction Number 1 of 2025 (Instruksi Presiden Republik Indonesia Nomor 1 Tahun 2025 Tentang Efisiensi Belanja Dalam Pelaksanaan Anggaran Pendapatan Dan Belanja Negara Dan Anggaran Pendapatan Dan Belanja Daerah Tahun Anggaran 2025, 2025).

## Methods

This study employs a normative juridical legal research method with a qualitative approach. This method is selected because the focus of the research lies in the analysis of policies and regulations related to the Digital Nusantara Tourism Information Center (TIC) using the Regulation Impact Assessment (RIA) framework; therefore, the objects of analysis consist of legal norms, doctrines, and public policies rather than empirical field data (Soekanto, 2020). Research data were obtained through a literature review of relevant laws and regulations, government policy documents, as well as academic literature in the form of books and journal articles discussing RIA and digital-based tourism policies. This normative juridical approach is commonly applied in legal and public policy research because it enables conceptual and argumentative evaluations of policy quality based on theoretical and normative frameworks that are academically accountable (Soekanto, 2020).

## **Result and Discussion**

### **1. Legal Framework**

The examination of the regulatory framework of the Digital Tourism Information Center (TIC) Program in this study is conducted through a legal framework approach, namely by mapping and analyzing relevant tourism sector regulations as well as cross-sector regulations related to the digitalization of public services, both vertically and horizontally. This approach is used to assess the extent to which existing regulations have formed a consistent and integrated legal system in supporting the implementation of Digital TIC.

At the statutory level, regulation of the tourism sector in Indonesia is based on Law Number 10 of 2009 concerning Tourism. This law affirms the role of the central and regional governments in the administration of tourism, including the provision of tourism information as part of services

to tourists (Undang-Undang Republik Indonesia Nomor 10 Tahun 2009 Tentang Kepariwisata, 2009). However, the norms regulated remain general in nature and do not explicitly govern digital-based tourism information service models, let alone an integrated national Digital TIC system. The absence of explicit regulation indicates that, at the statutory level, there is no specific norm that directly serves as the legal basis for the implementation of Digital TIC.

These provisions are subsequently elaborated in Government Regulation Number 50 of 2011 concerning the National Tourism Development Master Plan for 2010–2025. This government regulation sets out the policy direction and strategies for national tourism development, including efforts to enhance competitiveness and the quality of tourism services (Peraturan Pemerintah Republik Indonesia Nomor 50 Tahun 2011 Tentang Rencana Induk Pembangunan Kepariwisata Nasional Tahun 2010 - 2025, 2011). Nevertheless, this regulation also does not contain specific provisions regarding the development of digital-based tourism information services or Digital TIC, meaning that the vertical relationship between the law and the government regulation does not directly regulate the object of this research.

From the perspective of government digitalization, cross-sector regulation can be found in Presidential Regulation Number 95 of 2018 concerning the Electronic-Based Government System (SPBE). This regulation encourages the use of information technology in public administration through principles of system integration, data interoperability, and public service efficiency (Peraturan Presiden Republik Indonesia Nomor 95 Tahun 2018 Tentang Sistem Pemerintahan Berbasis Elektronik, 2018). Although substantively relevant, SPBE is cross-sectoral in nature and is not specifically designed for the tourism sector. As a result, the application of SPBE principles in the development of Digital TIC is highly dependent on sectoral policies and is not accompanied by binding technical norms for regional governments in the tourism sector.

In addition, regulations concerning tourism sector institutions are stipulated in Presidential Regulation Number 96 of 2019 concerning the Ministry of Tourism and Creative Economy and Presidential Regulation Number 97 of 2019 concerning the Tourism and Creative Economy Agency. These two regulations provide the institutional authority framework for the Ministry of Tourism and Creative Economy in administering governmental affairs in the tourism sector. However, they do not directly regulate the technical substance of Digital TIC service implementation, so their role is more organizational than substantively normative.

