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Implementation of Maritime Environmental Pollution Prevention Policy at The Manado Harbormaster and Port Authority Office

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Abstract. This research aims to describe, analyze and interpret the evaluation of the implementation of Minister of Transportation Regulation Number 29 of 2014 concerning Prevention of Maritime Environmental Pollution at the Manado Harbormaster and Port Authority (KSOP) office. This research uses qualitative methods, because qualitative research places more emphasis on the process of searching for meaning, revealing the meaning behind the phenomena that appear in the research, with the aim that the problems studied are more comprehensive, in-depth, natural and real, and without much interference from researchers to the facts that emerge. The results of the research reveal that there are several ships that repeatedly apply for temporary pollution certificates. According to regulations or rules, it is not justified to extend pollution certificates repeatedly, but this is done based on aspects of social and economic impacts which if not done will result in delays. the ship's departure because it cannot be given a Sailing Approval Letter (SPB) if the ship does not have a temporary or permanent pollution certificate. This of course creates losses for the ship owner and will have a social impact on everyone involved on the ship, for example the ship's crew. For this reason, an extension of the temporary prevention certificate is given with various other considerations, both administrative and technical, as well as providing advice and suggestions to the ship owner to immediately complete the lack of documents that must be fulfilled to obtain a permanent prevention certificate.

Keywords. Implementation, Policy, Prevention, Maritime Environmental Pollution

A. Introduction

The Maritime Environmental Pollution Policy, which is regulated through Transportation Ministerial Regulation Number 29 of 2014, explains that pollution caused by ships is water damage and all its impacts caused by the delivery or disposal of substances in the form of hydrocarbons, toxic liquids, dangerous goods which are collected randomly. intentionally or unintentionally, via boat. Prevention of Pollution from Ships is an effort that the captain and/or crew must make as early as possible to avoid or reduce oil spill pollution from the ship into the waters. Petroleum is petroleum in any form, including crude oil, fuel oil, crude oil, impure petroleum and its processed products such as various types of asphalt, diesel, fuel oil, fuel oil, fuel oil, refined oil, naphtha , and others [1].

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The authority to regulate and prevent marine pollution and pollution is given to the Directorate of Sea Transportation and to follow up on this authority, the Director General of Sea Transportation issued a policy for the Implementation of Maritime Ship Seaworthiness through Regulation no. HK.103/2/19/DJPL-16 (Ada, 2023) [2].

Based on the Implementation Policy for the Implementation of Maritime Ship Seaworthiness No. HK.103/2/19/DJPL-16. then the Head of the Main Harbormaster's Office, the Head of the Harbormaster's Office and Class I, II, III, IV and V Port Authorities, the Head of the Batam Port Office, the Head of Class I, I, and III Port Implementation Units and the Transportation Attaché at the Indonesian Embassy can issue a Safety Certificate If the ship has a Ship Safety Inspector (Senior Marine Inspector, Marine Inspector or Assistant Marine Inspector) in accordance with its authority. A Safety Certificate can be issued after going through an inspection and testing process by a confirmed Ship Safety Inspector (Marine Inspector, Marine Inspector or Assistant Marine Inspector). The issued Safety Certificate must be signed by a Government Official who has qualifications as a Ship Safety Inspector (Senior Marine Inspector, Marine Inspector or Assistant Marine Inspector). Ship Safety Inspector Officials (Senior Marine Inspector, Marine Inspector or Assistant Marine Inspector) can sign the endorsement of the Ship Safety Certificate after going through the inspection and testing process. Head A (8) Head of the Main Harbormaster's Office, Head of the Harbormaster's Office and Class I, II, III, IV and V Port Authority, Head of the Batam Port Office, Head of Class I, I, and III Port Implementation Units and Transportation Attaché at the Indonesian Embassy can cancel/revoke the Ship Safety Certificate temporarily if a discrepancy is found that endangers the safety of the ship after receiving a recommendation from the Ship Safety Inspector Officer (Senior Marine Inspector, Marine Inspector or Assistant Marine Inspector) in accordance with their authority until the ship's safety requirements are fulfilled again and can be activated return. Revocation/cancellation and reactivation of safety certificates must be reported to the Head Office of the Directorate General of Sea Transportation with a copy to the Director of Shipping and Maritime Affairs (Ralibi, 2017) [3].

