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Opportunities to Accelerate Public Access to The Amdal Documents via Electronic Systems

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Abstract

An Environmental Impact Analysis or Analisis Mengenai Dampak Lingkungan (Amdal) constitutes public information in the environmental sector pursuant to Article 65(2) of Law No. 32 of 2009 and its explanatory notes. Nevertheless, obstacles remain to accessing Amdal documents. Public agencies argue that Amdal is not a government product and that they are not obligated to provide it. Furthermore, EIA documents are often not in the possession of the public agencies deemed to have authority over them. This study employs a normative legal approach, drawing on primary and secondary legal sources and secondary data. The EIA exhibits varying degrees of transparency at each stage: during preparation; during the processing of Environmental Approval and Business Licensing; after obtaining Business Licensing; and once the business or operation is in operation. Amdalnet is an environmental document information system that forms part of the Environmental Information System (SILH) as regulated in Article 62 of Law No. 32 of 2009. Amdalnet already provides access to EIA documents at any time, though with various limitations. Amdalnet could incorporate repository or directory features to store, sort, and share EIA documents more effectively.

Keywords: *Amdalnet, EIA, public information disclosure, right to information.*

INTRODUCTION

Public information transparency is an indicator of the quality of good governance, because the public can be involved and actively participate in monitoring every policy implementation [1]. Public information disclosure in Indonesia is regulated by Law Number 14 of 2008 concerning Public Information Disclosure. There are also sectoral legal bases that regulate public information disclosure, such as the environmental sector, which is regulated by Law Number 32 of 2009 concerning Environmental Protection and Management (hereinafter referred to as Law Number 32 of 2009). One of the articles that govern information disclosure in the environmental sector is Article 65, paragraph (2), of Law Number 32 of 2009, which mandates that environmental documents and information be accessible to the public.

One of the documents related to the environment is the Environmental Impact Analysis, or *Analisis Mengenai Dampak Lingkungan* (Amdal). Article 1 number 11 of Law Number 32 of 2009 defines Amdal as a study of the significant impacts of a planned business and/or activity on the environment, which is necessary for the decision-making process regarding the implementation of the business and/or activity. Amdal is the result of a study prepared by the initiator or person responsible for the business as a prerequisite for obtaining an Environmental Permit or Environmental Approval and a Business Permit or Business Approval. The Amdal document is a codification of three documents, namely

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the Terms of Reference (KA), Environmental Impact Analysis (ANDAL), Environmental Management Plan (RKL), and Environmental Monitoring Plan (RPL).

Amdal is an instrument for preventing environmental pollution and/or damage, and serves as a guideline for those responsible for businesses to carry out activities that maintain the surrounding environment so that it remains good and healthy, and serves as a guideline for the community in examining the impact of a business. In its preparation, Article 26 paragraph (1) of Law 32 of 2009 as amended by Article 22 number 5 of Law Number 6 of 2023 mandates that the preparation of the Amdal involve the community directly affected through public consultations that listen to the community's response to the impacts that may be received and felt during the continuation of the business. Legally, an Amdal is an environmental document that is accessible to the public. Article 65 paragraph (2) of Law Number 32 of 2009 and its explanation already state that an Amdal is open information, and this is reinforced by the Information Commission's jurisprudence, which states that an Amdal is an open document accessible to the public [2]. However, in practice, the community still finds it difficult to obtain Amdal documents, and the document does not automatically become easily accessible environmental documents.

There are various challenges to the public's access to the Amdal document. Public bodies offer various excuses when requested to provide the Amdal document, such as claiming they lack the authority or obligation to do so. Another reason is that the document is not in the government's hands, prompting public bodies to suggest that the public request it directly from the activity or business's initiator. However, neither the regional nor the central government can claim to lack the Amdal document because, as supervisors under Article 71 of Law Number 32 of 2009, the Amdal serves as a reference document and a tool for measuring the suitability of business activities. Furthermore, requesting a copy of the Amdal document from a private entity does not guarantee its provision, as Law Number 14 of 2008 only regulates public and private bodies that use state funds, either in whole or in part. This situation is exacerbated by the lack of legal mechanisms and protections for the public when requesting the Amdal from a private entity, similar to the legal protections for requests for information and documents from public bodies.