At the level of administrative regulation, more detailed arrangements for Digital TIC can be found in the Circular Letter of the Deputy for Marketing of the Ministry of Tourism and Creative Economy Number SE/1/DS.01.01/D.5/2024 concerning the Development of the Digital Nusantara Tourist Information Center (TIC) in the Regions, as well as the Ministerial Guideline of the Ministry of Tourism and Creative Economy Number PDM/4/PM.01.00/MK/2024 concerning the Development of the Digital Nusantara Tourist Information Center. These documents explicitly regulate principles, content standards, technology standards, and stages of Digital TIC development at both national and regional levels. Thus, substantively, these administrative regulations provide a fairly comprehensive technical framework for the implementation of Digital TIC.

Nevertheless, when viewed vertically, there are issues in the normative relationship between these administrative regulations and higher-level laws and regulations. Circular letters and ministerial guidelines are not included in the hierarchy of generally binding laws and regulations, so their applicability is more advisory and serves as technical guidance (13). This condition indicates the existence of a normative gap, in which the technical regulation of Digital TIC is not yet supported by norms at the level of laws or government regulations that specifically regulate obligations, national standards, and integration mechanisms for Digital TIC. Horizontally, potential problems also arise from the relationship between regulations of

equal rank. Sectoral tourism regulations and cross-sector digital governance regulations have not been fully harmonized within a single integrated policy framework. As a result, regional governments have broad discretionary space in interpreting Digital TIC policies, which has implications for differences in standards, information quality, and levels of integration among regions. This situation has the potential to create fragmentation in the regulation and implementation of Digital TIC at the regional level.

Based on this vertical and horizontal analysis, it can be concluded that the regulatory framework for the Digital Tourism Information Center (TIC) Program in Indonesia exists in various forms of regulation, but remains dispersed and has not yet been systematically integrated. However, the main problem does not lie in the absence of policy, but rather in optimizing the use of technology and cross-stakeholder coordination. Therefore, evaluation through the RIA framework is directed toward identifying the most efficient forms of administrative and collaborative intervention for the tourism industry (14).

As an initial step in the analysis, this study identifies regulations related to the implementation of the Digital Tourism Information Center (TIC), as presented in the following table.

**TABLE 1.** Identification of regulations related

<b>Regulation</b>	<b>Level</b>	<b>Relevant Articles/Sections</b>	<b>Substances Related to Digital ITC</b>
Constitution 1945.	Constitution	Article 33.	It is the cornerstone of the country's economy
Law No. 10 of 2009.	Law	Articles on the role of the government and tourism norms	The normative basis of the provision of tourism information.

		in Article 5 (d), Article 22 (c), Article 26 (e), and Article 27 (c).	
Government Regulation No. 50 of 2011.	Government Regulations	Tourism development policy direction in Articles 2 to 5.	Digital ITC has not yet been regulated.
Presidential Regulation No. 95 of 2018.	Presidential Regulation	The principles of SPBE and system integration in Articles 2 to 5.	Digitization of public services.
Presidential Instruction No. 1 of 2025.	Presidential Instruction	First and third instructions.	The mandate for the ministry to ITC is to conduct spending efficiency and prioritize programs with high economic leverage such as Digital ITC.
SE Deputy of Marketing 2024 Guidelines for the 2024 Budget	Circular Letter Guidelines	All contents of the circular Bab II–IV	Regional Digital ITC Guidelines. Content standards, technology, and integrations.

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Sources: Authors, 2026 (edited)

Based on the identification table above, the regulation of *Digital Tourism Information Centers* (TIC) in Indonesia is spread across various regulations with different levels. The Tourism Law and Government