Follow-up to the implementation of Maritime Vessel Seaworthiness Implementation No. HK.103/2/19/DJPL-16, all means of sea transportation, especially ships operating at sea, must meet the ship's seaworthiness, including an Oil Pollution Prevention Certificate, for the issuance of a certificate for preventing oil pollution from ships in the stages, namely: a).The first inspection is carried out, and a temporary oil prevention certificate is given which is valid for 3 months, for a temporary operational permit and the ship's seaworthiness examiner is given authority to the port harbor authority according to the port class b). Meanwhile, the stage of obtaining a permanent certificate issued by the central government is carried out, c). Furthermore, it can be extended, and the permit is permanent, valid for 1 (one) year and must be renewed every year through a re-examination which must be submitted by the entrepreneur/ship owner through a bureaucratic mechanism that has been established, namely at the head office of the Ministry of Maritime Transportation in the certification licensing section (Mangara , 2015) [4].

Manado Harbormaster & Port Authority Office has a problem where there are entrepreneurs/ship owners who already have to apply for a permanent permit to obtain a certificate for Prevention of Oil Pollution, but in reality the entrepreneur/ship owner neglects their obligation to apply for a permanent certificate. As an indicator, there are 22 ships operating at Manado Port but only 5 ships or 22.72 percent have permanent certificates, while 17 ships or 72.27 percent do not have permanent certificates and only rely on temporary certificates with operational permits valid for 3 months, or have not met the requirements. set out in policy.

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Based on the problems mentioned above, an assessment was carried out from the dimensions of public policy, especially the implementation of maritime pollution policies, especially pollution from ships through petroleum pollution in the form of crude oil, petroleum, dirty oil, impure petroleum and processed products such as asphalt, diesel fuel, raw materials. fuel oil, fuel oil, fuel oil, refined oil, naphtha, etc. at the research location at the Manado Harbormaster's Office and Class III Port Authority. This research aims to describe, analyze and interpret the evaluation of the implementation of Minister of Transportation Regulation Number 29 of 2014 concerning Prevention of Maritime Environmental Pollution at Manado Harbormaster and Port Authority (KSOP) offices.

B. Method

This research uses qualitative research with the aim of exploring and understanding the meaning that comes from the problem of evaluating the implementation of ship certificate management policies at the port of Manado. Qualitative research reveals real events and also reveals hidden values from real events (Moleong in Tarore & Supit, 2023) [5].

This research focuses on: 1) Implementation of ship certificate management policies at the Class III Manado Port Authority and Port Authority Office; 2) Determinants of implementing the policy for processing ship certificates at the Class III Manado Harbormaster and Port Authority Office. The data analysis technique used is the Miles & Huberman approach model in Masengi et al. (2023), namely data collection, data reduction, data display, and drawing conclusions [6]. Then, to ensure the validity of the data, researchers used 4 main criteria presented by Lincoln and Guba in Moleong (2013), namely credibility, dependability, transferability, and comfirmability [7].