The Environmental Information System (*Sistem Informasi Lingkungan Hidup*/ SILH), as regulated in Article 62 of Law Number 32 of 2009 concerning Environmental Protection and Management and Chapter IX of Government Regulation Number 22 of 2021 concerning the Implementation of Environmental Protection and Management, can be a means and opportunity to accelerate information disclosure, particularly Amdal documents, which are legally accessible but remain closed in practice. The central and regional governments are expected to be able to provide this information and documents periodically through an electronically integrated Environmental Information System. This development is expected to be an adaptive solution to accelerate the disclosure of environmental document information in the digital era. However, the opposite could occur, namely that the SILH currently developed by the central and regional governments is unable to address the challenge of closed access to EIA documents, or even becomes a factor that hinders information disclosure and public participation due to the complexity of bureaucratic matters within the SILH.

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Amdal is a prerequisite for Environmental Approval, which then becomes a requirement for Business Licensing. Therefore, Amdal goes through several stages, starting from the preparation of the Amdal document as a prerequisite for Environmental Approval and Business Licensing, to becoming a document used for monitoring businesses or activities that are already operating. This paper will normatively analyze the disclosure of information on Amdal documents at various stages: (1) preparation of the Amdal document, (2) as a requirement for Environmental Approval and Business Licensing, and (3) when the activity or business is operational. This paper also explores normatively the opportunities for greater transparency of Amdal documents in the digital age, based on empirical evidence and integrating these with concepts in electronic systems. Therefore, this paper can provide recommendations for accelerating the transparency of Amdal documents in the digital age.

This paper focuses on two topics. The first section will examine the degree of transparency of Amdal information at several stages: during preparation, during the Business Licensing process, and during the operation of the activity or business. The second section will examine how legal regulations that already support public disclosure of Amdal information can best be utilized through electronic systems developed by public bodies.

METHOD

This research examines, from a normative legal perspective through a conceptual approach and in-depth literature comparison, how laws and regulations regulate the disclosure of information on Amdal documents and the use of digital technology to accelerate the disclosure of public information on Amdal documents. This type of research is a literature study that examines scientific literature, journals, books, and laws and regulations to build an understanding of information disclosure in Amdal, as well as the concept and practice of information disclosure through electronic information systems.

The primary sources of information for this research are national and international scientific journals, law books, legislation, court rulings, including administrative dispute decisions at the Information Commission, and case study reports published by government and non-governmental institutions. This research also draws on reports from civil society organizations related to public information disclosure in the environmental sphere. Data collection utilized document analysis techniques, comprising the collection, reading, and interpretation of each relevant source of information. The analysis employed a juridical-normative approach to examine laws and regulations governing information disclosure in the Amdal document, as well as the use of electronic systems to accelerate it.

RESULT AND DISCUSSION

Legal Analysis of Public Information Disclosure on Amdal Documents in Various Stages

Article 25 letter a of the International Covenant on Civil and Political Rights guarantees that human rights related to the environment include the right to receive prior notification of environmental risks, the right to compensation, including the right to sue for litigation in the public interest, and the right to effective redress for environmental

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damage and the government's ability to collect and utilize data and information for decision-making processes aimed at implementing sustainable development[3]. Jane Holder and Marie Lee in Environmental Protection, Law and Policy[4] stated that the principle of public participation consists of 3 main pillars, namely access to environmental information, public participation, and access to justice, citing the Aarhus Convention, a convention on access to information, public participation in decision-making, and access to justice in the environment in 1998. Jane and Marie Lee emphasized that access to environmental information is part of the principle of public participation, meaning that the public not only accesses information but also influences it. The public has the right to know, have their opinions heard, and give consent to activities that will impact the lives of the community.

The right to information in Indonesia is guaranteed through Law Number 14 of 2008 concerning Public Information Disclosure (Law Number 14 of 2008) and, specifically, information in the environmental sector is guaranteed through Law Number 32 of 2009. Amdal is an environmental document based on Article 65 paragraph (2) along with its explanation and can be accessed by the public. Amdal, as a document accessible to the public, has varying degrees of openness at each stage: when it is prepared, when it becomes a requirement for Business Licensing, and when it becomes a guideline for supervision once an activity or business is already operating. The Amdal document has a dual function: as a prerequisite for environmental approval, which then becomes a requirement for Business Licensing, and as a guideline for the supervision of activities or businesses that are currently operating.