Regulations only provide the basis and direction of general policies, the SPBE Presidential Regulation regulates the digitization of public services across sectors, while the technical arrangements for Digital ITC are only regulated through circulars and ministerial guidelines that are administrative. This condition shows that there is no specific and binding regulation to regulate Digital ITC as a national system. The implementation of Digital ITC through the Circular Letter (SE) and the Ministerial Guidelines is a manifestation of the *rule-making function* of the executive institution (*quasi-legislative power*). Theoretically, the ministry has the discretion to establish policy regulations (*Policies*) to fill the legal *vacuum* in technical-operational aspects that are not regulated in detail in the Tourism Law (Azis et al., 2023). Although this instrument is not included in the hierarchy of Article 7 paragraph (1) of Law 12/2011 concerning the Formation of Laws and Regulations, the *rule-making theory* legitimizes that ministers are authorized to make internal arrangements to ensure the standardization of bureaucratic services. The move to revise the SE and Guidelines is much more effective than forming new regulations, as it provides flexibility for the government to adapt to the dynamics of digital technology without being hampered by rigid legislation procedures (Kurnia et al., 2023).

## **2. Identifying Problems in the Implementation of Digital Tourism Information Center (TIC)**

The main problem to be solved is the inefficiency of data management and the potential for duplication of the development of tourism information systems between regions that burden the budget. Without collaboration with the private sector, governments risk being stuck in slow and high-cost technology development, which is unable to keep pace with the dynamics of tourists need for real-time and accurate information (Sinaga, 2022). The development of Digital ITC is still ongoing based on the initiative of each local government, so that the tourism information system develops separately with different content standards, information quality, and

management mechanisms. This condition causes the tourism information received by tourists to be non-uniform and has the potential to reduce the effectiveness of the ITC function as an official source of tourism information (Sinaga, 2022). This problem has a high level of significance because tourism information is an important factor in the decision-making process of tourists. The ease of access and quality of destination information have a direct effect on the interest in visiting, length of stay, and the level of tourist spending in the destination area. When tourism information is not managed in an integrated and consistent manner, the potential for increased tourist visits and regional economic turnover becomes suboptimal.

Government action is needed to solve these problems because the provision of tourism information is part of public services that are the authority of the government and local governments. Without government intervention, the management of tourism information risks being left entirely to market mechanisms that do not guarantee accuracy, sustainability, and equitable access to information. In addition, the government has a strategic role in setting standards, coordinating between regions, and ensuring the integration of tourism information systems in the framework of national tourism development.

Normatively, regulations related to Digital ITC have actually existed in various regulations. Law Number 10 of 2009 concerning Tourism regulates the obligations of governments and local governments in providing tourism information, while Presidential Regulation Number 95 of 2018 concerning Electronic-Based Government Systems encourages the digitization of public services. In addition, the Ministry of Tourism and Creative Economy has issued a Circular Letter and Guidelines for the Development of Nusantara Digital ITC as a technical reference for local governments (Peraturan Presiden Republik Indonesia Nomor 95 Tahun 2018 Tentang Sistem Pemerintahan Berbasis Elektronik, 2028).

However, existing regulations have not been able to resolve the identified problems because they are general, separate, and have not yet formed a single legally binding legal framework. The provisions in presidential laws and regulations have not specifically regulated Digital ITC as an integrated system, while ministerial circulars and guidelines are administrative and do not have binding force like laws and regulations. As a result, the implementation of Digital ITC remains dependent on the commitment and capacity of each region, thus causing fragmentation of regulation and implementation in the field (Gazali, 2022).

From the relevant stakeholders, local governments view Digital ITC as an important need in supporting the promotion and service of tourism information, but face limitations in regulatory guidelines and resources to develop an integrated system. Tourism business actors, especially small and medium enterprises, consider that uncoordinated tourism information makes it difficult to promote tourism products and services effectively. Meanwhile, tourists expect a one-stop official tourism information that is accurate, accessible, and trustworthy (Yasin, 2025).

### **3. Conformity of the Government's Actions with the Problems Faced**

The purpose of government action in the regulation of *the Digital Tourism Information Center* (TIC) is formulated by referring to the basic function of TIC as a tourism information service center that provides information on destinations, accommodation, transportation, and other supporting services in an integrated manner and easily accessible to tourists. In public policy, this goal is not only interpreted as the development of technological facilities, but as an effort to improve the quality of tourism information services through a coordinated and sustainable digital system (Firmansyah, 2025). The main goal of the government's action is the availability of a Digital ITC system that is able to

present tourism information in a complete, accurate, and consistent manner, both at the national and regional levels. The goal also includes increasing the accessibility of tourism information for tourists and strengthening the function of ITC as a promotional medium for regional tourism destinations and products. With an integrated information system, the government is expected to support tourism business actors in expanding the reach of promotion and increasing the visibility of tourist destinations.