C. Result and discussion

Implementation Of Ship Certificate Management Policies At The Class III Manado Harbormaster And Port Authority Office

Technical Difficulties in Managing Certificates

Minister of Transportation Regulation Number 29 of 2014 concerning Prevention of Environmental Pollution states that ship pollution results in damage to water bodies caused by spills or releases of substances such as oil, toxic liquids, dangerous cargo in packaging, dirt, rubbish and air, whether intentional or accidental. For this reason, it is necessary to carry out pollution prevention efforts that must be carried out by the captain and/or ship's crew as early as possible to avoid or reduce pollution from oil spills, toxic liquid materials, dangerous cargo in packaging, sewage, garbage (garbage) and exhaust gases. from ships to water and air. These actions are carried out quickly, precisely, integrated and coordinated to control, reduce and eliminate spills of oil, toxic liquids or other cargo from ships into the sea. The aim is to minimize losses to society and damage to the marine environment. Its implementation is carried out through handling of ship operations, prevention of pollution from harbor activities as well as tank cleaning activities, transportation of hazardous and toxic waste by ship, ship recycling and dumping of waste in the waters.

This prevention includes oil pollution from ships, pollution from toxic liquid materials from ships, pollution from cargo of dangerous materials in the form of packaging from ships, sewage pollution from ships, waste pollution from ships, air pollution including chemical emissions and energy efficiency and pollution arising from spilled cargo. and goods from ships, by means of anti-barnacle control (Anti-Fouling System/AFS). Structural and equipment requirements to prevent environmental contamination include the installation of an oil-water

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separator (OWS) in the engine room with an output level of 15 parts per million (ppm) or less. Oil/water/OWS separation equipment must be approved by the general manager. If there is a sampling area in the drain, the system can operate with an associated pump. The oil filtration equipment piping system shall be separate from the main bilge system, with a return provided for testing of the oil filtration equipment with a closed outboard valve installed between the isolation device and the outboard valve. The dirty oil storage tank (sludge tank) is equipped with a special pump that can discharge dirty oil directly from the storage tank to a standard outlet with an outlet to the dirty oil storage tank or oil-water separator, having a direct connection to the outside of the vessel via a standard drain connection, The piping must allow pumping of residual dirty oil from the machinery space and bilge to the storage bag facility via a standard drain connection, equipped with a standard drain connection to facilitate the drainage of the remaining bilge machinery and oil from the dirty oil storage tank to land, with the size of the connection flange standard exhaust. Control of the discharge of oil into the sea where every ship is prohibited from discharging oil or oily mixtures into the sea, oil or oily mixtures from the machinery space must be kept on board the ship and then disposed of in storage facilities or can be thrown into the sea. Disposal at sea is carried out according to the following provisions: a) The ship is in a navigable condition. b) the oily mixture is processed in the oil-water separation plant, c) the content of the oily mixture discharged does not exceed 15 ppm, d) the oily mixture does not come from the bilge water of the cargo pump room, the oily mixture is mixed with the remaining oil cargo. Oil or oil mixtures from ship holds may be stored on board the ship and then disposed of in storage facilities or discharged overboard as appropriate.

National Guidelines for Monitoring Compliance and Enforcement of Rules on the Implementation of Anti-Fouling System Control Inspections where it is explained that Ship Safety Inspection Officers / Ship Seaworthiness and Security Inspection Officials in Indonesia in controlling anti-barnacle systems: a) prohibit and limit the use of anti-barnacle systems - dangerous barnacles on ships, b). must not use or apply Organotin compounds which act as biocides in anti-barnacle systems, c). use appropriate measures so that waste from the application or cleaning of anti-barnacle systems is controlled by being collected, handled, treated and disposed of in a safe place with environmentally friendly methods to protect human health and the environment. To accommodate waste originating from ships at ports, Port Authorities, Port Management Units, Port Business Entities and Special Terminal Managers are required and responsible for providing waste storage facilities. Waste management is carried out in accordance with statutory provisions. Transport of waste to the collection, processing and final disposal site is carried out based on the provisions stipulated by the Minister responsible for the environment (Handojo et al., 2022) [8].

Issuance of National Pollution Prevention Certificate (SNPP), required to submit the following documents: Copy of Measurement Letter, Copy of Ship Nationality Certificate (Surat Laut/Pas Besar), Copy of Temporary National Pollution Prevention Certificate, Marine Inspection Report Book, Inspector in accordance with PM . 29/2014, Copy of Condition Assessment Scheme (CAS) Certificate for Single Hull oil tankers aged >20 years, Copy of Safety Certificate (Rahmah, 2022) [9].