Preparation of Amdal

Article 26 paragraph (1) of Law Number 32 of 2009 emphasizes that the community is involved in the preparation of the Amdal, and that community involvement is carried out based on the principles of providing transparent and complete information, as well as prior notification before the activity is carried out. Article 26 paragraph (3) describes the community that needs to be involved, including those affected by the impacts, environmental observers, and/or those affected by all decisions in the Amdal process. Under the Job Creation Law, the community involved in preparing the Amdal is limited to those who are directly affected, which is considered to diminish the role of community participation in preparing the Amdal document [5]. Despite the decline in transparency and public participation, affected communities still have access to environmental information. This environmental information includes activity plans and the physical, chemical, biological, social, economic, and public health impacts reported in public announcements and consultations. In addition, communities directly affected by the activity or business will be invited to a public consultation forum, and the Amdal compiler will convey the impacts of the activity or business to the community and collect suggestions, opinions, and responses within 10 working days. At this stage, the community does not receive a copy of the Amdal document because it is still being drafted. However, the community is aware of the substance that should be included in the Amdal document, such as the activity plan, impacts on the community and the environment, and monitoring and management efforts.

Management of Environmental Approval and Business Licensing

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Following the enactment of the Job Creation Law, the process for obtaining Environmental Approval and Business Permits uses electronic systems, namely Amdalnet and OSS RBA. Prior to the enactment of the Job Creation Law, Environmental Approvals and Business Permits were handled manually and were subject to the authority of regional or central governments. The main difference before the enactment of the Job Creation Law was that the assessment of Amdal documents was carried out by the Amdal Assessment Commission. Post-Law, the Amdal Assessment Commission has been replaced by the Feasibility Testing Agency established by the Central Government [6].

The Environmental Approval process in Amdalnet starts from the automatic screening stage, public announcements and consultations at the activity or business location, preparation of the Terms of Reference, preparation of Andal and RKL-RPL documents, and final assessment by the Environmental Feasibility Test Team, and ends with the issuance of an Environmental Feasibility Decree (SKKLH) identified by OSS RBA as Environmental Approval.

The OSS was developed to create a simpler, more transparent, and risk-based business licensing system. The OSS's sole purpose is to simplify business licensing processes, or, in other words, to increase administrative efficiency [8], and it is not intended to be accessible to non-business actors for obtaining public information regarding registered Business Identification Numbers. Based on the Decree of the Secretary of the Ministry/Principal Secretary as the Superior of the Information and Documentation Management Officer of the Ministry of Investment Number 37 of 2024 concerning the Classification of Excluded Information within the Ministry of Investment, business licensing products, including Business Identification Number (NIB) documents, are designated as exempt information. Furthermore, there is no mechanism for reporting violations on the OSS platform if the public detects violations in the issuance of NIBs or business permits [7]. In other words, OSS does not provide the means and facilities for public disclosure of information and public participation.

Amdalnet, inaugurated on February 7, 2023, is an Environmental Document Information System that provides facilities and supporting tools to facilitate and simplify the Environmental Approval process for business actors. Amdalnet is an Environmental Document Information System developed on a geospatial basis and functions as a service center for digitizing environmental documents and environmental approvals used in the screening process, preparing environmental documents, assessing/examining environmental documents, and issuing environmental approvals both at the central and regional levels, managed online/electronically and can be integrated with other information systems. Amdalnet is expected to provide convenience for business actors in the Environmental Approval process, which is a prerequisite for issuing Business Permits, and is already integrated with OSS [8].

Unlike OSS, Amdalnet is designed for information transparency and public participation. It offers a facility for the public to submit objections, and the public can view business and/or activity plans through announcements posted on Amdalnet. The general public is one of the components of Amdalnet users besides the initiator and the drafting team, who can provide feedback by filling in the Community Activity Suggestions, Opinions and Responses (SPT) form on Amdalnet.

In the post-Job Creation Law stages of Environmental Approval and Business Licensing, there are no legal provisions explicitly stating that AMDAL documents are publicly

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accessible, as they were during the AMDAL's preparation. This is likely because all approvals and permits are processed through several electronic systems: Amdalnet for Environmental Approval and OSS for Business Licensing. Both systems were developed to expedite service times and reduce bureaucratic red tape in the licensing process [9] and they are not intended as a platform for public disclosure of information. While Amdalnet offers additional functions that support information disclosure and public participation, its primary purpose is to facilitate and simplify the Environmental Approval process.