*The expected outcome* of the government's actions in regulating Digital ITC is the increase in the effectiveness of tourism information services and the efficiency of tourism data management. A well-managed Digital ITC system is expected to make it easier for tourists to plan trips, improve the travel experience, and encourage an increase in tourist visits and regional economic turnover. In addition, from the government's side, the integration of tourism information through Digital ITC has the potential to reduce inefficient promotion costs and reduce duplication of information system management in various regions.

However, the purpose of government action in regulating Digital ITC is realistically only directed to solve some of the problems of tourism, especially those related to the fragmentation of tourism information and the lack of optimal use of digital technology in information services. The Digital ITC regulation is not intended to solve all tourism development problems, such as the limitations of destination infrastructure, the quality of tourism human resources, or the management of environmental carrying capacity, which requires other sectoral policies. Thus, the objectives of the Digital ITC policy are specific and measurable, but still have an important contribution in supporting the efficiency and competitiveness of the tourism industry.

#### **4. Identification and Review of Policy Options in Digital ITC Settings**

Based on the government's goal to improve the effectiveness and efficiency of the implementation of the Digital Tourism Information Center (TIC), there are several policy options that can be considered. In the approach *Regulation Impact Assessment*, the identification of options is not directed to directly justify one particular choice, but rather to open up a range of alternative actions that can rationally achieve policy objectives (BAPPENAS, 2009). The first option is regulatory intervention through the formation or revision of regulations that specifically regulate Digital ITC. This option can be done by clarifying the division of authority between the central and regional governments, setting minimum service standards, and regulating coordination and evaluation mechanisms. This regulatory approach is seen as able to answer the problem of regulatory fragmentation that has caused Digital ITC to run not uniformly between regions. From the perspective of RIA, new regulations or regulatory revisions can be a solution if the problem cannot be solved only through voluntary or administrative policies (OECD, 2012).

The second option is an alternative *non-regulatory*, namely strengthening policies without the formation of new regulations. The form can be in the form of technical guidelines, increasing the capacity of apparatus, strengthening the inter-agency coordination system, and using collaborative joint technology. This option emphasizes the role of the government as a facilitator, not a full controller, thus providing greater room for adaptation for local governments. The RIA Manual explains that non-regulatory options should be considered if policy objectives can still be achieved through soft policy instruments with lower compliance costs (BAPPENAS, 2009).

In addition, the RIA explicitly requires that the "*doing nothing*". This option sees the possibility that the problem of Digital ITC can be solved by stakeholders themselves, for example through local government initiatives or cooperation with tourism business actors (The Asia Foundation, 2009). However, this option contains risks if left for too long, because without a

clear policy direction, the implementation of Digital ITC has the potential to be increasingly uncoordinated, causing service gaps between regions, and reducing the effectiveness of tourism information nationally (BAPPENAS, 2009). Risk of maintaining status conditions *quo* It also includes uncertainty of service standards, weak accountability, and difficulty in evaluating policy performance. Within the framework of the RIA, this condition is considered to have the potential to cause greater social and economic costs compared to the implementation of more targeted policy options. Therefore, although the option of doing nothing must still be analyzed, it is generally used as a benchmark to assess the urgency of policy intervention, both in the form of regulation and non-regulation (BAPPENAS, 2009).

By considering these various options, the government can choose the most proportionate policy alternative, both in terms of achieving goals, cost burdens, and impacts on stakeholders. This approach is in line with the RIA principles which emphasize evidence-based decision-making and rational consideration of the various policy options available (Retnosari, Rizqi, et al., 2024).