Public policies regarding prevention and maritime pollution by ships must be implemented in protecting the maritime environment in each and every maritime area where ships sail. Mazmanian and Sabatier in Dilapanga et al. (2023) describe the policy implementation process in three characteristics: 1) Aspects or characteristics that stand alone from a problem. The ranges are: 1) technical difficulty, 2) diversity of target group behavior, 3) proportion of target group to population, and 4) level of desired behavior change. The second

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category is the intervening dimension, namely the policy's ability to systematize the process of implementing policies or managing policy programs. The scope is as follows: 1) Clarity and coherence of policy objectives, 2) Allocation of financial resources, 3) Hierarchical integration within and between implementing agencies, 4) Decision making rules for implementing agencies, and 5) recruitment of implementing staff, and 6) access formal external. 3) dependent aspects or external factors that influence policy implementation [10].

The process of implementing policies to prevent maritime pollution by ships can also be in line with the concept above which is divided into three characteristics. The first is the independent aspect or characteristics of the problem, which concerns technical difficulties and the diversity of behavior of the target group. The policy target is preventing maritime pollution by ships, especially in issuing temporary or permanent certificates that use an Anti-Barnacle Control System (Anti-Fouling System) with the obligation to submit documents: Copy of Measurement Letter, Copy of Ship Nationality Certificate (Surat Laut/Pas Besar), Copy of National Certificate Temporary Pollution Prevention, Marine Inspection Report Book, Inspector in accordance with PM. 29/2014, Copy of Condition Assessment Scheme (CAS) Certificate for Single Hull oil tankers >20 years old, Copy of Safety Certificate according to interview results is a technical difficulty experienced and difficult for service users or target groups to fulfill. The Permanent Certificate must have an Anti-Barnacle Control System (Anti-Fouling System) and must be issued by the Director General of Transportation. Technically it is difficult, so service users or younger target groups apply for temporary certificates that only use traditional tools taught by marine ship technicians. The second dimension is the intervening dimension, namely political ability to systematize the process of implementing policies or managing policy programs. This scope includes hierarchical integration within and between implementing authorities, decision-making rules for implementing authorities, which provide opportunities for the issuance of temporary certificates as long as efforts to prevent environmental pollution are used, even using traditional tools that are economically affordable for service users but do not damage maritime conditions. Apart from that, Van meter and Van Horn in Akib (2012) mention that aspects that influence the successful implementation of public policy are communication between organizations involved in public policy, as well as economic and social conditions, in this case service users [11].

Based on data obtained from the Harbor Master's Office and Region III Authority of Manado City, it shows that of the fifty-one vessels actively operating, only two vessels have permanent certificates and the remaining forty-nine vessels are only temporarily certified.

Table 1. Data on SNPP Certified Ships for 2022 -2023

NO	SHIP NAME	TEMPORARY CERTIFICATE	PERMANENT CERTIFICATE
1	LUCKY SHIP	√	
2	BARCELONA II	√	
3	MERCY TERATAI	√	
4	GLORY MARY	√	
5	TB.MITRA ABADI II	√	
6	BARCELONA III A	√	
7	SAINT MARY	√	
8	MERIT TERATAI	√	