The legal provision that serves as the basis for the general disclosure of Amdal information, both before and after the Job Creation Law, is Article 65 paragraph (2) of Law Number 32 of 2009. This provision states that everyone has the right to access information to fulfill the right to a good and healthy environment. Furthermore, the article explicitly states that one of the pieces of information referred to is Amdal.

In practice, the Amdal document is not yet accessible as a complete document, even though its preparation is complete. At this stage, the Amdal is required for Business Licensing through the OSS (Online Business Licensing System), which is not accessible to the general public. However, the public can know about the company's planned activities and provide suggestions, opinions, and responses through Amdalnet. Those requiring the Amdal document may request it from the public agency through the public information disclosure mechanism stipulated in Law Number 14 of 2008.

After Obtaining Business Permits and Operating Businesses and/or Activities

Once the initiator or business actor has obtained a Business Permit and is deemed to have a legal basis to conduct activities or businesses in accordance with the permit, the Amdal document will serve as the basis for environmental monitoring conducted by the regional and central governments. The Amdal serves as a legal instrument and benchmark for government oversight of activities and businesses. The Environmental Management Plan – Environmental Monitoring Plan (Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan/RKL-RPL) contained in the Amdal document will be compared with actual field conditions by environmental supervisory officials [10].

This provision is implicitly contained in Article 76 paragraph (1) of Law Number 32 of 2009, namely that the central government or regional government can impose administrative sanctions on those responsible for businesses and/or activities if, during supervision, a violation of Business Licensing or approval from the Central Government or Regional Government is found. The violation in question is, of course, based on the provisions stipulated in laws and regulations on environmental protection and management, as regulated in Article 71 paragraph (1) of Law Number 32 of 2009.

Therefore, it is necessary for supervisors to have a copy of the Amdal document to supervise the activities or businesses as stated in Articles 71 and 76 of Law Number 32 of 2009. Amdal can be an instrument for the central or regional government to identify, release, and manage the environmental impacts of a business activity that has a significant impact and is not merely an administrative requirement [10].

However, the provisions of Article 76 of Law Number 32 of 2009 do not apply to members of the public who are not supervisors, or, in other words, are not part of the central government or regional government, so the public does not automatically obtain the Amdal document. Similar to the degree of Amdal openness in the Business Licensing process, the legal provisions that allow the public to access Amdal document information

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are Article 65 paragraph (2) of Law Number 32 of 2009 and its explanation, which explicitly states that Amdal documents are public information. The public can access Amdal documents through public information requests using the public information disclosure mechanism. Regardless of how the practice of obtaining Amdal documents was described previously, under legal regulations, Amdal documents, as environmental monitoring documents at this stage, are open and accessible to the public.

Based on the description of the three stages above, starting from the stage of preparing the Amdal, the stage of processing the Environmental Approval and Business Permit, as well as the stage of operational activities or businesses, the Amdal can be provided to the community as part of community participation and access to environmental information. Article 26 paragraph (2) of Law Number 32 of 2009 regulates community participation in the preparation of the Amdal; however, in this case, the document cannot be considered an Amdal because it is only in draft form. Then, Article 65 paragraph (2) regulates in general regarding access to environmental information, and further, the Explanation of Article 65 paragraph (2) further regulates the environmental information. The Explanation of Article 65 paragraph (2) attempts to provide the characteristics of environmental information, namely data, information, or other information relating to environmental protection and management which, according to its nature and purpose, is open to public knowledge, such as environmental impact analysis documents, reports, and evaluations of environmental monitoring results, both monitoring of arrangement and monitoring of changes in environmental quality, as well as spatial planning.

Thus, the argument that the Amdal document is not a government product and that public bodies have no obligation or authority to provide it to the public is flawed. Legally, the Amdal document is considered environmental information and is accessible to the public during its preparation, in the Business Permit process, and during the implementation of activities or undertakings. Furthermore, a public body cannot justify not providing a copy of the Amdal document simply because it does not possess it. This is because the EIA document serves as an oversight instrument for public bodies in the environmental sector at both the central and regional levels.