## **5. Analyze the Costs, Benefits, and Impacts of Each Policy Option.**

In the Regulation Impact Assessment approach, each policy option needs to be analyzed in terms of *costs*, benefits, and impacts, both direct and indirect (BAPPENAS, 2009). This analysis was carried out qualitatively by considering the significance of the proposed Digital ITC regulation, considering that the policies studied do not have a wide impact across strategic sectors, but have a real influence on tourism information governance and the efficiency of the tourism industry. In the regulatory intervention option, the costs incurred are mainly related to the process of drafting or revising regulations, coordination between ministries and local governments, as well as institutional adjustments and information systems at the regional level. Local governments also have the potential to bear the cost of adaptation to meet the set standards. However, the expected benefits

are relatively clear, namely the creation of legal certainty, uniformity of Digital ITC standards, and the integration of tourism information systems nationally . This option is expected to generate benefits that are proportionate to the costs incurred, especially in the medium and long term, as they are able to reduce duplication of system development and improve the efficiency of public budgets. Unintended consequences can arise if regulations are designed too detailed or rigid, thus potentially limiting regional flexibility in adapting Digital ITC to local characteristics(Azis et al., 2023).

In terms of impact, regulatory interventions have a direct impact on the government through increasing certainty of authority and coordination, as well as on the business world through the availability of more consistent and reliable tourism information. The indirect impact can be seen on the community and consumers, namely the increasing ease of access to tourism information. The impact on the environment is relatively small and indirect, for example through the potential for more planned management of tourism flows. From a sustainable development perspective, these options tend to support a balance between economic and social goals as they encourage the efficiency of the tourism industry while improving the quality of public services (Istiqomah et al., 2025).

In the non-regulatory intervention option, the costs incurred are relatively lower because they do not require the formation of new regulations. The main costs lie in strengthening coordination between agencies, increasing the capacity of human resources, and developing or integrating technology systems. The expected benefits are policy flexibility and speed of implementation, especially for regions that already have digital readiness. However, these benefits are not always evenly distributed because they depend heavily on the commitment and capacity of each region. An unintended consequence of this option is the weak sustainability of the policy, because without a binding regulatory basis, the implementation of Digital ITC can be stalled or changed as policy priorities

change. The impact of non-regulatory options on the government and the business world is limited and varies between regions. For the public and consumers, the benefits are only felt in areas that are actively developing Digital ITC. In terms of sustainable development, this option has the potential to partially support economic and social goals, but it has not been able to guarantee equitable distribution of benefits and consistency of tourism information services nationally (BAPPENAS, 2009).

On options *doing nothing (status quo)*, policy costs in the short term are almost non-existent because the government does not make additional interventions. However, the benefits produced are also very limited and only felt by regions or business actors who have adequate capacity and resources. This option does not generate expected benefits on a national scale and instead risks incurring hidden costs in the long run. The unintended consequences of maintaining the status quo are the continued fragmentation of the Digital ITC system, inequality in the quality of tourism information between regions, and inefficiencies due to duplication of system development. In terms of impact, the option of doing nothing has a negative impact indirectly on the government and society because the efficiency goals of the tourism industry are difficult to achieve. The business world, especially small and medium tourism businesses, also has the potential to be disadvantaged due to limited access to promotions through integrated information systems. From a sustainable development perspective, this option is less likely to support a balance of economic and social goals because it widens the gap between regions and hinders the equitable distribution of the benefits of tourism digitalization (BAPPENAS, 2009).

Based on this analysis, it can be concluded that the level of qualitative analysis used is adequate to assess the significance of the proposed Digital ITC regulation. Regulatory and non-regulatory intervention options show greater potential benefits than options *doing nothing*, noting that policy design needs to pay attention to proportionality so that the costs incurred

are in line with the expected benefits (Retnosari, Rizqi, et al., 2024). Although there are normative hierarchical gaps, non-regulatory intervention through government-private collaboration remains the top choice. This is because the efficiency of the tourism industry is achieved faster through the use of the existing digital ecosystem rather than waiting for a long legislative process.