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9	MAJESTIK KAWANUA II	√	
10	EXPRESS BAHARI 2E		√
11	TB.MITRA ABADI II	√	
12	SUNLIA	√	
13	SAINT MARY	√	
14	LCT.KARYA MEKAR 2	√	
15	MERIT TERATAI	√	
16	MERCY TERATAI	√	
17	LCT.KARYA MEKAR	√	
18	GANDHA NUSANTARA 18	√	
19	GLORY MARY	√	
20	BARCELONA III A	√	
21	MERIT TERATAI	√	
22	MERCY TERATAI	√	
23	BARCELONA III A	√	
24	LCT KARYA MEKAR 2	√	
25	SAINT MARY	√	
26	BARCELONA VA	√	
27	MERCY TERATAI	√	
28	AL SUDAIS 21	√	
29	BARCELONA III A	√	
30	SAINT MARY	√	
31	MERIT TERATAI	√	
32	GLORY MARY	√	
33	GREGORIUS	√	
34	MERCY TERATAI	√	
35	MERIT TERATAI	√	
36	BARCELONA III A	√	
37	ARSI	√	
38	SAINT MARY	√	
39	MERIT TERATAI	√	
40	GREGORIUS	√	
41	TB.SURYA 07	√	
42	SEA SAFARI 8	√	
43	BARCELONA III A	√	
44	SAINT MARY	√	
45	MERCY TERATAI	√	
46	TB.MUTIARA BARITO 08	√	

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47	MERIT TERATAI	√	
48	MARINA BAY 1	√	
49	TB.BERAU COAL 28		√
50	GLORY MARY	√	
51	TB.AMB 01	√	
	TOTAL	49	2

Research data shows that there are technical difficulties for ship owners or service users in the territory of Manadu City III and Authority III to fulfill policy demands and this data is in line with the results of interviews with three ship owner service users, the director of a company that protects service users in the city of Manado, and one shipping technical officers, two implementers who take care of the licensing for the issuance of temporary maritime pollution prevention certificates at the Office of Harbormaster and Authority III Manado City.

Bureaucratic Structure

Weber in Masengi et al. (2023) refer to bureaucracy as a form of organization, as a system of authority that is determined rationally to organize work in an organization [12]. The modern type of government organization has specialist tasks in the government administration system (Fritz Morstein Marx in Idris, 2017) [13]. Bureaucracy is a chain of command in the form of a pyramid, in administrative and military agencies. Bureaucracy as an organizational structure in procedures, division of labor, hierarchy and impersonal relationships (Langkai et al., 2019) [14]. Factors determining and at the same time inhibiting policy implementation include the bureaucratic structure, for this reason in public organizations it is better if the bureaucratic structure has clear stages, its functions and duties are clear, its operational processes are flexible and efficient (Nugroho, 2021) [15].

Implementation of public policy as an action carried out by the implementer aims to solve problems, achieve certain goals and targets set out in public policy (Permatasari, 2020) [16]. The bureaucratic aspect or division of tasks and functions in implementing public policies shows that implementers are professional in implementing public policies. Bureaucratic elements are established to facilitate the implementation of public policies which describe in detail the duties, functions and responsibilities and obligations of certain officials, which determine what their domain is in implementing policies, how to implement policies and the reasons for giving these positions to certain organs (Langkai et al. , 2019) [17].

Indeed, the Directorate of Sea Transportation relies on the principles of simple bureaucracy, effective, efficient and optimal performance in carrying out its duties, but because of the lengthy bureaucracy it has become an obstacle to the implementation of policies to obtain permanent certificates. This condition should pay attention to the importance of organizing the bureaucratic structure as stated by Ripley and Franklin in Firdaus & Oktisari (2018) identifying namely: 1) Bureaucracy was created as an instrument in handling public needs, 2) Bureaucracy is the dominant institution in implementing public policies have different interests in each hierarchy. 3) Bureaucracy has a number of different goals. 4) The function of the bureaucracy is in a complex and extensive environment. 5) The bureaucracy has a high survival instinct, so it is rare to find dead bureaucracies. 6) Bureaucracy is not a neutral force and is not under complete control from outside parties [18].