Accelerating the Digitalization of Environmental Impact Analysis Document Information Disclosure Through Electronic Systems

Law Number 14 of 2008 concerning Public Information Disclosure regulates several types of public information, namely information that must be provided and announced periodically; information that must be announced immediately; and information that must be available at all times. Furthermore, by assessing the characteristics of the Amdal document according to the type of public information, it can be said that Amdal is among the information that must be available at all times, namely, the results of decisions by Public Agencies and their considerations.

Some parties consider the disclosure of information from the Amdal document to violate third parties' confidentiality and affect business competition. This argument is based on the fact that the Amdal document consists of a study conducted by the initiator or business actor that provides an overview and assessment of the potential of an activity or business. Therefore, public bodies argue that the Decree on the Feasibility of Environmental Management (SKKLH) is open information, as it is a product of the public

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body, whereas the Amdal document prepared by the private sector as a business actor is not. However, the analysis of the laws and regulations in the previous section, which is reinforced by several decisions of the Information Commission, states that the Amdal document is an open document and must be disclosed and provided to the applicant, such as the Decision of the North Kalimantan Information Commission Number 001/VI/KI Kaltara-PS-A/2025 and the Decision of the Central Information Commission Number 102/VIII/KIP-PSI-A/2023. This jurisprudence confirms that Amdal is information that must be available at all times and has been declared open to the public through objection and/or dispute resolution mechanisms, thereby constituting public information accessible to users of public information.

The argument from the public body that information in the form of the Amdal document is not within their control and is then used as justification for not providing the Amdal document is totally wrong. One of the considerations that annuls this argument is the consideration of one of the Panels in the decision of the Central Information Commission Number 102/VIII/KIP-PSI-A/2023. In the dissenting opinion or different opinion to the decision, it is stated that the public body with environmental authority should be able to help provide access to the Applicant to obtain related information and/or documents, so that the Applicant's goal of using the information as stated in the purpose of the application is achieved, help direct where the document can be accessed, and make the information available at all times.[1]

Therefore, based on Article 26, Article 65 paragraph (2) and the Explanation of Article 65 paragraph (2) of Law Number 32 of 2009 and Article 11 paragraph (1) and paragraph (2) of Law Number 14 of 2008, it is stated that the Amdal document is public information that can be accessed by the public. However, the practice is actually different from the provisions of the legislation. Even though a request for public information has been submitted in accordance with Law Number 14 of 2008, the requested information may not be accessible due to changes in authority between the regional and central governments in managing Environmental Permits or Environmental Approvals. Before the Job Creation Law, Amdal documents were controlled by regional governments, both districts and provinces, because regional governments at that time still had the authority to examine and approve Amdals, which resulted in the issuance of Environmental Permits. Under the Job Creation Law, all regional government authority over Environmental Permits was revoked and transferred to the central government. Therefore, regional governments argued that they no longer controlled the Amdal documents because the central government had become the authority, and suggested requesting them from the central government. Meanwhile, requesting access to Amdal documents from the central government in Jakarta will incur very high costs if the requester lives far from Jakarta.

This distance issue can be addressed by using an electronic system. Requests for the Amdal documents can be submitted through electronic channels, such as a dedicated channel and/or email to the Ministry of Environment's Public Information and Data Protection Agency (PPID). However, using a dedicated channel and/or email does not guarantee a response or approval. If the request is not responded to, even if it reaches the objection stage, the applicant must still travel to Jakarta to register an information dispute

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request and attend a hearing with the Central Information Commission. Therefore, this electronic channel remains ineffective in addressing these emerging issues.

Another solution is to utilize the environmental document information system channel owned and developed by the Ministry of Environment, namely Amdalnet. As part of the Environmental Information System (SILH), the environmental document information system aims to facilitate public disclosure of information in the environmental document assessment and inspection process. The Central Government, through the Ministry of Environment and Forestry (currently under the jurisdiction of the Ministry of Environment), implements the SILH through several electronic platforms that are claimed to be integrated with one another, such as Amdalnet (www.amdalnet.kemenlh.go.id) and the Electronic Environmental Reporting Information System/SIMPEL (https://simpel.kemenlh.go.id/2023).