## **6. Implementation and Evaluation of Non-Regulatory Options in Digital ITC Arrangements**

The selection of non-regulatory options in an effort to strengthen the implementation of the Digital Tourism Information Center (TIC) was carried out with deep consideration that the core of the problem faced was actually not the absence of underlying legal norms. The existing regulatory framework has basically provided legitimacy for the government to organize and develop digital-based tourism information services. However, the main problem lies in the implementation aspect, especially related to the urgent need to accelerate national data integration and optimize cross-sector resources which have been running partially and fragmented. This condition causes the use of Digital ITC to not be able to function optimally as an integrated and easily accessible tourism information node for users.

Within the framework of Regulation Impact Assessment (RIA), the non-regulatory approach is seen as the most relevant policy instrument to answer the efficiency challenges of the tourism industry without having to be trapped in the process of forming new regulations that are rigid and take a long time. This approach allows the government to focus on solving the root of the problem in a technical and coordinated nature, instead of adding layers of legal regulation that do not necessarily directly impact improving service performance. The use of this non-legal instrument also minimizes the risk of *over-regulation* which actually has the potential to hinder digital innovation in the tourism sector (BAPPENAS, 2009). The implementation

of the non-regulatory option is focused on strengthening administrative guidelines through a strategic collaboration scheme with the private sector, which includes online travel agents, information technology service providers, and tourist destination managers. This collaboration is seen as strategic considering that the private sector in general already has a mature digital infrastructure, database, and operational experience in technology-based tourism information management. Instead of forcing the government to allocate a large budget to build all digital infrastructure from zero which risks creating duplication of the system and wasting state spending as mandated in Presidential Instruction Number 1 of 2025 regarding the efficiency of government spending, the government is positioning itself as a regulator, facilitator, and owner of national data standards. In this scheme, the private sector is actively involved to provide the platform ecosystem as well as the range of technologies that they have developed carefully and tested in the market(OECD, 2021).

The collaborative approach is in line with the governance principles recommended by the OECD, which states that in conditions of fiscal and economic constraints, the involvement of non-government actors is the key to driving productivity and innovation without creating additional financial burdens for countries (OECD, 2012). Thus, the role of the government is no longer focused on the function of a single service provider, but shifts towards strengthening coordination, setting standards, and supervising the quality and interoperability of the data produced (Shinta Wahyuni & Evi, 2023).

In order for the implementation of this option to run effectively and consistently at the central and regional levels, the government needs to set minimum information standards and data sharing protocols through revisions to existing technical guidelines and administrative policies. The determination of this standard is crucial to ensure uniformity of data quality, prevent system fragmentation, and support the integration of tourism information management into the Electronic-Based Government

System (SPBE). In this context, the character of the non-regulatory option provides an advantage in the form of wider room for the government to make periodic technical adjustments following the dynamics of digital technology that changes very progressively in a matter of months. This kind of flexibility is a crucial aspect that is often unable to be accommodated if the government only relies on formal legal procedures that take a long time each time a rule change is made (Retnosari, Rizqi, et al., 2024).

The effectiveness of the implementation of this non-regulatory option is no longer measured through the parameters of the application of punitive or administrative legal sanctions, but through a performance monitoring mechanism based on real data or real-time monitoring. Compliance of the parties in the implementation of Digital ITC, including the commitment of private partners, is encouraged through compliance with service level agreements (SLAs) and key performance indicators mutually agreed upon in the cooperation agreement. From RIA's perspective, this kind of evaluation approach is seen as more ideal for the tourism industry because it emphasizes an outcome-oriented approach. The main focus is directed at real results in the form of improving the ease of access to information for tourists, improving the quality of user experience, and contributing to increasing destination visits, rather than just fulfilling legal formalities that often do not come into direct contact with the needs of users in the field.