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The bureaucratic structure relating to the submission of a temporary certificate for the prevention of maritime pollution by ships at the Manado Class III Port Authority and Port Authority Office is as follows.:

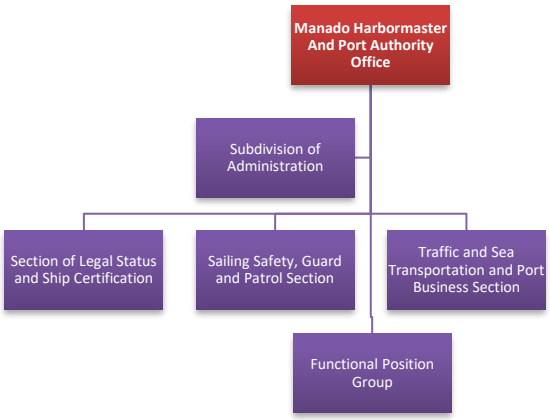

Figure 1. Organizational Structure of the Manado Harbormaster's Office and Class III Port Authority

From some of the descriptions above and combined with document data and interview data, it shows that the bureaucratic structure in an effort to facilitate services, sometimes actually extends services because the issuance of permanent maritime pollution prevention certificates takes a very long time, namely from the harbormaster's office and Wilyah III Manado authority to the directorate of sea transportation or to the national level.

Disposition of the Leadership of KSOP CLASS III Manado

Disposition is the characteristic of the implementer, in the form of commitment, honesty, in carrying out public policies according to the goals and objectives (Nugroho, 2014) [19]. Based on data obtained from the Harbor Master's Office and Region III Authority of Manado City, it shows that of the fifty-one vessels actively operating, only two vessels have permanent certificates and the remaining forty-nine vessels are only temporarily certified.

The Port Harbormaster and Class III Authority of Manado Port have a commitment or disposition to implement efforts to prevent oil pollution at sea by ships. The indicator is the issuance of policies aimed at preventing oil pollution in the sea. Prevention and Pollution of the Maritime Environment, including oil in terms of disposal of waste into the sea. The government's commitment to prevent pollution in waters, especially as a result of oil spills, both small and large, which damage the maritime environment. Commitment or disposition in the form of the government's responsibility to maintain and guarantee the protection of the maritime environment through fast, precise and coordinated countermeasures. Several steps have been taken, such as ratifying maritime environmental protection regulations, strengthening institutional functions, increasing cooperation domestically and internationally by placing a Technical Organizing Unit at the Directorate General of Sea Transportation (Sintia & Rani, 2019) [20].

Results of interviews with the data processing section for sea transportation business development and loading and unloading workers at the Class III Manado Harbormaster and Port Authority Office, MP, technicians in the Marine inspector section, who checked the ship's seaworthiness, namely MY, head of the legal status and ship certification section, who signed

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MT's temporary certificate that they are committed to implementing the public policy of preventing maritime pollution by oil from ships, they carry out technical inspections on preventing pollution from ships to the sea, carry out inspections of control of ship anti-trip systems when ship operators submit applications that include mandatory documents in the form of an application letter from company, Sea Certificate / Large Pass, Measurement Letter, IMO Number, TBT free certificate or other documents from the anti-barnacle paint manufacturer as well as the name of the anti-barnacle system manufacturer, the name and color of the anti-barnacle system, the active ingredient and the Chemical Abstract Service Registration number (CAS number) and Material Safety Data Sheets anti-barnacle system from the manufacturer. Efforts to explain repeatedly about the validity period and function of the Anti-Barnacle system certificate for 30 months or following the dry dock schedule, the obligation to prevent pollution originating from ship operational activities, complete storage facilities including storage for dirty oil, toxic liquid waste, waste, ozone destroyers , B3 waste, sediment/ballast water deposits, explains the consequences of ship exhaust pollution. Service users only apply for a temporary certificate which is valid for 3 months, if they are not able to use the Anti-Barnacle system according to policy. The permissibility of using traditional tools to prevent marine pollution was taught and created jointly through the supervision of technicians from the harbormaster's office and the Manado port authority. The inclusion of the use of this traditional tool does not interfere with marine pollution and is appropriate to the economic conditions or income of service users. Service users have not been able to buy WOS equipment because the price is very expensive and difficult to obtain. This policy was taken because the ship's cargo and passengers only overflowed on religious holidays. If you wait for service users to apply for a permanent certificate, it will certainly disrupt people's need for sea shipping and sending goods. On the other hand, the application for a temporary certificate benefits the regional government in original regional income. Despite this, the harbor authority and the Manado Port Authority always strive together with service users to comply with efforts to prevent marine pollution, when our ships sail.