Amdalanet claims to facilitate transparency in public information. A search of the Amdalnet website reveals a Digital AMDAL menu which provides public access to Amdal documents. The website displays access options for Amdal or UKL-UPL documents. Then, there is a table containing the number, the initiator's name, the activity name, the authority, the date of publication, and environmental documents, including Amdal Digital v2, Kerangka Acuan (KA) Documents, ANDAL Documents, and RKL-RPL Documents, which can be selected for access. The public, as users, can access the Amdal documents based on their needs, whether only the Terms of Reference document, ANDAL document, RKL-RPL document, or all of these documents. In short, Amdalnet, through the AMDAL Digital menu, can serve as an information-system-based solution for the public, supporting the right of access to environmental information.

Although at first glance Amdalnet appears to be a solution for the public to exercise their right to access environmental information quickly, simply, and free of charge, it still has several weaknesses. Weaknesses that arise when using AMDAL Digital on Amdalnet include: the initiators' names are not arranged alphabetically or indexed; some documents are not available in the Environmental Documents menu; and the search menu does not function. Therefore, document searches must be done manually, which can be time-consuming and laborious, as they must search through 1,378 Amdal documents (as of August 2026). In addition, the available documents cannot be downloaded; they are only readable, so when the website page is closed or refreshed, users or the public must read the Amdal document from the beginning.

Another issue in accessing AMDAL documents in AMDAL Digital is the lack of the desired document. When users have found the desired AMDAL document by the initiator's name, there are four options in the Environmental Documents section: AMDAL Digital v2, KA document, ANDAL document, and RKL-RPL document. If users select one of them, for example, the ANDAL document, sometimes the document is not available. One example is the ANDAL document from PT Vale Indonesia for nickel ore mining operations in the Bahodopi Block, Morowali Regency, Central Sulawesi Province, which is not available and must be requested through the Ministry of Environment's PPID.

The various problems outlined above can be minimized by adding a directory or repository feature or function to the AMDAL Digital menu. This directory or repository feature is expected to help users or the public gain more meaningful access to environmental information. A directory is used to store, group, and organize files within a computer operating system and contains a list or index of these files. A repository, on

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the other hand, is a centralized storage location with a tracking system to monitor, manage, and record every change to files, and to provide open access to the public [11]. Directories can also be called digital cabinets, repositories, and digital libraries.

Repositories are widely used by educational institutions, such as universities, and are designed to store scientific works and other digital literature [12]. This trend is evident in the legal regulations governing repositories, namely Law No. 43 of 2007 concerning Libraries, Law No. 13 of 2018 concerning the Transfer and Storage of Printed and Recorded Works, and Law No. 11 of 2019 concerning the National Science and Technology System. Directories, on the other hand, are more commonly used by various institutions. Legal regulations regarding directories are based on Law No. 43 of 2009 concerning Archives and Law No. 27 of 2022 concerning Personal Data Protection, and are reinforced by Presidential Regulation No. 95 of 2018 concerning Electronic-Based Government Systems.

A fairly obvious difference between repositories and directories is their primary function: tracking and collaboration. Repositories are designed to store and document information, with version history tracking and support for team collaboration and simultaneous updates. Directories, on the other hand, group files for neatness and ease of discovery, without the ability to check file or information change history and without support for simultaneous collaboration and updates [13].

Based on the concept of a directory or repository as a storage container or scientific communication infrastructure, there are provisions that must be met by both, namely (1) as a database, (2) a long-term storage container, and (3) being able to communicate, exchange data, or use data effectively, also known as interoperability [11]. Based on this concept and its provisions, there are at least three main functions that Amdalnet should have, with additional directory or repository features, namely: a place to collect Amdal documents, a place to store and categorize them, and a means of sharing them with the public.

First, the function of collecting the Amdal documents. Since 2023, Environmental Approvals have been processed through Amdalnet, which is integrated into the Ministry of Investment's OSS RBA (Regional Budgeting System). Therefore, it can be assumed that Environmental Approvals approved through Amdalnet will automatically display the Amdal documents in the Amdal Digital menu, although this assumption needs to be verified. If the Amdal documents automatically appear in Amdal Digital after the Environmental Approval is approved, this is a commendable effort, as the number of Amdal documents displayed after 2023 will continue to grow and be consistently updated.