## **7. Community Participation or Consultation Stakeholders**

In the framework *Regulation Impact Assessment*, community participation and consultation with stakeholders are integral to the policy formulation process. Consultations are conducted to ensure that the problems identified, the policy options considered, and the cost-benefit impact analysis are not only based on the central government's perspective, but also reflect the real conditions and needs of the affected parties directly

on the ground (BAPPENAS, 2009). In an effort to strengthen Tourism Information Center (ITC) Digital, relevant stakeholders to consult include the central government as policy makers, local governments as service implementers at the site level, and private sector partners that include digital platform providers and tourism industry players. This consultation can be carried out through coordination forums, focused policy discussions, and the collection of input in the process of preparing technical guideline documents. This approach is in line with the RIA principle which places consultation as an instrument to obtain an initial perception of the root of the problem and a more comprehensive policy need (Rantala & Alasuutari, 2024).

The views of stakeholders on the implementation of Digital ITC currently show that there is an urgent need to strengthen coordination and standardization of services nationally. Local governments tend to emphasize the importance of policy flexibility so that digital development can still be adjusted to the unique characteristics of destinations in each region. On the other hand, private sector partners and service users are more focused on the aspects of ease of access, data reliability, and speed of information updating. For the private sector, clarity regarding data interoperability standards is the main importance so that the technology investments they invest can be integrated with government systems efficiently. This difference of views reflects the diversity of interests which, within the framework of the RIA, are the main considerations for formulating more balanced and inclusive policies (Wicaksono, 2023).

At several stages of discussion, there are often dissenting views, especially regarding the extent of government intervention in regulating the tourism digital ecosystem. Some stakeholders from the private sector may consider that overly restrictive and bureaucratic arrangements have the potential to limit the space for innovation and the speed of technological adaptation. Meanwhile, the ministry considers that without strong national standards, the effectiveness of Digital ITC is difficult to achieve evenly. The

existence of this dynamic view ultimately encourages the choice of a more moderate and pragmatic option, namely strengthening policies through non-regulatory channels that prioritize technical collaboration rather than the formation of new regulations that are rigid and static.

Stakeholder consultation in the RIA system is not a one-time thing, but is carried out continuously at each stage of the policy cycle. In the initial stage, the consultation serves to obtain an accurate perception of the bureaucratic and technical problems faced. In the next stage, input from business actors is used to identify the most business-feasible policy options and to confirm the cost and benefit analysis of each option. In the final stage, the consultation is used to obtain feedback on the feasibility and level of implementation of the policy options that have been selected so that they can be implemented consistently by all parties (BAPPENAS, 2009). Thus, the active participation of elements of the government, society, and the private sector plays a crucial role in ensuring that the proposed Digital ITC policy not only has a proper normative foundation, but is also realistic and acceptable to the parties involved in daily operations. This participatory approach is fully in line with the RIA principles which emphasize the aspects of transparency, accountability, and broad public involvement in every policy decision-making process (Retnosari, Rizqi, et al., 2024).

## **Conclusion**

The regulatory framework for the Digital Nusantara Tourism Information Center (TIC) program is basically available, but it is still fragmentary and does not yet have legally binding force at the national level. The technical arrangements outlined through the Deputy Circular Letter and the Minister's Guidelines cause this policy to not be included in the hierarchy of laws and regulations that are generally binding. As a result, the implementation of Nusantara's Digital ITC in the regions is highly dependent on the discretion and commitment of each local government. This condition creates a normative gap that has an impact on the lack of uniform and nationally integrated tourism information standards.

Based on the Regulation Impact Assessment (RIA) approach, it can be concluded that non-regulatory policy options through strengthening strategic collaboration between the government and the private sector are the most proportionate and efficient choice. This option was chosen by considering the urgency of state spending efficiency as mandated in Presidential Instruction Number 1 of 2025. The use of the private digital ecosystem that has developed is considered to be able to provide an economic impact and improve service quality faster than the formation of new regulations that are rigid and require a long legislative process. In this context, the policy focus is no longer directed to the development of digital infrastructure independently by the government, but to the establishment of national data standards and the supervision of information quality through strategic partnership mechanisms.

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