The government is very committed to preventing pollution at sea, this is implemented by issuing several regulations aimed at preventing pollution at sea. The Ministry of Transportation issues regulations on Prevention and Pollution of the Maritime Environment regarding the terms and procedures for disposing of waste into the sea. Waste that can be dumped into the sea includes hazardous and toxic waste (B3) and non-hazardous and toxic waste (non-B3). Waste testing must be carried out in an accredited laboratory, or use a laboratory that applies procedures that meet Indonesian National Standards. The location for dumping (disposal) waste into the sea must meet the requirements: located on the seabed in a sea that has a permanent thermocline layer, not in a certain location or in a sensitive area, such as a marine conservation area, recreation or marine tourism area, mangrove/mangrove forest area , seagrass and coral reef ecosystems, national parks, marine natural tourism parks, cultural and scientific heritage areas, areas prone to natural disasters, fish spawning and rearing areas and fish cultivation, protected marine biota migration routes, fisheries management areas, shipping lanes, and special military areas and initial sea water quality must meet sea water quality standards in accordance with statutory provisions. Dumping must have permission from the Minister.

The Ministry of Transportation is taking steps to deal with oil spills at sea due to Indonesia being the largest archipelagic country in the world. These geographical conditions make sea transportation the lifeblood of Indonesia, which must be developed properly and correctly, in order to support economic growth. One of the main disruptions to sea transportation

is pollution in the waters, especially as a result of oil spills. This potential pollution can occur both on a small and large scale. This pollution can damage the environment and endanger people in the affected areas. One of the roles and responsibilities of the government is to maintain and ensure the implementation of maritime environmental protection. In order to deal with oil spills, a system of countermeasures that is fast, precise and coordinated is needed. The Ministry of Transportation has taken various concrete steps regarding this matter. These steps include, ratifying maritime environmental protection regulations, strengthening institutional functions, increasing cooperation domestically and internationally and building human resource capacity. In strengthening institutional functions, the Ministry of Transportation through the technical directorate seeks to increase skills and abilities to support the implementation of duties and functions in the field, renewing patrol boats and oil spill movement detection software, as well as procuring pollution control equipment placed in various Technical Organizing Units of the Directorate General Sea Transportation. The Ministry of Transportation has also collaborated with related ministries and institutions. The Ministry of Transportation is also actively collaborating with other countries in the Asia-Pacific region, especially in handling cross-border oil pollution.

D. Conclusion

Based on the research results and discussion described above, the following conclusions can be drawn:

1) In connection with the Implementation of the Permanent Certificate Issuance Policy, the research results show that a) Service users or ship owners experience technical difficulties in fulfilling the technical requirements for applications for the issuance of Permanent Certificates; b) Service users or ship owners go through a long bureaucratic structure in applying for a permanent certificate; c) The commitment of implementing officials in the process of issuing permanent certificates at the Airport Harbormaster's Office and Port Authority III is disrupted by the income of service users who experience ups and downs in income when the ship sails.

2) The determinants of implementing the Permanent Certificate Issuance policy are a) The commitment of implementing officials in the process of issuing permanent certificates at the Airport Harbormaster's Office and Port Authority III is disrupted by the income of service users who experience ups and downs in income when the ship is sailing; b) Service users or ship owners experience technical difficulties in fulfilling the technical requirements for the application for the issuance of a Permanent Certificate; c) Service users or ship owners go through a long bureaucratic structure in applying for a permanent certificate.

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