For Environmental Approvals or Environmental Permits issued before the Job Creation Law and not through Amdalnet, the Ministry of Environment, as the holder of Amdalnet access, can request regional governments with Amdal documents issued before the Job Creation Law, as well as businesses with Environmental Approvals, to voluntarily upload their Amdal documents to Amdalnet. This can be seen as a challenge for the Ministry of Environment. Furthermore, it is hoped that Amdal documents that have been or will be stored will be available in a digitally readable version. Currently, uploaded Amdal documents are predominantly scanned, rendering them unreadable digitally. The hope is that once Amdal documents are digitally readable, the information contained within can be summarized, and users can easily search the documents via a computerized process.

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Second, the storage function. In addition to serving as a repository for Amdal documents, Amdalnet is expected to categorize collected Amdal documents as needed, for example, by the initiator's name, the type, and/or the location of the business activity. Furthermore, it is recommended that the categorization include filtering features based on multiple combinations of criteria, for example, searching by business type and location. Categorization can help organize storage and ensure sufficient space for long-term storage.

Third, the sharing function. Amdalnet currently has a sharing function, but it's limited to reading. For simple reading, Amdalnet is commendable because users are not required to sign in or log in to their Amdal account. Amdalnet provides read access to Amdal documents in the Amdal Digital menu. A notable feature of this function is the lack of an option to download the documents.

It is recommended that the sharing function be complemented by a reference service that serves as a bridge between the public, both as users and as sources of EIA information. Reference services are expected to assist in finding accurate, relevant, and reliable information, as well as improving users' ability to independently search for and utilize information [12]. In other words, the information available on Amdalnet isn't limited to AMDAL document attachments but also includes summaries and search suggestions. For example, when searching for information on coal mining AMDALs in Central Sulawesi, Amdalnet can display search summaries, statistics, and recommended related searches.

Following the development of directory and repository features or functions on Amdalnet, the sustainability of digital data also needs to be considered. The collected, stored, and managed Amdal documents must be securely maintained and available as needed, adapting to software and hardware developments [14]. Currently, the documents available on Amdalnet are only scanned as PDFs or JPEGs. If AMDAL documents were upgraded to a computer-readable digital format, this could create greater opportunities and benefits than the existing documents.

CONCLUSION

In general, an Amdal document is said to be an open document that can be accessed by the public based on several laws and regulations, but with varying degrees of openness at each stage due to the purpose of using the Amdal document. Article 26, Article 65 paragraph (2), and the Explanation of Article 65 paragraph (2) of Law Number 32 of 2009 have emphasized that the Amdal document, both in draft form and after becoming a document, is information that can be accessed by the public, both as a document and as information. This legal provision is reinforced by the jurisprudence of the Information Commission, which refers to Article 11 paragraph (1) and paragraph (2) of Law Number 14 of 2008.

At the stage where the draft Amdal document is still being prepared, the public has access to it through public announcements and consultations. At the stage where the Amdal document serves as a prerequisite for Environmental Approval and Business Licensing, the public can access the document through Amdalnet and submit public information requests, albeit with certain limitations. At this stage, the Amdal document has become a monitoring tool for the compliance of activities or businesses after the issuance of Environmental Approval and Business Licensing, as well as for those already

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operating. The public can access the Amdal document through the Digital AMDAL menu on Amdalnet or through public information disclosure mechanisms.

Electronic systems are a means of accelerating public disclosure of AMDAL-related information, such as electronic mail and the Environmental Information System, Amdalnet, managed by the Ministry of Environment. The Digital AMDAL menu in Amdalnet provides AMDAL documents, including *Kerangka Acuan* (KA), ANDAL documents, and RKL-RPL documents, which can be accessed by the public as non-registered users. However, there are notes on improvements to the Digital AMDAL menu, including that the names of initiators are not arranged alphabetically, the names or types of business activities are not indexed, the search menu is not yet functioning, and AMDAL documents are not accessible through the Environmental Documents menu.

The directory or repository feature in Amdalnet is considered capable of minimizing the shortcomings of the current Digital AMDAL. The directory or repository can help organize, index, and categorize stored AMDAL documents. Furthermore, AMDAL documents can be found through improved filtering features and a combination of search and filtering keywords. Amdalnet enhancements are expected to facilitate the disclosure of environmental information and documents, particularly AMDAL, and more meaningfully fulfill the right of access to environmental documents.

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